



## **PUBLIC DISCLOSURE**

June 13, 2016

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

Landmark Bank, National Association  
Charter Number 1467  
801 East Broadway  
Columbia, MO 65201

Office of the Comptroller of the Currency  
Kansas City Field Office  
7101 College Boulevard, Suite 1600  
Overland Park, KS 66210

**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**

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision and to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **Landmark Bank, N.A.** (LMB) issued by the OCC, the institution’s supervisory agency, for the evaluation period ending December 31, 2015. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

**Institution’s CRA Rating: Satisfactory**

The following table indicates the performance level of Landmark Bank, National Association with respect to the lending, investment, and service tests:

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

- The overall geographic distribution of loans is good. The geographic distribution of loans is good in the states of Missouri and Oklahoma. In the state of Texas, the geographic distribution of loans is adequate. Missouri and Oklahoma represent 85 percent of reported loans during the evaluation period and 79 percent of LMB’s deposits.
- The overall borrower distribution of loans is good. The borrower distribution of loans in the states of Missouri and Texas is good. In the state of Oklahoma, the borrower distribution of loans is excellent. Missouri and Texas represent 72 percent of reported loans during the evaluation period and 73 percent of LMB’s deposits.
- Excellent community development lending had a positive impact on the overall lending test rating. The performance elevated LMB’s otherwise overall good lending performance to excellent.

- The overall level of qualified investments is adequate. The level of qualified investments in the state of Missouri is adequate. The level of qualified investments in the state of Oklahoma is excellent. The level of qualified investments in the state of Texas is satisfactory.
- Delivery systems are accessible to essentially all portions of LMB's assessment areas (AAs). Bank employees provide an adequate level of community development services in LMB's AAs.

## 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 metropolitan area/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. CTs 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 multi-family 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 refinance, as defined in the HMDA regulation. These include loans for multi-family (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 metropolitan area/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 (MSA):** 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 MSA 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.

**Multi-family:** 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 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

LMB is a \$2.4 billion interstate financial institution headquartered in Columbia, Missouri. LMB is a subsidiary of the Landrum Company, a \$2.4 billion, one-bank holding company. LMB is a full-service banking institution offering a wide range of products for individuals and businesses. The bank offers various loan and deposit products, along with trust accounts for individuals and corporations. LMB's primary business focus is commercial lending to small- and medium-sized businesses. Residential real estate lending is a significant product for the bank.

As of December 31, 2015, LMB had \$1.4 billion in loans comprising 48 percent commercial and commercial real estate loans, 34 percent residential real estate loans, 11 percent agricultural loans, five percent consumer loans, and two percent other loans and leases. Tier 1 capital totaled \$203 million, or 8.4 percent of total assets.

LMB operates 42 banking offices, 4 loan processing centers (Ada, OK maintains drive-through operations), one deposit operations center (Chickasaw and Choctaw Nation Deposits), 52 ATMs including one cash-dispensing ATM. The bank also has 25 additional branded cash-dispensing ATMs and 13 video tellers throughout its five AAs in three states (Missouri, Oklahoma, and Texas). The AAs consist of two MSAs in (17860) Columbia, Missouri, and (43300) Sherman-Denison, Texas; and three non-MAs in Missouri, Oklahoma, and Texas.

LMB has no legal, financial, or other factors that impede its ability to help meet the credit needs of its AAs. LMB received a Satisfactory rating in its previous CRA examination dated November 26, 2012.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We reviewed home mortgage, small business, and small farm loans from January 1, 2012 through December 31, 2015. The mortgage loans were home purchase, home improvement, and refinance loans. Primary products for this review are those for which the bank originated at least 20 loans within the analysis period for each AA. Performance Tables one through 12 in Appendix D include the data from 2014-2015. Lending data, from January 1, 2012 through December 31, 2013, is discussed in the applicable narrative sections in the evaluation. We reviewed Community Development (CD) loans, investments, and services for the period September 4, 2012 through December 31, 2015.

### Data Integrity

Prior to the CRA evaluation, we performed a data integrity examination to ensure the accuracy of the bank's publicly filed information on home mortgage, small business, and small farm loans. We reviewed data that the bank collected and reported during the evaluation period. We did not identify any substantive inaccuracies in the data. Therefore, we concluded that data for home mortgage, small business, and small farm loans is reliable for this examination. During the examination, we reviewed CD loans, investments, and services to ensure all activities met the CD definition. Finally, we reviewed the appropriateness of the bank's processes for

collecting and reporting home mortgage, small business, and small farm loan data. We found no substantive deficiencies in these processes.

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

In each state where the bank has an office, a sample AA within each state was selected for full-scope reviews. Refer to the "Scope" section under each State Rating section (as applicable) for details regarding how we selected the areas.

### **Ratings**

The bank's overall rating is a blend of state ratings. There are three states and five total AAs. CRA performance in the Columbia MSA received the most weight. This AA constitutes 38.51 percent of the bank's total deposit base and 28.67 percent of the total reported loans, excluding CD loans. The non-MA OK AA received the second highest weighting with 26.87 percent of the bank's total deposits and 29.35 percent of total reported loans. The Southern MO AA received the third highest weighting with 13.21 percent of the bank's total deposit base and 29.44 percent of total reported loans. The Sherman-Denison MSA and non-MA TX AA each represent 17.82 percent and 3.59 percent of the bank's total deposits.

When evaluating lending test performance, we gave more weight to home mortgage loans, which is the bank's primary lending focus, followed by small loans to businesses. Within the home mortgage category in the Columbia MSA, home purchase carried the most weight followed by home refinance, and home improvement loans with 784 loans, 307 loans, and 39 loans, respectively. LMB made 178 small business and two small farm loans during the evaluation period in the Columbia MSA. We did not analyze small farm and multi-family loans in the Columbia MSA since the loan volume is less than 20 for each analysis period in the evaluation period.

In the Southern MO AA, a non-MA AA, we gave the most weight to home mortgage loans followed by loans to small farms, and loans to small businesses. Home mortgage loans were represented by home purchase (291 loans), followed by home refinance (233 loans), and home improvement (30 loans). LMB made 500 loans to small farms and 472 loans to small businesses during the evaluation period. We did not analyze multi-family loans in the Southern MO AA.

