



## **PUBLIC DISCLOSURE**

April 11, 2014

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Fidelity Bank  
Charter Number 706081

100 East English Street  
Wichita, KS 67202

Office of the Comptroller of the Currency

2959 N. Rock Road  
Suite 510  
Wichita, KS 67226

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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# Overall CRA Rating

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

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

Performance Levels	Fidelity Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
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:

- Fidelity’s lending activity demonstrated good responsiveness to community credit needs. The overall geographic distribution of loans by income level of the geography is good. The overall distribution of loans to borrowers of different income levels is good. The bank’s activities demonstrate excellent responsiveness to community development lending needs.
- Fidelity’s level of qualified community development investments and grants exhibits adequate responsiveness to community development needs.
- Fidelity’s delivery systems are accessible to essentially all portions of the institution’s assessment areas. The bank’s services and hours are generally consistent throughout all locations. The institution provides an adequate level of community development services.

## 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 usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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 do 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 applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on 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 refinancings, 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 ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine

the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any 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 Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in ‘loans to small farms’ as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders’ equity, perpetual preferred shareholders’ equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is 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 Institution

Fidelity Bank (Fidelity) is a \$1.56 billion interstate thrift financial institution headquartered in Wichita, Kansas. The bank is a wholly owned subsidiary of Fidelity Financial Corporation, Wichita, Kansas, a holding company with \$213 million in assets. The bank has no affiliates requiring consideration for CRA activities.

Fidelity is a full-service banking institution that offers a broad range of commercial, real estate, and consumer credit products; however, the bank's primary lending activities focus on residential real estate and small business loan products. Fidelity also has an active loan-servicing portfolio among its business lines. On December 31, 2013, net loans and leases represent 76 percent of the bank's total assets. The bank's \$1.20 billion loan portfolio consisted of 79 percent real estate loans, 14 percent consumer loans, and 7 percent commercial and industrial loans. Tier One Capital totaled \$192.45 million.

Fidelity has two assessment areas (AAs), one each in Kansas and Oklahoma. The Kansas AA consists of Sedgwick County of the Wichita MA #48620. The bank's Oklahoma AA is comprised of Cleveland and Oklahoma Counties of the Oklahoma City MA #36420. Fidelity has a total of 22 branches and 25 automated teller machines (ATMs). Sixteen branches and 19 ATMs are in the state of Kansas. Six branches and six ATMs are in the state of Oklahoma.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The Office of Thrift Supervision last evaluated Fidelity's CRA performance on June 15, 2009. The bank received an overall rating of "Satisfactory".

Refer to Appendix C Market Profiles for Full-Scope Areas to review the demographic data for the bank's AAs.



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for loans originated was January 1, 2011 through December 31, 2013. The evaluation period for CD loans, CD investments, and CD services was July 15, 2009 through April 11, 2014. Lending activity in 2011 through 2013 was evaluated primarily against 2012 HMDA Aggregate Peer Mortgage Data (HMDA data) and 2012 Peer Small Business Data – Aggregate Lending (business data), and secondarily, 2000 or 2010 U.S. Census Bureau data on the distribution of families or owner-occupied housing units, as applicable. Peer Data for 2013 was not available for comparison as of the date of this evaluation.

The need for two evaluation periods was prompted by changes in census tract delineations that became effective January 1, 2012 because of the 2010 U.S. Census. The bank's activities during 2011 are considered one evaluation period and will be measured against demographic data from the 2000 U.S. Census. The years 2012 and 2013 are considered a different evaluation period and will be measured against demographic data from the 2010 U.S. Census. The evaluation period of 2012-2013, receives the most weight when considering the bank's CRA performance.

The evaluation of lending products included home mortgage loans, small business loans, and community development loans. Bank-wide, loans reportable under HMDA represented 79 percent of HMDA and CRA reportable loans (small loans to businesses) combined. CRA reportable loans represented 21 percent. Small loans to farms were minimal and will not be included in the lending analysis. Each AA was evaluated with proportionate weight assigned to its primary lending product.

### Data Integrity

The bank reported data is accurate. Prior to this evaluation, we conducted a data integrity examination to test the accuracy of the data reported by the bank. There have not been any changes to systems and controls.

### Ratings

The bank's overall rating is a blend of the state ratings. Performance in the State of Kansas received the most weight in the overall rating. The Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits dated June 30, 2013, reflects that the Sedgwick AA accounts for 85 percent of Fidelity's deposits and 73 percent of the offices. Eighty-five percent of lending during the evaluation periods occurred within the Sedgwick AA.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any AA by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## State Rating

### State of Kansas

<b>CRA Rating for Kansas:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Low Satisfactory</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Fidelity’s lending activity demonstrated good responsiveness to community credit needs. The overall distribution of loans by income level of the geography is good. The overall distribution of loans to borrowers of different income levels and businesses of different sizes is excellent. Community development lending had a positive impact on the bank’s lending test.
- Fidelity demonstrated adequate responsiveness to community development investment needs.
- Fidelity’s delivery systems are reasonably accessible to essentially all portions of the AA. The institution provides an adequate level of community development services.

### Description of Institution’s Operations in Kansas

Fidelity has designated Sedgwick County, Kansas (Sedgwick AA) as its Kansas AA as all branches and ATMs are in Sedgwick County. Fidelity operates 16 branches and 19 ATMs in the Sedgwick AA. Branches in the Sedgwick AA held deposits of \$1.06 billion as of June 30, 2013. This places Fidelity third in deposit market share in the AA, with 9.39 percent of all deposits. Competition within the Sedgwick AA is strong with 41 institutions insured by the Federal Deposit Insurance Corporation (FDIC) having 173 offices within the AA. The top two competitors hold 36.39 percent of all deposits in the AA.

Refer to the Market Profiles for the State of Kansas in Appendix C for detailed demographics and other performance context information.

### Scope of Evaluation in Kansas

Fidelity’s branches in the Sedgwick AA held 84.56 percent of the bank’s total deposits as of June 30, 2013 and originated 84.59 percent of all loans during the evaluation periods. Therefore, the State of Kansas will receive the most weight in the overall CRA rating.

We performed a full-scope review on the Sedgwick AA. We weighted home mortgage lending more heavily than small business lending, as these products represented 83 percent of the number and 82 percent of the dollar volume of all loans originated in the AA during the evaluation periods. Additionally, we weighted home purchase and home refinance lending heavier than home improvement and multi-family lending, as these products represented the overwhelming majority of all home

mortgage loans originated during the evaluation periods. An analysis of Fidelity's small farm loans for the Sedgwick AA is not meaningful since the bank did not originate any loans of this type during either evaluation period.

During this evaluation, examiners reviewed contacts made with community and/or business organizations over the course of the evaluation periods. The community contacts indicated that the primary credit needs for the Sedgwick AA are financing for affordable housing and financing for small businesses. It was the opinions of the contacts that local banks were supporting most of these needs.

## **LENDING TEST**

Based on a full-scope review, the bank's lending performance in the Sedgwick AA is rated "High Satisfactory".

### **Lending Activity**

Lending levels reflect good responsiveness to businesses and individuals in the AA in relation to area credit needs and the bank's deposit market share.

Refer to the State of Kansas section and the applicable evaluation period of Table 1 Lending Volume in Appendix D for the facts and data used to evaluate Fidelity's lending activity.

