



PUBLIC DISCLOSURE

April 8, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Omaha
Charter Number 209
1620 Dodge Street
Omaha, NE 68197

Office of the Comptroller of the Currency
425 South Financial Place
Suite 2700
Chicago, IL 60605

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 of Omaha (FNBO or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	FNBO Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			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:

- Lending levels reflect excellent responsiveness to credit needs in the bank’s assessment areas (AAs) considering the number and dollar amount of home mortgages, small business and farm loans in the AAs.
- The bank’s distribution of loans among geographies of different income levels is good, based on good distribution of home mortgages and excellent distribution of small loans to businesses and farms.
- The bank’s distribution of loans to individuals and businesses of different income levels is excellent based on excellent distribution of home mortgages and small business lending and good distribution of small farm lending.
- The bank has made a relatively high level of community development (CD) loans.
- The bank has made an excellent level of qualified CD investments, which exhibits good responsiveness to credit and community needs.
- The bank’s branches and alternative delivery systems are reasonably accessible to essentially all portions of the AA.

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.

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 generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 (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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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 householder 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 five years and used to determine the income level category of geographies. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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 (MSA): 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.

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) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or by 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 secured either 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.

Description of Bank

FNBO is headquartered in Omaha, Nebraska. Founded in 1857 in Omaha, the bank is in its sixth generation of family ownership. FNBO is a subsidiary of First National of Nebraska, Inc. (FNNI). FNBO offers a full range of credit products within its AAs including consumer, commercial, agricultural, and real estate loan products. Credit card lending is one of FNBO's primary business activities and includes a nationwide customer base.

FNBO is an interstate bank with 105 branch offices and 109 deposit-taking automated teller machines (ATMs) located in seven rating areas: Omaha-Council Bluffs, Nebraska-Iowa (NE-IA) Combined Statistical Area (CSA) (Omaha CSA), and the states of Colorado, Illinois, Kansas, Nebraska, South Dakota, and Texas. FNBO has approximately 5,000 employees.

As of December 31, 2018, FNBO had total assets of \$21.6 billion and tier 1 capital of \$2.1 billion. The bank's loan portfolio primarily consisted of 38 percent consumer credit cards, 33 percent real estate loans, 12 percent commercial and industrial loans, and nine percent agricultural loans. The majority of the bank's deposits come from the branch footprint.

The bank's primary deposit-taking competitors in its AAs were large banks, including Wells Fargo, Chase, and US Bank, as well as regional and local banks. FNBO's primary home mortgage lending competitors were Wells Fargo, US Bank, and Quicken Loans. Primary small business lending competitors were Chase, Wells Fargo, and Citibank, while farm lending included these banks as well as John Deere Financial.

FNBO has a community development corporation (CDC) subsidiary. The CDC has a small loan portfolio, investments, and real estate. During the evaluation period, the CDC provided deposits to two minority-owned deposit institutions. First Capital Partners (FCP), LLC is an affiliate of FNBO and its portfolio, FCP Fund II, is a licensed Small Business Administration (SBA) Small Business Investment Company (SBIC). FCP is a direct investor of mezzanine capital and private equity in privately owned businesses in the middle market space.

The bank did not undertake any mergers or acquisitions during the evaluation period.

There were no legal or financial factors impeding the bank's ability during the evaluation period to help meet credit needs in its AAs. The bank's CRA performance was rated "Outstanding" in the last public evaluation dated January 4, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

For this evaluation, we analyzed home mortgage loans the bank reported under the HMDA and small loans made to businesses and farms the bank reported under the CRA. Lending was reviewed for the period of January 1, 2015, through December 31, 2018. In order to perform a quantitative analysis in an AA, a minimum of 20 loans was needed in each loan product and analysis period.

Due to changes between the 2010 Census and 2015 U.S. Census American Community Survey (ACS), a separate analysis was performed of 2015 through 2016 and 2017 through 2018 data to evaluate the lending test geographic distribution and borrower income criteria. In the Denver CSA, Grand Island MSA, NE Non-MSA, SD Non-MSA, and Dallas MSA the bank made changes to the AAs from 2015 to 2016 and a separate analysis was performed for 2015, 2016, and 2017 through 2018 data. A separate analysis was performed of 2015 through 2016 and 2017 through 2018 data in the Omaha CSA, Fort Collins MSA, Chicago MSA, Rockford MSA, Kansas City MSA, and Lincoln MSA.

Performance tables in appendix D reflect the data from all analysis periods. The evaluation period for CD loans, investments, and services was January 1, 2016, through December 31, 2018.

Selection of Areas for Full-Scope Review

In each state and multistate metropolitan area (MMSA) where the bank has an office, a sample of AAs within that state or MMSA was selected for full-scope reviews.

The bank has 11 AAs in six states and one MMSA. The Omaha CSA, Denver CSA, Fort Collins MSA, Chicago MSA, Rockford MSA, Kansas City MSA, NE Non-MSA, SD Non-MSA, and Dallas MSA were chosen for full-scope review. The Grand Island MSA and Lincoln CSA were chosen for limited-scope review. AAs that represented a significant portion of the bank's deposit base and lending business in the state were selected for full-scope reviews. In addition, the Rockford MSA was chosen due to its importance to the AA. Full-scope reviews consider quantitative and qualitative factors, as well as performance context factors, while limited-scope reviews consider quantitative factors only.

Refer to the Scope section under each State and MMSA Rating section (as applicable) for details regarding how the areas were selected.

Ratings

The bank's overall rating is a blend of the MMSA rating and State ratings. The Omaha CSA received the greatest emphasis in the evaluation. The rating area accounts for 28.5 percent of the bank's branch network, 57.8 percent of total deposits, and 39.6 percent of the reportable loans during the evaluation period. The States of Colorado and Nebraska received the next greatest emphasis in overall ratings. The State of Colorado accounts for 23.8 percent of the branches, 16.6 percent of deposits, and 16 percent of total loans. The State of Nebraska accounts for 20.0 percent of branches, 10.2 percent of deposits, and 24.6 percent of total loans. Illinois has the next greatest weight, followed by Kansas, South Dakota, and Texas. The MMSA and state ratings are based primarily on those areas that received full-scope reviews.

Lending Inside and Outside of Assessment Areas

The ratio is a bank-wide calculation and is not calculated by individual rating area or AA. The analysis is limited to bank originations and purchases and does not include any affiliate data. For the combined four-year evaluation period, the bank originated a majority of all loan products outside the bank's AAs. When excluding nationwide credit card lending products, the majority of the bank's lending is originated and purchased in the bank's AAs.

Other Factors Considered in Analysis under Each Performance Test

This evaluation analyzed performance from 2015, 2016, and 2017 through 2018. More emphasis was placed on performance in the more current timeframe from 2017 through 2018 to reach performance conclusions. The more recent timeframes are more reflective of the bank's business strategy and economic conditions.

In the analysis of the distribution of loans to geographies with different income levels, we placed greater emphasis on the bank's performance in moderate-income CTs, particularly if the number of owner-occupied housing units or businesses in the low-income CTs significantly limited opportunities to originate loans. We further emphasized performance in moderate-income geographies if there was a limited number or no low-income CTs in the AA.

In the analysis of borrower distribution, conclusions for small business and farm lending were based primarily on available data as displayed in appendix D. However, annual business revenues were not reported on a significant number of reportable CRA loans. The bank relied on other analytical tools in the credit evaluation process of small business and small farm credit card loans during most of the evaluation period. The bank improved revenue collection in late 2017. Due to the significant level of loans reported without revenue information in some AAs, internal loan data was considered to provide performance context.

Lending Test – Nationwide Lending

Nationwide CD lending had a positive impact on the bank's overall lending performance. The bank originated three CD loans totaling \$14.9 million. These loans were revolving lines of credit to a small business investment company that promotes economic development. The company is headquartered adjacent to the Chicago MSA and holds a portfolio of companies across the nation.

Lending Test – Broader Regional Area Loans

CD lending in the broader regional area had a positive impact on the bank's overall lending performance. The bank originated two CD loans totaling \$7 million.

One regional loan consisted of a \$4 million credit line to an equity fund for a nonprofit tax credit syndicator headquartered in Omaha with offices in Iowa, Kansas, and Oklahoma. The company has partnered in the development of over 500 projects and created over 17,000 affordable houses since 1993. According to the company's website, they are a leader in affordable housing in the Midwest with projects that are pre-qualified and pre-approved for receipt of Low-Income Housing Tax Credits (LIHTC). The company has the purpose, mandate, or function to serve at least one of the bank's AAs.

The bank made one regional loan with no purpose, mandate, or function to serve an AA consisting of a \$3 million revolving line of credit to a manufacturing corporation headquartered adjacent to the bank's AA in Kansas City, MO. This loan assisted in revitalizing and stabilizing an LMI community that was identified as a major employment center for industrial business by the Northeast Industrial District Area Plan.

Innovative and Flexible Loan Programs

The bank offers flexible home loan programs targeted to LMI borrowers that provided a positive impact under the lending test performance, including Federal Housing Association (FHA), Veterans Affairs (VA), and United States Department of Agriculture (USDA) loans. The bank also partners with government and state agencies originating loans through other individual homebuyer programs. The bank originates loans sponsored by Colorado Housing Finance Authority, Illinois Housing Development Authority, Iowa Finance Authority, Nebraska Investment Finance Authority, and South Dakota Housing Development Authority. The bank also originates loans through Fannie Mae's HomeReady program, which is a low down payment mortgage product designed for LMI borrowers. The bank originated 7,177 loans totaling \$1.1 billion under all these programs. Loans originated under these programs are included in the bank's home mortgage lending analysis.

The bank's Secured Credit Card Loan program is another flexible loan product that provided a positive impact targeting LMI borrowers. This product is a secured credit card loan program to help customers build positive credit history after negative or minimal credit history. The bank originated 10,230 loans within its AAs during the evaluation period. Approximately 90 percent of the borrowers were classified as LMI and 34 percent were located in LMI geographies.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this bank, or any affiliate whose loans have been considered as part of the bank's lending performance, has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

Multistate Metropolitan Area Rating

Omaha CSA

CRA rating for the Omaha CSA ¹:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans and small loans to businesses;
- A good geographic distribution based on good dispersion of home mortgage loans and excellent dispersion of small business and farm loans;
- An excellent borrower distribution, as evidenced by excellent distribution of home mortgage and good distribution of small business and farm loans;
- An excellent level of qualified CD investments that are responsive to credit and community needs;
- Branches and alternative delivery systems are accessible to essentially all portions of the AA; and
- A relatively high level of CD Services.

Description of Institution's Operations in the Omaha CSA

Refer to the community profile for the MMSA in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Omaha CSA

The Omaha CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based on the Omaha CSA. Refer to appendix A for more information.

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OMAHA CSA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

Lending Activity

Refer to table 1 Lending Volume in appendix D for the facts and data used to evaluate the bank's lending activity.

The lending activity is excellent. Home mortgage and small business lending activity is excellent and farm lending activity is adequate considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on Federal Deposit Institution Corporation (FDIC) Deposit Market Share data as of June 30, 2018, the bank had \$9.7 billion in deposits with 30.4 percent market share within the AA. The bank ranked first in total deposits among 49 banks in the AA.

Home mortgage lending is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 15,335 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank ranked second among 369 lenders. The bank's home mortgage loan market share was 9.7 percent. The five largest mortgage lenders captured 34.4 percent of the market.

Small business lending is excellent considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 5,672 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked third among the 105 lenders in the AA. The bank's market share of small business loans was 10.6 percent. The five largest small business lenders captured 55.3 percent of the market.

Small farm lending is adequate considering the bank's market share and ranking when compared to deposit market share and small farm lending competition in the AA. The bank originated 216 farm loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data for small farms, the bank ranked fifth among the 18 lenders in the AA. The bank's market share of small farm loans was 8.2 percent. The five largest small farm lenders captured 79.3 percent of the market.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. Home mortgage performance is good and small loans to businesses and farms is excellent.

Home Mortgage Loans

The geographic distribution of home mortgage loans is good.

Refer to table O in the Omaha CSA 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.

During the 2017 through 2018 analysis period, the distribution of loans is good. The proportion of loans in LMI geographies was below the proportion of owner-occupied housing units in these geographies but near to aggregate lending.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period and is good.

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent.

Refer to table Q in the Omaha CSA 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.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses is excellent. The proportion of loans in LMI geographies was somewhat below the proportion of businesses in those geographies. The proportion of loans in low-income geographies is near to aggregate lending, while lending in moderate-income geographies exceeded aggregate lending in those geographies.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period. It is excellent and had a neutral impact.

Small Loans to Farms

The geographic distribution of small loans to farms is excellent.

Refer to table S in the Omaha CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

During the 2017 through 2018 analysis period, the distribution of small loans to farms is excellent. The proportion of loans made in low-income geographies significantly exceeded both the proportion of farms and aggregate lending in those geographies. The proportion of loans in moderate-income geographies was somewhat near to the proportion of farms and exceeded aggregate lending in those geographies.

During the 2015 through 2016 analysis period, the distribution of small loans to farms is good and had a neutral impact. The proportion of loans made in low-income geographies significantly exceeded both the proportion of farms and aggregate lending in those geographies. There were no loans made in moderate-income geographies.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps identified.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans is excellent. The borrower distribution of home mortgage loans is excellent, and the distribution of small loans to businesses and farms is good.

Refer to table P in the Omaha CSA 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.

Home Mortgage Loans

The borrower distribution of home mortgage loans in the Omaha CSA is excellent.

During the 2017 through 2018 analysis period, the distribution is excellent. The proportion of loans to low-income borrowers was significantly below the proportion of low-income families, but performance is good after considering housing affordability and the high rates of poverty within the low-income CTs. Almost 34 percent of families in low-income CTs are living below the poverty level, making it difficult to qualify for a mortgage loan. The proportion of lending to moderate-income borrowers exceeded the proportion of moderate-income families. The bank's lending to LMI borrowers exceeded aggregate lending and had a positive impact.

During the 2015 through 2016 analysis period, the distribution is excellent. The proportion of loans to LMI borrowers exceeded both the proportion of LMI families and aggregate lending.

Small Loans to Businesses

The borrower distribution of small loans to businesses is good.

Refer to table R in the Omaha CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of loans to businesses by revenue is good. The proportion of loans was below the proportion of small businesses but exceeded aggregate lending.

During the 2015 through 2016 analysis period, the distribution of loans to businesses by revenue is good after considering performance context (see Other Factors Considered in Analysis under Each

Performance Test section). The proportion of loans was significantly below the proportion of small businesses and below aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

Small Loans to Farms

The borrower distribution of small loans to farms is good.

Refer to table T in the Omaha CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of small loans to farms by revenue is excellent after considering performance context (see Other Factors Considered in Analysis under Each Performance Test section). The proportion of loans was below the proportion of small businesses but exceeded aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small farms.

During the 2015 through 2016 analysis period, the distribution of small loans to farms by revenue is good after considering performance context (see Other Factors Considered in Analysis under Each Performance Test section). The proportion of loans was well below the proportion of small businesses and below aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small farms.

Community Development Lending

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

CD lending is excellent and had a significant positive impact on the bank's overall lending performance in the Omaha CSA. The bank originated a high level of CD loans with 44 CD loans totaling \$376.6 million or 31.3 percent of allocated tier 1 capital during the evaluation period. CD lending is responsive to AA needs with 70 percent of loans towards revitalization or stabilization and over 17 percent related to economic development activities.

Examples of CD loans originated during the evaluation period include:

- A \$35 million revolving line of credit that will retain and create LMI jobs.
- Two loans totaling \$49 million for housing projects located in moderate-income CTs targeted for redevelopment.
- Seven loans totaling \$149 million to fund development of mixed-use properties in LMI CTs designated for redevelopment.
- A \$10 million loan to construct emergency housing for LMI individuals in a low-income CT.
- A \$7.7 million loan to refinance a 210-unit multifamily property offering affordable housing for LMI individuals.

Product Innovation and Flexibility

The bank uses flexible loan programs to help meet credit needs in its AA. The bank's use of these flexible programs had a neutral impact on conclusions under the lending test. The various programs included the following:

Omaha 100

The Omaha 100 is a nonprofit Community Development Financial Institution (CDFI) that provides affordable home mortgages for LMI individuals through a consortium consisting of area banks. The bank was one of the organization's co-founders in 1997 and helped to establish its structure. The bank is the custodian of the mortgage loan funds, coordinates the participation of investors, services the mortgages, and is active on the Omaha 100 board of directors and loan committee. Of the 111 loans originated during the evaluation period, 105 were to LMI individuals totaling \$2 million.

Omaha 100 and Habitat Partnership

The Omaha 100 and Habitat Partnership mortgage loan program is an innovative and flexible product developed by the bank. Recognizing a need for a sustainable funding facility for Habitat for Humanity home mortgages, the bank worked with the leaders of Habitat for Humanity and Omaha 100 to develop a fund to provide loans to individuals purchasing a home from Habitat for Humanity of Omaha. Development of the fund involved introducing the concept to Habitat for Humanity and the Omaha 100 investors, establishing fund terms, negotiating roles and responsibilities for each party, and raising capital from the investors. The first 32 originations were in 2018, and 31 of these loans were to LMI individuals totaling \$3.5 million.

Easter Seals

The bank partners with Easter Seals to offer a flexible loan program which assists disabled LMI individuals. The loan program is aimed at providing either the resources to work from home, accessibility options at home, or as a means of getting to work. The Nebraska Department of Human Services funded the program through a \$1 million grant. The bank extends and services the loans. The program also offers technical assistance to participants who wish to start their own businesses. During the evaluation period, 11 of the 15 loans originated were to LMI individuals totaling \$163 thousand.

Micro Lending

During 2009 through 2017, the bank offered a consumer loan program with flexible documentation and alternative credit history requirements. This product was offered in three branches in the Omaha CSA to borrowers with an established deposit relationship through a referral by a personal banker. Loan amounts range from \$500 to \$5,000. Depending on qualifications, some borrowers completed financial education prior to receiving a loan. Ninety-four of the 98 loans were to LMI individuals totaling \$213 thousand.

First Down

The bank offers a flexible loan product for first-time homebuyer assistance. The bank has partnered with the Federal Home Loan Bank and the Nebraska Housing Developers Association to provide \$4,000 grants to qualifying LMI homebuyers to assist with their down payment and closing costs. Because of this program, 13 home mortgage loans were originated to LMI individuals totaling \$1.4 million in the Omaha CSA.

For additional information, refer to the summary of innovative and flexible loan programs in the Other Factors – Lending Test section for a description of products offered bank-wide.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "Outstanding". Based on the full-scope review, the bank's performance in the Omaha CSA is excellent.

Refer to table 14 in the MMSA section of appendix D for the facts and data used to evaluate the bank's level of qualified investments in the Omaha CSA.

Omaha CSA

Based on full-scope review, the bank has an excellent level of qualified investments. During the evaluation period, the bank made 33 investments totaling \$37.6 million and 143 grants totaling \$5.8 million. Current period investments and grants are equal to 3.6 percent of allocated tier 1 capital. Additionally, the bank had 31 prior period investments totaling \$38.7 million that provide an ongoing benefit to the AA. Qualified investments total \$82.2 million representing 6.8 percent of allocated tier 1 capital.

The bank's investments exhibit good responsiveness to identified community needs. Investments are occasionally innovative or complex. In terms of volume, 70.9 percent of the bank's investments were in mortgage-backed securities (MBSs) or Low-Income Housing Tax Credits (LIHTC). The investments in MBSs and LIHTC supported affordable housing needs in the AA. The bank made three qualified investments in Community Development Financial Institutions (CDFIs) totaling \$2.6 million, which accounted for six percent of the investments in the AA. The investments in the CDFIs supported economic development in the AA. The bank provided grants to fund various CD organizations that support community service, affordable housing, revitalization efforts, and economic development throughout the AA.

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 review, the bank's performance in the Omaha CSA is good.

Retail Banking Services

Refer to table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery systems and branch openings and closings.

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is adequate.

The bank's delivery systems are reasonably accessible to essentially all portions of the AA. The bank operates 30 branches in the AA. The bank's distribution of branches in low-income geographies is significantly below the percentage of the population living within those geographies. The bank's distribution of branches in moderate-income geographies exceeds the percentage of the population living within those geographies.

The bank makes adequate use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank's deposit-taking ATMs were more accessible than branches. The bank has 42 deposit-taking ATMs within the AA. In addition to having one deposit-taking ATM at each of its 30 branches, the bank has 12 additional stand-alone deposit-taking ATMs located in middle- and upper-income geographies within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank relocated one branch within a moderate-income geography and opened one branch in an upper-income geography.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly in LMI geographies or to LMI individuals. The bank maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

The bank's performance in providing CD services in the Omaha CSA is excellent. Bank employees provided a relatively high level of CD services. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a large number of CD services, consistent with its capacity and expertise to conduct specific activities.

The bank's employees from various lines of business provided technical assistance to 173 different CD organizations, totaling 18,126 hours, in the AA during the evaluation period. The employees participated in 76 affordable housing and 592 community service activities.

Examples of services in the AA include:

- Employees provided financial education to LMI individuals and families through an organization that helps maintain stable housing, to improve basic budgeting skills, and asset building.
- Employees served on the board for an organization that addresses affordable housing needs in the AA. The organization provides homeownership and housing opportunities to LMI individuals and families.

State Rating

State of Colorado

CRA Rating for Colorado²:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans and small loans to businesses;
- A good geographic distribution, based on excellent dispersion of small business loans, and adequate dispersion of home mortgage and farm loans;
- A good borrower distribution, as evidenced by excellent distribution of home mortgage and good distribution of small business and farm loans;
- A significant number and volume of CD loans;
- An excellent level of qualified CD investments and grants which exhibit responsive to CD needs in the AAs;
- The bank's branches and alternative delivery systems are accessible to essentially all portions of the AAs.

Description of Institution's Operations in Colorado

Refer to the community profile for the state of Colorado in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Colorado

The Denver CSA and Fort Collins MSA were selected for analysis using full-scope procedures. The Denver CSA represented the majority of the bank's branches and a little less than half of the bank's lending in the rating area. The Fort Collins MSA represented the majority of the deposits and a little more than half of the lending in the rating area. The bank did not originate or purchase a sufficient volume of small farm loans in the Fort Collins MSA during the evaluation period to perform a

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

meaningful analysis. The bank did not originate or purchase a sufficient volume of small farm loans in the Denver CSA during the 2015 analysis period to perform a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Denver CSA and Fort Collins MSA is excellent.

Lending Activity

Refer to table 1 Lending Volume in appendix D for the facts and data used to evaluate the bank's lending activity.

Denver CSA

The lending activity is excellent. Home mortgage and small business lending are excellent and small farm lending is poor considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on the FDIC Deposit Market Share data as of June 30, 2018, the bank had \$1.1 billion in deposits with 3.2 percent market share. The bank ranked sixth in total deposits among 45 banks in the AA.

Home mortgage lending is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 2,265 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank was ranked 47 of 708 lenders. The bank's home mortgage loan market share was 0.4 percent. The five largest mortgage lenders captured 22.9 percent of the market.

Small business lending is excellent considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 2,047 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked 15 of 151 lenders in the AA. The bank's market share was 1.1 percent. The five largest small business lenders captured 62.4 percent of the market share.

Small farm lending is poor considering the bank's market share and ranking when compared to deposit market share and small farm lending competition in the AA. The bank originated 99 small farm loans during the 2015 through 2018 evaluation period. According to 2017 peer small farm data, the bank ranked 10 of 25 lenders in the AA. The bank's market share was 2.7 percent while the five largest small farm lenders captured 70 percent of the market.

Fort Collins MSA

The lending activity is excellent. Home mortgage and small business lending activity are excellent considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on the FDIC Deposit Market Share data as of June 30, 2018, the bank had \$1.7 billion in deposits with 22.2 percent market share. The bank ranked first in total deposits among 27 banks in the AA.

Home mortgage lending is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 2,865 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank was ranked seven of 467 lenders. The bank's home mortgage loan market share was 2.9 percent. The five largest mortgage lenders captured 24.5 percent of the market.