In the non-MA OK AA, we gave more weight to home mortgage loans followed by small business loans and small farm loans. Within the home mortgage category in the non-MA OK AA, home purchase, home refinance, and home improvement loans totaled 325 loans, 171 loans, and 54 loans, respectively. The bank made 464 loans to small businesses and 385 loans to small farms. We did not analyze multi-family due to low loan volume in the non-MA OK AA.

In the Sherman-Denison MSA, we gave more weight to home mortgage loans followed by small loans to businesses and then small loans to farms. Within the home mortgage category, home purchase loans represent 261 loans while home refinance and home improvement loans represent 119 loans and 20 loans, respectively. LMB made 160 small loans to businesses and

34 small loans to farms during the evaluation period. We did not analyze multi-family loans in the Sherman-Denison MSA since no loans were made during the evaluation period.

In the non-MA TX AA, we gave more weight to home mortgage, followed by small loans to business and then small loans to farms. Within the home mortgage category, more weight was given to home purchase loans followed by home refinance then home improvement with these categories totaling 48 loans, 19 loans, and nine loans, respectively in the AA. LMB made 59 loans to small businesses and 28 loans to small farms during the evaluation period. We did not analyze multi-family loans during the evaluation because no loans were made in the AA.

We primarily based the state ratings on those areas that received full-scope reviews. Refer to the "Scope" section under each State Rating section for details regarding how we weighted the areas in arriving at the respective ratings.

### **Inside/Outside Ratio**

This ratio is a bank-wide calculation and not calculated by individual AA. Analysis is limited to bank originations and purchases and does not include any affiliate data. For the evaluation period, LMB made a high percentage of all loans by number, inside the bank's AAs (86.15 percent). The percentages based on the number of loans made inside the AAs by loan type are as follows: home purchase (34.03 percent), home improvement (3.42 percent), home refinance (16.91 percent), small loans to businesses (26.54 percent), and small loans to farms (18.90 percent).

### **Product Innovation and Flexibility**

LMB offers flexible loan products. We did not consider any products or services innovative. Performance had a neutral impact in the Columbia MSA, Southern MO AA, Sherman-Denison MSA and non-MA TX AA, but had a positive impact in the non-MA OK AA for the bank's lending and investment test performance. LMB made loans and investments in New Market Tax Credits during the evaluation period in the non-MA OK AA.

### **Lending Gap Analysis**

We reviewed summary reports to analyze LMB's home mortgage, small business, and small farm lending activity over the evaluation period to identify gaps in the geographic distribution of loans. We did not identify any unexplained gaps. The bank's AAs consist of whole geographies, meet the requirements of the regulation, and do not arbitrarily exclude any LMI areas.

### **Other Performance Data/Lending Test**

LMB adequately addressed the CD needs of its AAs. In addition to qualified CD loans made within the bank's AA, LMB originated two loans in the statewide area. These CD loans were to an organization without a purpose/mandate/function (P/M/F) to serve one or more of the bank's AAs and had a neutral impact on the lending test rating for the bank. The following CD loans are located in the State of Missouri, where the bank has no branch locations.

- Two loans totaling \$10.4 million to an organization with a primary mission of providing affordable housing in the City of Saint Louis, Missouri. The loans provide community development services to LMI individuals.

Refer to Table 1 Lending Volume in the “Statewide area” section of Appendix D for the facts and data used to evaluate the bank’s level of CD lending.

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

Pursuant to 12 CFR 25.28(c), or 12 CFR 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.

The OCC did not identify evidence of discriminatory or illegal credit practices with respect to this institution.



## State Rating

### State of Missouri

<b>CRA Rating for Missouri<sup>1</sup>:</b>	Satisfactory
<b>The lending test is rated:</b>	Outstanding
<b>The investment test is rated:</b>	Low Satisfactory
<b>The service test is rated:</b>	High Satisfactory

- Overall, geographic distribution was good. Overall performance in the Columbia MSA is adequate while performance in the Southern MO AA is excellent.
- Overall borrower income was good, as evidenced by good distribution of loans to individuals of different income levels. Overall performance in the Columbia MSA is good and in the Southern MO AA shows excellent performance.
- The bank was a leader in providing CD loans that were responsive in meeting community credit needs. The performance elevated otherwise overall good lending performance to excellent in the state.
- There is an adequate level of CD investments.
- The branch distribution system is accessible to individuals living in geographies of different income levels. Bank employees provided an adequate level of CD services.

### Description of Institution's Operations in Missouri

LMB has two AAs in the state of Missouri. They include Columbia MSA and Southern MO AA. The Columbia MSA includes all of Boone County. The Southern MO AA, a non-MA AA, includes Howell, Texas, and Wright counties, and one CT in Shannon County. LMB operates 20 full-service branches and 26 ATMs in Missouri.

As of June 30, 2015, the bank ranked 24, out of 344, in total state deposits with a 0.64 percent market share. The state of Missouri accounted for 52 percent of total bank deposits and 58 percent of total loan originations. The bank ranked second in the Columbia MSA in deposit market share out of 32 institutions, with 22 percent of the deposits. The bank also ranked second in the Southern MO AA in deposit market share out of 18 institutions, with 17 percent of the deposits.

Refer to the market profiles for the state of Missouri in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

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<sup>1</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## Scope of Evaluation in Missouri

For the state of Missouri, we performed full-scope reviews in both the Columbia MSA and Southern MO AA. The state rating is based primarily on results of those areas that received full-scope reviews, refer to Appendix A for more information. We selected the Columbia MSA based on the high percent of deposits (74 percent) in the state. We also selected Southern MO AA based on the high percent of loans (54 percent) in the state. Eleven branches and 20 ATMs are in the Columbia MSA and nine branches and six ATMs are in the Southern MO AA.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Missouri is rated "Outstanding." Based on full-scope reviews, the bank's responsiveness in the Columbia MSA is good and the Southern MO AA is excellent. CD lending had a positive impact on the lending test rating.

Home Mortgage loans received the most weight under the lending test. These loans represent 60 percent by number and 75 percent by dollar volume of the bank's total reported loans in Missouri. Small business loans received the next highest weight at 23 percent by number and 17 percent by dollar volume of total reported loans in the AA. Small farm loans received the least weight with 17 percent by number and 8 percent by dollar volume. We did not analyze small farm loans in the Columbia MSA since only two loans were made in 2014-2015 and nine loans were made in 2012-2013.