As of June 30, 2013, Fidelity ranked third in the Sedgwick AA with a deposit share of 9.39 percent. In relationship to deposit share, home mortgage lending activity volumes are good. Fidelity originated 3,699 home mortgage loans totaling \$475 million to borrowers in the AA between January 1, 2011 and December 31, 2013. The HMDA data reflects that Fidelity ranked second in the AA for home purchase loans with a market share of 11.50 percent and fifth for home refinance loans with a market share of 4.58 percent.

Business lending activity in the AA is good. Fidelity originated 786 small loans to businesses totaling \$105 million in the AA during the evaluation periods. The business data reflects that Fidelity ranked ninth in the market with 10.81 percent of the total dollar volume and 3.71 percent of the number of loans. Business data reflects that four of the banks that rank higher than Fidelity originate primarily credit card loans with an average size of \$5 thousand.

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

Fidelity's distribution of loans by income level of geography is good.

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

Fidelity's geographic distribution of home mortgage loans is adequate.

Refer to tables 2, 3, 4, and 5 in the Sedgwick County section of Appendix D for the facts and data used to evaluate the geographic distribution of Fidelity's home mortgage loan originations and purchases.

For the 2011 evaluation period, Fidelity's overall geographic distribution of home mortgage loans in the Sedgwick County AA is adequate. For low-income tracts, the bank's percentage of home purchase and

home refinance loans is significantly lower than the percentage of reflected on by HMDA data. For moderate-income tracts, the bank's percentage of home purchase and home refinance loans is near to or exceeds the HMDA data.

For the 2012-2013 evaluation period, Fidelity's overall geographic distribution of home mortgage loans in the Sedgwick AA is good. For low-income tracts, the bank's percentage of home purchase and home refinance loans is somewhat lower than or exceeds the percentage of HMDA data. For moderate-income tracts, the bank's percentage of home purchase and home refinance loans is near to or significantly exceeds the HMDA data.

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

Fidelity's overall geographic distribution of small loans to businesses is adequate. Small loans to businesses are not the primary product in the Sedgwick AA; therefore, the rating for small loans to businesses did not significantly affect the overall rating for the Lending Test.

Refer to Table 6 in the State of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

For the 2011 evaluation period, Fidelity's overall geographic distribution of small loans to businesses in the Sedgwick County AA is poor. For low-income tracts, the bank's percentage of loans to businesses is significantly lower than reflected in the business data. For moderate-income tracts, the bank's percentage of loans to businesses is lower than the business data.

For the 2012-2013 evaluation period, Fidelity's overall geographic distribution of small loans to businesses in the Sedgwick County AA is adequate. For low-income tracts, the bank's percentage of loans to businesses is somewhat lower than the business data. However, the bank's percentage of small loans to businesses is near to the U.S. Census Demographic. For moderate-income tracts, the bank's percentage of loans to businesses is lower than the business data.

Fidelity's relationship with one borrower significantly affects its rating for small loans to businesses. Loans to this borrower represent 45.61 percent of the CRA reported business loans in the AA during the 2011 evaluation period and 28.54 percent in the 2012-2013 evaluation period. Additionally, the borrower is located in an upper-income tract.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for any unexplained lending gaps in the Sedgwick County AA. Given Fidelity's focus in the AA on home mortgage lending, examiners focused on census tracts located near bank branches in which Fidelity did not originate any home mortgage loans during the evaluation periods.

No significant gaps were identified. Fidelity originated home mortgage loans in 38 of the 44 (86.36 percent) low- and moderate-income tracts in the AA during the 2011 evaluation period and 50 of the 54 (92.59 percent) low- and moderate-income tracts during the 2012-2013 evaluation period. Low- or moderate-income tracts where Fidelity did not lend are generally located some distance from branches or have very low levels of owner-occupied households.

***Inside/Outside Ratio***

For the geographic distribution analysis under the lending test, we performed an inside/outside analysis at the bank level. An adequate percentage of the bank's loans, or 66 percent, were extended to borrowers within the bank's AAs. Fidelity's business strategy of originating mobile home loans provided by a third-party influences the inside/outside analysis, as the majority of these loans are to borrowers outside of the bank's AAs.

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

Fidelity's distribution of loans to borrower of different income levels and businesses of different sizes reflects excellent penetration.

***Home Mortgage Loans***

Fidelity's overall borrower distribution for home mortgage loans is excellent.

Refer to Tables 8, 9, and 10 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.

For the 2011 evaluation period, Fidelity's overall borrower distribution of home mortgage loans in the Sedgwick County AA is excellent. For low-income borrowers, the bank's percentage of home purchase and home refinance loans significantly exceeds HMDA data. For moderate-income borrowers, the bank's percentage of home purchase and home refinance loans exceeds HMDA data. Additionally, for moderate-income borrowers, the bank's percentage of home purchase and home refinance loans significantly exceeds the 2000 U.S. Census Demographic.

For the 2012-2013 evaluation period, Fidelity's overall borrower distribution of home mortgage loans in the Sedgwick County AA is excellent. For low-income borrowers, the bank's percentage of home purchase and home refinance loans is near to or significantly exceeds HMDA data. For moderate-income borrowers, the bank's percentage of home purchase and home refinance loans exceeds or significantly exceeds HMDA data. Additionally, for moderate-income borrowers, the bank's percentage of home purchase and home refinance loans significantly exceeds the 2010 U.S. Census Demographic and significantly exceeds Fidelity's overall market share for those products.

***Small Loans to Businesses***

Fidelity's overall distribution of small loans to businesses with gross revenues of \$1 million or less is adequate. As business loans are not a primary product, the rating for small loans to businesses did not significantly affect the overall rating for the Lending Test.

Refer to Table 11 in the State of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

For the 2011 evaluation period, Fidelity's level of lending (20.35 percent) to businesses with gross revenues of \$1 million or less is adequate; however, lower than business data (34.78 percent). Eighty-eight percent of loans originated were \$250 thousand or less. During the 2012-2013 evaluation period, Fidelity's lending to businesses with gross revenues of \$1 million or less is poor. The bank's percentage

of small loans to businesses (14.97 percent) is significantly lower than the business data (30.77 percent). Eighty-two percent of loans originated were \$250 thousand or less.

### **Community Development Lending**

Fidelity's community development lending activity demonstrates excellent responsiveness to community development needs in the Sedgwick AA and had a very positive impact on the Lending Test, enhancing lending activity as well as geographic and borrower distribution. The need for improved access to quality affordable housing is high in the AA and Fidelity's loans exhibited an excellent level of responsiveness to improving access to quality affordable housing

Refer to the State of Kansas section within Table 1 titled Lending Volume (2012/2013) in Appendix D for the facts and data used to evaluate the Bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes Geographic Lending data on all Multifamily Loans, including those that also qualify as community development loans, but Table 5 does not separately list community development loans.

During the evaluation period, Fidelity originated or participated in thirty-four community development loans totaling \$13 million and representing 7.66 percent of December 31, 2013 allocated Tier One Capital. While the majority of these loans supported affordable housing, Fidelity's largest community development loan was \$5.5 million loan to rebuild a hotel in the Old Town redevelopment district in central Wichita. This loan supported the revitalization/stabilization of a low-income geography.

Other community development loans included twenty-seven loans to a State of Kansas certified community housing development organization (CHDO). These loans supported the development and construction of twenty-seven single-family homes sold to families with incomes of less than 80 percent of the AA's median income. These families also received pre-homeownership training provided by the CHDO. Single-family affordable homeownership is a significant community development need in the Sedgwick County AA.