Small business lending is excellent considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 2,023 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked seven of 541 lenders in the AA. The bank's market share was 5.5 percent. The five largest small business lenders captured 57.2 percent of the market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. Home mortgage and small loans to farms performance is adequate and small loans to businesses performance is excellent.

Home Mortgage Loans

The geographic distribution of home mortgage lending is adequate.

Refer to table O in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Denver CSA

The geographic distribution of home mortgage lending is adequate.

During the 2017 through 2018 analysis period, the distribution of loans is adequate. The proportion of loans in LMI geographies was below the proportion of owner-occupied housing units in LMI income geographies. The proportion of loans in low-income geographies was below aggregate lending. The proportion of loans in moderate-income geographies was well below aggregate lending. Competition in the AA is high, with a significant number of moderate-income CTs located further away from the bank's branch locations. The top five lenders in moderate-income CTs make up 23.6 percent of all lending, and there are 464 lenders in the moderate-income CTs.

During the 2016 analysis period, the distribution of loans is good. The proportion of loans in low-income geographies exceeded the proportion of owner-occupied housing units and aggregate lending. The proportion of loans in moderate-income geographies was below owner-occupied housing units in those geographies, but near to aggregate lending.

During the 2015 analysis period, the distribution of loans is excellent. The proportion of loans in low-income geographies exceeded the proportion of owner-occupied housing units in low-income geographies. The proportion of loans in moderate-income geographies was near to the proportion of owner-occupied housing units in moderate-income geographies. The proportion of LMI geographies exceeded aggregate lending.

Fort Collins MSA

The geographic distribution of home mortgage lending is adequate.

During the 2017 through 2018 analysis period, the distribution of loans is adequate. The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and aggregate lending. Lending in moderate-income geographies was near to the proportion of owner-occupied housing units in moderate-income geographies and aggregate lending. Competition in the AA is high and there is minimal lending in low-income CTs. One of three low-income CTs is Colorado State University, with minimal opportunities for home mortgage lending. The top five lenders in low-income CTs make up 39.9 percent of the lending volume.

During the 2015 through 2016 analysis period, the distribution of loans is good and had a neutral impact. The proportion of loans in low-income geographies exceeded the proportion of owner-occupied housing units and aggregate lending. Lending in moderate-income geographies is near to the proportion of owner-occupied housing units and aggregate lending.

Small Loans to Businesses

The geographic distribution of small business lending is excellent.

Refer to table Q in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Denver CSA

The geographic distribution of small loans to businesses is excellent. During the 2017 through 2018 analysis period, the distribution of loans is excellent. The proportion of loans in LMI geographies exceeded the proportion of small businesses in those geographies. The proportion of loans to low-income geographies exceeded aggregate lending. The proportion of loans to moderate-income geographies near to the aggregate lending.

The 2015 and 2016 analysis period is consistent with the 2017 through 2018 analysis period.

Fort Collins MSA

The geographic distribution of small loans to business is excellent.

During the 2017 through 2018 analysis period, the distribution of loans is excellent. The proportion of loans in LMI geographies exceeded the proportion of small businesses in those geographies and aggregate lending.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period.

Small Loans to Farms

The geographic distribution of small loans to farms is adequate.

Refer to table S in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Denver CSA

The geographic distribution of small loans to farms is adequate.

During the 2017 through 2018 analysis period, the distribution of loans is good. The proportion of loans in low-income geographies was near to the proportion of small farms in those geographies. The proportion of loans in moderate-income geographies was well below the proportion of small farms in those geographies. The proportion of loans in LMI geographies exceeded the aggregate lending.

During the 2016 analysis period, the distribution of loans is poor. The bank originated minimal farm loans in this AA, and no loans in LMI tracts.

Fort Collins MSA

There were not enough loans for meaningful analysis during the evaluation period. The minimal lending activity had a neutral impact on the bank's overall lending performance.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps identified.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of all loans is excellent. The borrower distribution of mortgage loans is excellent, small business and small farm performance is good.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers is excellent.

Refer to table P in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Denver CSA

The distribution of the bank's home mortgage loans to LMI borrowers is good. The high cost of housing and shortage of affordable housing in the Denver CSA impacted the bank's ability to make home mortgage loans to LMI borrowers. Refer to the Denver CSA Community Profile in appendix B for details regarding housing costs and affordable housing needs. These factors were considered when evaluating the bank's performance in the AA.

During the 2017 through 2018 analysis period, the bank's borrower distribution is good. The percentage of loans to low-income borrowers was well below percentage of low-income families but exceeded aggregate lending. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families and was near to aggregate lending.

During the 2016 analysis period, the bank's borrower distribution is excellent. The percentage of loans to low-income borrowers was below percentage of low-income families but exceeded aggregate lending. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending.

The 2015 analysis period is consistent with the 2016 analysis period.

2015 and 2016 borrower distribution had a positive impact on overall performance.

Fort Collins MSA

The distribution of the bank's home mortgage loans to LMI borrowers is excellent. The high cost of housing and shortage of affordable housing in the Fort Collins MSA impacted the bank's ability to make home mortgage loans to LMI borrowers. Refer to the Fort Collins MSA Community Profile in appendix B for details regarding housing costs and affordable housing needs. These factors were considered when evaluating the bank's performance in the AA.

During the 2017 through 2018 analysis period, the bank's borrower distribution is excellent. The percentage of loans to low-income borrowers was well below percentage of low-income families but exceeded the aggregate lending. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Refer to table R in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Denver CSA

The borrower distribution of small loans to businesses is good. In evaluating the distribution of small loans to businesses, we noted that credit card loans represent a significant volume of reportable small loans to businesses and revenue information was not collected for credit card loans until late 2017. The lack of revenue information inhibits the ability to analyze small loans to businesses by borrower characteristics. The bank completed a self-assessment, which includes loans under \$100 thousand as a proxy for small businesses.

During the 2017 through 2018 analysis period, the distribution of loans to businesses by revenue is good considering performance context (see Other Factors Considered in Analysis under Each Performance Test section). The proportion of loans was well below the proportion of small businesses, but matched aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

The 2015 and 2016 analysis period is consistent with the 2017 through 2018 analysis period.

Fort Collins MSA

The borrower distribution of small loans to businesses is good. In evaluating the distribution of small loans to businesses, we noted that credit card loans represent a significant volume of reportable small loans to businesses and revenue information was not collected for credit card loans until late 2017. The lack of revenue information inhibits the ability to analyze small loans to businesses by borrower characteristics. The bank completed a self-assessment, which includes loans under \$100 thousand as a proxy for small businesses.

During the 2017 through 2018 analysis period, the distribution of loans to businesses by revenue is good after considering performance context (see Other Factors Considered in Analysis under Each Performance Test section). The proportion of loans was well below the proportion of small businesses but was near to aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

During the 2015 through 2016 analysis period, the distribution of loans to businesses by revenue is adequate after considering performance context (see Other Factors Considered in Analysis under Each Performance Test section) and had a neutral impact. The proportion of loans was significantly below the proportion of small businesses and was below aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

Small Loans to Farms

The borrower distribution of the bank's originations and purchases of small loans to farms is good.

Refer to table T in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Denver CSA

The borrower distribution of the bank's originations and purchases of small loans to farms is good.

During the 2017 through 2018 analysis period, the distribution of small loans to farms by revenues is good. The proportion of loans was below the proportion of small farms but exceeded aggregate lending.

During the 2016 analysis period, the distribution of small loans to farms by revenues is adequate and had a neutral impact. The proportion of loans was well below the proportion of small farms but near to aggregate lending.

Fort Collins MSA

There were not enough loans for meaningful analysis during the evaluation period.

Community Development Lending

The bank's level of CD lending is good and had a positive impact on lending performance in the AAs. Lending opportunities within the AAs, state, and region and the bank's capacity to address these needs were considered.

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

Denver CSA

CD lending is good and had a positive impact on the bank's overall lending performance in the Denver CSA. The bank originated a relatively high level of CD loans with six loans totaling \$40.2 million.

The level of CD lending is responsive to the identified needs in the AA. The community contacts identified affordable housing, multifamily housing, and financing opportunities for small businesses and start-ups as needs in the community. Approximately 40 percent of the CD loans provided went to the Housing Authority of the City of Boulder, which manages one-third of the County's affordable housing inventory.

Fort Collins MSA

CD lending is good and had a positive impact on the bank's overall lending performance in the Fort Collins MSA. The bank originated a relatively high level of CD loans with six loans totaling \$17.7 million.

The level of CD lending is responsive to identified needs in the AA. The community contact identified needs in the community including affordable housing, childcare, and increased wages. Approximately eight percent of the CD loans provided financing for 48 buildable lots for Habitat for Humanity. Another 47.7 percent of CD loans provided community services to the AA.

Examples of CD loans originated during the evaluation period include:

- A loan totaling \$7 million to fund the purchase of a new warehouse and distribution facility for the food bank of Larimer County which serves LMI individuals.
- A loan totaling \$3.5 million to fund student housing in a moderate-income CT as part of a revitalization plan around Colorado State University.

CO – Statewide

CD lending is good and had a positive impact on the bank's overall lending performance in the state of Colorado. The bank originated a relatively high level of CD loans with one loan totaling \$17.6 million to revitalize the area around Aurora, Colorado.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in the state of Colorado is rated "Outstanding". The bank's rating in Colorado is based off excellent performance in the full-scope reviews of the Denver CSA and the Fort Collins MSA.

Refer to table 14 in the State of Colorado section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Denver CSA

Based on full-scope review, the bank has an excellent level of qualified investments in the AA. Current period investments total \$27.1 million. During the evaluation period, the bank made 29 investments totaling \$26.7 million and 40 grants totaling \$389 thousand. Current period investments and grants are equivalent to 20.5 percent of allocated tier 1 capital. Additionally, 21 prior period investments totaling \$6.9 million provide an ongoing benefit to the AA. Qualified investments total \$34 million representing 25.7 percent of allocated tier 1 capital.

The bank's investments exhibit good responsiveness to identified community needs, although investments are rarely innovative or complex. MBSs made up 88.5 percent of current period investments and grant volume. A significant majority of MBSs were comprised of home loans to LMI borrowers originated during the evaluation period. The bank's investments in MBSs supported affordable housing needs in the AA. The bank made one loan to a CDFI totaling \$600 thousand that supported economic development in the AA. The bank provided grants to fund various CD organizations that support community service, affordable housing, and economic development throughout the AA.

Fort Collins MSA

Based on a full-scope review, the bank has an excellent level of qualified investments in the Fort Collins MSA. Current period investments total \$16.6 million. During the evaluation period, the bank made 16 investments totaling \$16 million and 33 grants totaling \$584 thousand. Current period investments and grants are equivalent to 7.7 percent of allocated tier 1 capital. Additionally, 22 prior period investments totaling \$7.4 million provide an ongoing benefit to the AA. Qualified investments total \$24 million representing 11.2 percent of allocated tier 1 capital.

The bank investments exhibit good responsiveness to identified community needs, although investments are rarely innovative or complex. MBSs made up 87.6 percent of the current period investment volume. A significant majority of MBSs were comprised of home loans to LMI borrowers originated during the evaluation period. The bank's investments in MBSs supported affordable housing needs in the AA. The bank made one investment in a CDFI totaling \$1.4 million, which supported economic development in the AA. The bank provided grants to fund various CD organizations that support community service, affordable housing, and economic development throughout the AA.

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 Denver CSA is adequate and in the Fort Collins MSA is excellent.

Retail Banking Services

Refer to table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery systems and branch openings and closings.

Denver CSA

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is adequate.

The bank's delivery systems are reasonably accessible to essentially all portions of the AA. The bank operates 16 branches in the AA. The bank's distribution of branches in low-income geographies is significantly below the percentage of the population living within those geographies. The bank's distribution of branches in moderate-income geographies is near to the percentage of the population living within those geographies.

The bank makes adequate use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has ten deposit-taking ATMs attached to branches within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank opened two branches in moderate-income geographies.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly in LMI geographies or to LMI individuals. The bank maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Fort Collins MSA

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is excellent.

The bank's delivery systems are readily accessible to essentially all portions of the AA. The bank operates nine branches in the AA. The bank's distribution of branches in LMI geographies exceeds the percentage of the population living within those geographies.

The bank makes adequate use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. In addition to having one deposit-taking ATM at each of its nine branches, the bank has six additional stand-alone deposit-taking

ATMs located in middle- and upper-income geographies within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank did not open or close any branches.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly in LMI geographies or to LMI individuals. The bank maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

The bank's performance in providing CD services is good. In addition to CD services in the full-scope AAs, the bank collaborated with one organization to provide community services in the broader statewide area, which had a neutral impact.

Denver CSA

Based on the level of CD services in the Denver CSA, it is concluded, that CD services are good.

Bank employees provided a relatively high level of CD services. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a large number of CD services, consistent with its capacity and expertise to conduct specific activities.

The bank's employees from various lines of business provided technical assistance to 24 different CD organizations, totaling 2,294 hours, in the AA during the evaluation period. The employees participated in 12 affordable housing and 37 community service activities.

Examples of services in the AA include:

- An employee served on the board of an organization that supports affordable housing along with rehabilitation and construction programs including multifamily rentals for LMI individuals and families in the AA.
- Employees served on the board of an organization, which addresses the revitalization and stabilization of LMI CTs in the AA. The organization works to promote a strong business environment and encourage development through business attraction, retention, expansion, and creation.

Fort Collins MSA

Based on the level of CD services in the Fort Collins MSA, it is concluded, that CD services are good.

Bank employees provided a relatively high level of CD services. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a large number of CD services, consistent with its capacity and expertise to conduct specific activities.

The bank's employees, from various lines of business, provided technical assistance to 17 different CD organizations, totaling 1,186 hours, in the AA during the evaluation period. The employees participated in 10 affordable housing and 21 community service activities.

Examples of services in the AA include:

- An employee served on the board of an organization, which provides safe, affordable, and accessible childcare within the AA for LMI individuals and families.
- Employees served on the board of an organization that provides support and assistance to LMI individuals and families that are in need of affordable housing.

State of Illinois

CRA rating for the State of Illinois³:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Low Satisfactory

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans, small loans to businesses and small loans to farms;
- An excellent geographic distribution, based on excellent dispersion of home mortgage loans and small business loans, and good dispersion of small loans to farm;
- An excellent borrower distribution, as evidenced by excellent distribution of home mortgage loans and good distribution of small loans to businesses and farms;
- An excellent level of qualified investments which exhibit responsiveness to community needs, as evidenced by excellent performance in the AAs;
- The bank's branches and alternative delivery systems are reasonably accessible to essentially all portions of the AAs.

Description of Institution's Operations in Illinois

Refer to the community profile for the state of Illinois in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Illinois

The Chicago and Rockford MSAs were selected for analysis using full-scope procedures. The Chicago MSA represented the majority of the bank's branches, deposits, and lending in the rating area. The Rockford MSA was selected for full-scope review because of the bank's importance to the AA. The bank did not originate or purchase a sufficient volume of small business and small farm loans in the Rockford MSA during the evaluation period to perform a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Chicago MSA is excellent and in the Rockford MSA is good.

Lending Activity

Refer to table 1 Lending Volume in appendix D for the facts and data used to evaluate the bank's lending activity.

Chicago MSA

The lending activity is excellent. Home mortgage, small business, and small farm lending activities are excellent considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on the FDIC Deposit Market Share data as of June 30, 2018, the bank had \$1.3 billion in deposits with six percent market share. The bank ranked fourth in total deposits among 57 banks in the AA.

Home mortgage lending is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 2,865 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank was ranked 11 of 525 lenders. The bank's home mortgage loan market share was 1.6 percent. The five largest mortgage lenders captured 28.7 percent of the market.

Small business lending is excellent considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 1,913 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked 10 of 131 lenders in the AA. The bank's market share was 2.3 percent. The five largest small business lenders captured 55.4 percent of the market share.

Small farm lending is excellent considering the bank's market share and ranking when compared to deposit market share and small farm lending competition in the AA. The bank originated 556 small farm loans during the 2015 through 2018 evaluation period. According to 2017 peer small farm data, the bank ranked first of 26 lenders in the AA. The bank's market share was 25.6 percent while the five largest small farm lenders captured 79.5 percent of the market.

Rockford MSA

The lending activity is excellent. Home mortgage lending activity is excellent considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on the FDIC Deposit Market Share data as of June 30, 2018, the bank had \$18.9 million in deposits with 3.3 percent market share. The bank ranked seventh in total deposits among eight banks in the AA.

Home mortgage lending is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 127

home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank ranked 10 of 180 lenders in the AA. The bank's market share was 2.1 percent. The five largest mortgage lenders captured 35.5 percent of the market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution is excellent. Home mortgage, small loans to businesses, and small loans to farms performance is excellent.

Home Mortgage Loans

The geographic distribution of home mortgage lending is excellent.

Refer to table O in the state of Illinois 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.

Chicago MSA

The geographic distribution of home mortgage lending is excellent.

During the 2017 through 2018 analysis period, the distribution of loans is excellent. The proportion of loans in low-income geographies exceeded the proportion of owner-occupied housing units and aggregate lending. The proportion of loans in moderate-income geographies exceeded the proportion of owner-occupied housing units in those geographies and aggregate lending.

During the 2015 through 2016 analysis period, the distribution of loans is good and had a neutral impact. The proportion of loans in low-income geographies exceeded the proportion of owner-occupied housing units and aggregate lending. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied housing units but was near to aggregate lending.

Rockford MSA

The geographic distribution of home mortgage lending is adequate.

In evaluating the geographic distribution of home loans in the AA, it is important to note that under the 2010 U.S. Census, no low-income CTs exist.

During the 2017 through 2018 analysis period, the distribution of home loans is poor. The proportion of loans in moderate-income geographies was significantly below the proportion of owner-occupied housing units in moderate-income geographies and aggregate lending. Changes in the CT income designations between 2016 and 2017 eliminated one moderate-income CT adjacent to the branch and created another moderate-income CT further from the bank's branch location. In addition, there are fewer owner occupied homes and a higher poverty rate in the moderate-income CT, causing additional difficulties in lending to this area.

During the 2015 through 2016 analysis period, the distribution of home loans is excellent and had a positive impact. The proportion of loans in moderate-income geographies exceeded the proportion of owner-occupied housing units and aggregate lending.

Small Loans to Businesses

The geographic distribution of small business lending is excellent.

Refer to table Q in the state of Illinois 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.

Chicago MSA

The geographic distribution of small business lending is excellent.

During the 2017 through 2018 analysis period, the distribution of loans is excellent. The proportion of loans in low-income geographies was near to the proportion of small businesses. The proportion of loans in moderate-income geographies exceeded the proportion of small business loans in those geographies. The proportion of loans in LMI geographies exceeded aggregate lending.

During the 2015 through 2016 analysis period, the distribution of loans is good and had a neutral impact. The proportion of loans in LMI geographies was near to the proportion of small businesses in LMI geographies. The proportion of loans in low-income geographies exceeded aggregate lending. The proportion of loans in moderate-income geographies was near to aggregate lending.

Small Loans to Farms

The geographic distribution of small loans to farms is excellent.

Refer to table S in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Chicago MSA

The geographic distribution of small loans to farms is excellent.

During the 2017 through 2018 analysis period, the distribution of loans is excellent. The proportion of loans in LMI geographies exceeded the proportion of small farms in LMI geographies. The proportion of loans in low-income geographies was below aggregate lending. The proportion of loans in moderate-income geographies exceeded aggregate lending.

During the 2015 through 2016 analysis period, the distribution of loans is good and had a neutral impact. The proportion of loans in low-income geographies was significantly below the proportion of low-income geographies and aggregate lending. There are only six farms located in low-income CTs, which presents very limited opportunity to lend. The proportion of moderate-income geographies was below moderate-income geographies but exceeded aggregate lending.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps identified.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of all loans is excellent. The borrower distribution of mortgage loans is excellent, and small business and small farm performance is good.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers is excellent.

Refer to table P in the state of Illinois 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.

Chicago MSA

The distribution of the bank's home mortgage loans to LMI borrowers is excellent. The high cost of housing in the Chicago MSA impacted the bank's ability to make home mortgage loans to low-income borrowers. Refer to the Chicago MSA Community Profile in appendix B for details regarding housing costs. These factors were considered when evaluating the bank's performance in the AA.

During the 2017 through 2018 analysis period, the borrower distribution is excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income families but exceeded aggregate lending. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period and is excellent.

Rockford MSA

The distribution of the bank's home mortgage loans to LMI borrowers is excellent.

During the 2017 through 2018 analysis period, the borrower distribution is excellent. The percentage of loans to low-income borrowers was near to the percentage of low-income families but exceeded aggregate lending. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period and is excellent.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Refer to table R in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Chicago MSA

The borrower distribution of small loans to businesses is good. In evaluating the distribution of small loans to businesses, we noted that credit card loans represent a significant volume of reportable small

loans to businesses and revenue information was not collected for credit card loans until late 2017. The lack of revenue information inhibits the ability to analyze small loans to business by borrower characteristics. The bank completed a self-assessment, which includes loans under \$100 thousand as a proxy for small businesses.

During the 2017 through 2018 analysis period, the distribution of loans to businesses by revenue is good considering performance context (see Other Factors Considered in Analysis under Each Performance Test section). The proportion of loans was well below the proportion of small businesses but exceeded aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

During the 2015 through 2016 analysis period, the distribution of loans to businesses by revenue is adequate considering performance context (see Other Factors Considered in Analysis under Each Performance Test section) and had a neutral impact. The proportion of loans was significantly below the proportion of small businesses, but near to aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

Small Loans to Farms

The borrower distribution of the bank's originations and purchases of small loans to farms is good.

Refer to table T in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Chicago MSA

The borrower distribution of the bank's originations and purchases of small loans to farms is good.

During the 2017 through 2018 analysis period, the distribution of small loans to farms is good. The proportion of loans was below the proportion of small farms but exceeded aggregate lending.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period.

Community Development Lending

The bank's level of CD lending is good and had a positive impact on lending in the AAs. Lending opportunities within the AAs, state, and region and the bank's capacity to address these needs were considered.

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

Chicago MSA

CD lending is good and had a positive impact on the bank's overall lending performance in the Chicago MSA. The bank originated a relatively high level of CD loans with 10 loans totaling \$42.7 million.

The level of CD lending is responsive to identified needs in the AA. The community contact identified the need for small mortgages in LMI neighborhoods, bank branches in LMI communities, small business financing, and flexible home loan programs. Approximately 86 percent of the CD loans provided financing to small businesses. One loan for \$4.5MM was to improve a public library in a designated revitalization zone.

Rockford MSA

CD lending in the Rockford MSA is adequate and had a neutral impact on the bank's overall lending performance and high competition. The bank did not originate any CD loans in the AA during the evaluation period.

Illinois – Statewide

CD lending in the state of Illinois is good and had a positive impact on lending performance in the state of Illinois. The bank originated a relatively high level of CD loans with seven loans totaling \$16.2 million during the evaluation period. Five loans totaling \$15.1 million have a purpose, mandate, or function to serve the state of Illinois. Four of the five loans had the purpose of economic development and one was for revitalization. Two loans totaling \$1.1 million serve the state of Illinois with no purpose, mandate, or function to serve one or more of the bank's AA in the state. These loans in the greater statewide area address affordable economic development needs. These loans were considered because the bank was responsive to CD needs in the full-scope AAs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "Outstanding". The bank's rating in Illinois is based off excellent Investment Test performance in the full-scope reviews of the Chicago MSA and the Rockford MSA and statewide investments.

Refer to table 14 in the state of Illinois section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Chicago MSA

Based on full-scope review, the bank has an excellent level of qualified investments. Current period qualified investments total \$13.5 million. During the evaluation period, the bank made 25 investments totaling \$13 million and provided 36 grants totaling \$460 thousand. Current period investments and grants are equivalent to 8.4 percent of allocated tier 1 capital. Additionally, 31 prior period investments totaling \$5.3 million provide an ongoing benefit to the AA. Qualified investments total \$18.8 million representing 11.7 percent of allocated tier 1 capital.