### Lending Activity

The bank's overall lending in the State of Missouri is good.

Refer to Tables 1 Lending Volume and 1 Other Products in the State of Missouri section of Appendix D for the facts and data used to evaluate the bank's lending activity.

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

#### Columbia MSA

The bank's overall lending activity in the Columbia MSA is adequate. The Columbia MSA has a large student population that typically do not purchase homes but rather live in apartments. The number of multi-family housing units has increased over the last two years in the AA and these units are designed for college students and young professionals. As of June 30, 2015, LMB had a deposit market share of 21.72 percent and ranked 2nd among 32 depository institutions. Home Mortgage loans received primary consideration since it is the bank's primary loan product. Home Mortgage loan volumes increased slightly during the 2012-2013 period and declined 2 percent during the 2014-2015 period.

For home purchase and home improvement loans, LMB ranks 4<sup>th</sup> (by number) at 9.97 and 7.30 percent, respectively. LMB ranks 2<sup>nd</sup> (by number) for home refinance loans at 7.78 percent. For small loans to businesses and farms, LMB ranks 12<sup>th</sup> and 13<sup>th</sup> (by number) at 3.21 percent and 0.88 percent, respectively. We did not analyze small farm or multi-family lending. The bank made only two small farm loans and six multi-family loans during the evaluation period.

### Southern MO AA

The bank's overall lending activity in the Southern MO AA is excellent. As of June 30, 2015, LMB had a deposit market share of 17.31 percent and ranked 2nd among 18 depository institutions. Home mortgage loans received primary consideration since this is the bank's primary loan product.

For home purchase, home improvement, home refinance, LMB ranked 1<sup>st</sup> (by number) at 20.82 percent, 16.52 percent, and 22.75 percent, respectively. Small loans to businesses and farms, LMB ranks 1<sup>st</sup> (by number) at 21.73 percent and 66.57 percent, respectively.

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

The overall geographic distribution of loans reflects good penetration. There are no low-income CTs in the Southern MO AA. Overall performance in the Columbia MSA is adequate and overall performance in the Southern MO AA is excellent.

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

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

The overall geographic distribution of home mortgage loans is adequate.

### Columbia MSA

The overall geographic distribution of home mortgage loans in the Columbia AA is adequate. Home purchase loans received the most weight in our analysis since they represent 69 percent of the bank's total home mortgage lending (by number) in the AA. The next highest weight was placed on home refinance loans followed by home improvement loans, which are 27 percent and 3 percent of total home mortgage lending, respectively. We did not review multi-family loans due to the low number of loans.

The overall geographic distribution of home purchase loans is adequate. The geographic distribution of home purchase loans exceeds demographics in low-income tracts in 2014-2015. Home purchase loans in moderate-income tracts shows adequate responsiveness. Market share in low-income tracts exceeds the overall market share while moderate-income tracts shows an adequate level of performance. The bank's performance in 2012-2013 is weaker than performance in 2014-2015 with poor performance.

The overall geographic distribution of home improvement loans is poor. The geographic distribution of home improvement is poor for both low- and moderate-income CTs in 2014-2015. Market share for home improvement shows a poor level of lending to low- and moderate-income tracts with no market share. In 2012-2013, overall geographic distribution was stronger in moderate-income tracts at an adequate level and similar in low-income tracts at a poor level of performance.

The overall geographic distribution of home refinance loans is poor. Home refinance loans in low-income tracts for geographic distribution is adequate and poor in moderate-income CTs in 2014-2015. The market share for home refinance loan products is adequate in low-income tracts and poor in moderate-income tracts compared to the overall market share. The bank's performance in 2012-2013 is consistent with performance in 2014-2015 with a poor level of performance.

### *Southern MO AA*

The overall geographic distribution of home mortgage loans in the Southern Missouri AA is excellent. Home Mortgage loans received the most weight in our analysis followed by small loans to farms. A geographic analysis of low-income CTs is not meaningful since there are no low-income tracts in the AA.

The overall geographic distribution of home purchase loans is excellent. Home purchase loans in moderate-income tracts is excellent in 2014-2015. Market share at 21.15 percent in moderate-income tracts is slightly below the overall market share at 21.35 percent. In 2012-2013, performance is consistent with performance in 2014-2015.

The overall geographic distribution of home improvement loans is excellent. The geographic distribution of home improvement loans is excellent in moderate-income CTs in 2014-2015. Market share for home improvement exceeds the overall market share in moderate-income tracts. The bank's performance in 2012-2013 is consistent with the overall excellent level of performance.

The overall geographic distribution of home refinance loans is excellent. Home refinance loans shows excellent distribution in moderate-income tracts in 2014-2015. The market share at 19.02 percent for moderate-income tracts is slightly lower than the overall market share of 20.55 percent. The bank's performance in 2012-2013 bank performance is consistent with the overall excellent level.

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

Refer to Table 6 in the State of Missouri 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.

The overall geographic distribution of small loans to businesses is excellent. We gave primary weight for small loans to businesses to Southern MO AA with 73 percent (by number) in Missouri.

Columbia MSA

The geographic distribution of small loans to businesses is good. The percentage of these loans in low-income tracts is excellent in 2014-2015. Loans to small businesses is poor in moderate-income CTs. The market share in low-income tracts exceeds overall market share, while market share in moderate-income tracts is poor compared to the overall market share. The bank's performance in 2012-2013 is stronger compared to 2014-2015 with a good level of performance and is consistent with low-income tract level of performance.

Southern MO AA

The geographic distribution of loans to small businesses is excellent. Loans to small businesses is excellent in moderate-income CTs in 2014-2015. Market share in moderate-income tracts exceeds overall market share. The bank's performance in 2012-2013 is consistent with the bank's overall excellent level for 2014-2015. A geographic analysis of low-income CTs is not meaningful since there are no low-income tracts in the AA.

**Small Loans to Farms**

Refer to Table 7 in the State of Missouri 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 farms.

The overall geographic distribution of small loans to farms is excellent. Primary weight is placed on the Southern MO AA with 99.6 percent of the loan volume in Missouri.