### **Product Innovation and Flexibility**

Fidelity uses flexible lending practices in order to serve AA credit needs. An example is the financing of twenty-seven single-family development and construction loans to a Kansas certified CHDO in the Sedgwick County AA. This type of lending may require a significant bank investment in credit administration and support for loans with comparatively small balances. From the bank's perspective, the opportunities to create affordable first time homeownership opportunities for low- and moderate-income families justified their investment in bank resources supporting these loans.

### **INVESTMENT TEST**

Based on a full-scope review, the bank's performance in the Sedgwick County AA is rated "Low Satisfactory".

Refer to Table 14 titled Qualified Investments (2012/2013) in the State of Kansas section in Appendix D for the facts and data used to evaluate the bank's level of qualified investments for the evaluation period.

Fidelity made a \$2 million investment in a multi-state equity capital fund that invests in affordable rental and homeowner housing through the syndication of federal low-income housing tax credits. This equity capital fund includes Sedgwick County in their service area and Fidelity has designated \$1.6 million of this investment to support affordable housing needs in their Sedgwick County AA. Fidelity also had \$204 thousand in qualified donations to nine organizations in the Sedgwick County AA. Of significance are donations to organizations that provide financial training and education to low- and moderate-income school children and community services targeted to low- and moderate-income school children.

## **SERVICE TEST**

Based on a full-scope review, the bank's performance in the Sedgwick County AA is rated "Low Satisfactory".

### **Retail Banking Services**

Fidelity's delivery systems are reasonably accessible to all portions of the Sedgwick AA.

Refer to Table 15 in the State of Kansas section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank has maintained 16 branch locations and 19 ATMs in this full-scope AA, a decline from 20 branches and 23 ATMs following the closing of four in-store Wal-Mart branch locations between April 2012 and March 2013. None of the four locations were located in low- or moderate-income tracts.

The closing of four branches, along with their ATMs, were a part of the bank's strategic plan to reduce the overhead expense from unprofitable locations as leases expired. Management has increased their focus on promoting the bank's online banking features including its new mobile banking product. To the extent changes have been made, the bank's closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or individuals. The bank did not open any new branches in the Sedgwick AA during the evaluation periods.

For the 2011 evaluation period, the geographic distribution of branches and ATMs in low-income tracts does not reflect the demographics of the Sedgwick AA; however, as noted below, distribution improves in the 2012-2013 evaluation period.

For the moderate-income tracts during the 2011 evaluation period, the geographic distribution of branches and ATMs reasonably reflect the AA demographics. Demographics reflect that 29 percent of the population resides in moderate-income tracts, while 15 percent of the branches and 22 percent of the bank's ATMs in the AA are in these tracts. In addition, seven or 35 percent of other branches and eight or 35 percent of other ATMs located in middle- or upper-income tracts are adjacent or reasonably accessible to multiple moderate-income tracts within the Sedgwick AA.

For the 2012-2013 evaluation period, the geographic distribution of branches and ATMs in low-income tracts reasonably reflect the demographics. This is primarily due to the reclassification of census tracts subsequent to the 2010 U.S. Census. Currently, branch and ATM distribution in low-income tracts is 6.25 percent and 10.53 percent, respectively. Eight percent of the AA population resides in low-income tracts.



Out of 13 low-income tracts in the AA, the bank has one location, the main office, located in a low-income tract. There are two ATMs at this location. One of the ATMs accepts deposits and is available 24 hours per day. The second machine, cash dispensing only, is inside the branch located in downtown Wichita and available during regular business hours. The downtown location is adjacent to three other low-income tracts. In addition, four other branches and ATMs not located in low-income geographies are also adjacent or reasonably accessible to two other low-income tracts.

For the 2012-2013 evaluation period, the geographic distribution of branches and ATMs in moderate-income tracts reasonably reflects the demographics of the Sedgwick AA. Nearly 30.0 percent of the population resides in moderate-income tracts. The branch and ATM distribution in the moderate-income tracts is 18.75 percent and 42.10 percent, respectively. The bank has three branches and four ATMs, including a deposit accepting ATM, located in these geographies. An additional four branches and five ATMs, including one deposit taking ATM, located in middle- and upper-income tracts are either adjacent or reasonably accessible to other low- and/or moderate-income tracts.

In 2013, the bank upgraded four of the 19 ATMs within the Sedgwick AA to deposit accepting (savings and checking) machines. One of these ATMs is located in a low-income tract, one in a moderate-income tract, and two in middle-income tracts. Of the two machines in middle-income tracts, one is adjacent to low- and moderate-income tracts.

Services do not vary in a way that inconveniences low- or moderate-income geographies or low- or moderate-income individuals. Fidelity offers convenient and consistent business hours. Each traditional branch location is equipped with a drive-through facility. Hours of operations are Monday through Friday 9:00 A.M. to 5:00 P.M. for the lobby and 7:30 A.M. to 6:00 P.M. for the drive-through. In addition, the Wal-Mart locations provide extended evening hours Monday through Saturday and are open on Sundays. In-store locations are also open on holidays with the exception of New Years, Thanksgiving, and Christmas. There are no differences in the hours of operations or service offered in banks situated in low- or moderate-income tracts compared to those situated in middle- or upper-income tracts. Deposit products are accessible at all banking locations. Branch managers are available at all locations to assist loan applicants, when needed.

Fidelity's retail products include flexible home loan programs with the Federal Housing Administration, Veteran's Administration, and the U. S. Department of Agriculture/Rural Development. These flexible loan programs offer borrowers an opportunity to obtain home financing when they would otherwise be denied under a conventional loan program.

In addition to Fidelity's business line of portfolio servicing, the bank provides loan servicing at a reduced rate for loans originated through various programs sponsored by the City of Wichita's Housing Department and are within targeted Neighborhood Revitalization Areas. The bank also actively participates in the Home Affordable Modification Program.

Other delivery services include automated 24-hour telephone banking, 24-hour Internet banking, a customer call center, and online loan applications. The SmartVoice interactive telephone banking service includes obtaining information on existing accounts and account transfers. Internet banking service includes accessing existing accounts, account transfers, bill pay, and tax preparation software. The bank also introduced mobile banking in 2013, allowing online banking customers to access account information via their mobile device. The bank's Retail Banking Customer Center is available toll-free Monday through Friday 8:00 A.M. to 8:00 P.M. and Saturdays 9:00 A.M. to 6:00 P.M. The Mortgage

Servicing Call Center is also available toll-free Monday through Friday 8:00 A.M. to 5:00 P.M. Lastly, current or perspective customers may apply for select lending products (consumer loans, home equity lines of credit, and residential mortgages) via the bank's public website. We did not place any significant weight on these alternative delivery systems, as there was no information available to show whether these services are effective in reaching low- and moderate-income individuals and geographies.

### **Community Development Services**

Fidelity's performance for community development services conducted in the Sedgwick AA is adequate.

As a member of the Federal Home Loan Bank of Topeka, Fidelity sponsored the awarding of five Federal Home Loan Bank Grants totaling \$854 thousand to community housing development organizations in the Sedgwick AA. Bank personnel also provided financial services to a non-profit community development corporation providing non-traditional mortgages to low- and moderate-income individuals, financial services to an organization providing financial abuse counseling to senior citizens, and organizations that provided community services for low- and moderate-income individuals in the Sedgwick AA.