The bank exhibits good responsiveness to identified community needs, although rarely uses innovative or complex investments. In terms of volume, 97.4 percent of the bank's current period investments are MBSs. A significant majority of MBSs were comprised of home loans to LMI borrowers originated during the evaluation period. The bank's investments in MBSs supported affordable housing needs in the AA. The bank provided grants to fund various CD organizations that support community service, affordable housing, revitalization efforts, and economic development throughout the AA.

Rockford MSA

Based on full-scope review, the bank has an excellent level of qualified investments. During the evaluation period, the bank made one investment totaling \$118 thousand and three grants totaling \$30 thousand. Current period investments and grants are equivalent 6.3 percent of allocated tier 1 capital. Additionally, the bank has four prior period investments totaling \$257 thousand that provide an ongoing benefit to the AA. Qualified investments total \$405 thousand representing 17.3 percent of allocated tier 1 capital.

The bank exhibits good responsiveness to identified community needs, although rarely uses innovative or complex investments. The bank investment in MBSs accounted for 79.7 percent of the current period investments. A significant majority of MBSs were comprised of home loans to LMI borrowers originated during the evaluation period. The bank's investment in MBSs supported affordable housing needs in the AA. The bank provided grants to fund CD organizations that support affordable housing needs in the AA.

Investments – IL Statewide

The bank made four qualifying investments totaling \$86 thousand in the statewide area that had a purpose, mandate, or function to serve one or more of the bank's AAs in the state. These investments had a positive impact on performance in the rating area. The bank also made one qualifying investment that did not have a purpose, mandate, or function, totaling \$378 thousand. These investments promoted economic development needs in the state.

SERVICE TEST**Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Chicago MSA is adequate and in the Rockford MSA is poor.

Retail Banking Services

Refer to table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery systems and branch openings and closings.

Chicago MSA

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is adequate.

The bank's delivery systems are reasonably accessible to essentially all portions of the AA. The bank operates 13 branches and 15 deposit-taking ATMs in the Chicago AA. The bank's distribution of branches in both LMI geographies is below the percentage of the population living within those geographies. The bank has two branches located in LMI geographies. However, when considering a middle-income branch that serves an adjacent moderate-income geography within the AA, the distribution of branches exceeds the percentage of population living in moderate-income geographies. During the evaluation period, the bank did not open or close any branches.

The bank makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has 15 deposit-taking ATMs within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank did not open or close any branches.

The bank's services and business hours do not vary in a way that inconveniences the AA, particularly LMI geographies and individuals. All branches operate during traditional banking hours, yet branches do not offer Saturday hours.

Rockford MSA

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is poor.

The bank's delivery systems are unreasonably inaccessible to essentially all portions of the AA. The bank operates one branch and one deposit-taking ATM in the Rockford AA. The bank's distribution of branches and deposit-taking ATMs in both LMI geographies is significantly below the percentage of the population living within those geographies. The bank has no branches or deposit-taking ATMs located in LMI geographies. During the evaluation period, the bank did not open or close any branches.

The bank makes use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has one deposit-taking ATM within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank did not open or close any branches.

The bank's services and business hours do not vary in a way that inconveniences the AA, particularly LMI geographies and individuals. All branches operate during traditional banking hours, yet branches do not offer Saturday hours.

Community Development Services

The bank's performance in providing CD services is adequate.

Chicago MSA

Based on the level of CD services in the Chicago MSA, it is concluded, that CD services are good.

Bank employees provided a relatively high level of CD services. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a large number of CD services, consistent with its capacity and expertise to conduct specific activities.

Bank employees from various lines of business provided technical assistance to 29 different CD organizations, totaling 2,559 hours, in the AA during the evaluation period. The employees participated in five affordable housing and 50 community service activities.

Examples of services in the AA include:

- Employees served as board members for an organization, which primarily serves LMI individuals in providing basic needs, and giving people the tools to become financially stable.
- An employee served as a board member for an organization, which provides affordable housing for low-income individuals and families in the AA. The organization's mission is to provide clean, decent, and safe affordable housing for low-income individuals.

Rockford MSA

Based on the level of CD services in the Rockford MSA, it is concluded, that CD services are poor.

Bank employees provided a limited level of CD services that were responsive in helping the bank address community needs.

An employee provided technical assistance to one CD organization, totaling 100 hours in the AA during the evaluation period. The employee participated in two community service activities serving on the board of an organization, which provides workforce development in the AA. The organization provides career counseling, financial assistance, and other support services in the AA. The organization primarily serves LMI individuals and families.

State of Kansas

CRA rating for the State of Kansas⁴:	Satisfactory
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	Needs to Improve

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans and a good level of lending to small loans to businesses;
- A good geographic distribution based on adequate dispersion of home mortgage loans and excellent dispersion of small business loans;
- An excellent borrower distribution, as evidenced by excellent distribution of home mortgage and good distribution of small business loans;
- An excellent level of qualified investments which exhibit responsiveness to community needs, as evidenced by excellent performance in the AA;
- The bank's branches and alternative delivery systems are accessible to limited portions of the AA and are unreasonably inaccessible.

Description of Institution's Operations in Kansas

Refer to the community profile for the state of Kansas in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Kansas

The Kansas City MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based on the Kansas City MSA. The bank did not originate or purchase a sufficient volume of small farm loans in the Kansas City MSA during the evaluation period to perform a meaningful analysis. Refer to appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the lending test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the Kansas City MSA is excellent.

Lending Activity

Refer to table 1 Lending Volume in appendix D for the facts and data used to evaluate the bank's lending activity.

The lending activity is excellent. Home mortgage lending activity is excellent and small business lending activity is good considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on the FDIC Deposit Market Share data as of June 30, 2018, the bank had \$745.9 million in deposits with 3.7 percent market share. The bank ranked ninth in total deposits among 61 banks in the AA.

Home mortgage lending activity is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 1,526 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank ranked 20 of 455 lenders. The bank's home mortgage loan market share was 1.3 percent. The five largest mortgage lenders captured 26.4 percent of the market.

Small business lending is good considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 756 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked 16 of 121 lenders in the AA. The bank's market share was 1.2 percent. The five largest small business lenders captured 59.6 percent of the market share.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans is good. Home mortgage performance is adequate and small loans to businesses is excellent.

Home Mortgage Loans

The geographic distribution of home mortgage lending is adequate.

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.

During the 2017 through 2018 analysis period, the distribution of loans is poor. The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and aggregate lending. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied housing units in moderate-income geographies and aggregate lending. CT changes in the bank's AA negatively affected the bank's performance, including a 20 percent decrease in the number of moderate-income CTs.

During the 2015 through 2016 analysis period, the distribution of loans is good and had a positive impact. The proportion of loans in low-income geographies exceeded the proportion of owner-occupied housing units and aggregate lending. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied housing units and below aggregate lending.

Small Loans to Businesses

The geographic distribution of small business lending is excellent.

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.

During the 2017 through 2018 analysis period, the distribution of loans is excellent. The proportion of loans in LMI geographies exceeded the proportion of small businesses in those geographies and aggregate lending.

During the 2015 through 2016 analysis period, the distribution of loans is good and had a neutral impact. The bank originated no loans in low-income CTs; however, the number of small businesses in these geographies is minimal. The proportion of loans in moderate-income geographies exceeded the proportion of small businesses and aggregate lending in those geographies.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps identified.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of all loans is excellent. Home mortgage loan performance is excellent and small loans to businesses performance is good.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers is excellent.

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.

The high cost of housing in the Kansas City MSA impacted the bank's ability to make home mortgage loans to low-income borrowers. Refer to the Kansas City MSA Community Profile in appendix B for details regarding housing costs and needs. These factors were considered when evaluating the bank's performance in the AA.

During the 2017 through 2018 analysis period, the bank's borrower distribution is excellent. The percentage of loans to low-income borrowers was well below the percentage of low-income families but

exceeded aggregate lending. The percentage of loans to moderate-income borrowers exceeded the percentage of moderate-income families and aggregate lending.

The 2015 through 2016 analysis period is consistent with the 2017 through 2018 analysis period.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses is good.

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 originations and purchases of small loans to businesses.

In evaluating the distribution of small loans to businesses, we noted that credit card loans represent a significant volume of reportable small loans to businesses and revenue information was not collected for credit card loans until late 2017. The lack of revenue information inhibits the ability to analyze small loans to business by borrower characteristics. The bank completed a self-assessment, which includes loans under \$100 thousand as a proxy for small businesses.

During the 2017 through 2018 analysis period, the distribution of small loans to businesses by revenue is good considering performance context (see Other Factors Considered in Analysis under Each Performance Test section). The proportion of loans was well below the proportion of small businesses but exceeded aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

During the 2015 through 2016 analysis period, the distribution of loans to businesses by revenue is adequate considering performance context (see Other Factors Considered in Analysis under Each Performance Test section) and had a neutral impact. The proportion of loans was significantly below the proportion of small businesses and well below aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

Community Development Lending

The bank's level of CD lending is good and had a positive impact on lending in the AA. Lending opportunities within the AA, state, and region and the bank's capacity to address these needs were considered.

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

Kansas City MSA

CD lending in the Kansas City MSA is good and had a positive impact on the bank's overall lending performance in the Kansas City MSA. The bank originated a relatively high level of CD loans with one loan totaling \$1.9 million.

The level of CD lending is responsive to identified needs in the AA. The community contacts identified the needs of the community to include financing of small businesses.

Kansas – Statewide

CD lending in the broader statewide area of Kansas is good and had a positive impact on the bank's overall lending performance in the state of Kansas. The bank originated a relatively high level of CD loans with two CD loans totaling \$3.6 million. One loan was for affordable housing to refinance a 76-unit multifamily property.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Performance under the Investment Test is rated "Outstanding". Investment Test ratings in Kansas are based off excellent performance in the full-scope review of the Kansas City MSA and statewide investments benefitting the AA.

Refer to table 14 in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Kansas City MSA

Based on full-scope review, the bank has an excellent level of qualified investments. Current period investments and grants total \$8.7 million. During the evaluation period, the bank made 11 investments totaling \$8.5 million and 14 grants totaling \$222 thousand. Current period investments and grants are equivalent to 9.5 percent of allocated tier 1 capital. Additionally, the bank has 10 prior period investments totaling \$4.7 million that provide an ongoing benefit to the AA. Qualified investments total \$13.4 million representing 14.5 percent of allocated tier 1 capital.

The bank exhibits good responsiveness to identified community needs, and occasionally uses innovative or complex investments. In terms of volume, 96.2 percent of the bank's current period investments are MBSs. A significant majority of MBSs were comprised of home loans to LMI borrowers originated during the evaluation period. The bank made one investment in a LIHTC for \$118 thousand. The bank's investments in MBSs and LIHTC supported affordable housing needs in the AA. The bank provided grants to fund various CD organizations that support community service and economic development throughout the AA.

Investments – KS Statewide

The bank made one qualified investment in the broader statewide area with a purpose, mandate, or function to serve the bank's AA totaling \$4.1 million. This investment supported affordable housing through a LIHTC.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated Needs to Improve. Based on full-scope review, the bank's performance in the Kansas City MSA is poor.

Retail Banking Services

Refer to table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery systems and branch openings and closings.

Kansas City MSA

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is poor.

The bank's delivery systems are unreasonably inaccessible to essentially all portions of the AA. The bank operates seven branches and seven deposit-taking ATMs in the AA. The bank's distribution of branches and deposit-taking ATMs in both LMI geographies is significantly below the percentage of the population living within those geographies. The bank has no branches or deposit-taking ATMs located in LMI geographies. During the evaluation period, the bank opened one branch in an upper-income geography.

The bank makes adequate use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has seven deposit-taking ATMs within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank opened one branch in an upper-income geography.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly in LMI geographies or to LMI individuals. The bank maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

The bank's performance in providing CD services in the AA is adequate.

Bank employees provided a limited level of CD services that were effective and responsive in helping the bank address community needs. The bank's employees provided technical assistance to 10 different CD organizations, totaling 191 hours, in the AA during the evaluation period. The employees participated in 18 community service activities. One bank employee served on the board of an organization, which provides support to LMI adults with developmental disabilities living in the AA. The mission of the organization is to help adults with developmental disabilities live independently and safely in the community.

State of Nebraska

CRA Rating for Nebraska⁵:	Outstanding
The lending test is rated:	Outstanding
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans, small loans to businesses and small loans to farms;
- An excellent geographic distribution of loans as evidenced by excellent distribution of small loans to businesses and farms, and a good distribution of home mortgage loans;
- An excellent distribution of loans based on borrower income level. For home mortgage and small loans to farms performance is excellent, and small loans to businesses performance is good;
- A relatively high level of CD loans that were responsive to community needs;
- An excellent level of qualified investments which exhibit responsive to community needs, as evidenced by excellent performance in the full-scope AA;
- The bank's branches and alternative delivery systems are accessible to essentially all portions of the AAs.

Description of Institution's Operations in Nebraska

Refer to the community profile for the state of Nebraska (NE) in appendix C for detailed demographics and other performance context information for AA that received full-scope reviews.

Scope of Evaluation in Nebraska

The NE Non-MSA was selected for analysis using full-scope procedures. The NE Non-MSA represented the majority of the bank's branches, deposits, and lending in the rating area. The Grand Island MSA and Lincoln CSA were selected for limited-scope review. Ratings are primarily based on results of the full-scope review. Refer to appendix A for more information.

⁵ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Outstanding". Based on full-scope reviews, the bank's performance in the NE Non-MSA is excellent.

Lending Activity

Refer to table 1 Lending Volume in appendix D for the facts and data used to evaluate the bank's lending activity.

The lending activity is excellent. Home mortgage, small business, and farm lending activity is excellent considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank had \$1.3 billion in deposits with 12.6 percent market share. The bank ranked first in total deposits among 69 banks in the AA.

Home mortgage lending is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 3,032 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank was ranked first among 235 lenders. The bank's home mortgage loan market share was 13 percent. The five largest mortgage lenders captured 44.1 percent of the market.

Small business lending is excellent considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 2,778 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked first among the 62 lenders in the AA. The bank's market share of small business loans was 15.3 percent. The five largest small business lenders captured 54.8 percent of the market.

Small farm lending is excellent considering the bank's market share and ranking when compared to deposit market share and small farm lending competition in the AA. The bank originated 3,861 farm loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data for small farms, the bank ranked second among the 24 lenders in the AA. The bank's market share of small farm loans was 23.5 percent. The five largest small farm lenders captured 86.5 percent of the market.

Distribution of Loans by Income Level of the Geography

The geographic distribution of the bank's lending is excellent. Home mortgage performance is good, small loans to businesses and small loans to farms performance is excellent.

Home Mortgage Loans

The geographic distribution of the bank's home mortgage lending is good.

Refer to table O in the state of Nebraska 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.

During the 2017 through 2018 analysis period, the distribution is good. The proportion of lending in low-income geographies was well below the proportion of owner-occupied housing units and approximates aggregate lending. Lending in moderate-income geographies approximates owner-occupied housing units and was somewhat below aggregate lending in those geographies.

The 2016 geographic distribution is adequate and had a neutral impact. There were no low-income CTs in the AA. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied housing units and was below aggregate lending.

The 2015 geographic distribution is poor and had a neutral impact. There were no low-income CTs in the AA. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied housing units and aggregate lending.

Small Loans to Businesses

The overall geographic distribution of small loans to businesses is good.

Refer to table Q in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's performance in 2017 through 2018 is good. The proportion of small loans to businesses in low-income geographies was below the proportion of businesses and aggregate lenders in those geographies. The proportion of small loans to businesses in moderate-income geographies exceeds both the proportion of businesses and aggregate lenders in those geographies.

During the 2016 analysis period, the distribution of small loans is poor and had a neutral impact. There were no low-income CTs in the AA. The proportion of loans in moderate-income geographies was well below the proportion of businesses in those geographies and aggregate lending.

During the 2015 analysis period, the distribution of small loans is good. There were no low-income CTs in the AA. The proportion of loans in moderate-income geographies was below the proportion of businesses in those geographies. The proportion of loans in moderate-income geographies approximates aggregate lending.

Small Loans to Farms

The geographic distribution of small loans to farms is excellent.

Refer to table S in the state of Nebraska section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The bank's performance in 2017 through 2018 is good, given the limited opportunities for small loans to farms in these geographies. There was a total of four farms in low-income CTs and 114 farms in moderate-income CTs within the AA. There were no loans to farms made in low-income geographies, which was significantly below the proportion of farms and approximates aggregate lenders in those geographies. The proportion of small loans to farms in moderate-income geographies was significantly below the proportion of farms and approximates aggregate lenders in those geographies.

During the 2016 analysis period, the distribution of small loans is excellent and had a positive impact. There were no low-income CTs in the AA. The proportion of loans in moderate-income geographies was somewhat near to the proportion of farms in those geographies and exceeded aggregate lending.

The 2015 analysis period is consistent with the 2016 analysis period.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze home mortgage, small business and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of the bank's lending is excellent. Home mortgage and small loans to farms performance is excellent and small loans to businesses performance is good.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers is excellent.

Refer to table P in the state of Nebraska 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 high cost of housing in the NE Non-MSA impacted the bank's ability to make home mortgage loans to low-income borrowers. Refer to the NE Non-MSA Community Profile in appendix B for details regarding housing costs and affordable housing needs. These factors were considered when evaluating the bank's performance in the AA.

During the 2017 through 2018 analysis period, the distribution is excellent. The proportion of loans to low-income borrowers was well below the proportion of low-income families but near to aggregate lending. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and aggregate lending.

During the 2016 analysis period, the distribution is good and had a neutral impact. The proportion of loans to low-income borrowers was below the proportion of low-income families but exceeded aggregate lending. The proportion of loans to moderate-income borrowers was somewhat below the proportion of moderate-income families and exceeded aggregate lending.

During the 2015 analysis period, the distribution is excellent. The proportion of loans to low-income borrowers was well below the proportion of low-income families but exceeded aggregate lending. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and aggregate lending.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Refer to table R in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of loans to businesses by revenue is good. The proportion of loans was below the proportion of small businesses but exceeded aggregate lending.

The 2015 and 2016 analysis periods were consistent with 2017 through 2018.

Small Loans to Farms

The borrower distribution of the bank's small loans to farms is excellent.

Refer to table T in the state of Nebraska section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of small loans to farms by revenues is excellent. The proportion of small loans to farms was near to the proportion of small farms and exceeded aggregate lending.

During the 2016 analysis period, the distribution of loans is good. The proportion of loans was below the proportion of small farms but exceeded aggregate lending.

The 2015 analysis period is consistent with the 2016 analysis period.

Community Development Lending

The bank's level of CD lending is good and had a positive impact on lending performance in the AAs. Lending opportunities within the AAs, state, and region and the bank's capacity to address these needs were considered.

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

NE Non-MSA

CD lending in NE Non-MSA is good and had a positive impact on the bank's overall lending performance in the NE Non-MSA. The bank originated a relatively high level of CD loans with 10 CD loans totaling \$60.4 million.

The level of CD lending is responsive to identified needs in the AA. Community contact specified that affordable housing, workforce housing, and a higher skilled labor force are needed in the NE Non-MSA. Approximately 66 percent of the CD loans provided financing for economic development activities. Another 5.5 percent provided financing for seven affordable housing units.

Examples of CD loans originated during the evaluation period include:

- Two loans totaling \$40 million to an ethanol plant in order to retain approximately 55 jobs.
- A \$9.9 million loan to a public power company to cover the cost of capital improvements to the electric system in underserved CTs throughout the AA.

NE - Statewide

CD lending in the broader statewide area of Nebraska is good and had a positive impact on the bank's overall lending performance in the state of Nebraska. The bank originated a relatively high level of CD loans with five totaling \$75 million. All five of the loans revitalized or stabilized underserved middle-income or moderate-income CT communities by creating or retaining jobs for LMI individuals.

Product Innovation and Flexibility

The bank uses flexible loan programs to help meet credit needs in its AA. The bank's use of these flexible programs had a neutral impact on conclusions under the lending test. The various programs included the following:

Box Butte General Hospital

The bank offers a flexible lending product to the Box Butte General Hospital (BBGH), which is located in an underserved middle-income CT. The bank issues credit to individuals for medical expenses owed to BBGH in connection with a \$400 thousand guidance line issued to BBGH. The guidance line serves as a guarantee in the event of a loss. Forty-three out of the 60 loans originated were to LMI individuals, totaling \$227 thousand.

Easter Seals

The bank partners with Easter Seals to offer a flexible loan program which assists disabled LMI individuals. The loan program is aimed at providing either the resources to work from home, accessibility options at home, or as a means of getting to work. The Nebraska Department of Human Services funded the program through a \$1 million grant. The bank extends and services the loans. The program also offers technical assistance to participants who wish to start their own businesses. Two out of the three loans were originated to LMI individuals totaling \$33 thousand.

FirstDown

The bank offers a flexible loan product for first-time homebuyer assistance. The bank has partnered with the Federal Home Loan Bank and the Nebraska Housing Developers Association to provide \$4,000 grants to qualifying LMI homebuyers to assist with their down payment and closing costs.

Because of this program, 13 home mortgage loans were originated to LMI individuals totaling \$1 million in the NE Non-MSA. In addition, the limited-scope areas of Lincoln CSA and Grand Island MSA had three loans originated to LMI individuals totaling \$293 thousand.

For additional information, refer to the summary of innovative and flexible loan programs in the Other Factors – Lending Test section for a description of products offered bank-wide.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance under the lending test in the Grand Island MSA and Lincoln CSA are inconsistent with the bank's overall outstanding performance under the lending test in Nebraska. The bank's performance in the Grand Island MSA and Lincoln CSA, is weaker than the bank's overall performance in Nebraska, specifically, the geographic distribution to small farms. Due to the low volume of loans in the limited-scope areas, this did not affect the bank's overall performance in Nebraska. Refer to the tables in the state of Nebraska section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Performance under the Investment Test in Nebraska is rated "Outstanding". The Investment Test ratings are based on excellent performance in the full-scope review of the NE Non-MSA and statewide investments benefitting the AA.

Refer to table 14 in the state of Nebraska section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

NE Non-MSA

Based on full-scope-review, the bank has an excellent level of qualified investments. Current period investments and grants total \$4.4 million. During the evaluation period, the bank made 14 investments totaling \$4 million and 33 grants totaling \$418 thousand. Current period qualified investments are equivalent to 2.7 percent of allocated tier 1 capital. Additionally, the bank had 33 prior period investments totaling \$13 million that provide an ongoing benefit to the AA. Qualified investments equaled \$17.4 million representing 10.8 percent of allocated tier 1 capital.

The bank exhibits good responsiveness to identified community needs. The bank makes occasional use of innovative or complex investments. In terms of volume, 77.5 percent of the bank's current period investments are bonds dedicated to revitalization and stabilization efforts within the AA. The remaining investments are comprised of LIHTC and MBSs, which support affordable housing needs in the AA. The bank provided grants to fund various CD organizations that support community service, affordable housing, revitalization efforts, and economic development throughout the AA.

Investments – NE Statewide

The bank had five qualifying investments totaling \$2.1 million in the statewide area. Three of the five had a purpose, mandate, or function to serve one or more of the bank's AAs in the state and had a positive impact. Investments included LIHTCs, equity equivalent investments, and grants. These

investments are responsive to the continuing need for affordable housing and promote economic development statewide.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Grand Island MSA and the Lincoln CSA is consistent with the bank's overall Investment Test rating in Nebraska. Excellent performance is due to the volume of qualified investments compared to allocated tier 1 capital.

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 review, the bank's performance in the NE Non-MSA is good.

Retail Banking Services

Refer to table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery systems and branch openings and closings.

NE Non-MSA

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is adequate.

The bank's delivery systems are reasonably accessible to essentially all portions of the AA. The bank operates 13 branches in the AA. The bank's distribution of branches in low-income geographies is significantly below the percentage of the population living within those geographies. The bank does not have any branches in low-income geographies, however only 1.3 percent of the AA's population lives in low-income geographies. The bank's distribution of branches in moderate-income geographies exceeds the percentage of the population living within those geographies.