Columbia MSA

The geographic distribution of small loans to farms is not meaningful. The bank made two loans in the AA during the 2014-2015 review period, and nine loans during the 2012-2013 review period.

Southern MO AA

The geographic distribution of small loans to farms is excellent. The percentage of these loans in moderate-income tracts exceeds demographics in 2014-2015. In addition, the market share in moderate-income tracts meets the overall market share. In 2012-2013, the bank's performance is consistent with the overall performance in 2014-2015. A geographic analysis of low-income CTs is not meaningful since there are no low-income tracts in the AA.

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

The overall distribution of borrowers reflects, given the product lines offered by the bank, good penetration among retail customers of different levels and business customers of different sizes. Overall performance in the Columbia MSA is good and the Southern MO AA shows excellent performance.

## ***Home Mortgage Loans***

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

The overall borrower distribution of home mortgage loans is good.

### *Columbia MSA*

The distribution of home mortgage loans to borrowers of different income levels is good in the Columbia MSA. Refer to the Distribution of Loans by Income Level of Geography section for the weighting placed on the different loan products. The percentage of families below poverty level is 9.5 percent.

The borrower distribution of home purchase loans is good. Given the percent of families below poverty, the percentage of loans to low-income borrowers is adequate in 2014-2015. The market share of these loans is adequate. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics; the market share of these loans is adequate. The bank's performance relative to low-income borrowers is weaker in 2012-2013 with a poor level compared to 2014-2015. The performance relative to moderate-income borrowers is consistent in 2012-2013 with an excellent level of lending.

The borrower distribution of home improvement loans is adequate. The percentage of loans to low-income borrowers is poor considering the percent of families that live below poverty in 2014-2015; the bank has no market share. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics; market share is excellent. In 2012-2013, the bank's performance is consistent with the 2014-2015 levels of performance.

The borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers is good considering the percent of families that live below poverty. The market share of these loans meets the overall market share to low-income borrowers. The percentage of loans to moderate-income borrowers is excellent and the market share is near to the overall market share. The bank's performance in 2012-2013 to borrowers is weaker than the bank's 2014-2015 level of lending with adequate performance to low-income individuals and good performance to moderate-income individuals.

### *Southern MO AA*

The distribution of home mortgage loans to borrowers of different income levels is excellent. Refer to the Distribution of Loans by Income Level of Geography section for the weighting placed on the different loan products. The percentage of families below poverty level is 16.3 percent.

The borrower distribution of home purchase loans is excellent. Given the percent of families below poverty, the percentage of loans to low-income borrowers is excellent. The market share of these loans is also excellent. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics; the market share of these loans is good. For 2012-2013,

the bank's performance in the Southern MO AA is consistent with 2014-2015 lending performance.

The borrower distribution of home improvement loans is adequate. The percentage of loans to low-income borrowers is excellent considering the percent of families that live below poverty; the market share of these loans shows a good level of lending versus the overall market share. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics; market share is poor. The bank's 2012-2013 level of lending to borrowers of different income levels is consistent with the 2014-2015 performance.

The borrower distribution of home refinance loans is excellent. The percentage of loans to low-income borrowers is excellent in 2014-2015 considering the percent of families that live below poverty. The market share of these loans is excellent and significantly exceeds the overall market share. The percentage of loans to moderate-income borrowers is good and the market share exceeds the overall market share. The 2012-2013 performance is consistent with 2014-2015 performance.

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

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

The distribution of small loans to businesses of different sizes is excellent. The Southern MO AA received more weight for small loans to businesses, with 73 percent of loans made within the State of Missouri.

#### *Columbia MSA*

The overall distribution of small loans to businesses of different sizes is good. LMB's percentage of loans to businesses with revenues of \$1 million or less is adequate in 2014-2015. However, market share performance is excellent. The market share of loans to small businesses with revenues of \$1 million or less exceeds the bank's overall market share. In addition, 75 percent of business loans were in loan amounts of \$250 thousand or less. The bank's performance in 2012-2013 is consistent with the bank's 2014-2015 overall performance.

#### *Southern MO AA*

The overall distribution of small loans to businesses is excellent. LMB's percentage of loans to businesses with revenues of \$1 million or less is excellent. The market share of loans to small businesses with revenues of \$1 million or less significantly exceeds the bank's overall market share. In addition, 89 percent of business loans were in loan amounts of \$100 thousand or less. The bank's performance in 2012-2013 is consistent with the bank's 2014-2015 overall performance.

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

Refer to Table 12 in the State of Missouri section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The distribution of small loans to farms is excellent. LMB's Southern MO AA received the most weight in small loans to farms, with 99.6 percent of the bank's small farm loans within the State of Missouri.

#### Columbia MSA

LMB's percentage of small loans to farms is not meaningful with two loans during the review period and nine loans in 2012-2013.

#### Southern MO AA

The overall distribution of small loans to farms is excellent. LMB's percentage of loans to farms with revenues of \$1 million or less is good in 2014-2015. Market share performance is excellent. The overall market share of small loans to farms with revenues of \$1 million or less slightly exceeds the overall market share. In addition, 84 percent of farm loans were in amounts of \$100 thousand or less. The 2012-2013 data is consistent with the bank's overall lending in 2014-2015.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the State of Missouri section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multi-family loans that also qualify as CD loans.

CD lending activities had a positive impact on the Missouri lending test.

#### Columbia MSA

The bank originated nine CD loans totaling \$12.8 million in the Columbia MSA. This includes a loan to revitalize and stabilize a low-income CT in Columbia, Missouri by constructing a new office building providing commercial office space. The building location is within District C-P, which is an area planned for development as a business district in the City of Columbia's formal development plan. The bank's level of CD lending compared to tier 1 capital is 6.3 percent.