## State Rating

### State of Oklahoma

<b>CRA Rating for Oklahoma:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>High Satisfactory</b>
<b>The investment test is rated:</b>	<b>Low Satisfactory</b>
<b>The service test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include:

- Fidelity’s lending activity demonstrated good responsiveness to community credit needs. The overall distribution of loans by income level of the geography is good. The overall distribution of loans to borrowers of different income levels and businesses of different sizes is good. The volume and type of loans with a community development purpose demonstrates excellent responsiveness to community development needs.
- Fidelity demonstrated adequate responsiveness to community development investment needs.
- Fidelity’s delivery systems are reasonably accessible to essentially all portions of the AA. The institution provides a limited level of community development services.

### Description of Institution’s Operations in Oklahoma

Fidelity has designated Cleveland County and Oklahoma County as a two county AA in the State of Oklahoma (Cleveland/Oklahoma AA). All of the bank’s Oklahoma branches are located in these two counties. As of March 24, 2014, the bank operates six branches and six ATMs in the Cleveland/Oklahoma AA. The Cleveland/Oklahoma AA held deposits of \$194 million as of June 30, 2013. This places Fidelity 22<sup>nd</sup> in deposit market share in the AA, with 0.85 percent of all deposits. Competition is strong with 57 FDIC insured financial institutions having 322 offices within the AA. The top three competitors hold 40 percent of all deposits in the AA.

Refer to the Market Profiles for the State of Oklahoma in Appendix C for detailed demographics and other performance context information.

### Scope of Evaluation in Oklahoma

Fidelity’s branches in the Cleveland/Oklahoma AA held 15 percent of the bank’s total deposits and originated 15 percent of the number of loans during the evaluation periods. Therefore, the State of Oklahoma will not receive as much weight as the State of Kansas in the overall CRA rating.

We performed a full-scope review on the Cleveland/Oklahoma AA. We weighted home mortgage lending slightly more than small business lending, as these products represented 61 percent of the number and 65 percent of the dollar of loans originated in the AA during the evaluation periods. Additionally we weighted home purchase and home refinance lending heavier than home improvement and multi-family lending, as these products represented the overwhelming majority of all home

mortgage loans originated during the evaluation periods. An analysis of Fidelity's small farm loans for the Cleveland/Oklahoma AA is not meaningful since the bank did not originate any loans of this type during either evaluation period.

During this examination, examiners reviewed a community contact performed by an OCC Community Development Officer during the course of the evaluation period. The community contact indicated that the primary credit needs for the AA were financing for affordable housing, small business loans, and financial literacy programs. Banks are generally meeting the credit needs of the community; however, the contact states the difficulty for banks to participate in a small dollar loan program is a barrier.

## **LENDING TEST**

The bank's performance under the lending test in the Cleveland/Oklahoma AA is rated "High Satisfactory".

### **Lending Activity**

Lending levels reflect adequate responsiveness to businesses and individuals in the AA in relation to area credit needs and the bank's deposit market share.

Refer to the State of Oklahoma section and the applicable evaluation period of Tables 1 Lending Volume in Appendix D for the facts and data used to evaluate the bank's lending activity.

As of June 30, 2013, Fidelity ranked 22<sup>nd</sup> in the Cleveland/Oklahoma AA with a deposit share of 0.85 percent. In relationship to deposit share, home mortgage lending activity volumes reflect poor responsiveness to assessment area credit needs. The institution originated 498 loans totaling \$93 million to borrowers in the AA during the evaluation periods. The 2012 HMDA data reflects that Fidelity ranked 40<sup>th</sup> in the AA for home purchase loans with a market share of 0.42 percent. The bank was ranked 179<sup>th</sup> for home refinance with a 0.02 percent market share.

Business lending activity in the AA is good. The 2012 business data for CRA reportable business loans reflects that Fidelity was ranked 24<sup>th</sup> in the market with 0.66 percent of the number and 2.40 percent of the total dollar volume and of loans. The institution originated 319 small business loans totaling \$50 million to businesses between January 1, 2011 and December 31, 2013.

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

The overall geographic distribution of loans by income level of the geography reflects good penetration throughout the assessment area.

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

Fidelity's overall geographic distribution of home mortgage loans is good.

Refer to Tables 2, 3, 4, and 5 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

For the 2011 evaluation period, Fidelity's overall geographic distribution of home mortgage loans in the AA is adequate. For low-income tracts, the bank's percentage of home refinance loans significantly exceeds the percentage of HMDA data. The bank did not originate any home purchase loans.

Opportunities in the low-income tracts are limited as these tracts contain just 2.14 percent of owner-occupied units based on the 2000 U.S. Census. Additionally, the majority of low-income tracts are located in Oklahoma City's center core, over seven miles from the nearest branch. For moderate-income tracts, the bank's percentage of home purchase and home refinance loans is near to or significantly exceeds the percentage of HMDA data.

For the 2012-2013 evaluation period, Fidelity's overall geographic distribution of home mortgage loans in the AA is excellent. For low-income tracts, the bank's percentage of home purchase and home refinance loans significantly exceeds the HMDA data. Similarly, for moderate-income tracts, the bank's percentage of home purchase and home refinance loans exceeds or significantly exceeds HMDA data.

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

Fidelity's overall geographic distribution of small loans to businesses is adequate.

Refer to Table 6 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

For the 2011 evaluation period, Fidelity's overall geographic distribution of small loans to businesses in the AA is adequate. For low-income tracts, the bank's percentage of small loans to businesses is significantly lower than the business data. As noted above, the majority of low-income tracts are located a challenging distance from the nearest branch. For moderate-income tracts, the bank's percentage of small loans to businesses exceeds the business data.

For the 2012-2013 evaluation period, Fidelity's overall geographic distribution of small loans to businesses in the AA is adequate. For low-income tracts, the bank's percentage of small loans to businesses is significantly lower than the business data. For moderate-income tracts, the bank's percentage of small loans to businesses is near to the business data.

### ***Lending Gap Analysis***

Our geographic distribution analysis included a review for any unexplained lending gaps in the Cleveland/Oklahoma AA. Examiners focused on census tracts located near bank branches in which Fidelity did not originate any home mortgage or small businesses loans during the evaluation periods. Fidelity adequately lends in the low- and moderate-income tracts that are located within a reasonable distance from its branches.

No significant lending gaps were identified. Fidelity originated home mortgage loans in 20 of the 110 (18.18 percent) low- and moderate-income census tracts in the AA during the 2011 evaluation period and 55 of the 118 (46.61 percent) low- and moderate-income census tracts during the 2012-2013 evaluation period. Additionally, Fidelity originated small loans to businesses in 10 of the 110 (9.09 percent) low- and moderate-income census tracts during the 2011 evaluation period and 22 of the 118 (18.64 percent) low- and moderate-income census tracts during the 2012-2013 evaluation period.

As noted above, the majority of low-income census tracts are located a significant distance from the branches.

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

For the geographic distribution analysis under the lending test, we performed an inside/outside analysis at the bank level. An adequate percentage of the bank's loans, or 66 percent, were extended to borrowers within the bank's AAs. Fidelity's business strategy of originating mobile home loans provided by a third-party influences the inside/outside analysis, as the majority of these loans are to borrowers outside of the bank's AAs.

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

Fidelity's distribution of loans to borrowers of different income levels and businesses of different sizes reflects good penetration.

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

Fidelity's overall borrower distribution for home mortgage loans is good.

Refer to Tables 8, 9, and 10 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

For the 2011 evaluation period, Fidelity's overall borrower distribution of home mortgage loans in the AA is excellent. For low-income borrowers, the bank's percentage of home purchase and home refinance loans is near to or significantly exceeds the HMDA data. For moderate-income borrowers, the bank's percentage of home purchase and home refinance loans significantly exceeds HMDA data.