The bank makes adequate use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has 20 deposit-taking ATMs within the AA and four deposit-taking ATMs in moderate-income CTs. In addition to having one deposit-taking ATM at each of its 13 branches, the bank has seven additional stand-alone deposit-taking ATMs located in middle- and upper-income geographies within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank opened one branch in a middle-income geography.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly in LMI geographies or to LMI individuals. The bank maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

The bank's performance in providing CD services is good. In addition to CD services in the full- and limited-scope AAs, the bank collaborated with 14 organizations to develop affordable housing, foster economic development, support revitalization and stabilization, and provided community services in the broader statewide area.

NE Non-MSA

The bank's performance in providing CD services in the AA is excellent. Bank employees provided a relatively high level of CD services. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a large number of CD services consistent with its capacity and expertise to conduct specific activities.

The bank's employees from various lines of business provided technical assistance to 33 different CD organizations, totaling 1,764 hours, in the AA during the evaluation period. The employees participated in 11 affordable housing and 43 community service activities.

Examples of services in the AA include:

- Employees served on the board for an organization, which supports affordable housing. The organization provides LMI individuals and families with access to safe and affordable quality housing located within the AA.
- An employee served on the board for an organization, which provides economic development for small businesses in the AA. The organization supported permanent job creation, retention, and improvement through technical assistance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope review, the bank's performance under the Service Test in the Grand Island MSA is consistent with the bank's overall "High Satisfactory" performance under the Service Test in the rating area. In the Lincoln CSA, the bank's performance is weaker than the bank's overall performance in the state and is considered adequate due to adequate branch distribution and had a negative impact.

Refer to table 15 in the state of Nebraska section of appendix D for the facts and data that support these conclusions.

State of South Dakota

CRA Rating for South Dakota⁶:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	High Satisfactory
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans, small loans to businesses, and small loans to farms;
- An adequate geographic distribution of loans as evidenced by adequate distribution of home mortgage and small loans to farm, and a good distribution of small loans to businesses;
- A good distribution of loans based on borrower income level. For home mortgage and small loans businesses and farms performance is good. A good level of qualified investments which exhibit responsive to community needs, as evidenced by good performance in the AA. The bank's branches and alternative delivery systems are accessible to essentially all portions of the AA.

Description of Institution's Operations in South Dakota

Refer to the community profile for the state of South Dakota in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in South Dakota

The South Dakota (SD) Non-MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based on the SD Non-MSA. Refer to appendix A for more information. During the 2015 and 2016 analysis period, there were no LMI designated CTs in the AA

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH DAKOTA

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

⁶ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

The bank's performance under the lending test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the SD Non-MSA is good.

Lending Activity

Refer to table 1 Lending Volume in appendix D for the facts and data used to evaluate the bank's lending activity.

The lending activity is excellent. Home mortgage, small business, and farm lending activity is excellent considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank had \$354 million in deposits with 18.5 percent market share. The bank ranked second in total deposits among 13 banks in the AA.

Home mortgage lending is excellent considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 304 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank ranked fourth among 89 lenders. The bank's home mortgage loan market share was 5.9 percent. The five largest mortgage lenders captured 50.3 percent of the market.

Small business lending is excellent considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 611 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked second among the 43 lenders in the AA. The bank's market share of small business loans was 14.1 percent. The five largest small business lenders captured 61.4 percent of the market.

Small farm lending is excellent considering the bank's market share and ranking when compared to deposit market share and small farm lending competition in the AA. The bank originated 896 farm loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data for small farms, the bank ranked first among the 18 lenders in the AA. The bank's market share of small farm loans was 31.1 percent. The five largest small farm lenders captured 89.5 percent of the market.

Distribution of Loans by Income Level of the Geography

The geographic distribution of the bank's lending is adequate. Home mortgage and small loans to farms performance is adequate, and small loans to businesses performance is good.

Home Mortgage Loans

The geographic distribution of the bank's home mortgage lending is adequate. Refer to table O in the state of South Dakota 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.

During the 2017 through 2018 analysis period, the distribution is adequate. There were no low-income tracts in the AA. Lending in moderate-income geographies exceeded owner-occupied housing units and was significantly below aggregate lending in those geographies.

Small Loans to Businesses

The overall geographic distribution of small loans to businesses is good.

Refer to table Q in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's performance in 2017 through 2018 is good. There were no low-income tracts in the AA. The proportion of small loans to businesses in moderate-income geographies was below the proportion of businesses and exceeded aggregate lenders in those geographies.

Small Loans to Farms

The geographic distribution of small loans to farms is adequate.

Refer to table S in the state of South Dakota section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The bank's performance in 2017 through 2018 analysis period is adequate, given the limited opportunities for small loans to farms in this geography. There were no low-income CTs in this AA and only one moderate-income CT. There was a total of seven farms in the moderate-income CT in the AA. There were no loans to farms made in the moderate-income CT by the bank or aggregate lenders.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of the bank's lending is good. Home mortgage, small loans to businesses, and small loans to farms performance is good.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers is good.

Refer to table P in the state of South Dakota 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 high cost of housing in the SD Non-MSA impacted the bank's ability to make home mortgage loans to low-income borrowers. Refer to the SD Non-MSA Community Profile in appendix B for details regarding housing costs and affordable housing needs. These factors were considered when evaluating the bank's performance in the AA.

During the 2017 through 2018 analysis period, the distribution is good. The proportion of loans to low-income borrowers was well below the proportion of low-income families and aggregate lending. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was near to aggregate lending.

During the 2016 analysis period, the distribution is adequate and had a neutral impact. The proportion of loans to low-income borrowers was well below the proportion of low-income families and aggregate lending. The proportion of loans to moderate-income borrowers was somewhat below the proportion of moderate-income families and below aggregate lending.

During the 2015 analysis period, the distribution is excellent. The proportion of loans to low-income borrowers was below the proportion of low-income families and near to aggregate lending. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and aggregate lending.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans to businesses is good.

Refer to table R in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of loans to businesses by revenue is good. The proportion of loans was below the proportion of small businesses but exceeded aggregate lending.

During the 2016 analysis period, the distribution of loans to businesses by revenue is adequate. The proportion of loans was well below the proportion of small businesses but near to aggregate lending.

During the 2015 analysis period, the distribution of loans to businesses by revenue is good. The proportion of loans was well below the proportion of small businesses but exceeded aggregate lending. The 2015 and 2016 conclusions had a neutral impact on the overall analysis.

Small Loans to Farms

The borrower distribution of the bank's originations and purchases of small loans to farms is good.

Refer to table T in the state of South Dakota section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During the 2017 through 2018 analysis period, the distribution of loans is good. The proportion of small loans to farms was below the proportion of farms but exceeded aggregate lending.

The distribution to farms during the 2015 and 2016 analysis period is consistent with the 2017 through 2018 analysis period.

Community Development Lending

CD lending in the SD Non-MSA is poor and had a neutral impact on the bank's overall lending performance. The bank did not originate or purchase any loans that qualify for CD purposes within this AA during the evaluation period.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Performance under the Investment Test in South Dakota is rated "High Satisfactory". Based on good performance in the full-scope review of the SD Non-MSA.

Refer to table 14 in the state of South Dakota section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

SD Non-MSA

Based on full-scope review, the bank has a good level of qualified investments. Current period investments and grants total \$2.2 million. During the evaluation period, the bank made two investments in a CDFI totaling \$2 million and 11 grants totaling \$153 thousand. Current period investments and grants equal 4.9 percent of allocated tier 1 capital. Additionally, the bank has one prior period investment totaling \$78 thousand that provides an ongoing benefit to the AA. Qualified investments total \$2.2 million representing 5.1 percent of allocated tier 1 capital.

The bank exhibits good responsiveness to identified community needs and occasionally uses innovative or complex investments. In terms of volume, 92.9 percent of the bank's dollar volume of investments had economic development as the CD purpose, which is an identified AA need. The bank provided grants to fund various CD organizations that support community service and affordable housing throughout the AA.

Investments – SD Statewide

The bank made one statewide investment during the evaluation period totaling \$178 thousand with a purpose, mandate, or function that benefits the AA. This investment supported affordable housing through LIHTCs. Statewide investments had a neutral impact on the overall performance.

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 review, the bank's performance in the SD Non-MSA is good.

Retail Banking Services

Refer to table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery systems and branch openings and closings.

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is good.

The bank's delivery systems are reasonably accessible to essentially all portions of the AA. The bank operates four branches in the AA. There are no low-income geographies in the AA.

The bank's distribution of branches in moderate-income geographies exceeds the percentage of the population living within those geographies.

The bank makes adequate use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has four deposit-taking ATMs within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank did not open or close any branches.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly in LMI geographies or to LMI individuals. The bank maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

The bank's performance in providing CD services is good. In addition to CD services in the full-scope AA, the bank collaborated with two organizations to develop affordable housing and provide community services in the broader statewide area.

SD Non-MSA

The bank's performance in providing CD services in the AA is good.

Bank employees provided a moderate level of CD services. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a moderate number of CD services, consistent with its capacity and expertise to conduct specific activities.

The bank's employees from various lines of business provided technical assistance to 10 different CD organizations, totaling 1,057 hours, in the AA during the evaluation period. The employees participated in three affordable housing and 15 community service activities.

Examples of services in the AA include:

- An employee served on the board for an organization that supports affordable housing. The organization works to provide affordable housing to LMI individuals and families located in the AA.

- An employee served on the board for an organization that supports economic development in the AA. The organization's primary service is to provide technical assistance to small businesses relocating to a specific LMI area in the AA.

State of Texas

CRA Rating for Texas⁷:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Substantial Noncompliance

The major factors that support this rating include:

- A good level of lending for small loans to businesses, and an adequate level of home mortgage loans;
- A good geographic distribution of loans as evidenced by a good distribution of small loans to businesses and adequate distribution of home mortgage loans;
- A good distribution of loans based on borrower income level. Home mortgage and small loans to businesses performance is good;
- An excellent level of qualified CD investments and grants which exhibit responsive to CD needs in the AA;
- The bank's branches and alternative delivery systems are inaccessible to significant portions of the AA.

Description of Institution's Operations in Texas

Refer to the community profile for the state of Texas in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

Scope of Evaluation in Texas

The Dallas MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based on the Dallas MSA. The bank did not originate or purchase a sufficient volume of HMDA loans in the Dallas MSA during the 2015 analysis period to perform a meaningful analysis. The bank did not originate or purchase a sufficient volume of small farm loans in the Dallas MSA during the evaluation period to perform a meaningful analysis. Refer to appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

⁷ For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Dallas MSA is good.

Lending Activity

Refer to tables 1. Lending Volume in appendix D for the facts and data used to evaluate the bank's lending activity.

The lending activity is good. Home mortgage lending is adequate and small business lending activity is good considering the bank's capacity based on deposits, competition, and market presence in the AA.

Based on FDIC Deposit Market Share data as of June 30, 2018, the bank had \$163 million in deposits with one percent market share. The bank ranked 27 in total deposits among 71 banks in the AA.

Home mortgage lending is adequate considering the bank's market share and ranking when compared to deposit market share and home mortgage lending competition in the AA. The bank originated 215 home mortgage loans during the 2015 through 2018 evaluation period. According to 2017 peer mortgage data, the bank was ranked 184 among 758 lenders. The bank's home mortgage loan market share was less than 0.1 percent. The five largest mortgage lenders captured 27.9 percent of the market.

Small business lending is good considering the bank's market share and ranking when compared to deposit market share and small business lending competition in the AA. The bank originated 775 small business loans during the 2015 through 2018 evaluation period. According to 2017 peer small business data, the bank ranked 19 among the 262 lenders in the AA. The bank's market share of small business loans was 0.6 percent. The five largest small business lenders captured 64.4 percent of the market.

Distribution of Loans by Income Level of the Geography

The geographic distribution of the bank's lending is good. Home mortgage performance is adequate and small loans to businesses performance is good.

Home Mortgage Loans

The geographic distribution of the bank's home mortgage lending is adequate.

Refer to table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The heavy competition in the Dallas MSA, with 758 mortgage lenders in the market, coupled with a distance of 15 to 20 miles to most of the moderate-income CTs in the AA led to a lending volume

significantly below the number of owner-occupied housing units and aggregate lending in the AA. These factors were considered when evaluating the bank's performance in the AA.

The AA changed in 2016 to include the full county of Denton, which increased the number of LMI CTs, which were approximately 15 to 20 miles from the bank. This is reflected in the change in performance over the evaluation period.

During the 2017 through 2018 analysis period, the distribution is adequate, given the competition, distance to moderate-income CTs, and limited lending opportunities in low-income CTs. The proportion of lending in low-income geographies was significantly below the proportion of owner-occupied housing units and aggregate lending. With only 250 owner-occupied housing units in low-income CTs within the AA, there were limited opportunities to lend. Lending in moderate-income geographies was significantly below owner-occupied housing units and aggregate lending in those geographies. Lending to moderate-income CTs was approximately half of aggregate peer's lending which is reasonable given the distance to the majority of the moderate-income CTs and the heavy competition in the AA.

The 2015 through 2016 geographic distribution is good and had a neutral impact. There were no low-income CTs in the AA. The proportion of loans in moderate-income geographies was below both the proportion of owner-occupied housing units and aggregate lending.

Small Loans to Businesses

The overall geographic distribution of small loans to businesses is good.

Refer to table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The bank's performance in 2017 through 2018 is excellent. The proportion of small business loans made in low-income geographies exceeded both the proportion of businesses and aggregate lenders in those geographies. Income designation changes to CTs within the AA increased the opportunity to lend with approximately 1,300 businesses within the low-income CTs. The proportion of small loans to businesses in moderate-income geographies exceeded the proportion of businesses and approximates aggregate lenders in those geographies.

During the 2016 analysis period, the distribution of small loans is adequate, given the low amount of small businesses located in low-income tracts coupled with the heavy competition in the AA. There were approximately 500 businesses located in the low-income CTs and 170 business lenders throughout the AA. The proportion of small business loans made in low-income geographies was significantly below both the proportion of businesses and aggregate lenders in those geographies. The proportion of loans in moderate-income geographies was below the proportion of businesses and aggregate lenders in those geographies.

The 2015 analysis period is consistent with the 2016 analysis period and is adequate. The 2015 through 2016 distribution of small loans had a negative impact on the overall geographic distribution.

Lending Gap Analysis

Summary reports and maps were reviewed to analyze home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. There were no unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of the bank's lending is good. Home mortgage and small loans to businesses performance is good.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to LMI borrowers is good.

Refer to table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The high cost of housing and heavy competition in the Dallas MSA impacted the bank's ability to make home mortgage loans to LMI borrowers. Refer to the Dallas MSA Community Profile in appendix B for details regarding housing costs and affordable housing needs. These factors were considered when evaluating the bank's performance in the AA.

During the 2017 through 2018 analysis period, the distribution is adequate. The proportion of loans to low-income borrowers was significantly below the proportion of low-income families but exceeded aggregate lending. The proportion of loans to moderate-income borrowers was well below the proportion of moderate-income families and was significantly below aggregate lending.

During the 2015 through 2016 analysis period, the distribution is good and had a positive impact. The proportion of loans to low-income borrowers was significantly below the proportion of low-income families and aggregate lending. The proportion of loans to moderate-income borrowers was somewhat near to the proportion of moderate-income families and approximated aggregate lending.

Small Loans to Businesses

The borrower distribution of the bank's originations and purchases of small loans is good. Refer to table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

In evaluating the distribution of small loans to businesses, we noted that credit card loans represent a significant volume of reportable small loans to businesses and revenue information was not collected for credit card loans until late 2017. The lack of revenue information inhibits the ability to analyze small loans to business by borrower characteristics. The bank completed a self-assessment, which includes loans under \$100 thousand as a proxy for small businesses.

During the 2017 through 2018 analysis period, the distribution of loans to businesses by revenue is good after considering performance context (see Other Factors Considered in Analysis under Each

Performance Test section). The proportion of loans was well below the proportion of small businesses but was near to aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

During the 2016 analysis period, the distribution of loans to businesses by revenue is adequate after considering performance context (see Other Factors Considered in Analysis under Each Performance Test section) and had a neutral impact. The proportion of loans was significantly below the proportion of small businesses and aggregate lending. We gave positive consideration to analysis indicating loans with unreported revenues would be consistent with loans made to small businesses.

The 2015 analysis period is consistent with the 2016 analysis period and is adequate. 2015 and 2016 analysis periods had a neutral impact on overall performance.

Community Development Lending

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

CD lending in the Dallas MSA is poor and had a neutral impact on the bank's overall lending performance in the AA. Lending opportunities within the AAs, state, and region and the bank's capacity to address these needs were considered. The bank originated one CD loan of \$1.5 million. The CD loan is for a children's day care facility that will create 22 permanent jobs for LMI individuals.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Performance under the Investment Test in Texas is rated "Outstanding". The conclusion is based on excellent performance in the full-scope review of the Dallas MSA.

Refer to table 14 in the state of Texas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Dallas MSA

Based on full-scope review, the bank has an excellent level of qualified investments. Current period investments and grants total \$6.4 million. During the evaluation, the bank made seven investments totaling \$6 million and two grants totaling \$35 thousand. Qualified investments total \$6.4 million representing 31.6 percent of allocated tier 1 capital. The bank's investments exhibit good responsiveness to identified community needs, although they were rarely innovative or complex. In terms of volume, 99.4 percent of the bank's investments are MBSs. A significant majority of MBSs were comprised of home loans to LMI borrowers originated during the evaluation period. The bank's investments supported affordable housing needs in the AA. The bank provided grants to fund CD organizations that support community service and economic development throughout the AA.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Substantial Noncompliance". Based on full-scope review, the bank's performance in the Dallas MSA is very poor.

Retail Banking Services

Refer to table 15 of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery systems and branch openings and closings.

Dallas MSA

Based on full-scope review, the bank's branch distribution and retail service performance in the AA is very poor.

The bank's delivery systems are unreasonably inaccessible to essentially all portions of the AA. The bank operates four branches and four deposit-taking ATMs in the Dallas AA. The bank's distribution of branches and deposit-taking ATMs in both LMI geographies is significantly below the percentage of the population living within those geographies. The bank has no branches or deposit-taking ATMs located in LMI geographies. During the evaluation period, the bank did not open or close any branches.

The bank makes adequate use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. The bank has four deposit-taking ATMs within the AA. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals. During the evaluation period, the bank did not open or close any branches.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly in LMI geographies or to LMI individuals. The bank maintains standard business hours and offers traditional banking products and services at all branch locations in the AA.

Community Development Services

The bank's performance in providing CD services in the AA is poor. Bank employees provided a low level of CD services that were responsive in helping the bank address community needs.

A bank employee provided technical assistance to one CD organization, totaling 110 hours in the AA during the evaluation period. The employee participated in three community service activities including serving on the board of an organization, which provides educational services to LMI individuals in the AA.

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 metropolitan and nonmetropolitan 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”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/15 to 12/31/18 Investment and Service Tests and CD Loans 01/01/16 to 12/31/18	
Financial Institution	Products Reviewed	
First National Bank of Omaha (FNBO)	Home Mortgage, Small Business Loans, Small Farm, and CD Loans Retail and CD Services Qualified Investments	
Affiliate(s)	Affiliate Relationship Products Reviewed	
FNN CDC	Operating Subsidiary Loans and Investments	
First Capital Partners	Operating Subsidiary Loans and Investments	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam Counties	
<u>MMSA</u> Omaha CSA	Full-scope	NE: Douglas, Sarpy, and Dodge Counties IA: Pottawattamie and Mills Counties
<u>Colorado</u> Denver CSA	Full-scope	Adams (partial county in 2015), Broomfield, Boulder, Jefferson (partial county in 2015), and Weld Counties
Fort Collins MSA	Full-scope	Larimer County
<u>Illinois</u> Chicago MSA	Full-scope	DeKalb, Kane, Kendall, and McHenry Counties
Rockford MSA	Full-scope	Boone County
<u>Kansas</u> Kansas City MSA	Full-scope	Johnson County
<u>Nebraska</u> NE Non-MSA	Full-scope	Antelope (added in 2016), Boone (added in 2016), Box Butte, Buffalo, Butler, Colfax, Custer (added in 2016), Dawes, Dawson, Hooker (removed in 2015), Kearney, Lincoln, Madison, McPherson (removed in 2015), Morrill, Pierce (added in 2016), Phelps, Platte, Polk, Scottsbluff, Sheridan, Sioux (removed in 2015), and Stanton (added in 2016) Counties
Grand Island MSA	Limited-scope	Hall, Howard (added in 2016), and Merrick (added in 2016) Counties
Lincoln CSA	Limited-scope	Gage and Lancaster Counties
<u>South Dakota</u> SD Non-MSA	Full-scope	Beadle, Bon Homme (removed in 2015), Clay (removed in 2015), Davison, Hutchinson (removed in 2015), Sanborn, and Yankton Counties
<u>Texas</u> Dallas MSA	Full-scope	Collin and Denton (partial county in 2015) Counties

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS: FNBO				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
FNBO	Outstanding	Outstanding	High Satisfactory	Outstanding
Multistate Metropolitan Area or State:				
Omaha CSA	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Colorado	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Illinois	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Kansas	Outstanding	Outstanding	Needs to Improve	Satisfactory
State of Nebraska	Outstanding	Outstanding	High Satisfactory	Outstanding
State of South Dakota	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Texas	High Satisfactory	Outstanding	Substantial Noncompliance	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

Omaha CSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Omaha CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	243	12.3	22.2	40.3	25.1	0.0
Population by Geography	851,647	9.3	21.4	41.0	28.3	0.0
Housing Units by Geography	352,152	9.6	22.0	42.9	25.5	0.0
Owner-Occupied Units by Geography	211,841	4.9	18.8	42.9	33.5	0.0
Occupied Rental Units by Geography	115,875	15.8	27.2	43.9	13.0	0.0
Vacant Units by Geography	24,436	20.9	25.9	38.0	15.2	0.0
Businesses by Geography	51,454	6.6	16.1	47.5	29.7	0.0
Farms by Geography	2,471	2.1	7.7	58.2	31.9	0.0
Family Distribution by Income Level	213,482	20.7	18.0	21.4	39.9	0.0
Household Distribution by Income Level	327,716	23.5	16.8	18.4	41.3	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA		\$73,632	Median Housing Value			\$150,024
Median Family Income Non-MSAs - NE		\$61,382	Median Gross Rent			\$823
			Families Below Poverty Level			8.8%
<p><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></p>						

2015-2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Omaha CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	243	11.9	21.4	40.3	25.9	0.4
Population by Geography	820,858	8.9	20.8	40.8	29.2	0.3
Housing Units by Geography	337,042	9.5	22.3	42.5	25.5	0.1
Owner-Occupied Units by Geography	209,111	5.5	17.5	44.3	32.7	0.0
Occupied Rental Units by Geography	102,711	15.1	30.1	40.8	13.8	0.1
Vacant Units by Geography	25,220	20.2	30.6	35.3	13.5	0.4
Businesses by Geography	49,660	6.9	17.6	44.6	30.6	0.4
Farms by Geography	2,481	1.7	10.6	61.8	25.8	0.0
Family Distribution by Income Level	204,581	20.9	17.4	22.4	39.3	0.0
Household Distribution by Income Level	311,822	23.4	17.0	18.3	41.3	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA		\$69,538	Median Housing Value			\$145,581
Median Family Income Non-MSAs - NE		\$54,221	Median Gross Rent			\$730
			Families Below Poverty Level			8.2%
<i>Source: 2010 U.S. Census and 2016 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>						

The bank defined Omaha CSA includes Dodge, Douglas, and Sarpy Counties in Nebraska and Mills and Pottawattamie Counties in Iowa.

The bank operates a total of 30 branches and 42 deposit-taking ATMs in the Omaha AA. The bank has 10 branches and 10 deposit-taking ATMs located in low- or moderate-income geographies.

The 2018 FFIEC Updated MFI was \$81,300. While strong competition to provide financial services exists within the bank's AA, the June 30, 2018, FDIC Deposit Market Share Report shows the bank ranked first of 44 depository financial institutions, with a 30.45 percent market share. Competitors include several branches of national, regional, and local community banks operating in the AA. The bank's top five competitors, in order of market share rank, are Mutual of Omaha, Wells Fargo, U.S. Bank, American National, and Great Western Banks. These competitors control 45.76 percent of the deposit market share in the AA. The bank's deposits in the AA as of June 30, 2018, totaled \$9.4 billion.