#### Southern MO AA

The bank originated 18 CD loans totaling \$28 million in the Southern MO AA. One loan to provide funding to purchase and renovate a 96,000 square-foot existing building for behavioral healthcare and administrative functions, was to a hospital that meets essential community needs. Another loan will fund the construction of a 12,000 square foot Medical Complex in Mountain Grove, fund the purchase of new imaging equipment for the hospital, and refinance its existing indebtedness. The AA consists of moderate-income and distressed middle-income

CTs. The middle-income CTs are distressed due to poverty. The bank's level of CD lending to tier 1 capital is 13.8 percent.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in the State of Missouri is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Columbia MSA is adequate and the Southern MO AA is excellent. Current period investments represented four percent of allocated tier 1 capital for the Columbia MSA and 12 percent for the Southern MO AA. The Columbia MSA received greater weight with 74 percent of the bank's deposits in Missouri.

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

#### Columbia MSA

Based on a full-scope review, the bank's performance in the Columbia MSA is adequate. Qualified investments for the AA total \$3.3 million and represent 49 percent of the bank's CD investments in the State of Missouri. The investments are non-complex, but responsive to identified community development needs for affordable housing, community services, and economic development. Current period investments total \$3.3 million. The investments consist primarily of:

- \$1.5 million invested in affordable housing;
- \$1.5 million invested in school bonds; and
- \$121 thousand in charitable donations to area organizations that provide targeted services for low- and moderate-income individuals and families.

#### Southern MO AA

The bank's performance in the Southern MO AA is excellent. Qualified investments for the AA totaling \$3.4 million represent 51 percent of the bank's CD investments within the State of Missouri. The investments are non-complex, but responsive to identified community development needs for community services and economic development. Current period investments total \$3.4 million. The investments primarily consist of:

- \$60 thousand invested in economic development to provide training, support, and seed money to small businesses;
- \$3.3 million invested in school bonds in low-income areas;
- \$22 thousand in charitable donations to area organizations that provide targeted services for low- and moderate-income individuals and families;

- \$1 thousand in affordable housing donations; and
- \$10 thousand for revitalization and stabilization.

## **SERVICE TEST**

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

LMB's performance under the service test in Missouri is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Columbia MSA is excellent and performance is adequate in the Southern MO AA.

Refer to Table 15 in the State of Missouri 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.

### **Retail Banking Services**

#### Columbia MSA

The bank provided an excellent level of retail services.

LMB's service delivery systems are readily accessible to geographies and individuals of different income levels in the Columbia MSA. The percentage of branches in low-income tracts exceeds the percentage of population residing in those tracts. The percentage of branches in moderate-income tracts exceeds the percentage of population residing in those tracts. Additionally, one branch each in middle- and upper-income tracts is adjacent to moderate-income tracts. LMB did not open any branches, but closed one branch in a middle-income CT in the AA during this evaluation period. Each branch also has an ATM as part of its location.

The percentage of ATMs located in low-income tracts exceeds the percentage of population residing in those tracts. The percentage of ATMs is somewhat lower in moderate-income tracts than the percentage of population residing in those tracts.

LMB is currently in the process of implementing a new Video-Teller system into each AA. Video Teller units allow customers to speak to a live banker by video screen to cash checks, make deposits and withdrawals, transfer funds, and ask questions about any banking product or service. The Video Teller units are open seven days a week from 7 am to 7 pm. The majority of the five Video Tellers in the Boone County AA are in LMI tracts (One in low-income and two in moderate-income).

There is no material difference in services offered at branch locations. Banking hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies and individuals. A majority of branches and drive up facilities offer extended hours on Friday and Saturday.

Other alternative delivery systems offered by the bank include:

E-Banking: LMB offers e-banking services through its website. Customers may access their accounts through the bank's website and initiate various transactions. Customers can open personal checking, savings, and money-market accounts online. Customers can also apply for personal and residential mortgage loans online. Bill pay service is offered free of charge.

Bank by Phone: Customers may bank by phone through LMB's In-Touch phone system. This system also allows Spanish-speaking customers to bank by phone.

Bank by Mail: All branches accept deposits from customers by mail.

The bank does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in low- or moderate-income geographies, or use of these systems by low- and moderate-income individuals. Therefore, these services had a neutral impact on the bank's service test performance in all AAs.

### Southern MO AA

The bank provided an adequate level of retail services in this AA.

LMB's service delivery systems are reasonably accessible to all geographies and individuals of different income levels in the AA. The percentage of branches in moderate-income tracts is lower than the percentage of population residing in those tracts. There are no low-income tracts in the AA. Based on percentages, the number of ATMs in moderate-income tracts exceeds the percentage of the population residing in those tracts. There are five stand-alone ATMs in the AA. There are six ATMs located in moderate-income tracts and nine located in middle-income, distressed tracts. LMB opened one branch during the evaluation period in a middle-income tract. There were no branch closings in the AA during the evaluation period.

There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and individuals.

Refer to the Columbia MSA in the State of Missouri service test comment section for a detailed summary of LMB alternative delivery systems.

## **Community Development Services**

LMB provided an adequate level of CD services in the State of Missouri.

### Columbia MSA

The bank provided an adequate level of CD services.

LMB's staff provided technical and financial expertise to 22 different organizations that promote CD initiatives in the AA. The majority of the organizations provide community services to low- and moderate-income individuals. These services include programs for domestic abuse

victims, financial literacy, food, revitalization and stabilization of the community, affordable housing, and fundraising.

Southern MO AA

The bank provided an adequate level of CD services in this AA.

LMB's staff provided their financial expertise to eleven different organizations that promote CD initiatives in the AA. The majority of the organizations provide community services to low- and moderate-income individuals. These services include programs for affordable housing, fundraising, financial literacy, domestic abuse victims, and revitalization and stabilization.

## State of Oklahoma

<b>CRA Rating for Oklahoma<sup>2</sup>:</b>	Outstanding
<b>The lending test is rated:</b>	Outstanding
<b>The investment test is rated:</b>	Outstanding
<b>The service test is rated:</b>	Low Satisfactory

The major factors that support this rating include:

- Overall, geographic distribution was good, as demonstrated by an excellent penetration of home mortgage loans, good penetration of small loans to businesses, and good penetration of small loans to farms in geographies of different income levels.
- Overall, borrower distribution was excellent, as evidenced by a good distribution of home mortgage loans, excellent distribution of small loans to businesses, and excellent distribution of small loans to farms, individuals of different income levels, and businesses of different sizes.
- The bank is a leader in making CD loans that meet community credit needs. The performance elevated otherwise overall good lending performance to excellent within the state of Oklahoma.
- There is an excellent level of CD investments in the AA.
- The overall branch distribution system is reasonably accessible to individuals of different income levels living in geographies. Bank employees provide a good level of CD services.