For the 2012-2013 evaluation period, Fidelity's overall borrower distribution of home mortgage loans in the AA is good. For low-income borrowers, the bank's percentage of home purchase and home refinance loans is near to or significantly exceeds HMDA data. For moderate-income borrowers, the bank's percentage of home purchase and home refinance loans is near to HMDA data. Additionally, for moderate-income borrowers, the bank's percentage of home purchase and home refinance loans significantly exceeds the 2010 U.S. Census Demographic.

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

Fidelity's overall distribution of small loans to businesses with gross revenues of \$1 million or less is excellent.

Refer to Table 11 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

For the 2011 evaluation period, Fidelity's lending (70.0 percent) to businesses with gross revenues of \$1 million or less is excellent. The bank's percentage of loans to small businesses significantly exceeds the business data (40.13 percent). Eighty-three percent of loans originated were \$250 thousand or less.

For the 2012-2013 evaluation period, Fidelity's lending to businesses with gross revenues of \$1 million or less is good. The bank's percentage of loans to small businesses (44.10 percent) exceeds business data 38.53 percent). Seventy-nine percent of loans originated were \$250 thousand or less.

### **Community Development Lending**

Fidelity's community development lending activity demonstrates excellent responsiveness to community development needs in their Cleveland/Oklahoma AA.

Refer to the State of Oklahoma section within Table 1 titled Lending Volume in Appendix D for the facts and data used to evaluate the Bank's level of community development lending. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes Geographic Lending data on all Multifamily Loans, including those that also qualify as community development loans, but Table 5 does not separately list community development loans.

During the evaluation period, Fidelity originated or participated in six community development loans totaling \$13 million and representing 42.45 percent of December 31, 2013 allocated Tier One Capital. All of these loans supported multi-family affordable housing. The need for improved access to quality affordable housing is high in the AA and Fidelity's loans exhibited an excellent level of responsiveness to improving access to quality affordable housing.

### **Product Innovation and Flexibility**

Fidelity did not provide any information regarding innovative or flexible loan products.

## **INVESTMENT TEST**

Based on full-scope reviews, the bank's performance in the Cleveland/Oklahoma AA is rated "Low Satisfactory".

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

Fidelity made a \$2 million investment in a multi-state equity capital fund that invests in affordable rental and homeowner housing through the syndication of federal low income housing tax credits. This equity capital fund includes Cleveland and Oklahoma Counties in their service area. Fidelity has designated \$400 thousand of this investment to support affordable housing needs in this AA. Fidelity also had \$18 thousand in qualified donations to four organizations in the Cleveland/Oklahoma AA. Of significance are donations to an organization that provides revitalization/stabilization to a low- and moderate-income geography, and organizations that provide community services targeted to low- and moderate-income individuals.

## **SERVICE TEST**

Based on a full-scope review, Fidelity's service performance in the Oklahoma/Cleveland AA is rated "Low Satisfactory".

## Retail Banking Services

Fidelity's delivery systems are accessible to limited portions of low- and moderate-income geographies; however, delivery systems are reasonably accessible to individuals of different income levels throughout the Cleveland/Oklahoma AA. Due to Fidelity's limited presence in the AA, limited accessibility for low- and moderate-income tracts did not significantly affect the bank's overall rating for the Service Test.

Refer to Table 15 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank has a minor presence in Oklahoma. Its branches are located in three distinct and widely separated areas of the Oklahoma City MSA. Two branches with ATMs are located in Edmond, Oklahoma, north of Oklahoma City. Three branches with ATMs are located in northwestern suburban Oklahoma City. One branch and ATM is located in Moore, Oklahoma, which is south of Oklahoma City. The majority of the low- and moderate-income census tracts are located in the inner core of Oklahoma City. There are no Fidelity branches in the city's center.

The bank Cleveland/Oklahoma AA contains six locations consisting of one main office and five branches. The AA has six ATMs, one at each branch location. One of the branches (Moore, OK) was constructed in July 2013. The Moore ATM accepts deposits while the other five ATMs are cash dispensing only. The bank's opening of the Moore branch has generally not adversely affected the accessibility of its delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals.

For the 2011 evaluation period, the geographic distribution of branches and ATMs in low- and moderate-income tracts is below the AA demographics. The AA population for low- and moderate-income tracts is 4.29 percent and 29.73 percent, respectively. The bank did not have any branches or ATMs in low-income tracts. In moderate-income tracts, the bank had one branch and ATM or 20.0 percent of the bank's locations. This facility, along with three branches and ATMs located in upper-income tracts, is adjacent to or reasonably accessible to six moderate-income tracts.

For the 2012-2013 evaluation period, the 2010 U.S. Census created additional low-income tracts. As a result, the bank's current geographic distribution of branches and ATMs in low-income tracts reflect the demographics in the AA. Seven percent of the AA population resides in low-income tracts. The branch and ATM distribution in these tracts is 16.67 percent.

For moderate-income tracts during the 2012-2013 evaluation period, the geographic distribution of branches and ATMs does not reflect the demographics of the Cleveland/Oklahoma AA. Prior to the 2010 U.S. Census reclassification, the bank had one branch and one ATM in a moderate-income tract. Because of reclassification, there were no branches or ATMs in moderate-income tracts during the 2012-2013 evaluation period; however, four of the six locations are adjacent or reasonably accessible to eight other moderate-income tracts.

Services do not vary in a way that inconveniences certain portions of the Cleveland/Oklahoma AA, particularly low- and moderate-income geographies or low- and moderate-income individuals. Fidelity offers convenient and consistent business hours at all of the Cleveland/Oklahoma AA branches. All bank locations have a drive-through facility. Lobby service hours Monday through Friday are



9:00 A.M. to 5:00 P.M. Drive-through facilities for all locations have extended hours starting at 7:30 A.M. to 6:00 P.M. Saturday hours for both the lobbies and drive-through facilities are 9:00 A.M. to 12:00 P.M. Hours of operation are the same for all locations within the AA.

Fidelity's retail products include flexible home loan programs, HAMP, and loan servicing as discussed under the Sedgwick County AA. Free or reduced cost loan servicing is provided for approximately 533 loans through programs operated by the Central Oklahoma Habitat for Humanity. These loans have unusual characteristics and require a sizeable commitment of resources with little or no remuneration.

Alternative delivery systems are the same as the Sedgwick County AA. Please refer to the State of Kansas evaluation for details. We did not place any significant weight on these alternative delivery systems, as there was no information available to show whether these services are effective in reaching LMI geographies or LMI individuals.

### **Community Development Services**

Fidelity's performance for community development services in the Cleveland/Oklahoma AA is poor. Fidelity reported one community service consisting of board membership for an educational services organization targeting educational services to low- and moderate-income adults.

## 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”).

<b>Time Period Reviewed</b>	<b>Lending Test:</b> January 1, 2011 – December 31, 2013 <b>Community Development Loan, Investment, and Service Tests:</b> June 15, 2009 – April 11, 2014	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Fidelity Bank		Small Business and Home Mortgage Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
<u>State of Kansas</u> Sedgwick County (part of MA #48620)	Full-scope	
<u>State of Oklahoma</u> Cleveland/Oklahoma Counties (part of MA #36420)	Full-scope	

## Appendix B: Summary of State Ratings

Fidelity Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Fidelity Bank	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
State of Kansas	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State of Oklahoma	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

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

## Appendix C: Market Profiles for Full-Scope Areas

### State of Kansas Full-Scope Area

The Sedgwick County AA lies within the Wichita MSA. Wichita is the largest city located in Sedgwick County. The 2013 assessment area consists of 13 low-income, 41 moderate-income, 34 middle-income, and 36 upper-income tracts. The 2010 U.S. Census identified changes in the number of low- and moderate-income tracts within the bank's Sedgwick County AA. The census indicates that low-income tracts increased by eight and moderate-income tracts increased by two. Other examples of demographic fluctuations can be identified by comparing the tables below.