Employment

The employment condition of the AA has improved over the evaluation period. According to the U.S. Bureau of Labor Statistics, unemployment rates for the Omaha MMSA improved from 3.2 percent as of December 2015 compared to 2.9 percent as of December 2018. For the Fremont Micropolitan Area, the unemployment rate as of December 2018 was 2.5 percent compared to 3.3 percent as of December 2015. As of December 2018, the Nebraska, Iowa, and nationwide unemployment rates were 2.8 percent, 2.4 percent, and 3.9 percent, respectively.

Economic Factors

According to November 2018 Moody's Analytics, increases in employment in the AA are most concentrated in factories and builders with private services having mixed success. Professional and business services are a weak spot along with retail. Major employers include Nebraska Medical Center, Offutt Air Force Base, University of Nebraska Medical Center, CHI Health, The Methodist Health System, Hy-Vee Inc., Wal-Mart Stores Inc., and Union Pacific among others. The AA exhibits market strengths including low costs, a skilled workforce and strong population growth that is attractive to businesses, high housing affordability, and above average labor force participation. According to the 2015 U.S. Census Bureau's 2015 American Community Survey (ACS), the percentage of families living below the poverty level in the AA was 8.8 percent.

Housing Characteristics

Housing data for the Omaha CSA was reviewed on the MSA and Non-MSA level due to the AMFI data being available on this level. The Omaha MSA and Fremont Micropolitan Area combine to form the Omaha CSA.

Omaha MSA

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$40,650 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income) in the Omaha MSA could afford a \$189,309 mortgage with a payment of \$1,016 per month. A moderate-income borrower making \$65,040 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income) in the Omaha MSA could afford a \$302,894 mortgage with a payment of \$1,626 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the Omaha MSA with an estimated payment of \$1,498. The median housing value in the Omaha MSA is \$156,175 and \$279,050 in 2015 and 2018, reflecting a 78.7 percent change from 2015 to 2018 according to Realtor.com data.

Fremont Micropolitan Area

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,000 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Fremont Micropolitan Area could afford a \$158,339 mortgage with a payment of \$850 per month. A moderate-income borrower making \$54,400 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Fremont Micropolitan Area could afford a \$253,343 mortgage with a payment of \$1,360 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the Fremont Micropolitan Area with an estimated payment of \$1,168. The median housing value in the Fremont Micropolitan Area is \$201,975 and \$217,550 in 2015 and 2018 reflecting a 78.7 percent change from 2015 to 2018 according to Realtor.com data.

Community Contact

Three community contacts conducted in the AA were reviewed as part of this performance evaluation. One contact was an economic development organization and cited a need for financial education, business planning assistance, and access to affordable capital for small business owners and entrepreneurs. The other contact stated that retail growth was slow with loss of a grocery store in a more rural area of the AA. The third contact was an affordable housing organization. They cited a need

for more affordable housing units for LMI families. The contact stated that many low-income borrowers have non-traditional or irregular income, which make it difficult for them to qualify for loans offered by banks.

STATE OF COLORADO

Denver CSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	398	6.5	24.6	37.4	29.6	1.8
Population by Geography	1,665,229	6.8	26.1	38.9	28.0	0.2
Housing Units by Geography	651,198	6.6	25.8	40.0	27.7	0.0
Owner-Occupied Units by Geography	414,441	3.1	20.8	41.2	35.0	0.0
Occupied Rental Units by Geography	205,420	13.3	35.8	37.5	13.4	0.0
Vacant Units by Geography	31,337	9.6	26.0	40.1	24.3	0.0
Businesses by Geography	172,460	5.4	23.7	37.1	33.8	0.1
Farms by Geography	4,944	3.8	19.3	44.2	32.7	0.0
Family Distribution by Income Level	412,209	21.0	18.5	21.6	38.9	0.0
Household Distribution by Income Level	619,861	23.0	16.9	18.6	41.5	0.0
Median Family Income MSA - 14500 Boulder, CO MSA	\$96,926	Median Housing Value				\$273,307
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA	\$80,820	Median Gross Rent				\$1,088
Median Family Income MSA - 24540 Greeley, CO MSA	\$70,457	Families Below Poverty Level				7.5%
<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>						

2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	398	7.3	21.4	39.7	29.9	1.8
Population by Geography	1,579,427	6.6	23.4	41.4	28.4	0.2
Housing Units by Geography	632,307	6.2	24.9	41.7	27.2	0.0
Owner-Occupied Units by Geography	409,594	3.3	18.9	43.0	34.7	0.0
Occupied Rental Units by Geography	179,896	11.8	37.5	38.7	12.0	0.0
Vacant Units by Geography	42,817	10.0	28.7	41.7	19.6	0.0
Businesses by Geography	154,830	4.8	22.1	38.5	34.5	0.1
Farms by Geography	4,389	3.2	17.1	47.4	32.3	0.0
Family Distribution by Income Level	393,121	21.0	17.8	21.4	39.7	0.0
Household Distribution by Income Level	589,490	22.7	16.4	18.9	42.0	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$87,860	Median Housing Value			\$262,988
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$75,101	Median Gross Rent			\$924
Median Family Income MSA - 24540 Greeley, CO MSA		\$64,996	Families Below Poverty Level			7.9%
<i>Source: 2010 U.S. Census and 2016 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>						

2015						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Denver CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	275	6.2	17.5	44.0	30.9	1.5
Population by Geography	1,090,021	5.5	19.6	45.3	29.4	0.2
Housing Units by Geography	432,089	5.1	21.7	45.3	28.0	0.0
Owner-Occupied Units by Geography	281,337	2.7	15.8	46.3	35.2	0.0
Occupied Rental Units by Geography	120,981	10.0	34.5	42.4	13.1	0.0
Vacant Units by Geography	29,771	7.4	25.0	47.2	20.4	0.0
Businesses by Geography	115,278	3.4	19.2	42.2	35.2	0.0
Farms by Geography	3,561	2.2	14.9	50.7	32.2	0.0
Family Distribution by Income Level	267,692	19.5	17.0	21.9	41.7	0.0
Household Distribution by Income Level	402,318	22.0	15.7	18.3	43.9	0.0
Median Family Income MSA - 14500 Boulder, CO MSA		\$87,860	Median Housing Value			\$276,226
Median Family Income MSA - 19740 Denver-Aurora-Lakewood, CO MSA		\$75,101	Median Gross Rent			\$945
Median Family Income MSA - 24540 Greeley, CO MSA		\$64,996	Families Below Poverty Level			7.0%
<i>Source: 2010 U.S. Census and 2015 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>						

The bank defined Denver CSA consists of Adams, Broomfield, Boulder, Jefferson, and Weld Counties from 2016 and onward. The bank delineated portions of Adams, Broomfield, Boulder, portions of Jefferson, and Weld Counties in 2015. The bank operates a total of 16 branches and 10 deposit-taking ATMs in the AA. Four branches and four deposit-taking ATMs are located in low- or moderate-income geographies.

Employment Factors

Employment data for the Denver CSA was reviewed on the MSA level due to the data being available on this level. The Denver, Boulder, and Greeley MSA's combine to form the Denver CSA.

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Denver MSA was 3.7 percent, which is higher than 3.3 percent as of December 2015. The Boulder MSA unemployment rate was 3.3 percent as of December 2018, which is higher than 2.9 percent as of December 2015. The Greeley MSA unemployment rate was 3.5 percent as of December 2018 compared to 3.6 percent as of December 2015. The national unemployment rate for December 2018 was 3.9 percent, and 3.6 percent for the state of Colorado. According to the 2015 U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was 7.5 percent.

Housing Characteristics

Housing data for the Denver CSA was reviewed on the MSA level due to the AMFI data being available on this level. The Denver, Boulder, and Greeley MSA's combine to form the Denver CSA.

Boulder MSA

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$54,300 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Boulder MSA could afford a \$252,877 mortgage with a payment of \$1,358 per month. A moderate-income borrower making \$86,880 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Boulder MSA could afford a \$404,604 mortgage with a payment of \$2,172 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the Boulder MSA with an estimated payment of \$3,210. The median housing value in the Boulder MSA is \$472,050 and \$598,050 in 2015 and 2018 reflecting a 26.7 percent change from 2015 to 2018 according to Realtor.com data.

Denver MSA

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$44,950 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Denver MSA could afford a \$209,334 mortgage with a payment of \$1,124 per month. A moderate-income borrower making \$71,920 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Denver MSA could afford a \$334,934 mortgage with a payment of \$1,798 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the Denver MSA with an estimated payment of \$2,416. The median housing value in the Denver MSA is \$469,107 and \$450,000 in 2015 and 2018 reflecting a 4.1 percent change from 2015 to 2018 according to Realtor.com data.

Greeley MSA

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower

making \$41,200 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Greeley MSA could afford a \$191,870 mortgage with a payment of \$1,030 per month. A moderate-income borrower making \$65,920 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Greeley MSA could afford a \$306,992 mortgage with a payment of \$1,648 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the Greeley MSA with an estimated payment of \$2,094. The median housing value in the Greeley MSA is \$304,925 and \$390,050 in 2015 and 2018, reflecting a 27.92 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

Economic data for the CSA was reviewed on MSA level. The Denver, Boulder, and Greeley MSA's combine to form the Denver CSA.

Denver MSA

November 2018 Moody's Analytics state key economic drivers in the Denver MSA are an expanding tech sector, booming housing market, and rapidly rising incomes. Single-family home prices have surged more than 80 percent over the past six years as housing demand has outstripped supply. Homeownership is out of reach for an increasing share of the population and an increasing share of the population and households have been moved into the rental market. The major employers in the area are HealthONE, University of Colorado Hospital, and Lockheed Martin Corporation. The expanding labor force will allow employers to keep hiring even as the labor market tightens.

Boulder MSA

According to November 2018 Moody's Analytics, key economic drivers in the Boulder MSA are a highly skilled workforce which is a major draw for tech firms, and nearly two-thirds of the area adults over the age of 25 have at least a bachelor's degree which is the highest share nationally. The major employers in the area are The University of Colorado, Global Foundries, and Level 3 Communications LLC.

Greeley MSA

November 2018 Moody's Analytics state key economic drivers in the Greeley MSA are a strong factory base with exposure to noncyclical food manufacturing with construction and mining leading the way to boost the labor market. The major employers in the area are JBS, Banner Health System, and Vestas. Longer term, the metro area's proximity to and lower cost than Denver and Boulder will attract commuters.

Community Contacts

Discussions occurred with three community contacts located in the AA in 2017 and 2018. One contact represents a housing authority that primarily serves low-income individuals. The contact stated the main need in the AA is affordable housing. Low-income individuals have a difficult time locating affordable housing. There is a need to expand affordable multifamily housing in the Denver, Boulder, and Greeley markets. One contact represented a realtor association. The contact noted there is a need for affordable housing in the market area, but high housing cost is translating to high rental cost as well. It is extremely difficult for LMI individuals to afford a house without considerable down payment and additional assistance. The third community contact represented an economic development council focused on developing business in the market area. The contact noted there is an opportunity for financing early-stage companies and other companies that are looking to expand. There is a lack of affordable housing and transportation.

Fort Collins MSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Fort Collins MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	4.1	27.4	49.3	17.8	1.4
Population by Geography	318,227	3.5	25.8	48.8	21.9	0.0
Housing Units by Geography	136,851	1.9	29.9	48.9	19.2	0.1
Owner-Occupied Units by Geography	80,264	1.5	20.5	52.7	25.2	0.0
Occupied Rental Units by Geography	44,874	2.8	42.7	43.0	11.4	0.1
Vacant Units by Geography	11,713	1.2	44.9	45.4	7.4	1.2
Businesses by Geography	35,320	3.1	28.5	42.9	25.5	0.0
Farms by Geography	1,323	4.1	19.3	46.6	29.9	0.1
Family Distribution by Income Level	78,216	20.5	17.2	22.6	39.6	0.0
Household Distribution by Income Level	125,138	24.6	16.2	17.7	41.5	0.0
Median Family Income MSA - 22660 Fort Collins, CO MSA		\$76,886	Median Housing Value			\$270,378
			Median Gross Rent			\$1,048
			Families Below Poverty Level			6.4%
<p><i>Source: 2015 ACS Census and 2018 D&B Data</i></p> <p><i>Due to rounding, totals may not equal 100.0</i></p> <p><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

2015-2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Fort Collins MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	2.7	24.7	49.3	21.9	1.4
Population by Geography	299,630	2.6	22.4	48.3	26.7	0.0
Housing Units by Geography	130,619	2.6	23.6	50.2	23.6	0.1
Owner-Occupied Units by Geography	79,218	1.0	18.2	50.0	30.8	0.0
Occupied Rental Units by Geography	38,197	6.3	32.3	49.3	12.0	0.0
Vacant Units by Geography	13,204	1.5	30.6	53.3	13.7	0.9
Businesses by Geography	31,274	1.1	20.9	49.1	28.9	0.0
Farms by Geography	1,203	1.1	16.3	49.5	32.9	0.2
Family Distribution by Income Level	74,324	20.2	17.6	22.3	39.9	0.0
Household Distribution by Income Level	117,415	24.4	16.9	16.9	41.7	0.0
Median Family Income MSA - 22660 Fort Collins, CO MSA		\$73,771	Median Housing Value			\$257,750
			Median Gross Rent			\$862
			Families Below Poverty Level			6.9%
<i>Source: 2010 U.S. Census and 2016 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>						

The bank defined Fort Collins MSA consists of Larimer County.

The bank operates nine branches and 15 deposit-taking ATMs in the Fort Collins AA. Four branches and eight deposit-taking ATMs are located in low- or moderate-income geographies.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Fort Collins MSA was 3.3 percent, up from three percent in December 2015. The national unemployment rate for December 2018 was 3.9 percent, and 3.6 percent for the state of Colorado. According to the U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was 6.4 percent.

Housing Characteristics

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$42,550 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Fort Collins MSA could afford a \$198,157 mortgage with a payment of \$1,064 per month. A moderate-income borrower making \$68,080 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Fort Collins MSA could afford a \$317,051 mortgage with a payment of \$1,702 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the Fort Collins MSA with an estimated payment of \$2,282. The median housing value in the Fort Collins MSA is \$337,826 and \$425,050 in 2015 and 2018 reflecting a 25.8 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

According to November 2018 Moody's Analytics, major employers in the area are Colorado State University, University of Colorado Health, and Broadcom Ltd.

Community Contacts

Discussions occurred with one community contact located in the AA in 2019. The contact represented a nonprofit that provides funding for LMI youth education, homelessness, and financial literacy. The contact noted there is a need for affordable housing, childcare, and increased wages for LMI workers. The contact stated that even though the economy overall is doing very well they have seen an increase in people that are not self-sufficient since the recession because of housing inflation with little to no wage growth.

STATE OF ILLINOIS

Chicago-Naperville-Elgin, IL MSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	165	3.6	21.8	42.4	31.5	0.6
Population by Geography	1,056,624	2.5	19.6	39.2	38.2	0.5
Housing Units by Geography	382,095	2.7	18.2	41.5	37.4	0.1
Owner-Occupied Units by Geography	268,740	0.9	13.5	41.9	43.7	0.0
Occupied Rental Units by Geography	89,015	7.4	30.4	41.0	20.9	0.3
Vacant Units by Geography	24,340	5.7	25.7	39.7	28.6	0.2
Businesses by Geography	52,447	1.7	13.1	40.5	44.4	0.2
Farms by Geography	2,187	0.7	9.1	60.6	29.5	0.0
Family Distribution by Income Level	264,314	18.4	16.4	20.8	44.5	0.0
Household Distribution by Income Level	357,755	20.1	14.7	18.4	46.8	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$75,350	Median Housing Value			\$206,866
Median Family Income MSA - 20994 Elgin, IL MD		\$79,687	Median Gross Rent			\$1,048
			Families Below Poverty Level			7.2%
<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>						

2015-2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Chicago MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	165	3.0	21.8	44.2	30.9	0.0
Population by Geography	1,043,925	2.3	19.9	40.1	37.7	0.0
Housing Units by Geography	371,561	2.1	18.7	43.7	35.5	0.0
Owner-Occupied Units by Geography	276,456	0.3	15.0	43.9	40.8	0.0
Occupied Rental Units by Geography	74,142	8.1	31.0	43.1	17.8	0.0
Vacant Units by Geography	20,963	4.5	23.4	43.3	28.8	0.0
Businesses by Geography	49,784	1.5	12.6	44.5	41.3	0.0
Farms by Geography	2,081	0.3	7.5	61.5	30.7	0.0
Family Distribution by Income Level	260,989	16.7	16.7	22.0	44.6	0.0
Household Distribution by Income Level	350,598	18.7	15.5	18.9	46.8	0.0
Median Family Income MSA - 16974 Chicago-Naperville-Arlington Heights, IL MD		\$72,196	Median Housing Value			\$248,978
Median Family Income MSA - 20994 Elgin, IL MD		\$76,576	Median Gross Rent			\$958
			Families Below Poverty Level			6.0%
<i>Source: 2010 U.S. Census and 2016 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>						

The bank defined Chicago MSA consists of DeKalb, Kane, Kendall, and McHenry Counties.

The bank operates a total of 13 branches and no deposit-taking ATMs in the AA. The two branches are located in LMI geographies.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Chicago MSA was 4.2 percent, down from six percent in December 2015. The national unemployment rate for December 2018 was 3.9 percent, and 4.3 percent for the state of Illinois. According to the U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was 7.2 percent.

Housing Characteristics

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,200 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Chicago MSA could afford a \$191,870 mortgage with a payment of \$1,030 per month. A moderate-income borrower making \$65,920 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Chicago MSA could afford a \$306,992 mortgage with a payment of \$1,648 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the Chicago MSA with an estimated payment of \$1,498. The median housing value in the Chicago MSA is \$218,463 and \$279,050 in 2015 and 2018 reflecting a 27.7 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

The Chicago MSA is a major center for business, distribution, transportation, and finance according to November 2018 Moody's Analytics. Factory output is climbing, accompanied by a meaningful rise in manufacturing employment, particularly in food processing. The major employers in the area are Advocate Health Care Systems, Northwestern Memorial Healthcare, and University of Chicago.

Community Contacts

Discussions occurred with two community contacts located in the AA in 2017. One contact represented a nonprofit that conducts research and works to create an economic security and community prosperity for LMI individuals. The contact noted there is a need for bank branches in LMI communities, funding for small businesses, mortgage lending in LMI neighborhoods, and flexible home loans. The second community contact represented an economic development organization in the Elgin community. The contact noted there are opportunities for workforce and transportation development in the market area.

Rockford, IL MSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Rockford MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	57.1	28.6	0.0
Population by Geography	53,851	0.0	15.4	53.2	31.4	0.0
Housing Units by Geography	19,968	0.0	17.1	51.1	31.8	0.0
Owner-Occupied Units by Geography	14,711	0.0	11.7	52.3	36.0	0.0
Occupied Rental Units by Geography	3,418	0.0	36.2	50.9	12.8	0.0
Vacant Units by Geography	1,839	0.0	24.0	42.6	33.4	0.0
Businesses by Geography	2,021	0.0	16.8	44.7	38.5	0.0
Farms by Geography	182	0.0	5.5	54.4	40.1	0.0
Family Distribution by Income Level	13,783	15.7	17.1	22.3	45.0	0.0
Household Distribution by Income Level	18,129	17.3	12.9	20.7	49.1	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$60,048	Median Housing Value			\$147,215
			Median Gross Rent			\$679
			Families Below Poverty Level			9.0%
<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>						

2015-2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Rockford MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	14.3	57.1	28.6	0.0
Population by Geography	54,165	0.0	12.2	46.8	40.9	0.0
Housing Units by Geography	19,581	0.0	12.7	48.0	39.2	0.0
Owner-Occupied Units by Geography	14,784	0.0	12.4	42.9	44.7	0.0
Occupied Rental Units by Geography	3,124	0.0	13.6	72.6	13.8	0.0
Vacant Units by Geography	1,673	0.0	14.2	47.2	38.7	0.0
Businesses by Geography	2,024	0.0	7.3	59.6	33.1	0.0
Farms by Geography	185	0.0	2.2	69.7	28.1	0.0
Family Distribution by Income Level	13,810	16.6	14.4	23.3	45.6	0.0
Household Distribution by Income Level	17,908	16.6	14.1	17.6	51.8	0.0
Median Family Income MSA - 40420 Rockford, IL MSA		\$61,291	Median Housing Value			\$183,991
			Median Gross Rent			\$713
			Families Below Poverty Level			7.9%
<i>Source: 2010 U.S. Census and 2016 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>						

The bank defined Rockford MSA consists of Boone County.

The bank operates one branch and no deposit-taking ATMs in the Rockford AA. None of the branches are located in low- or moderate-income geographies.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Rockford MSA was 6.9 percent, down slightly from seven percent in December 2015. The national unemployment rate for December 2018 was 3.9 percent, and 4.3 percent for the state of Illinois. According to the U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was nine percent.

Housing Characteristics

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,100 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Rockford MSA could afford a \$154,148 mortgage with a payment of \$828 per month. A moderate-income borrower making \$52,960 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Rockford MSA could afford a \$246,637 mortgage with a payment of \$1,324 per month. This illustrates that LMI borrowers would not be challenged to qualify for a mortgage loan in the Rockford MSA with an estimated payment of \$698. The median housing value in the Rockford MSA is \$99,850 and \$129,950 in 2015 and 2018 reflecting a 30.2 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

According to November 2018 Moody's Analytics, key economic drivers in the Rockford MSA are logistics, retail, and critical manufacturing. Rockford's economy is making slow but steady progress after losing jobs in previous years. The major employers in the area are Fiat Chrysler Automobiles, Mercy Health, and Swedish American Health Systems.

Community Contacts

Discussions occurred with a community contact located in the AA in 2019. The contact represented a faith based social services organization that provides counseling, emergency assistance, and a host of other social services for LMI individuals. The contact stated a need for micro lending for entrepreneurs along with small dollar lending for consumers.

STATE OF KANSAS

Kansas City, MO-KS MSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	1.5	9.2	32.3	54.6	2.3
Population by Geography	566,814	0.9	7.7	32.8	58.5	0.0
Housing Units by Geography	231,029	1.2	8.3	35.4	55.2	0.0
Owner-Occupied Units by Geography	152,762	0.3	4.5	31.3	63.9	0.0
Occupied Rental Units by Geography	66,973	3.2	16.0	43.4	37.5	0.0
Vacant Units by Geography	11,294	2.0	14.6	42.1	41.2	0.0
Businesses by Geography	47,398	1.2	7.0	27.3	61.3	3.3
Farms by Geography	1,078	1.0	5.8	31.9	60.8	0.6
Family Distribution by Income Level	149,562	12.0	13.6	19.0	55.3	0.0
Household Distribution by Income Level	219,735	14.7	13.5	16.7	55.0	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$72,623	Median Housing Value			\$229,855
			Median Gross Rent			\$975
			Families Below Poverty Level			4.0%
<p><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></p>						

2015-2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	130	0.8	11.5	29.2	56.2	2.3
Population by Geography	544,179	0.7	10.1	28.4	60.8	0.0
Housing Units by Geography	222,167	0.8	11.4	30.9	57.0	0.0
Owner-Occupied Units by Geography	151,234	0.3	7.5	27.9	64.3	0.0
Occupied Rental Units by Geography	59,044	1.7	20.6	37.8	40.0	0.0
Vacant Units by Geography	11,889	2.0	15.6	34.6	47.7	0.0
Businesses by Geography	43,426	0.6	9.0	23.2	63.9	3.3
Farms by Geography	1,015	0.2	7.8	29.6	62.0	0.5
Family Distribution by Income Level	143,509	10.7	13.0	20.1	56.1	0.0
Household Distribution by Income Level	210,278	13.9	13.6	17.2	55.3	0.0
Median Family Income MSA - 28140 Kansas City, MO-KS MSA		\$68,846	Median Housing Value			\$224,105
			Median Gross Rent			\$880
			Families Below Poverty Level			3.6%
<i>Source: 2010 U.S. Census and 2016 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>						

The bank defined Kansas City MSA consists of Johnson County in Kansas.