## Description of Institution's Operations in Oklahoma

LMB has one AA in the State of Oklahoma, the non-MA OK AA. The AA consists of seven whole counties: Bryan, Carter, Garvin, Johnston, Marshall, Murray, and Pontotoc. LMB operates 13 full-service branches and eight ATMs in Oklahoma.

As of June 30, 2015, the non-MA OK AA ranked second in deposit market share out of 23 institutions with 12 percent of the deposits. The State of Oklahoma accounted for 27 percent of total bank deposits and 29 percent of total loan originations.

Refer to the market profiles for the State of Oklahoma in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

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

## Scope of Evaluation in Oklahoma

For the State of Oklahoma, we performed a full-scope review of the non-MA OK AA. The state rating is based primarily on results of those areas that received full-scope reviews, refer to Appendix A for more information. The AA has 13 branches and 14 bank-owned ATMs and four cash-dispensing ATMs located in the AA.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Oklahoma is rated "Outstanding." Based on full-scope reviews, the bank's performance in non-MA OK AA is good. CD lending had a positive impact on the overall lending test rating.

Home mortgage loans received the most weight under the lending test. These loans represent 39 percent by number and 49 percent by dollar volume of total reported loans in the State of Oklahoma. Small business loans received the next highest weight at 33 percent by number and by dollar volume of total reported loans. Small farm loans received the least weight with 28 percent by number and 18 percent by dollar volume.

### Lending Activity

Refer to Table 1 Lending Volume and Table 1 Other Products in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect excellent responsiveness in relation to area credit needs and the bank's deposit market share.

As of June 30, 2015, LMB ranks 2<sup>nd</sup> among 23 depository institutions with a deposit market share at 11.73 percent. For home purchase and home improvement loans, LMB ranks 2<sup>nd</sup> and 5<sup>th</sup> (by number) at 7.22 percent, and 5.33 percent, respectively. LMB ranks 2<sup>nd</sup> (by number) for home refinance loans at 7.56 percent. For small loans to businesses, LMB ranks 5<sup>th</sup> (by number) at 9.37 percent. LMB ranks 3<sup>rd</sup> in small loans to farms at 24.18 percent.

We did not analyze multi-family lending. LMB only made two loans during the 2014-2015 evaluation period and three loans during 2012-2013.

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

The overall geographic distribution of loans is good. While the distribution of home mortgage loans is excellent, the distribution of both small loans to businesses and small loans to farms is good. Small loans to businesses and small loans to farms represent a combined 60 percent of total reported loans in the AA.

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

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.

The overall geographic distribution of home mortgage loans is excellent.

Home purchase loans received the most weight in our analysis since they represent 59 percent of the bank's total home mortgage lending (by number). The next highest weight was on home refinance loans followed by home improvement loans, representing 31 percent and 10 percent of total home mortgage lending, respectively.

The overall geographic distribution of home purchase loans is excellent. The geographic distribution of home purchase loans exceeds demographics in low-income tracts in 2014-2015. Home purchase loans in moderate-income tracts shows excellent responsiveness. Market share in low- and moderate-income tracts exceeds the overall market share. The bank's performance in 2012-2013 is consistent with the performance in 2014-2015, with excellent performance.

The overall geographic distribution of home improvement is good. The geographic distribution of home improvement loans is excellent for both low- and moderate-income CTs. Market share for home improvement loans shows an excellent level of lending to low-income tracts and a good level of lending to moderate-income tracts. In 2012-2013, performance was consistent in moderate-income tracts and weaker in low-income tracts, with a poor level of performance in low-income tracts and excellent level of performance in moderate-income tracts.

The overall geographic distribution of home refinance loans is adequate. Geographic distribution of home refinance loans in low-income tracts is very poor and excellent in moderate-income CTs in 2014-2015. LMB has no market share in low-income tracts. LMB exceeds the overall market share in moderate-income tracts. The bank's performance in 2012-2013 is consistent with the performance in 2014-2015 with a poor level of performance in low-income tracts and an excellent level of responsiveness to moderate-income tracts.

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

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.

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

The geographic distribution of loans to small businesses is good. The percentage of these loans in low-income CTs is poor in 2014-2015. Loans to small businesses is excellent in moderate-income CTs. The market share in low-income CTs is adequate compared to overall market share and exceeds overall market share in moderate-income tracts. The bank's performance in 2012-2013 is stronger than in 2014-2015 in low-income tracts with a good level

of performance, and consistent in moderate-income tracts with an excellent level of performance.

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

Refer to Table 7 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of small loans to farms.

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

The geographic distribution of small loans to farms is good. The percentage of these loans in low-income CTs is poor in 2014-2015. Loans in moderate-income tracts shows excellent penetration and exceeds demographics. In addition, low-income CTs have no market share while moderate-income tracts significantly exceed the overall market share. In 2012-2013, the bank's performance is stronger in low-income CTs with a good level of performance and consistent in moderate-income CTs with the overall performance in 2014-2015.

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

The overall borrower distribution of loans is excellent.

While the distribution of home mortgage loans is good, the distribution of both small loans to businesses and small loans to farms is excellent. Small loans to businesses and small loans to farms represent a combined 60 percent of total reported loans in the AA.

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

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.

The overall borrower distribution of home mortgage loans is good.

The distribution of home mortgage loans to borrowers of different income levels is good. Refer to the Distribution of Loans by Income Level of Geography section for the weighting placed on the different loan products. The percentage of families below poverty level is 13.2 percent.

The borrower distribution of home purchase loans is good. Given the percentage of families below poverty, the percentage of loans to low-income borrowers is good. The market share of these loans also exceeds demographics. The percentage of loans to moderate-income borrowers is good; the market share of these loans is good. The bank's performance to low-income borrowers is consistent in 2012-2013 with a good level of performance compared to 2014-2015 and to moderate-income borrowers is stronger with an excellent level of performance.