Demographic Information: Sedgwick County AA - 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	118	4.24	33.05	37.29	25.42	0.00
Population by Geography	452,869	2.65	29.09	42.15	26.11	0.00
Owner-Occupied Housing by Geography	116,738	1.40	22.67	46.10	29.83	0.00
Business by Geography	45,569	1.98	24.75	41.13	32.14	0.00
Farms by Geography	1,258	0.95	11.76	51.75	35.53	0.00
Family Distribution by Income Level	118,663	17.98	18.92	24.26	38.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	43,797	4.50	43.39	41.12	10.98	0.00
Median Family Income HUD Adjusted Median Family Income for 2011		51,478 64,100	Median Housing Value Households Below Poverty Level		79,321 9.36%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information: Sedgwick County AA - 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	124	10.48	33.06	27.42	29.03	0.00
Population by Geography	498,365	7.93	29.95	29.65	32.47	0.00
Owner-Occupied Housing by Geography	127,710	4.01	25.63	31.80	38.56	0.00
Business by Geography	37,916	11.16	22.90	29.70	36.24	0.00
Farms by Geography	1,276	2.43	12.30	32.13	53.13	0.00
Family Distribution by Income Level	125,002	21.44	18.27	20.93	39.36	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	49,638	12.41	44.40	26.52	16.68	0.00
Median Family Income HUD Adjusted Median Family Income for 2013		61,850 63,200	Median Housing Value Households Below Poverty Level		116,537 13.13%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2013 HUD updated MFI

The October 2013 economic analysis for Wichita prepared by Moody's Analytics reflects a weak recovery with the housing market showing signs of recovery. The median sales price of new and existing homes has risen over this horizon. Recovery is also evidenced by the declining trend in unemployment. According to the Bureau of Labor Statistics, the December 2013 unemployment rate for Sedgwick County was 5.4 percent (unadjusted); favorable compared to the national unemployment rate of 6.7 percent. The Wichita MSA unemployment rate peaked in July 2009 at 10.6 percent, its highest level in ten years.

Manufacturing is the leading employment industry in Wichita. Manufacturing accounts for 18 percent of total employment. Specifically, the aviation industry continues to drive the Wichita economy. The manufacturing of aerospace products and parts accounts for 10 percent of total employment and 56 percent of manufacturing employment. Major aviation companies include Boeing (Defense, Space & Security), Bombardier Aerospace, Learjet, Cessna Aircraft Company, Hawker Beechcraft, and Spirit Aerosystems, Inc. Other key employment industries include trade, transportation and utilities, educational and health services, and government. These industries account for 17 percent, 15 percent, and 14 percent of total employment, respectively.

## State of Oklahoma Full-Scope Area

The 2013 Cleveland/Oklahoma AA lies within the Oklahoma City MSA. Oklahoma City is the largest city, with portions of the city in both counties. The 2013 Cleveland/Oklahoma AA consists of 31 low-income, 87 moderate-income, 104 middle-income, and 77 upper-income tracts, with four tracts unclassified. The 2010 U. S. Census identified changes in the number of low- and moderate income tracts within the bank's Cleveland/Oklahoma AA. The census indicates that low-income tracts increased by nine and moderate-income tracts decreased by one. Other examples of demographic fluctuations can be identified by comparing the tables below.

Demographic Information: Cleveland/Oklahoma AA - 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	279	7.89	31.54	33.69	25.09	1.79
Population by Geography	868,464	4.29	29.73	35.32	30.55	0.10
Owner-Occupied Housing by Geography	214,188	2.18	23.10	37.42	37.30	0.00
Business by Geography	107,031	3.73	20.68	33.96	39.62	2.02
Farms by Geography	2,429	1.32	15.73	36.15	46.03	0.78
Family Distribution by Income Level	226,032	20.35	17.84	21.21	40.60	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	86,318	6.37	42.16	35.38	16.08	0.00
Median Family Income HUD Adjusted Median Family Income for 2011		44,898 60,600	Median Housing Value Households Below Poverty Level		80,141 13.51%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information: Cleveland/Oklahoma AA - 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	303	10.23	28.71	34.32	25.41	1.32
Population by Geography	974,388	7.00	27.14	36.40	29.33	0.13
Owner-Occupied Housing by Geography	235,994	4.14	21.07	40.16	34.63	0.00
Business by Geography	92,146	6.54	20.84	34.98	36.19	1.44
Farms by Geography	2,282	3.16	18.49	38.78	39.22	0.35
Family Distribution by Income Level	235,467	22.17	17.93	20.04	39.87	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	94,411	11.48	38.95	35.50	14.07	0.00
Median Family Income HUD Adjusted Median Family Income for 2013		58,775 60,000	Median Housing Value Households Below Poverty Level		123,529 14.30%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2013 HUD updated MFI

The October 2013 economic analysis for Oklahoma City prepared by Moody's Analytics reflects an improving economy as indicated by falling housing inventories. Additionally, home prices have increased 8 percent in the past five years. The city has positioned itself to become an energy company mecca. Energy companies are emerging from downsizing brought on by low natural gas prices. The December 2013 unemployment rate (not seasonally adjusted) for Cleveland and Oklahoma Counties was 4.3 and 5.2 percent, respectively. These levels are favorable compared to a December 2013 national unemployment rate of 6.7 percent and an MSA high in February 2010 of 7.3 percent.

Government employment represents approximately 22 percent of total employment in the Oklahoma City MSA. The business, education, and healthcare industries and the agriculture, construction, and manufacturing industries account for approximately 33 percent and 17 percent, respectively, of employment in the Oklahoma City MSA. The largest employers in this area are the State of Oklahoma, Tinker Air Force Base, and Oklahoma University-Norman Campus, representing approximately eight percent, five percent, and two percent of employed persons within the Oklahoma City MA, respectively.

## Appendix D: Tables of Performance Data

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### 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 and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.



- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. 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.