The bank operates a total of seven branches and seven deposit-taking ATMs in the AA. None of the branches or deposit-taking ATMs are located in low- or moderate-income geographies.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Kansas City MSA was 3.3 percent down from the 4.2 percent from December 2015. The national unemployment rate in December 2018 was 3.9 percent and 3.3 percent for the state of Kansas. According to the U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was four percent.

Housing Characteristics

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,950 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Kansas City MSA could afford a \$186,049 mortgage with a payment of \$999 per month. A moderate-income borrower making \$63,920 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Kansas City MSA could afford a \$297,678 mortgage with a payment of \$1,598 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the Kansas City MSA with an estimated payment of \$1,498. The median housing value in the Kansas City MSA is \$167,900 and \$279,050 in 2015 and 2018 reflecting a 66.2 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

According to November 2018 Moody's Analytics, key economic drivers in the Kansas City MSA are logistics, financial centers, and construction boosting the labor market. The MSA has transformed into one of the Midwest's finance hubs with a high concentration of financial services jobs. The major employers in the area are Cerner Corporation, HCA Midwest Health System, The University of Kansas Hospital, and Saint Luke's Health System. The Federal Government is the largest employer in the market with Leavenworth Military base, Internal Revenue Service, Veterans Affairs, and Social Security Administration offices.

Community Contacts

Discussions occurred with a community contact located in the AA in 2018. The contact represented an economic development organization that focuses on business development. The contact noted that they have heard from businesses that capital is not difficult to acquire from more than one banks but there is a need for more banks involvement in funding start-ups. Flexible financing was identified as a need for start-ups because entrepreneurs may not have the collateral or credit history needed to obtain traditional small business loans.

STATE OF NEBRASKA

NE Non-MSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: NE - Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	1.1	11.5	74.7	12.6	0.0
Population by Geography	318,714	1.3	11.9	71.7	15.1	0.0
Housing Units by Geography	141,581	1.3	11.3	72.9	14.5	0.0
Owner-Occupied Units by Geography	87,792	0.9	8.8	74.2	16.1	0.0
Occupied Rental Units by Geography	39,391	2.0	16.9	67.4	13.7	0.0
Vacant Units by Geography	14,398	1.7	11.3	79.7	7.3	0.0
Businesses by Geography	22,092	1.1	12.1	71.3	15.4	0.0
Farms by Geography	4,238	0.1	2.7	83.9	13.3	0.0
Family Distribution by Income Level	84,037	18.4	18.2	23.4	40.0	0.0
Household Distribution by Income Level	127,183	22.5	16.2	19.1	42.2	0.0
Median Family Income Non-MSAs - NE		\$61,382	Median Housing Value			\$112,524
			Median Gross Rent			\$644
			Families Below Poverty Level			8.6%
<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>						

2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: NE Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	0.0	6.9	79.3	13.8	0.0
Population by Geography	318,317	0.0	6.8	77.7	15.4	0.0
Housing Units by Geography	140,681	0.0	6.9	78.5	14.6	0.0
Owner-Occupied Units by Geography	88,620	0.0	4.8	79.5	15.7	0.0
Occupied Rental Units by Geography	37,438	0.0	11.1	75.2	13.7	0.0
Vacant Units by Geography	14,623	0.0	8.9	81.0	10.1	0.0
Businesses by Geography	22,298	0.0	6.2	77.8	16.0	0.0
Farms by Geography	4,926	0.0	4.3	84.9	10.8	0.0
Family Distribution by Income Level	83,605	17.4	18.1	23.6	40.9	0.0
Household Distribution by Income Level	126,058	22.0	16.7	18.7	42.6	0.0
Median Family Income Non-MSAs - NE		\$54,221	Median Housing Value			\$99,244
			Median Gross Rent			\$557
			Families Below Poverty Level			8.4%
<i>Source: 2010 U.S. Census and 2016 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>						
2015						
Table A – Demographic Information of the Assessment Area						
Assessment Area: NE Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	77	0.0	7.8	76.6	15.6	0.0
Population by Geography	284,379	0.0	7.6	75.1	17.3	0.0
Housing Units by Geography	124,774	0.0	7.8	75.8	16.4	0.0
Owner-Occupied Units by Geography	77,823	0.0	5.5	76.7	17.9	0.0
Occupied Rental Units by Geography	34,262	0.0	12.2	72.9	15.0	0.0
Vacant Units by Geography	12,689	0.0	10.3	78.1	11.6	0.0
Businesses by Geography	21,534	0.0	6.7	75.0	18.3	0.0
Farms by Geography	4,806	0.0	4.8	81.5	13.8	0.0
Family Distribution by Income Level	73,636	17.3	17.7	23.5	41.4	0.0
Household Distribution by Income Level	112,085	22.0	16.7	18.4	42.9	0.0
Median Family Income Non-MSAs - NE		\$54,221	Median Housing Value			\$102,271
			Median Gross Rent			\$565
			Families Below Poverty Level			8.6%
<i>Source: 2010 U.S. Census and 2015 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>						

The bank defined NE Non-MSA consists of Antelope, Boone, Box Butte, Buffalo, Butler, Colfax, Custer, Dawes, Dawson, Kearney, Lincoln, Madison, Morrill, Pierce, Phelps, Platte, Polk, Scottsbluff, Sheridan, and Stanton Counties from 2016 and onward. The bank defined NE Non-MSA consists of Box Butte, Buffalo, Butler, Colfax, Dawes, Dawson, Hooker, Kearney, Lincoln, Madison, McPherson, Morrill, Phelps, Platte, Polk, Scottsbluff, Sheridan, and Sioux Counties in 2015.

The bank operates a total of 13 branches and 20 deposit-taking ATMs in the NE Non-MSA AA. Three of the branches and four of the deposit-taking ATMs are located in low- or moderate-income geographies.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the state of Nebraska was 2.8 percent, down from three percent in December 2015. The national unemployment rate for December 2018 was 3.9 percent. According to the U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was 8.6 percent.

Housing Characteristics

Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,000 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the NE Non-MSA could afford a \$158,339 mortgage with a payment of \$850 per month. A moderate-income borrower making \$54,400 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the NE Non-MSA could afford a \$253,343 mortgage with a payment of \$1,360 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the NE Non-MSA with an estimated payment of \$1,168. The median housing value in the NE Non-MSA is \$201,975 and \$217,550 in 2015 and 2018 reflecting a 7.7 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

According to November 2018 Moody's Analytics, key economic drivers in the state of Nebraska are low living and business costs, and a strong housing market. Manufacturing accounts for a 30 percent rise in payrolls. The farm economy is in a precarious position. Nebraska is one of the most agriculture-centric states, and accounts for about one-quarter of the state's total employment. Trade uncertainty and weaker foreign demand are immediate threats given that Nebraska's rural areas are some of the most affected by retaliatory tariffs that could further exacerbate commodity price drops. The major employers in the area are Nebraska Medical Center and Offutt Air Force Base.

Community Contacts

Discussions occurred with two community contacts located in the AA in 2018. One contact represented a University office that provides training in agriculture related areas and food business. The contact noted there is a need for affordable housing and that housing is limited. The second community contact represented an economic development corporation focused on business and community resources. The contact noted there is a need for higher skilled labors and for workforce housing.

STATE OF SOUTH DAKOTA

SD Non-MSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: SD Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	6.3	87.5	6.3	0.0
Population by Geography	62,930	0.0	5.5	91.6	2.9	0.0
Housing Units by Geography	28,392	0.0	5.4	91.7	2.9	0.0
Owner-Occupied Units by Geography	17,129	0.0	3.8	92.8	3.3	0.0
Occupied Rental Units by Geography	8,987	0.0	7.5	91.4	1.1	0.0
Vacant Units by Geography	2,276	0.0	8.7	84.4	6.9	0.0
Businesses by Geography	4,353	0.0	7.1	90.4	2.5	0.0
Farms by Geography	623	0.0	1.1	86.7	12.2	0.0
Family Distribution by Income Level	16,418	21.3	15.9	23.2	39.6	0.0
Household Distribution by Income Level	26,116	23.9	16.3	17.5	42.4	0.0
Median Family Income Non-MSAs - SD		\$60,961	Median Housing Value			\$118,589
			Median Gross Rent			\$600
			Families Below Poverty Level			11.2%
<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>						

2016
Table A – Demographic Information of the Assessment Area
Assessment Area: SD Non-MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	0.0	87.5	12.5	0.0
Population by Geography	61,695	0.0	0.0	85.5	14.5	0.0
Housing Units by Geography	27,748	0.0	0.0	85.5	14.5	0.0
Owner-Occupied Units by Geography	16,628	0.0	0.0	86.1	13.9	0.0
Occupied Rental Units by Geography	8,317	0.0	0.0	84.5	15.5	0.0
Vacant Units by Geography	2,803	0.0	0.0	84.4	15.6	0.0
Businesses by Geography	4,418	0.0	0.0	86.7	13.3	0.0
Farms by Geography	706	0.0	0.0	93.6	6.4	0.0
Family Distribution by Income Level	15,483	16.3	17.9	22.7	43.1	0.0
Household Distribution by Income Level	24,945	21.8	16.9	17.6	43.7	0.0
Median Family Income Non-MSAs - SD		\$54,734	Median Housing Value			\$101,631
			Median Gross Rent			\$503
			Families Below Poverty Level			6.1%

Source: 2010 U.S. Census and 2016 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.*

2015
Table A – Demographic Information of the Assessment Area
Assessment Area: SD Non-MSA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	0.0	87.5	12.5	0.0
Population by Geography	89,972	0.0	0.0	86.9	13.1	0.0
Housing Units by Geography	39,706	0.0	0.0	86.5	13.5	0.0
Owner-Occupied Units by Geography	24,002	0.0	0.0	86.4	13.6	0.0
Occupied Rental Units by Geography	11,422	0.0	0.0	87.8	12.2	0.0
Vacant Units by Geography	4,282	0.0	0.0	83.4	16.6	0.0
Businesses by Geography	6,680	0.0	0.0	86.7	13.3	0.0
Farms by Geography	1,786	0.0	0.0	88.7	11.3	0.0
Family Distribution by Income Level	21,774	17.1	17.7	22.7	42.4	0.0
Household Distribution by Income Level	35,424	23.8	16.3	17.5	42.4	0.0
Median Family Income Non-MSAs - SD		\$54,734	Median Housing Value			\$98,374
			Median Gross Rent			\$506
			Families Below Poverty Level			6.7%

Source: 2010 U.S. Census and 2015 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.*

The bank defined SD Non-MSA consists of Beadle, Davison, Sanborn, and Yankton Counties in 2016 and onward. The bank defined the SD Non-MSA to consist of Beadle, Bon Homme, Clay, Davison, Hutchinson, Sanborn, and Yankton Counties in 2015.

The bank operates a total of four branches and four deposit-taking ATMs in the SD Non-MSA. One branch and no deposit-taking ATMs are located in low- or moderate-income geographies.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the state of South Dakota was 2.9 percent, with no change as of December 2015. The national unemployment rate for December 2018 was 3.9 percent. According to the U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was 11.2 percent.

Housing Characteristics

Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$33,300 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the SD Non-MSA could afford a \$155,079 mortgage with a payment of \$833 per month. A moderate-income borrower making \$53,280 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the SD Non-MSA could afford a \$248,127 mortgage with a payment of \$1,332 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the SD Non-MSA with an estimated payment of \$1,235. The median housing value in the SD Non-MSA is \$188,500 and \$230,000 in 2015 and 2018 reflecting a 22 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

According to November 2018 Moody's Analytics, key economic drivers in the state of South Dakota consumer industries are primarily leisure, hospitality, and construction. The overall economy is described as lukewarm. A 25 percent tariff on crops is exacerbating agriculture's weak position. The major employers in the area are Sanford Health and Avera health.

Community Contacts

Discussions occurred with two community contacts located in the AA in 2017 and 2018. Both contacts represented nonprofits focused on economic development that provide assistance to businesses locating or expanding in the market area. The contact stated there has been more than a 40 percent drop in farm income in the last three years. Both contacts noted there is a need for affordable and workforce housing in rural markets. There are opportunities for banks to participate in consortium financing that can help support statewide CDFIs.

STATE OF TEXAS

Dallas MSA

2017-2018						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Dallas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	289	2.8	10.7	27.3	58.8	0.3
Population by Geography	1,594,066	2.3	9.5	28.6	59.3	0.3
Housing Units by Geography	594,194	2.8	10.1	29.7	57.0	0.4
Owner-Occupied Units by Geography	368,982	0.3	5.5	26.2	67.9	0.1
Occupied Rental Units by Geography	194,120	7.2	18.0	35.2	38.6	1.0
Vacant Units by Geography	31,092	4.7	14.5	36.9	43.1	0.9
Businesses by Geography	151,188	3.1	7.4	22.3	67.0	0.2
Farms by Geography	3,203	1.9	7.0	31.3	59.5	0.2
Family Distribution by Income Level	409,207	13.5	12.8	17.1	56.5	0.0
Household Distribution by Income Level	563,102	15.5	13.3	16.6	54.6	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD		\$71,149	Median Housing Value			\$223,665
			Median Gross Rent			\$1,103
			Families Below Poverty Level			5.7%
<p><i>Source: 2015 ACS Census and 2018 D&B Data</i></p> <p><i>Due to rounding, totals may not equal 100.0</i></p> <p><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i></p>						

2016						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Dallas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	289	1.7	10.0	27.0	61.2	0.0
Population by Geography	1,444,955	1.6	8.9	28.0	61.6	0.0
Housing Units by Geography	529,904	1.8	10.3	29.7	58.3	0.0
Owner-Occupied Units by Geography	338,490	0.1	4.1	25.9	69.8	0.0
Occupied Rental Units by Geography	154,392	4.9	22.4	36.2	36.5	0.0
Vacant Units by Geography	37,022	3.9	15.9	36.5	43.6	0.0
Businesses by Geography	129,809	1.1	8.3	22.3	68.3	0.0
Farms by Geography	2,881	0.6	7.5	33.1	58.8	0.0
Family Distribution by Income Level	353,998	12.4	12.5	17.9	57.2	0.0
Household Distribution by Income Level	492,882	15.0	13.3	16.4	55.2	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD		\$67,175	Median Housing Value			\$203,832
			Median Gross Rent			\$954
			Families Below Poverty Level			4.9%

Source: 2010 U.S. Census and 2016 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.

2015						
Table A – Demographic Information of the Assessment Area						
Assessment Area: Dallas MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	204	0.5	7.8	24.5	67.2	0.0
Population by Geography	1,030,905	0.4	7.0	25.0	67.6	0.0
Housing Units by Geography	378,821	0.7	8.1	26.7	64.5	0.0
Owner-Occupied Units by Geography	245,116	0.0	3.5	22.3	74.2	0.0
Occupied Rental Units by Geography	107,465	1.8	17.4	35.2	45.6	0.0
Vacant Units by Geography	26,240	2.0	13.0	34.0	51.0	0.0
Businesses by Geography	101,587	0.1	8.1	19.0	72.8	0.0
Farms by Geography	2,022	0.3	7.8	26.3	65.6	0.0
Family Distribution by Income Level	255,174	11.9	11.9	17.4	58.8	0.0
Household Distribution by Income Level	352,581	13.5	13.0	16.1	57.3	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD		\$67,175	Median Housing Value			\$216,425
			Median Gross Rent			\$986
			Families Below Poverty Level			4.8%

Source: 2010 U.S. Census and 2015 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.

The Dallas MSA consists of Collin and Denton Counties in 2016 and onward. The bank defined Dallas MSA consists of part of Denton County and Collin County in 2015.

The bank operates a total of four branches and four deposit-taking ATMs in the AA. None of the branches or deposit-taking ATMs are located in low- or moderate-income geographies.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2018 the unemployment rate in the Dallas MSA was 3.5 percent and 3.8 percent in December 2016. The national unemployment rate for the December 2018 was 3.9 percent and 3.7 percent for the state of Texas. According to the U.S. Census Bureau's 2015 ACS, the percentage of families living below the poverty level in the AA was 5.7 percent in 2018.

Housing Characteristics

Data for the Dallas AA was reviewed on the MSA level due to the AMFI data being available on this level. The AA median housing value was used for the Dallas AA.

Assuming a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$38,600 per year (or less than 50 percent of the 2018 FFIEC adjusted MFI) in the Dallas MSA could afford a \$179,762 mortgage with a payment of \$965 per month. A moderate-income borrower making \$61,760 per year (or less than 80 percent of the 2018 FFIEC adjusted MFI) in the Dallas MSA could afford a \$287,619 mortgage with a payment of \$1,544 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the Dallas MSA with an estimated payment of \$1,786. The median housing value in the Dallas MSA is \$250,050 and \$332,640 in 2015 and 2018 reflecting a 33 percent change from 2015 to 2018 according to Realtor.com data.

Economic Conditions

According to November 2018 Moody's Analytics, key economic drivers in the Dallas MSA are the stable demand for professional services because of many corporate headquarters located in the MSA and a well-positioned distribution center for the southwest benefitting from international trade growth. The economy is advancing at a solid pace, with year-over-year job growth twice the national average. In the housing market, buoyant homebuilding is contributing to overall growth in the economy. The major employers in the area are Wal-Mart Stores Inc., AT&T, and Baylor Scott & White Health.

Community Contacts

Discussions occurred with two community contacts located in the AA during 2017. One contact represents an organization that provides an array of social services to LMI individuals. The contact noted there is a lack of affordable housing because the good economy has created a shortage of housing stock for LMI individuals. The other contact is a NeighborWorks organization. The contact noted that affordable housing continues to be a major concern in the MSA with the majority of clients being minority mothers with an average age of less than 35 years old.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases, (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/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. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems. The following is a listing and brief description of the tables included in each set:

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. See Interagency Q&As 12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, 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 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 MA/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 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. Because 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 (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. The table also presents aggregate peer data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (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. The table also presents aggregate peer data for the years the data is available.

Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.

Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution 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, 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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.

Tables of Performance Data

MMSA

OMAHA CSA

LENDING VOLUME													Geography: OMAHA CSA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018	
Assessment Area (2017):	% 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)					
Full Review:																
Omaha CSA	100.0	15,335	2,545,919	5,672	551,671	216	29,671	44	376,627	21,267	3,503,888	100.00				

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Omaha CSA	6,909	1,155,916	100.0	31,362	4.9	3.4	3.7	18.8	15.2	17.0	42.9	39.1	39.6	33.5	42.4	39.7	0.0	0.0	0.0
Total	6,909	1,155,916	100.0	31,362	4.9	3.4	3.7	18.8	15.2	17.0	42.9	39.1	39.6	33.5	42.4	39.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16
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
Omaha CSA	8,426	1,390,003	100.0	37,601	5.5	3.0	3.0	17.5	11.0	12.6	44.3	42.2	41.5	32.7	43.8	42.9	0.0	0.0	0.0
Total	8,426	1,390,003	100.0	37,601	5.5	3.0	3.0	17.5	11.0	12.6	44.3	42.2	41.5	32.7	43.8	42.9	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 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 **2015-16**

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
Omaha CSA	8,426	1,390,003	100.0	37,601	20.9	9.0	6.9	17.4	18.9	16.3	22.4	23.0	20.5	39.3	38.5	37.2	0.0	10.6	19.1
Total	8,426	1,390,003	100.0	37,601	20.9	9.0	6.9	17.4	18.9	16.3	22.4	23.0	20.5	39.3	38.5	37.2	0.0	10.6	19.1

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

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
Omaha CSA	6,909	1,155,916	100.0	31,362	20.7	9.0	7.6	18.0	21.5	18.2	21.4	23.6	20.6	39.9	36.8	34.5	0.0	9.1	19.3
Total	6,909	1,155,916	100.0	31,362	20.7	9.0	7.6	18.0	21.5	18.2	21.4	23.6	20.6	39.9	36.8	34.5	0.0	9.1	19.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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 **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Omaha CSA	3,288	278,060	100.0	14,122	6.6	5.9	5.9	16.2	14.7	14.4	47.6	48.6	45.5	29.6	30.8	34.2	0.0	0.0	0.0
Total	3,288	278,060	100.0	14,122	6.6	5.9	5.9	16.2	14.7	14.4	47.6	48.6	45.5	29.6	30.8	34.2	0.0	0.0	0.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-16**

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
Omaha CSA	2,384	273,611	100.0	16,155	6.8	5.3	5.6	17.5	15.5	14.2	44.5	49.7	42.6	30.7	29.3	37.6	0.4	0.3	0.1
Total	2,384	273,611	100.0	16,155	6.8	5.3	5.6	17.5	15.5	14.2	44.5	49.7	42.6	30.7	29.3	37.6	0.4	0.3	0.1

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Omaha CSA	3,288	278,060	100.0	14,122	80.0	53.2	48.1	7.3	27.8	12.8	19.0
Total	3,288	278,060	100.0	14,122	80.0	53.2	48.1	7.3	27.8	12.8	19.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2015-16**

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
Omaha CSA	2,384	273,611	100.0	16,155	79.8	31.3	41.4	7.4	30.9	12.8	37.8
Total	2,384	273,611	100.0	16,155	79.8	31.3	41.4	7.4	30.9	12.8	37.8

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Omaha CSA	104	13,837	100.0	584	1.9	3.8	0.3	7.7	6.7	3.1	59.2	73.1	67.5	31.3	16.3	29.1	0.0	0.0	0.0
Total	104	13,837	100.0	584	1.9	3.8	0.3	7.7	6.7	3.1	59.2	73.1	67.5	31.3	16.3	29.1	0.0	0.0	0.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2015-16**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Omaha CSA	112	15,834	100.0	592	1.7	6.3	0.7	10.5	0.0	5.4	62.2	81.3	73.6	25.6	12.5	20.1	0.0	0.0	0.2
Total	112	15,834	100.0	592	1.7	6.3	0.7	10.5	0.0	5.4	62.2	81.3	73.6	25.6	12.5	20.1	0.0	0.0	0.2

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Omaha CSA	104	13,837	100.0	584	96.6	71.2	59.6	1.9	12.5	1.5	16.3
Total	104	13,837	100.0	584	96.6	71.2	59.6	1.9	12.5	1.5	16.3

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2015-16**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Omaha CSA	112	15,834	100.0	592	97.0	51.8	62.3	1.7	17.9	1.3	30.4
Total	112	15,834	100.0	592	97.0	51.8	62.3	1.7	17.9	1.3	30.4

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: MMSA									
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Omaha CSA	31	38,747	176	43,457	207	82,204	100.00	8	8,148

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MMSA																	
Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018																	
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
Omaha CSA	100.00	30	100.00	3.33	30.00	40.00	26.67	1	0	0	0	0	1	9.30	21.40	41.00	28.30

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

STATE OF COLORADO

LENDING VOLUME												
Geography: Colorado												
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018												
Assessment Area (2017):	% 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)	
Full Review:												
Denver CSA	47.3	2,265	505,223	2,047	170,918	99	14,919	6	40,216	4,417	731,276	38.1
Fort Collins MSA	52.7	2,865	677,722	2,023	232,195	20	2,586	6	17,663	4,914	930,166	61.9
Statewide without P/M/F	0	0	0	0	0	0	0	1	17,589	1	17,589	0

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Denver CSA	1,287	270,004	44.4	93,527	3.1	2.4	3.1	20.8	14.5	22.1	41.2	45.1	40.2	35.0	38.1	34.5	0.0	0.0	0.0
Fort Collins MSA	1,614	339,927	55.6	16,558	1.5	0.7	1.5	20.5	18.1	20.7	52.7	50.9	49.0	25.2	30.2	28.8	0.0	0.0	0.0
Total	2,901	609,931	100.0	110,085	2.8	1.5	2.9	20.7	16.5	21.9	43.1	48.3	41.5	33.4	33.7	33.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
Denver CSA	505	135,756	100.0	112,727	3.3	4.0	2.4	18.9	14.3	16.5	43.0	50.7	44.0	34.7	31.1	37.1	0.0	0.0	0.0
Total	505	135,756	100.0	112,727	3.3	4.0	2.4	18.9	14.3	16.5	43.0	50.7	44.0	34.7	31.1	37.1	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2015