The borrower distribution of home improvement loans is good. The percentage of loans to low-income borrowers is excellent, considering the percent of families that live below poverty; the market share of these loans is excellent. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics; market share is excellent. In 2012-2013, the bank's performance is weaker with low-income borrowers at an adequate level of responsiveness compared to the 2014-2015 levels of performance. Moderate-income tracts show good levels of responsiveness.

The borrower distribution of home refinance loans is good. The percentage of loans to low-income borrowers is good, considering the percentage of families that live below poverty. The market share of these loans is very poor relative to low-income borrowers. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics, and market share exceeds the overall market share. The bank's performance in 2012-2013 is consistent with the 2014-2015 level of lending to low-income borrowers while lending to moderate-income borrowers shows weaker performance with a good level of performance.

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

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.

The overall distribution of small loans to businesses of different sizes is excellent.

The distribution of small loans to businesses of different sizes is excellent. LMB's percentage of loans to businesses with revenues of \$1 million or less is excellent; market share exceeds overall market share. In addition, 80 percent of business loans were in loan amounts of \$100 thousand or less. The bank's performance in 2012-2013 is consistent with the bank's 2014-2015 overall performance.

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

Refer to Table 12 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/purchase of small loans to farms.

The overall distribution of small loans to farms is excellent.

The distribution of small loans to farms is excellent. LMB's percentage of loans to farms with revenues of \$1 million or less is good. Market share performance is excellent. The overall market share of loans to small farms with revenues of \$1 million or less exceeds the overall market share. In addition, 85 percent of farm loans were in loan amounts of \$100,000 or less. The 2012-2013 data is consistent with the bank's overall lending in 2014-2015.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multi-family loans that also qualify as CD loans.

CD lending activities had a positive impact on the Oklahoma lending test.

The bank's CD lending activity shows excellent responsiveness in meeting the credit needs in the non-MA OK AA. As a percent of tier 1 capital, CD lending is 17.3 percent. LMB made 17 CD loans totaling \$36 million during the review period in this AA. This includes a loan to promote economic development; LMB made three notes totaling \$3 million, the proceeds were used by the borrower to develop commercial buildings for the Chickasaw Nation in Ada, Oklahoma. LMB used new market tax credits to assist in the funding of the loans to the Chickasaw Nation.

The borrower's construction, development, and leasing of the projects is expected to constitute a "qualified active low-income community business," as defined in Section 45D of the Internal Revenue Code. The first building is a three-story, 30,000 square foot new office building constructed by the Chickasaw Nation at 1921 South Craddock Road in Ada. The building will cost approximately \$9.5 million to construct, and will house three subdivisions of the Chickasaw Nation. The second building is a remodel of a 20,000 square foot bowling alley located at 1020 North Mississippi in Ada. This building will cost approximately \$3.5 to remodel, and will house additional subdivisions of the Chickasaw Nation.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Oklahoma is rated "Outstanding." Based on full-scope reviews, the bank's performance in the non-MA OK AA is excellent. Current period investments represented 16.8 percent of allocated tier 1 capital.

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

Based on a full-scope review, the bank's performance in the non-MA OK AA is excellent. Qualified investments for the AA total \$9.2 million and represent 100 percent of the bank's CD investments in Oklahoma. The bank made one investment that was innovative by purchasing New Market Tax Credits for a low-income community business for the Chickasaw Nation. The other investments are non-complex, but responsive to identified community development needs for community services and revitalization and stabilization. Current period investments total \$9 million. The investments consist primarily of:

- \$3.6 million invested in school bonds;
- \$4.5 million in purchases of new market tax credits;
- \$948 thousand in affordable housing mortgage-backed securities;
- \$4 thousand in economic development donations;
- \$26 thousand in revitalization/stabilization donations; and

- \$24 thousand in charitable donations to community services organizations that provide targeted services for low- and moderate-income individuals and families.

Prior period investments consist of \$131 thousand in school bonds to lower-income schools in the AA. More weight was given to current period investments in assigning the overall investment rating.

## **SERVICE TEST**

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

LMB's performance under the service test in Oklahoma is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the non-MA OK AA is good.

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.

LMB's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the non-MA OK AA.

### **Retail Banking Services**

The bank provided an adequate level of retail services in this AA.

The percentage of branches in moderate-income tracts is lower than the percentage of the population residing in those tracts. The bank opened one branch in a middle-income tract in the AA during the evaluation period. No branches closed in the AA during the evaluation period.

Each branch has an ATM. There are eight additional stand-alone ATM's in the AA, with two in moderate-income tracts. Based on percentages, the number of ATMs in moderate-income tracts exceeds the percentage of the population residing in those tracts. LMB has no branches or ATMs in the three low-income tracts, which contain three percent of the population in the AA. Five branches located in middle-income tracts are adjacent to low- and moderate-income tracts.

LMB has no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences low- and moderate-income individuals.

For additional information regarding LMB's alternative delivery systems refer to the Columbia MSA in the State of Missouri service test comment section for additional details.

### **Community Development Services**

LMB provided a good level of CD services in the non-MA OK AA.

LMB provided their financial expertise to 44 different organizations that promote CD initiatives in the non-MA OK AA. The majority of the organizations provide community services to low- and moderate- income individuals. These service programs include affordable housing, youth programs, small business financing, and revitalization and stabilization of the community in low- and moderate- income geographies.

## State of Texas

<b>CRA Rating for Texas<sup>3</sup>:</b>	Satisfactory
<b>The lending test is rated:</b>	Outstanding
<b>The investment test is rated:</b>	High Satisfactory
<b>The service test is rated:</b>	Low Satisfactory

The major factors that support this rating are:

- Overall, geographic distribution is adequate, demonstrated by adequate home mortgage loan distribution, excellent distribution of small loans to businesses, and very poor distribution of small loans to farms.
- Overall, borrower distribution is good. The distribution of home mortgage loans, small loans to businesses, and small loans to farms was good.
- The bank is a leader in making CD loans that meet community credit needs. The performance elevated otherwise overall good lending performance to excellent in the state.
- There is a satisfactory level of CD investments.
- The branch distribution system is reasonably accessible to individuals living in geographies of different income levels. Bank employees provided an adequate level of CD Services.