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)		
<b>State of Kansas</b>													
<b>Full Review:</b>													
2011-Sedgwick County AA-2000 Census	100.00	1,090	133,622	285	29,817	0	0	NA	NA	1,375	163,439	100.00	
<b>State of Oklahoma</b>													
<b>Full Review:</b>													
2011-Cleveland Oklahoma Counties AA-2000 Census	100.00	114	29,602	90	12,071	0	0	NA	NA	204	41,673	100.00	

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from June 15, 2009 to April 11, 2014. See Table for evaluation period January 1, 2012 to December 31, 2013 for Community Development loans originated during the full evaluation period.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME														Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011	
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA *	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA **	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
<b>State of Kansas</b>															
<b>Full Review:</b>															
2011-Sedgwick County AA-2000 Census	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2011-Cleveland Oklahoma Counties AA-2000 Census	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00	

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area (2011):	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>State of Kansas</b>					
<b>Full Review:</b>					
2011-Sedgwick County AA-2000 Census	0	0	0	0	
<b>State of Oklahoma</b>					
<b>Full Review:</b>					
2011-Cleveland Oklahoma Counties AA- 2000 Census	0	0	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2011 to December 31, 2011.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE												Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2011-Sedgwick County AA-2000 Census	739	100.00	1.40	0.14	22.67	12.18	46.10	50.61	29.83	37.08	0.58	13.34	47.29	38.79	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2011-Cleveland Oklahoma Counties AA-2000 Census	59	100.00	2.18	0.00	23.10	11.86	37.42	35.59	37.30	52.54	0.62	11.82	35.47	52.09	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT											Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>State of Kansas</b>														
<b>Full Review:</b>														
2011-Sedgwick County AA-2000 Census	39	100.00	1.40	0.00	22.67	12.82	46.10	53.85	29.83	33.33	2.39	13.62	49.13	34.87
<b>State of Oklahoma</b>														
<b>Full Review:</b>														
2011-Cleveland Oklahoma Counties AA-2000 Census	7	100.00	2.18	0.00	23.10	14.29	37.42	0.00	37.30	85.71	1.97	19.56	38.77	39.70

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE											Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Low	Mod	Mid	Upp
<b>State of Kansas</b>														
<b>Full Review:</b>														
2011-Sedgwick County AA-2000 Census	311	100.00	1.40	0.00	22.67	11.90	46.10	43.09	29.83	45.02	0.32	9.39	43.67	46.62
<b>State of Oklahoma</b>														
<b>Full Review:</b>														
2011-Cleveland Oklahoma Counties AA-2000 Census	45	100.00	2.18	4.44	23.10	20.00	37.42	22.22	37.30	53.33	0.40	9.31	31.35	58.95

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY												Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2011-Sedgwick County AA-2000 Census	1	100.00	4.30	0.00	32.79	100.00	42.30	0.00	20.62	0.00	7.14	30.95	42.86	19.05	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2011-Cleveland Oklahoma Counties AA-2000 Census	3	100.00	4.77	0.00	38.17	0.00	34.17	66.67	22.89	33.33	11.25	35.00	40.00	13.75	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multi-family housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2011-Sedgwick County AA-2000 Census	285	100.00	1.98	0.35	24.75	15.44	41.13	14.74	32.14	69.47	2.39	26.26	39.73	31.62	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2011-Cleveland Oklahoma Counties AA-2000 Census	89	100.00	3.73	1.12	20.68	21.35	33.96	34.83	39.62	42.70	4.95	19.81	32.67	42.57	

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS											Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>State of Kansas</b>														
<b>Full Review:</b>														
2011-Sedgwick County AA-2000 Census	0	0.00	0.95	0.00	11.76	0.00	51.75	0.00	35.53	0.00	0.00	2.70	59.46	37.84
<b>State of Oklahoma</b>														
<b>Full Review:</b>														
2011-Cleveland Oklahoma Counties AA-2000 Census	0	0.00	1.32	0.00	15.73	0.00	36.15	0.00	46.03	0.00	1.39	8.33	47.92	42.36

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE												Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>1</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2011-Sedgwick County AA-2000 Census	739	100.00	17.98	17.06	18.92	29.44	24.26	23.25	38.84	30.26	14.58	26.58	24.97	33.86	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2011-Cleveland Oklahoma Counties AA-2000 Census	59	100.00	20.35	14.29	17.84	28.57	21.21	22.45	40.60	34.69	10.94	23.77	24.00	41.29	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by BANK.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT												Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data				
	#	% of Total**	% Families*	% BANK Loans****	% Families <sup>2</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2011-Sedgwick County AA-2000 Census	39	100.00	17.98	5.13	18.92	20.51	24.26	30.77	38.84	43.59	12.08	19.90	27.05	40.97	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2011-Cleveland Oklahoma Counties AA-2000 Census	7	100.00	20.35	14.29	17.84	0.00	21.21	14.29	40.60	71.43	10.96	22.55	26.99	39.50	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

2 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: HOME MORTGAGE REFINANCE												Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sub>3</sub>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2011-Sedgwick County AA-2000 Census	311	100.00	17.98	11.26	18.92	19.11	24.26	26.96	38.84	42.66	8.38	18.29	25.76	47.57	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2011-Cleveland Oklahoma Counties AA-2000 Census	45	100.00	20.35	6.06	17.84	24.24	21.21	12.12	40.60	57.58	6.35	15.66	21.88	56.11	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.4% of loans originated and purchased by BANK.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data <sup>†</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Kansas</b>									
<b>Full Review:</b>									
2011-Sedgwick County AA-2000 Census	285	100.00	66.16	20.35	81.05	7.37	11.58	6,359	2,212
<b>State of Oklahoma</b>									
<b>Full Review:</b>									
2011-Cleveland Oklahoma Counties AA-2000 Census	90	100.00	63.78	70.00	71.11	13.33	15.56	14,614	5,865

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS					Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>State of Kansas</b>									
<b>Full Review:</b>									
2011-Sedgwick County AA-2000 Census	0	0.00	97.77	0.00	0.00	0.00	0.00	74	59
<b>State of Oklahoma</b>									
<b>Full Review:</b>									
2011-Cleveland Oklahoma Counties AA-2000 Census	0	0.00	97.04	0.00	0.00	0.00	0.00	150	120

\* Based on 2011 Peer Small Business Data -- US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>State of Kansas</b>																	
<b>Full Review:</b>																	
2011-Sedgwick County AA-2000 Census	100.00	20	100.00	0.00	15.00	40.00	45.00	0	0	0	0	0	0	2.65	29.09	42.15	26.11
<b>Full Review:</b>																	
2011-Cleveland Oklahoma Counties AA-2000 Census	100.00	5	100.00	0.00	20.00	0.00	80.00	0	0	0	0	0	0	4.29	29.73	35.32	30.55

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM										Evaluation Period: JANUARY 1, 2011 TO DECEMBER 31, 2011							
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of BANK Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	# of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>State of Kansas</b>																	
<b>Full Review:</b>																	
2011-Sedgwick County AA-2000 Census	100.00	20	80.00	0.00	15.00	40.00	45.00	23	82.14	0.00	21.74	39.13	39.13	2.65	29.09	42.15	26.11
<b>State of Oklahoma</b>																	
<b>Full Review:</b>																	
2011-Cleveland Oklahoma Counties AA-2000 Census	100.00	5	20.00	0.00	20.00	0.00	80.00	5	7.86	0.00	20.00	0.00	80.00	4.29	29.73	35.32	30.55

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
<b>State of Kansas</b>													
<b>Full Review:</b>													
2013-Sedgwick County AA-2010 Census	100.00	2,609	341,157	501	75,330	0	0	34	13,000	3,110	416,487	100.00	
<b>State of Oklahoma</b>													
<b>Full Review:</b>													
2013-Cleveland Oklahoma Counties AA-2010 Census	100.00	384	63,126	229	38,139	0	0	6	13,000	613	101,265	100.00	

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from June 15, 2009 to April 11, 2014.

\*\*\* Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME														Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013	
Assessment Area (2013):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA**	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
<b>State of Kansas</b>															
<b>Full Review:</b>															
2013-Sedgwick County AA-2010 Census	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2013-Cleveland Oklahoma Counties AA-2010 Census	0.00	0	0	0	0	0	0	0	0	0	0	0	0	100.00	

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

\*\*\* Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products**

LENDING VOLUME		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area (2013):	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>State of Kansas</b>					
<b>Full Review:</b>					
2013-Sedgwick County AA-2010 Census	0	0	0	0	
<b>State of Oklahoma</b>					
<b>Full Review:</b>					
2013-Cleveland Oklahoma Counties AA- 2010 Census	0	0	0	0	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2013.