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
Denver CSA	473	99,463	100.0	70,954	2.7	3.4	2.1	15.8	14.6	13.5	46.3	55.6	46.5	35.2	26.4	37.8	0.0	0.0	0.0
Total	473	99,463	100.0	70,954	2.7	3.4	2.1	15.8	14.6	13.5	46.3	55.6	46.5	35.2	26.4	37.8	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Denver CSA	1,287	270,004	44.4	93,527	21.0	7.1	5.9	18.5	18.9	20.6	21.6	29.2	25.0	38.9	40.0	32.9	0.0	4.8	15.6
Fort Collins MSA	1,614	339,927	55.6	16,558	20.5	4.8	4.5	17.2	17.7	16.5	22.6	26.6	24.1	39.6	45.8	41.7	0.0	5.2	13.2
Total	2,901	609,931	100.0	110,085	20.9	5.8	5.7	18.3	18.2	20.0	21.8	27.7	24.8	39.0	43.2	34.2	0.0	5.0	15.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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 **2015-16**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Fort Collins MSA	1,251	337,795	55.7	20,761	20.2	6.6	5.1	17.6	20.9	16.2	22.3	25.7	24.3	39.9	37.3	39.7	0.0	9.5	14.8
Total	1,251	337,795	55.7	20,761	20.2	6.6	5.1	17.6	20.9	16.2	22.3	25.7	24.3	39.9	37.3	39.7	0.0	9.5	14.8

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 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																			2016
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
Denver CSA	505	135,756	100.0	112,727	21.0	8.7	5.2	17.8	19.2	17.5	21.4	24.2	24.2	39.7	40.4	36.1	0.0	7.5	17.0
Total	505	135,756	100.0	112,727	21.0	8.7	5.2	17.8	19.2	17.5	21.4	24.2	24.2	39.7	40.4	36.1	0.0	7.5	17.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																			2015
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
Denver CSA	473	99,463	100.0	70,954	19.5	7.4	5.3	17.0	22.6	17.5	21.9	26.0	24.0	41.7	35.9	34.7	0.0	8.0	18.5
Total	473	99,463	100.0	70,954	19.5	7.4	5.3	17.0	22.6	17.5	21.9	26.0	24.0	41.7	35.9	34.7	0.0	8.0	18.5

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 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 **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Denver CSA	1,100	90,288	49.8	44,703	5.3	7.0	6.2	23.6	23.4	24.9	37.1	42.3	35.4	33.9	27.4	33.4	0.1	0.0	0.0
Fort Collins MSA	1,107	116,730	50.2	9,640	3.1	6.2	4.9	28.6	27.5	26.5	42.9	40.6	41.2	25.4	25.7	27.3	0.0	0.0	0.0
Total	2,207	207,018	100.0	54,343	5.0	6.6	6.0	24.4	25.4	25.2	38.1	41.4	36.5	32.4	26.6	32.4	0.1	0.0	0.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-16**

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
Fort Collins MSA	916	115,465	48.5	10,084	1.0	2.9	1.0	20.8	31.1	21.5	49.3	40.8	43.6	28.9	25.1	33.9	0.0	0.0	0.0
Total	916	115,465	48.5	10,084	1.0	2.9	1.0	20.8	31.1	21.5	49.3	40.8	43.6	28.9	25.1	33.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015**

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
Denver CSA	382	41,250	100.0	30,322	3.4	4.2	3.1	19.2	20.7	19.2	42.2	47.6	41.7	35.2	27.5	36.0	0.0	0.0	0.0
Total	382	41,250	100.0	30,322	3.4	4.2	3.1	19.2	20.7	19.2	42.2	47.6	41.7	35.2	27.5	36.0	0.0	0.0	0.0

*Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

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
Denver CSA	565	39,380	100.0	51,856	4.8	5.3	4.0	22.1	20.2	21.7	38.5	47.4	37.5	34.5	27.1	36.8	0.1	0.0	0.0
Total	565	39,380	100.0	51,856	4.8	5.3	4.0	22.1	20.2	21.7	38.5	47.4	37.5	34.5	27.1	36.8	0.1	0.0	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Denver CSA	1,100	90,288	49.8	44,703	89.0	53.4	53.4	3.9	25.0	7.1	21.6
Fort Collins MSA	1,107	116,730	50.2	9,640	89.1	49.7	52.1	3.6	31.0	7.4	19.3
Total	2,207	207,018	100.0	54,343	89.0	51.5	53.2	3.8	28.0	7.1	20.5

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2015-16**

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
Fort Collins MSA	916	115,465	48.5	10,084	88.5	29.3	42.1	3.8	35.0	7.7	35.7
Total	916	115,465	48.5	10,084	88.5	29.3	42.1	3.8	35.0	7.7	35.7

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 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											2016
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
Denver CSA	565	39,380	100.0	51,856	88.5	32.2	43.4	4.2	17.0	7.4	50.8
Total	565	39,380	100.0	51,856	88.5	32.2	43.4	4.2	17.0	7.4	50.8
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015
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
Denver CSA	382	41,250	100.0	30,322	82.7	36.4	52.0	3.3	22.5	14.0	41.1
Total	382	41,250	100.0	30,322	82.7	36.4	52.0	3.3	22.5	14.0	41.1
<i>Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Denver CSA	58	8,103	85.3	790	3.8	3.4	1.4	19.2	12.1	10.4	44.4	53.4	65.4	32.6	31.0	22.8	0.0	0.0	0.0
Fort Collins MSA	10	1,003	15.4	147	4.1	0.0	0.7	19.7	20.0	11.6	46.4	60.0	42.9	29.6	20.0	44.9	0.1	0.0	0.0
Total	68	9,106	100.0	937	3.9	2.9	1.3	19.3	13.2	10.6	44.8	54.4	61.9	31.9	29.4	26.3	0.0	0.0	0.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2015-16**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Fort Collins MSA	10	1,583	23.3	111	1.0	0.0	0.9	16.6	20.0	15.3	48.9	30.0	43.2	33.3	50.0	40.5	0.2	0.0	0.0
Total	10	1,583	23.3	111	1.0	0.0	0.9	16.6	20.0	15.3	48.9	30.0	43.2	33.3	50.0	40.5	0.2	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Denver CSA	23	3,809	100.0	576	3.2	0.0	1.0	17.1	0.0	10.4	47.4	73.9	65.1	32.3	26.1	23.4	0.0	0.0	0.0
Total	23	3,809	100.0	576	3.2	0.0	1.0	17.1	0.0	10.4	47.4	73.9	65.1	32.3	26.1	23.4	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Denver CSA	18	3,007	100.0	495	2.2	5.6	0.6	14.9	0.0	12.3	50.7	72.2	62.6	32.2	22.2	24.4	0.0	0.0	0.0
Total	18	3,007	100.0	495	2.2	5.6	0.6	14.9	0.0	12.3	50.7	72.2	62.6	32.2	22.2	24.4	0.0	0.0	0.0

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver CSA	58	8,103	85.3	790	95.3	77.6	64.8	2.8	5.2	1.9	17.2
Fort Collins MSA	10	1,003	15.4	147	96.5	60.0	59.2	1.9	30.0	1.6	25.0
Total	68	9,106	100.0	937	95.5	75.0	63.9	2.6	8.8	1.8	16.2

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Fort Collins MSA	10	1,583	23.3	111	96.7	30.0	53.2	1.7	40.0	1.6	42.9
Total	10	1,583	23.3	111	96.7	30.0	53.2	1.7	40.0	1.6	42.9

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver CSA	23	3,809	100.0	576	95.1	52.2	58.3	2.9	21.7	2.0	26.1
Total	23	3,809	100.0	576	95.1	52.2	58.3	2.9	21.7	2.0	26.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver CSA	18	3,007	100.0	495	95.4	50.0	60.6	2.8	33.3	1.9	16.7
Total	18	3,007	100.0	495	95.4	50.0	60.6	2.8	33.3	1.9	16.7
<i>Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Colorado				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver CSA	21	6,874	69	27,081	90	33,955	55.9	1	35
Fort Collins MSA	22	7,448	49	16,552	71	24,000	44.1	1	5,000

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS DECEMBER 31, 2018				Geography: Colorado				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018									
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
Denver CSA	61.90	16	64.00	0.00	25.00	50.00	25.00	2	0	0	2	0	0	6.80	26.10	38.90	28.00
Fort Collins MSA	38.10	9	36.00	11.11	33.33	33.33	22.22	0	0	0	0	0	0	3.50	25.80	48.80	21.90

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

STATE OF ILLINOIS

LENDING VOLUME		Geography: Illinois						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018				
Assessment Area (2017):	% 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)	
Full Review:												
Chicago MSA	96.9	2,865	471,526	1,913	209,811	556	93,177	10	42,684	5,444	817,198	98.6
Rockford MSA	3.1	127	12,286	22	572	25	4,416	0	0	174	17,274	1.4
Statewide with P/M/F	0	0	0	0	0	0	0	2	1,117	2	1,117	0
Statewide without P/M/F	0	0	0	0	0	0	0	5	15,110	5	15,110	0

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Chicago MSA	1,424	238,703	95.3	38,794	0.9	1.7	0.6	13.5	16.4	10.7	41.9	57.2	43.3	43.7	24.7	45.4	0.0	0.0	0.0
Rockford MSA	71	7,436	4.7	1,493	0.0	0.0	0.0	11.7	2.8	9.9	52.3	76.1	50.6	36.0	21.1	39.5	0.0	0.0	0.0
Total	1,495	246,139	100.0	40,287	0.8	1.6	0.6	13.4	15.8	10.7	42.4	58.1	43.6	43.3	24.5	45.1	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015-16**

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
Chicago MSA	1,441	232,823	96.3	44,198	0.3	2.2	0.4	15.0	8.0	9.4	43.9	65.0	41.2	40.8	24.8	49.1	0.0	0.0	0.0
Rockford MSA	56	4,850	3.7	1,592	0.0	0.0	0.0	12.4	16.1	10.2	42.9	53.6	36.7	44.7	30.4	53.1	0.0	0.0	0.0
Total	1,497	237,673	100.0	45,790	0.3	2.1	0.4	14.9	8.3	9.4	43.8	64.6	41.0	41.0	25.0	49.2	0.0	0.0	0.0

*Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MSA	1,424	238,703	95.3	38,794	18.4	11.9	8.0	16.4	24.6	19.4	20.8	26.5	22.8	44.5	30.1	33.0	0.0	6.9	16.8
Rockford MSA	71	7,436	8.4	1,493	15.7	11.3	4.0	17.1	25.4	14.5	22.3	29.6	22.0	45.0	32.4	41.7	0.0	1.4	17.7
Total	1,495	246,139	100.0	40,287	18.2	11.9	7.8	16.4	24.6	19.2	20.9	26.7	22.8	44.5	30.2	33.3	0.0	6.6	16.9

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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																			2015-16
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Chicago MSA	1,441	232,823	96.3	44,198	16.7	9.2	6.7	16.7	21.7	16.4	22.0	25.3	22.1	44.6	35.0	36.8	0.0	8.8	18.0
Rockford MSA	56	4,850	3.7	1,592	16.6	21.4	4.2	14.4	21.4	14.4	23.3	28.6	19.0	45.6	17.9	43.6	0.0	10.7	18.8
Total	1,497	237,673	100.0	45,790	16.7	9.6	6.6	16.6	21.7	16.3	22.1	25.5	22.0	44.7	34.3	37.0	0.0	8.9	18.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 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 **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Chicago MSA	1,039	107,748	99.0	19,550	1.7	1.6	1.5	13.2	13.4	11.0	40.7	40.9	41.2	44.2	43.5	46.2	0.2	0.6	0.1
Rockford MSA	11	215	1.8	532	0.0	0.0	0.0	16.9	18.2	15.2	44.8	72.7	39.3	38.4	9.1	45.5	0.0	0.0	0.0
Total	1,050	107,963	100.0	20,082	1.7	1.6	1.5	13.3	13.4	11.1	40.9	41.2	41.1	43.9	43.1	46.2	0.2	0.6	0.1

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015-16**

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
Chicago MSA	874	102,063	98.8	23,168	1.5	1.1	1.1	12.6	10.0	10.5	44.9	54.9	39.7	41.1	34.0	48.7	0.0	0.0	0.0
Rockford MSA	11	357	2.6	550	0.0	0.0	0.0	7.2	0.0	4.7	58.8	90.9	56.0	34.0	9.1	39.3	0.0	0.0	0.0
Total	885	102,420	100.0	23,718	1.4	1.1	1.1	12.4	9.8	10.4	45.4	55.4	40.0	40.8	33.7	48.5	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Chicago MSA	1,039	107,748	99.0	19,550	81.3	55.2	47.7	7.3	26.9	11.4	17.9
Rockford MSA	11	215	1.5	532	80.5	72.7	49.8	6.6	11.1	12.9	22.2
Total	1,050	107,963	100.0	20,082	81.2	55.4	47.7	7.3	26.7	11.5	17.9

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2015-16**

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
Chicago MSA	874	102,063	98.8	23,168	81.5	35.5	41.3	7.2	27.5	11.3	37.1
Rockford MSA	11	357	1.2	550	81.7	63.6	40.4	6.5	0.0	11.8	36.4
Total	885	102,420	100.0	23,718	81.5	35.8	41.3	7.2	27.1	11.3	37.1

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Chicago MSA	269	45,698	95.4	522	0.7	0.7	1.0	9.0	9.7	3.8	61.4	74.0	74.1	28.8	15.6	21.1	0.0	0.0	0.0
Rockford MSA	13	2,581	4.6	42	0.0	0.0	0.0	5.1	0.0	0.0	54.2	100.0	71.4	40.7	0.0	28.6	0.0	0.0	0.0
Total	282	48,279	100.0	564	0.6	0.7	0.9	8.7	9.2	3.5	60.9	75.2	73.9	29.7	14.9	21.6	0.0	0.0	0.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2015-16**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Chicago MSA	287	47,479	96.0	469	0.4	0.0	0.2	7.4	5.2	3.4	62.4	86.4	81.0	29.8	8.4	15.4	0.0	0.0	0.0
Rockford MSA	12	1,835	4.0	38	0.0	0.0	0.0	1.9	0.0	0.0	67.8	100.0	71.1	30.3	0.0	28.9	0.0	0.0	0.0
Total	299	49,314	100.0	507	0.3	0.0	0.2	7.0	5.0	3.2	62.8	87.0	80.3	29.9	8.0	16.4	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago MSA	269	45,698	95.4	522	94.4	70.3	54.2	3.7	22.7	1.9	7.1
Rockford MSA	13	2,581	4.6	42	96.7	76.9	45.2	2.2	23.1	1.1	0.0
Total	282	48,279	100.0	564	94.6	70.6	53.5	3.6	22.7	1.9	6.7

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2015-16**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Chicago MSA	287	47,479	96.0	469	94.5	64.5	51.2	3.7	28.9	1.8	6.6
Rockford MSA	12	1,835	4.7	38	97.8	83.3	55.3	1.1	0.0	1.1	28.6
Total	299	49,314	100.0	507	94.8	65.2	51.5	3.4	27.8	1.8	7.0

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Illinois				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago MSA	31	5,300	61	13,459	92	18,759	97.4	0	0
Rockford MSA	4	257	4	148	8	405	2.1	0	0
IL Statewide with P/M/F	1	66	3	20	4	86	0.4	0	0
IL Statewide without P/M/F	1	378	0	0	1	378	0	1	84

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: Illinois				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018									
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
Chicago MSA	98.57	13	92.86	0.00	15.38	46.15	38.46	0	0	0	0	0	0	2.50	19.60	39.20	38.20
Rockford MSA	1.43	1	7.14	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	15.40	53.20	31.40

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

STATE OF KANSAS

LENDING VOLUME		Geography: Kansas						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018					
Assessment Area (2017):	% 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)		
Full Review:													
Kansas City MSA	100	1,526	365,007	756	57,858	7	943	1	1,904	2,290	425,712	100	
Statewide without P/M/F	0	0	0	0	0	0	0	2	3,582	2	3,582	0	

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kansas City MSA	908	229,702	100.0	24,125	0.3	0.1	0.4	4.5	2.8	4.3	31.3	26.3	31.7	63.9	70.8	63.6	0.0	0.0	0.0
Total	908	229,702	100.0	24,125	0.3	0.1	0.4	4.5	2.8	4.3	31.3	26.3	31.7	63.9	70.8	63.6	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Kansas City MSA	618	135,305	100.0	29,375	0.3	0.3	0.2	7.5	4.7	5.9	27.9	27.0	25.6	64.3	68.0	68.3	0.0	0.0	0.0
Total	618	135,305	100.0	29,375	0.3	0.3	0.2	7.5	4.7	5.9	27.9	27.0	25.6	64.3	68.0	68.3	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

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
Kansas City M SA	908	229,702	100.0	24,125	12.0	4.0	3.9	13.6	13.8	13.7	19.0	23.7	20.7	55.3	56.2	46.4	0.0	2.4	15.3
Total	908	229,702	100.0	24,125	12.0	4.0	3.9	13.6	13.8	13.7	19.0	23.7	20.7	55.3	56.2	46.4	0.0	2.4	15.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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 **2015-16**

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
Kansas City M SA	618	135,305	100.0	29,375	10.7	5.5	3.3	13.0	15.4	11.9	20.1	22.2	19.8	56.1	51.3	48.6	0.0	5.7	16.4
Total	618	135,305	100.0	29,375	10.7	5.5	3.3	13.0	15.4	11.9	20.1	22.2	19.8	56.1	51.3	48.6	0.0	5.7	16.4

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 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																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas City MS A	400	28,426	100.0	13,682	1.2	1.3	1.0	7.0	10.0	7.8	27.4	23.0	25.6	61.2	62.0	62.0	3.2	3.8	3.7
Total	400	28,426	100.0	13,682	1.2	1.3	1.0	7.0	10.0	7.8	27.4	23.0	25.6	61.2	62.0	62.0	3.2	3.8	3.7

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas City MS A	356	29,432	100.0	16,158	0.5	0.0	0.5	9.0	10.4	8.1	23.3	19.9	20.6	64.0	64.9	67.7	3.2	4.8	3.1
Total	356	29,432	100.0	16,158	0.5	0.0	0.5	9.0	10.4	8.1	23.3	19.9	20.6	64.0	64.9	67.7	3.2	4.8	3.1

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas City M SA	400	28,426	100.0	13,682	82.1	49.8	47.0	7.0	25.3	11.0	25.0
Total	400	28,426	100.0	13,682	82.1	49.8	47.0	7.0	25.3	11.0	25.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas City M SA	356	29,432	100.0	16,158	82.2	24.7	38.6	7.4	29.2	10.4	46.1
Total	356	29,432	100.0	16,158	82.2	24.7	38.6	7.4	29.2	10.4	46.1
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kansas City M SA	2	370	100.0	99	0.9	0.0	0.0	5.7	0.0	5.1	32.2	0.0	21.2	60.6	100.0	73.7	0.5	0.0	0.0
Total	2	370	100.0	99	0.9	0.0	0.0	5.7	0.0	5.1	32.2	0.0	21.2	60.6	100.0	73.7	0.5	0.0	0.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015-16
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Kansas City M SA	5	573	100.0	82	0.2	0.0	0.0	8.3	0.0	2.4	29.5	0.0	26.8	61.5	100.0	70.7	0.5	0.0	0.0
Total	5	573	100.0	82	0.2	0.0	0.0	8.3	0.0	2.4	29.5	0.0	26.8	61.5	100.0	70.7	0.5	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas City M SA	1	350	100.0	99	92.9	100.0	54.5	4.1	100.0	3.1	0.0
Total	1	350	100.0	99	92.9	100.0	54.5	4.1	100.0	3.1	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas City M SA	5	573	100.0	82	93.7	40.0	51.2	3.5	0.0	2.8	75.0
Total	5	573	100.0	82	93.7	40.0	51.2	3.5	0.0	2.8	75.0
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Kansas				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Kansas City MSA	10	4,654	25	8,738	35	13,392	76.7	2	3,539
KS Statewide with P/M/F	1	4,058	0	0	1	4,058	23.3	1	88

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: Kansas				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018									
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
Kansas City MSA	100.00	7	100.00	0.00	0.00	28.57	71.43	1	0	0	0	0	1	0.90	7.70	32.80	58.50

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

STATE OF NEBRASKA

LENDING VOLUME		Geography: Nebraska						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018				
Assessment Area (2017):	% 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)	
Full Review:												
Grand Island MSA	8.6	470	59,341	448	41,056	220	34,459	5	19,690	1,143	154,546	4.2
Lincoln CSA	18	1,570	245,308	702	100,883	103	10,778	7	24,335	2,382	381,304	76
NE - Non-MSA	73.4	3,032	423,782	2,778	314,354	3,861	487,567	10	60,388	9,681	1,286,091	0
Statewide without P/M/F	0	0	0	0	0	0	0	5	75,000	5	75,000	0

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Grand Island MSA	275	34,192	10.7	2,070	0.0	0.0	0.0	22.2	25.1	24.3	45.6	36.0	45.5	32.2	38.9	30.2	0.0	0.0	0.0	
Lincoln CSA	783	114,637	30.4	12,096	1.5	0.9	2.1	17.8	13.9	18.7	41.0	40.2	38.9	39.5	44.6	40.0	0.1	0.4	0.2	
NE - Non-MSA	1,515	215,977	58.9	6,373	0.9	0.5	0.5	8.8	8.8	9.6	74.2	67.3	71.7	16.1	23.3	18.2	0.0	0.0	0.0	
Total	2,573	364,806	100.0	20,539	1.0	0.6	1.4	13.9	12.1	16.4	57.5	55.7	49.7	27.5	31.4	32.3	0.1	0.1	0.1	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2015-16
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	
Lincoln CSA	787	130,671	30.9	13,696	4.5	2.5	3.4	13.3	10.7	11.7	43.7	47.5	39.7	38.5	39.3	45.2	0.0	0.0	0.0	
Total	787	130,671	30.9	13,696	4.5	2.5	3.4	13.3	10.7	11.7	43.7	47.5	39.7	38.5	39.3	45.2	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
Grand Island MSA	129	17,695	14.0	2,117	0.0	0.0	0.0	4.0	7.8	5.1	77.5	59.7	70.3	18.5	32.6	24.6	0.0	0.0	0.0
NE Non-MSA	793	113,607	86.0	6,836	0.0	0.0	0.0	4.8	3.0	4.1	79.5	68.3	74.7	15.7	28.6	21.2	0.0	0.0	0.0
Total	922	131,302	100.0	8,953	0.0	0.0	0.0	4.7	3.7	4.3	79.2	67.1	73.7	16.2	29.2	22.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015
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
Grand Island MSA	66	7,454	8.4	1,734	0.0	0.0	0.0	5.2	7.6	6.6	70.8	53.0	63.6	24.0	39.4	29.8	0.0	0.0	0.0
NE Non-MSA	724	94,198	91.6	6,158	0.0	0.0	0.0	5.5	3.3	4.9	76.7	70.3	73.9	17.9	26.4	21.2	0.0	0.0	0.0
Total	790	101,652	100.0	7,892	0.0	0.0	0.0	5.4	3.7	5.3	75.7	68.9	71.6	18.9	27.5	23.1	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
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
Grand Island MSA	275	34,192	10.7	2,070	19.0	6.2	5.3	18.8	20.4	16.8	24.1	23.6	18.5	38.2	35.3	35.0	0.0	14.5	24.4
Lincoln CSA	783	114,637	30.4	12,096	21.0	6.6	6.7	17.1	20.4	17.6	21.3	25.9	20.8	40.6	38.8	30.7	0.0	8.2	24.2
NE - Non-MSA	1,515	215,977	58.9	6,373	18.4	6.3	5.8	18.2	21.2	18.4	23.4	22.5	20.5	40.0	36.3	33.5	0.0	13.7	21.8
Total	2,573	364,806	100.0	20,539	19.5	6.4	6.3	17.8	20.9	17.7	22.6	23.7	20.5	40.1	37.0	32.0	0.0	12.1	23.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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																			2015-16
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
Lincoln CSA	787	130,671	30.9	13,696	19.3	8.5	6.6	18.2	20.1	16.4	23.4	25.9	19.8	39.1	34.9	33.6	0.0	10.5	23.7
Total	787	130,671	30.9	13,696	19.3	8.5	6.6	18.2	20.1	16.4	23.4	25.9	19.8	39.1	34.9	33.6	0.0	10.5	23.7

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 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																			2016
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
Grand Island MSA	129	17,695	14.0	2,117	18.1	7.8	5.4	18.3	14.0	16.9	24.9	19.4	18.9	38.6	48.8	35.5	0.0	10.1	23.2
NE Non-MSA	793	113,607	86.0	6,836	17.4	6.3	5.5	18.1	16.6	16.7	23.6	23.1	21.7	40.9	40.1	35.9	0.0	13.9	20.2
Total	922	131,302	100.0	8,953	17.5	6.5	5.5	18.1	16.3	16.7	23.9	22.6	21.0	40.5	41.3	35.8	0.0	13.3	20.9

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																			2015
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
Grand Island MSA	66	7,454	8.4	1,734	18.0	3.0	8.2	18.6	13.6	18.1	24.7	19.7	20.8	38.8	50.0	31.7	0.0	13.6	21.3
NE Non-MSA	724	94,198	91.6	6,158	17.3	5.9	5.7	17.7	17.7	16.9	23.5	24.4	20.8	41.4	40.7	35.0	0.0	11.2	21.6
Total	790	101,652	100.0	7,892	17.4	5.7	6.2	17.9	17.3	17.1	23.7	24.1	20.8	41.0	41.5	34.3	0.0	11.4	21.6

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

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
Grand Island MSA	241	22,018	11.7	1,093	0.0	0.0	0.0	21.7	22.0	18.8	47.0	35.7	44.2	31.3	42.3	37.1	0.0	0.0	0.0
Lincoln CSA	388	54,638	18.9	5,224	3.5	3.1	3.1	27.6	28.6	23.9	33.3	32.2	33.1	33.8	34.8	38.7	1.9	1.3	1.3
NE - Non-MSA	1,425	170,618	69.4	4,763	1.1	0.8	1.0	12.2	12.5	10.4	71.4	67.9	71.7	15.3	18.8	16.9	0.0	0.0	0.0
Total	2,054	247,274	100.0	11,080	2.0	1.1	1.9	19.7	16.7	17.5	52.8	57.4	50.8	24.7	24.6	29.2	0.8	0.2	0.6

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

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
Lincoln CSA	314	46,245	16.7	5,211	7.2	4.8	5.7	22.7	24.8	22.0	34.9	34.7	33.3	34.8	35.0	38.9	0.4	0.6	0.2
Total	314	46,245	16.7	5,211	7.2	4.8	5.7	22.7	24.8	22.0	34.9	34.7	33.3	34.8	35.0	38.9	0.4	0.6	0.2

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
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
Grand Island M SA	113	9,534	14.4	1,165	0.0	0.0	0.0	6.3	13.3	7.0	73.5	56.6	71.6	20.1	30.1	21.4	0.0	0.0	0.0
NE Non-MSA	673	76,403	85.6	5,064	0.0	0.0	0.0	6.2	3.4	4.9	77.8	77.4	79.0	16.0	19.2	16.1	0.0	0.0	0.0
Total	786	85,937	100.0	6,229	0.0	0.0	0.0	6.2	4.8	5.3	77.0	74.4	77.6	16.8	20.7	17.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015
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
Grand Island M SA	94	9,504	12.1	927	0.0	0.0	0.0	7.7	9.6	7.9	66.3	67.0	64.2	26.0	23.4	27.9	0.0	0.0	0.0
NE Non-MSA	680	67,333	87.9	4,699	0.0	0.0	0.0	6.7	5.1	5.1	75.0	78.8	78.5	18.3	16.0	16.4	0.0	0.0	0.0
Total	774	76,837	100.0	5,626	0.0	0.0	0.0	6.8	5.7	5.6	73.6	77.4	76.1	19.5	16.9	18.3	0.0	0.0	0.0

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Grand Island MSA	241	22,018	11.7	1,093	75.9	61.0	49.5	7.3	28.2	16.8	10.8	
Lincoln CSA	388	54,638	18.9	5,224	79.6	47.2	51.2	6.8	36.6	13.6	16.2	
NE - Non-MSA	1,425	170,618	69.4	4,763	76.9	57.5	53.0	6.2	26.5	16.9	15.9	
Total	2,054	247,274	100.0	11,080	78.0	56.0	51.8	6.6	28.6	15.5	15.4	
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16	
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	
Lincoln CSA	314	46,245	16.7	5,211	80.4	33.1	46.7	6.7	33.4	12.9	33.4	
Total	314	46,245	16.7	5,211	80.4	33.1	46.7	6.7	33.4	12.9	33.4	
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2016
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	
Grand Island MSA	113	9,534	14.4	1,165	76.8	52.2	49.4	6.9	29.2	16.3	18.6	
NE Non-MSA	673	76,403	85.6	5,064	78.1	54.5	50.1	5.8	24.2	16.1	21.2	
Total	786	85,937	100.0	6,229	77.9	54.2	50.0	6.0	24.9	16.1	20.9	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2015
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	
Grand Island MSA	94	9,504	12.1	927	74.5	47.9	45.6	6.1	29.8	19.4	22.3	
NE Non-MSA	680	67,333	87.9	4,699	75.8	58.2	50.8	4.8	23.5	19.5	18.2	
Total	774	76,837	100.0	5,626	75.5	57.0	49.9	5.0	24.3	19.5	18.7	
<i>Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Grand Island MSA	121	18,953	6.1	473	0.0	0.0	0.0	5.5	0.8	1.9	56.3	55.4	63.6	38.2	43.8	34.5	0.0	0.0	0.0
Lincoln CSA	54	5,763	2.7	505	1.2	0.0	0.0	8.7	0.0	1.8	24.2	35.2	19.4	65.9	64.8	78.8	0.1	0.0	0.0
NE - Non-MSA	1,807	236,581	91.2	3,997	0.1	0.0	0.0	2.7	1.1	1.1	83.9	79.2	86.8	13.3	19.7	12.1	0.0	0.0	0.0
Total	1,982	261,297	100.0	4,975	0.3	0.0	0.0	4.0	1.0	1.3	70.9	76.6	77.7	24.8	22.4	21.0	0.0	0.0	0.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015-16
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Lincoln CSA	49	5,015	2.1	488	1.3	2.0	1.0	6.1	0.0	3.5	30.8	61.2	38.7	61.8	36.7	56.8	0.0	0.0	0.0
Total	49	5,015	2.1	488	1.3	2.0	1.0	6.1	0.0	3.5	30.8	61.2	38.7	61.8	36.7	56.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Grand Island MSA	66	11,282	6.1	461	0.0	0.0	0.0	1.6	0.0	0.2	90.4	90.9	94.4	8.0	9.1	5.4	0.0	0.0	0.0
NE Non-MSA	1,023	127,970	93.9	3,668	0.0	0.0	0.0	4.3	3.7	2.8	84.9	76.1	85.7	10.8	20.2	11.5	0.0	0.0	0.0
Total	1,089	139,252	100.0	4,129	0.0	0.0	0.0	3.9	3.5	2.5	85.6	77.0	86.7	10.5	19.6	10.8	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2015

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Grand Island MSA	33	4,224	3.1	154	0.0	0.0	0.0	3.1	0.0	0.0	78.7	84.8	85.7	18.2	15.2	14.3	0.0	0.0	0.0
NE Non-MSA	1,031	123,016	96.9	3,362	0.0	0.0	0.0	4.8	5.2	3.6	81.5	76.1	83.7	13.8	18.6	12.7	0.0	0.0	0.0
Total	1,064	127,240	100.0	3,516	0.0	0.0	0.0	4.6	5.1	3.4	81.2	76.4	83.8	14.1	18.5	12.7	0.0	0.0	0.0

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Grand Island MSA	121	18,953	6.2	473	96.4	91.7	66.2	2.4	1.7	1.3	7.4
Lincoln CSA	54	5,763	2.7	505	97.9	83.3	69.5	1.5	3.7	0.6	13.0
NE - Non-MSA	1,807	236,581	91.2	3,997	96.8	83.7	65.6	2.0	11.0	1.2	5.3
Total	1,982	261,297	100.0	4,975	97.0	84.2	66.1	1.9	10.2	1.1	5.7

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Lincoln CSA	49	5,015	2.1	488	98.3	91.8	77.0	1.3	0.0	0.4	15.4
Total	49	5,015	2.1	488	98.3	91.8	77.0	1.3	0.0	0.4	15.4

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Grand Island MSA	66	11,282	6.1	461	97.7	84.8	71.2	1.4	4.5	1.0	10.6	
NE Non-MSA	1,023	127,970	93.9	3,668	97.7	78.8	71.6	1.5	10.5	0.9	10.8	
Total	1,089	139,252	100.0	4,129	97.7	79.2	71.6	1.4	10.1	0.9	10.7	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2015
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Grand Island MSA	33	4,224	3.1	154	97.8	69.7	64.3	1.3	12.1	0.9	18.2	
NE Non-MSA	1,031	123,016	96.9	3,362	98.0	77.8	68.7	1.2	12.9	0.8	9.3	
Total	1,064	127,240	100.0	3,516	98.0	77.5	68.5	1.2	12.9	0.8	9.6	
<i>Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: NEBRASKA									
Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
NE - Non-MSA	33	13,001	47	4,418	80	17,419	58.5	11	5,494
Limited Review:									
Grand Island MSA	3	2,052	5	45	8	2,097	7.1	3	46
Lincoln CSA	14	3,149	28	5,018	42	8,167	27.4	2	1,077
NE Statewide with P/M/F	2	2,080	1	1	3	2,081	7	2	40
NE Statewide without P/M/F	0	0	2	65	2	65	0	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEBRASKA																	
Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018																	
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
Grand Island MSA	4.21	2	9.52	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	28.50	42.60	28.90
Lincoln CSA	19.81	6	28.57	0.00	33.33	33.33	33.33	0	0	0	0	0	0	5.20	24.50	36.60	30.70
NE - Non-MSA	75.98	13	61.92	0.00	23.08	69.23	7.69	1	0	0	0	1	0	1.30	11.90	71.70	15.10

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

STATE OF SOUTH DAKOTA

LENDING VOLUME													Geography: South Dakota				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018			
Assessment Area (2017):	% 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)									
Full Review:																				
SD Non-MSA	100.0	304	48,532	611	48,699	896	121,783	0	0	1,811	219,014	100.0								

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
SD Non-MSA	167	24,035	100.0	1,313	0.0	0.0	0.0	3.8	1.8	1.5	92.8	98.2	96.8	3.3	0.0	1.7	0.0	0.0	0.0
Total	167	24,035	100.0	1,313	0.0	0.0	0.0	3.8	1.8	1.5	92.8	98.2	96.8	3.3	0.0	1.7	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
SD Non-MSA	76	15,277	100.0	1,252	0.0	0.0	0.0	0.0	0.0	0.0	86.2	82.9	81.2	13.9	17.1	18.8	0.0	0.0	0.0
Total	76	15,277	100.0	1,252	0.0	0.0	0.0	0.0	0.0	0.0	86.2	82.9	81.2	13.9	17.1	18.8	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015**

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
SD Non-MSA	61	9,220	100.0	1,614	0.0	0.0	0.0	0.0	0.0	0.0	86.4	86.9	80.9	13.6	13.1	19.1	0.0	0.0	0.0
Total	61	9,220	100.0	1,614	0.0	0.0	0.0	0.0	0.0	0.0	86.4	86.9	80.9	13.6	13.1	19.1	0.0	0.0	0.0

*Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
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
SD Non-MSA	167	24,035	100.0	1,313	21.3	3.6	5.9	15.9	18.0	19.4	23.2	22.2	19.9	39.6	37.7	31.5	0.0	18.6	23.4
Total	167	24,035	100.0	1,313	21.3	3.6	5.9	15.9	18.0	19.4	23.2	22.2	19.9	39.6	37.7	31.5	0.0	18.6	23.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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																			2016
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
SD Non-MSA	76	15,277	100.0	1,252	16.3	2.6	4.6	17.9	14.5	17.3	22.7	27.6	22.2	43.1	42.1	36.3	0.0	13.2	19.6
Total	76	15,277	100.0	1,252	16.3	2.6	4.6	17.9	14.5	17.3	22.7	27.6	22.2	43.1	42.1	36.3	0.0	13.2	19.6

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																			2015
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
SD Non-MSA	61	9,220	100.0	1,614	17.1	6.6	7.2	17.7	21.3	19.3	22.7	16.4	20.5	42.4	36.1	31.0	0.0	19.7	22.1
Total	61	9,220	100.0	1,614	17.1	6.6	7.2	17.7	21.3	19.3	22.7	16.4	20.5	42.4	36.1	31.0	0.0	19.7	22.1

*Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 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 **2017-18**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
SD Non-MSA	308	27,802	100.0	1,017	0.0	0.0	0.0	7.0	4.9	2.8	90.5	92.9	94.8	2.5	2.3	2.5	0.0	0.0	0.0
Total	308	27,802	100.0	1,017	0.0	0.0	0.0	7.0	4.9	2.8	90.5	92.9	94.8	2.5	2.3	2.5	0.0	0.0	0.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2016**

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
SD Non-MSA	164	11,209	100.0	925	0.0	0.0	0.0	0.0	0.0	0.0	86.7	85.4	85.6	13.3	14.6	14.4	0.0	0.0	0.0
Total	164	11,209	100.0	925	0.0	0.0	0.0	0.0	0.0	0.0	86.7	85.4	85.6	13.3	14.6	14.4	0.0	0.0	0.0

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015**

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
SD Non-MSA	139	9,688	100.0	1,060	0.0	0.0	0.0	0.0	0.0	0.0	86.7	84.9	85.8	13.3	15.1	14.2	0.0	0.0	0.0
Total	139	9,688	100.0	1,060	0.0	0.0	0.0	0.0	0.0	0.0	86.7	84.9	85.8	13.3	15.1	14.2	0.0	0.0	0.0

*Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
SD Non-MSA	308	27,802	100.0	1,017	76.4	63.3	55.9	6.9	21.1	16.7	15.6
Total	308	27,802	100.0	1,017	76.4	63.3	55.9	6.9	21.1	16.7	15.6
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
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
SD Non-MSA	164	11,209	100.0	925	77.7	40.2	43.5	6.8	18.3	15.5	41.5
Total	164	11,209	100.0	925	77.7	40.2	43.5	6.8	18.3	15.5	41.5
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015
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
SD Non-MSA	139	9,688	100.0	1,060	76.8	47.5	47.0	5.3	10.8	17.9	41.7
Total	139	9,688	100.0	1,060	76.8	47.5	47.0	5.3	10.8	17.9	41.7
<i>Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
SD Non-MSA	417	54,572	100.0	647	0.0	0.0	0.0	1.1	0.0	0.0	86.9	96.9	91.8	12.1	3.1	8.2	0.0	0.0	0.0
Total	417	54,572	100.0	647	0.0	0.0	0.0	1.1	0.0	0.0	86.9	96.9	91.8	12.1	3.1	8.2	0.0	0.0	0.0

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

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
SD Non-MSA	205	30,045	100.0	432	0.0	0.0	0.0	0.0	0.0	0.0	93.6	94.6	95.1	6.4	5.4	4.9	0.0	0.0	0.0
Total	205	30,045	100.0	432	0.0	0.0	0.0	0.0	0.0	0.0	93.6	94.6	95.1	6.4	5.4	4.9	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
SD Non-MSA	274	37,166	100.0	686	0.0	0.0	0.0	0.0	0.0	0.0	88.7	94.9	86.0	11.3	5.1	14.0	0.0	0.0	0.0
Total	274	37,166	100.0	686	0.0	0.0	0.0	0.0	0.0	0.0	88.7	94.9	86.0	11.3	5.1	14.0	0.0	0.0	0.0

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
SD Non-MSA	417	54,572	100.0	647	98.1	82.5	63.1	1.0	10.8	1.0	6.7
Total	417	54,572	100.0	647	98.1	82.5	63.1	1.0	10.8	1.0	6.7

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
SD Non-MSA	205	30,045	100.0	432	98.3	76.1	58.6	0.9	14.1	0.9	9.8
Total	205	30,045	100.0	432	98.3	76.1	58.6	0.9	14.1	0.9	9.8

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
SD Non-MSA	274	37,166	100.0	686	98.8	79.6	59.9	0.7	10.9	0.4	9.5
Total	274	37,166	100.0	686	98.8	79.6	59.9	0.7	10.9	0.4	9.5

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: SOUTH DAKOTA				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
SD Non-MSA	1	78	13	2,153	14	2,231	92.6	0	0
SD Statewide with P/M/F	1	178	0	0	1	178	7.4	1	6
SD Statewide without P/M/F	0	0	0	0	0	0	0	1	1,000

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: SOUTH DAKOTA				Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018			
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				
SD Non-MSA	100.00	4	100.00	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	5.50	91.60	2.90				

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

STATE OF TEXAS

LENDING VOLUME		Geography: Texas						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018					
Assessment Area (2017):	% 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)		
Full Review:													
Dallas MSA	100.0	267	64,499	927	27,264	4	43	1	1,456	1,199	93,262	100.00	

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Dallas MSA	108	27,808	100.0	83,191	0.3	0.0	0.2	5.5	1.9	4.0	26.2	18.5	27.0	67.9	79.6	68.8	0.1	0.0	0.0
Total	108	27,808	100.0	83,191	0.3	0.0	0.2	5.5	1.9	4.0	26.2	18.5	27.0	67.9	79.6	68.8	0.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

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
Dallas MSA	91	22,707	100.0	93,864	0.1	0.0	0.1	4.1	1.1	2.7	25.9	20.9	25.2	69.8	78.0	72.0	0.0	0.0	0.0
Total	91	22,707	100.0	93,864	0.1	0.0	0.1	4.1	1.1	2.7	25.9	20.9	25.2	69.8	78.0	72.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2015**

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
Dallas MSA	68	13,984	100.0	61,723	0.0	0.0	0.0	3.5	5.9	2.3	22.3	17.6	19.7	74.2	76.5	78.0	0.0	0.0	0.0
Total	68	13,984	100.0	61,723	0.0	0.0	0.0	3.5	5.9	2.3	22.3	17.6	19.7	74.2	76.5	78.0	0.0	0.0	0.0

*Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-18**

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
Dallas MSA	108	27,808	196.4	83,191	13.5	1.9	1.5	12.8	3.7	8.2	17.1	17.6	17.8	56.5	72.2	59.9	0.0	4.6	12.6
Total	108	27,808	196.4	83,191	13.5	1.9	1.5	12.8	3.7	8.2	17.1	17.6	17.8	56.5	72.2	59.9	0.0	4.6	12.6

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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 **2016**

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
Dallas MSA	91	22,707	100.0	93,864	12.4	0.0	1.3	12.5	7.7	7.7	17.9	31.9	16.5	57.2	58.2	59.5	0.0	2.2	14.9
Total	91	22,707	100.0	93,864	12.4	0.0	1.3	12.5	7.7	7.7	17.9	31.9	16.5	57.2	58.2	59.5	0.0	2.2	14.9

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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 **2015**

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
Dallas MSA	68	13,984	100.0	61,723	11.9	1.5	1.5	11.9	11.8	7.4	17.4	19.1	15.7	58.8	58.8	59.4	0.0	8.8	16.0
Total	68	13,984	100.0	61,723	11.9	1.5	1.5	11.9	11.8	7.4	17.4	19.1	15.7	58.8	58.8	59.4	0.0	8.8	16.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2015 Bank Data, 2015 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																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas MSA	505	14,920	100.0	42,990	3.1	4.6	3.6	7.5	7.7	7.7	22.4	21.6	20.8	66.8	66.1	67.7	0.2	0.0	0.2
Total	505	14,920	100.0	42,990	3.1	4.6	3.6	7.5	7.7	7.7	22.4	21.6	20.8	66.8	66.1	67.7	0.2	0.0	0.2

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
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
Dallas MSA	231	6,341	100.0	47,135	1.1	0.0	0.8	8.3	6.5	8.3	22.3	20.8	19.3	68.3	72.7	71.7	0.0	0.0	0.0
Total	231	6,341	100.0	47,135	1.1	0.0	0.8	8.3	6.5	8.3	22.3	20.8	19.3	68.3	72.7	71.7	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2015**

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
Dallas MSA	191	6,003	100.0	29,377	0.1	0.0	0.1	8.1	6.8	9.2	19.0	19.4	17.0	72.8	73.8	73.7	0.0	0.0	0.0
Total	191	6,003	100.0	29,377	0.1	0.0	0.1	8.1	6.8	9.2	19.0	19.4	17.0	72.8	73.8	73.7	0.0	0.0	0.0

*Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas MSA	505	14,920	100.0	42,990	88.8	46.7	51.9	3.5	8.5	7.7	44.8
Total	505	14,920	100.0	42,990	88.8	46.7	51.9	3.5	8.5	7.7	44.8

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 **2016**

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
Dallas MSA	231	6,341	100.0	47,135	88.3	8.2	44.8	3.8	5.6	7.9	86.1
Total	231	6,341	100.0	47,135	88.3	8.2	44.8	3.8	5.6	7.9	86.1

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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 **2015**

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
Dallas MSA	191	6,003	100.0	29,377	82.5	6.8	54.3	3.1	4.7	14.4	88.5
Total	191	6,003	100.0	29,377	82.5	6.8	54.3	3.1	4.7	14.4	88.5

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

2017-18

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dallas MSA	0	0	0.0	279	1.9	0.0	0.7	7.2	0.0	4.3	31.7	0.0	48.0	58.9	0.0	47.0	0.2	0.0	0.0
Total	0	0	0.0	279	1.9	0.0	0.7	7.2	0.0	4.3	31.7	0.0	48.0	58.9	0.0	47.0	0.2	0.0	0.0

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

2016

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dallas MSA	2	26	100.0	226	0.6	0.0	0.0	7.5	0.0	4.0	33.1	0.0	50.9	58.8	100.0	45.1	0.0	0.0	0.0
Total	2	26	100.0	226	0.6	0.0	0.0	7.5	0.0	4.0	33.1	0.0	50.9	58.8	100.0	45.1	0.0	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

2015

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Dallas MSA	2	17	100.0	161	0.3	0.0	0.0	7.8	0.0	0.6	26.3	50.0	44.1	65.6	50.0	55.3	0.0	0.0	0.0
Total	2	17	100.0	161	0.3	0.0	0.0	7.8	0.0	0.6	26.3	50.0	44.1	65.6	50.0	55.3	0.0	0.0	0.0

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Dallas MSA	0	0	0.0	279	95.0	0.0	57.0	2.6	0.0	2.5	0.0	
Total	0	0	0.0	279	95.0	0.0	57.0	2.6	0.0	2.5	0.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Dallas MSA	2	26	100.0	226	95.1	0.0	57.1	2.7	0.0	2.2	100.0	
Total	2	26	100.0	226	95.1	0.0	57.1	2.7	0.0	2.2	100.0	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2015
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Dallas MSA	2	17	100.0	161	95.3	0.0	58.4	2.9	0.0	1.9	100.0	
Total	2	17	100.0	161	95.3	0.0	58.4	2.9	0.0	1.9	100.0	

Source: 2015 D&B Data; 01/01/2015 - 12/31/2015 Bank Data; 2015 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: TEXAS									
Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Dallas MSA	0	0	10	6,357	10	6,357	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: TEXAS																	
Evaluation Period: JANUARY 1, 2016 TO DECEMBER 31, 2018																	
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
Dallas MSA	100.00	4	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	2.30	9.50	28.60	59.30

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

REGIONAL AND NATIONWIDE

LENDING VOLUME		Geography: Regional						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018				
Assessment Area (2017):	% 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)	
Full Review:												
Regional with P/M/F								1	4,000	1	4,000	
Regional without P/M/F								1	3,000	1	3,000	

LENDING VOLUME		Geography: Nationwide						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2018				
Assessment Area (2017):	% 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)	
Full Review:												
Nationwide								3	14,883	3	14,883	

* Loan Data as of December 31, 2018. Rated area refers to either state or multistate rating area.

** The evaluation period for Community Development Loans is from January 01, 2016 to December 31, 2018.

*** Deposit Data as of June 30, 2018. Rated Area refers to either the state, multistate, or institution, as appropriate.