**Table 2a. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE												Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans****	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2013-Sedgwick County AA-2010 Census	1,758	100.00	4.01	1.54	25.63	17.18	31.80	34.36	38.56	46.93	2.11	18.47	33.28	46.14	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2013-Cleveland Oklahoma Counties AA-2010 Census	160	100.00	4.14	1.88	21.07	15.00	40.16	33.75	34.63	49.38	1.21	14.19	37.06	47.54	

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3a. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT												Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2013-Sedgwick County AA-2010 Census	59	100.00	4.01	1.69	25.63	23.73	31.80	15.25	38.56	59.32	3.34	17.78	31.50	47.38	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2013-Cleveland Oklahoma Counties AA-2010 Census	14	100.00	4.14	14.29	21.07	7.14	40.16	35.71	34.63	42.86	3.62	18.50	43.55	34.32	

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4a. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE											Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
<b>State of Kansas</b>														
<b>Full Review:</b>														
2013-Sedgwick County AA-2010 Census	791	100.00	4.01	1.26	25.63	16.94	31.80	27.31	38.56	54.49	1.19	13.83	29.78	55.19
<b>State of Oklahoma</b>														
<b>Full Review:</b>														
2013-Cleveland Oklahoma Counties AA-2010 Census	201	100.00	4.14	4.48	21.07	28.36	40.16	25.87	34.63	41.29	1.17	10.72	34.48	53.63

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 5a. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY												Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2013-Sedgwick County AA-2010 Census	1	100.00	14.07	100.00	36.37	0.00	34.26	0.00	15.30	0.00	21.28	46.81	25.53	6.38	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2013-Cleveland Oklahoma Counties AA-2010 Census	8	100.00	6.09	0.00	43.00	75.00	31.03	25.00	19.88	0.00	3.85	50.96	25.96	19.23	

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multi-family housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6a. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES											Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Low	Mod	Mid	Upp
<b>State of Kansas</b>														
<b>Full Review:</b>														
2013-Sedgwick County AA-2010 Census	501	100.00	11.16	9.78	22.90	15.57	29.70	32.34	36.24	42.32	12.88	24.36	27.56	35.20
<b>State of Oklahoma</b>														
<b>Full Review:</b>														
2013-Cleveland Oklahoma Counties AA-2010 Census	228	100.00	6.54	3.95	20.84	20.61	34.98	26.32	36.19	49.12	8.44	19.76	34.54	37.26

\* Based on 2012 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2013).

**Table 7a. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS											Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Low	Mod	Mid	Upp
<b>State of Kansas</b>														
<b>Full Review:</b>														
2013-Sedgwick County AA-2010 Census	0	0.00	2.43	0.00	12.30	0.00	32.13	0.00	53.13	0.00	0.00	8.91	41.58	49.50
<b>State of Oklahoma</b>														
<b>Full Review:</b>														
2013-Cleveland Oklahoma Counties AA-2010 Census	0	0.00	3.16	0.00	18.49	0.00	38.78	0.00	39.22	0.00	3.68	11.04	50.92	34.36

\* Based on 2012 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2013).

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

Borrower Distribution: HOME PURCHASE												Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>4</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2013-Sedgwick County AA-2010 Census	1,758	100.00	21.44	14.67	18.27	27.26	20.93	27.43	39.36	30.64	14.95	25.78	25.83	33.44	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2013-Cleveland Oklahoma Counties AA-2010 Census	161	100.00	22.17	8.82	17.93	20.59	20.04	25.74	39.87	44.85	9.51	24.24	23.27	42.98	

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.15% of loans originated and purchased by BANK.

4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9a. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT												Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>5</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2013-Sedgwick County AA-2010 Census	59	100.00	21.44	8.77	18.27	14.04	20.93	36.84	39.36	40.35	10.67	18.16	27.25	43.91	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2013-Cleveland Oklahoma Counties AA-2010 Census	14	100.00	22.17	9.09	17.93	18.18	20.04	27.27	39.87	45.45	10.40	20.14	26.63	42.83	

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.8% of loans originated and purchased by BANK.

<sup>5</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: HOME MORTGAGE REFINANCE												Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>6</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp	
<b>State of Kansas</b>															
<b>Full Review:</b>															
2013-Sedgwick County AA-2010 Census	791	100.00	21.44	8.36	18.27	20.55	20.93	25.62	39.36	45.48	7.42	16.91	26.17	49.50	
<b>State of Oklahoma</b>															
<b>Full Review:</b>															
2013-Cleveland Oklahoma Counties AA-2010 Census	201	100.00	22.17	8.53	17.93	14.73	20.04	19.38	39.87	57.36	6.00	15.79	21.93	56.27	

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.4% of loans originated and purchased by BANK.

<sup>6</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Kansas</b>									
<b>Full Review:</b>									
2013-Sedgwick County AA-2010 Census	501	100.00	69.32	14.97	68.86	12.77	18.36	8,222	2,530
<b>State of Oklahoma</b>									
<b>Full Review:</b>									
2013-Cleveland Oklahoma Counties AA-2010 Census	229	100.00	68.74	44.10	64.19	14.85	20.96	16,807	6,477

\* Based on 2012 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.5% of small loans to businesses originated and purchased by the bank.

**Table 12a. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Lending Data	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>State of Kansas</b>									
<b>Full Review:</b>									
2013-Sedgwick County AA-2010 Census	0	0.00	98.20	0.00	0.00	0.00	0.00	101	47
<b>State of Oklahoma</b>									
<b>Full Review:</b>									
2013-Cleveland Oklahoma Counties AA-2010 Census	0	0.00	96.76	0.00	0.00	0.00	0.00	167	122

\* Based on 2012 Peer Small Business Data -- US and PR

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.



**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Evaluation Period: June 15, 2009 TO April11, 2014							
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)		\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b><u>State of Kansas</u></b>									
<b>Full Review:</b>									
2013-Sedgwick County AA-2010 Census	0	0	10	1,804	10	1,804	76.83	0	0
<b><u>State of Oklahoma</u></b>									
<b>Full Review:</b>									
2013-Cleveland Oklahoma Counties AA-2010 Census	0	0	5	418	5	418	23.17	0	0

\* '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 institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013			
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
<b>State of Kansas</b>																			
<b>Full Review:</b>																			
2013-Sedgwick County AA-2010 Census	100.00	16	100.00	6.25	18.75	43.75	31.25	0	4	0	0	-2	-2	7.93	29.95	29.65	32.47		
<b>State of Oklahoma</b>																			
<b>Full Review:</b>																			
2013-Cleveland Oklahoma Counties AA-2010 Census	100.00	6	100.00	16.67	0.00	16.67	66.66	1	0	0	0	0	1	7.00	27.14	36.40	29.33		

**Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH and ATM DELIVERY SYSTEM										Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2013							
Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>State of Kansas</b>																	
<b>Full Review:</b>																	
2013-Sedgwick County AA-2010 Census	100.00	16	72.73	6.25	18.75	43.75	31.25	19	76.00	10.53	42.10	21.05	26.32	7.93	29.95	29.65	32.47
<b>State of Oklahoma</b>																	
<b>Full Review:</b>																	
2013-Cleveland Oklahoma Counties AA-2010 Census	100.00	6	27.27	16.67	0.00	16.67	66.66	6	24.00	16.67	0.00	16.67	66.66	7.00	27.14	36.40	29.33