## Description of Institution's Operations in Texas

LMB has two AAs in the State of Texas. The Sherman-Denison MSA and the non-MA TX AA. The Sherman-Denison MSA includes all of Grayson County, and the non-MA TX AA includes all of Cooke County. LMB operates 11 full-service branches in Texas. Nine branches are located in the Sherman-Denison MSA and two branches are located in the non-MA TX AA. LMB has 10 full service ATMs and two cash-dispensing ATMs in the Sherman-Denison MSA. The bank also has three video tellers in the MSA. Non-MA TX AA has two ATMs located at the branches.

As of June 30, 2015, the bank ranked 3<sup>rd</sup> out of 14 financial institutions in the Sherman-Denison MSA for deposit market share with 16.45 percent. The State of Texas accounted for 21 percent of total bank deposits and 13 percent for the total amount of loan originations. The non-MA TX AA was 4<sup>th</sup> out of six financial institutions with 7.58 percent in deposit market share.

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<sup>3</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Refer to the market profiles for the State of Texas in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **Scope of Evaluation in Texas**

For the State of Texas, we performed a full-scope review of the Sherman-Denison MSA and a limited scope review of the non-MA TX AA. The state rating is based on areas that receive full-scope reviews, refer to Appendix A for more information. We selected the Sherman-Denison MSA for a full-scope review based on the percent of LMB deposits (83 percent) and loans (78 percent) in the state.

## **LENDING TEST**

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

The bank's performance under the lending test in Texas is rated "Outstanding." Based on full-scope reviews, the bank's performance in Sherman-Denison MSA is good. CD lending had a positive impact on the overall lending test rating.

Home Mortgage loans received the most weight under the lending test. These loans represent 63 percent by number and 68 percent by dollar volume of total reported loans in the State of Texas. Small business loans received the next highest weight at 29 percent by number and 27 percent by dollar volume of total reported loans. Small farm loans received the least weight with eight percent by number and five percent by dollar volume.

### **Lending Activity**

Refer to Table 1 Lending Volume and Table 1 Other Products in the State of Texas section of Appendix D for the facts and data used to evaluate the bank's lending activity.

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

As of June 30, 2015, LMB ranks 3<sup>rd</sup> among 14 depository institutions with a deposit market share at 16.45 percent. For home purchase and home improvement loans, LMB ranks 4<sup>th</sup> and 5<sup>th</sup> (by number) at 5.83 percent, and 5.30 percent, respectively. LMB ranks 2<sup>nd</sup> (by number) for home refinance loans at 6.48 percent. For small loans to businesses, LMB ranks 8<sup>th</sup> (by number) at 4.04 percent. LMB ranks 4<sup>th</sup> in small loans to farms at 6.74 percent.

We did not analyze multi-family lending. No multi-family loans were made during the review period.

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

The overall geographic distribution of loans is adequate.

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

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

The overall geographic distribution of home mortgage loans in the Sherman-Denison MSA is adequate. A geographic analysis of low-income CTs is not meaningful since there are no low-income tracts in the AA. Home purchase loans received the most weight in our analysis since they represent 64.92 percent of the bank's total home mortgage lending (by number) in the State of Texas. The next highest weight was home refinance loans at 28.99 percent total home mortgage lending. Home improvement loans were not analyzed, but represent 6.09 percent of loans.

The overall geographic distribution of home purchase loans is adequate. Home purchase loans in moderate-income tracts shows adequate responsiveness in 2014-2015. The percentage of home purchase loans compared to demographics is poor. However, the bank's market share in moderate-income tracts exceeds the overall market share. The bank's performance in 2012-2013 is stronger than performance in 2014-2015 with good performance.

The overall geographic distribution of home improvement loans is very poor. Home improvement loans to moderate-income tracts is very poor and has no market share in the AA. We did not perform an analysis of for 2012-2013 since the bank made only nine loans.

The overall geographic distribution of home refinance loans is adequate. Home refinance loans in moderate-income tracts for geographic distribution is very poor. LMB is near to the overall market share in moderate-income tracts and performance is good. The bank's performance in 2012-2013 is stronger than the performance in 2014-2015 with an adequate level of responsiveness to moderate-income tracts.

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

Refer to Table 6 in the State of Texas 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.

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

The geographic distribution of loans to small businesses is excellent. Loans to small businesses is excellent in moderate-income CTs. The market share exceeds overall market share in moderate-income tracts. The bank's performance in 2012-2013 is consistent with 2014-2015, with an excellent level of responsive.

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

Refer to Table 7 in the State of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations/purchases of small loans to farms.

The overall geographic distribution of small loans to farms is very poor.

The geographic distribution of small loans to farms is poor. The percentage of loans in moderate-income tracts is significantly below demographics. In addition, moderate-income CTs have no market share. In 2012-2013, the bank's performance is consistent in moderate-income CTs with the overall performance in 2014-2015.

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

The overall borrower distribution of loans is good.

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

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

The overall borrower distribution of home mortgage loans is good.

The distribution of home mortgage loans to borrowers at different income levels is good. Refer to the Distribution of Loans by Income Level of Geography section for the weighting placed on the different loan products. The percentage of families below poverty level is 10.2 percent.

The borrower distribution of home purchase loans is good. Given the percent of families below poverty, the percentage of loans to low-income borrowers is adequate; market share is good compared to overall market share. The percentage of loans to moderate-income borrowers and market share shows good responsiveness; market share is adequate. The bank's performance compared to 2014-15 to low-income borrowers is consistent in 2012-2013, with an adequate level of performance. Performance to moderate-income borrowers is stronger with an excellent level of performance.

Borrower distribution of home improvement loans is poor. The percentage of loans to low-income borrowers is poor. The bank has no market share to low- or moderate-income borrowers. The percentage of loans to moderate-income borrowers is adequate. We did not analyze performance for 2012-2013 since the bank made nine loans during this timeframe.

The borrower distribution of home refinance loans is adequate. The percentage of loans to low-income borrowers is poor considering the percentage of families that live below poverty. The market share of these loans is adequate to low-income borrowers. The percentage of loans to moderate-income borrowers is adequate and the market share exceeds the overall market share. The bank's performance in 2012-2013 is consistent with the 2014-2015 level of lending to low-income borrowers while lending to moderate-income borrowers shows stronger performance with an excellent level of performance.

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

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

The overall distribution of small loans to businesses of different sizes is good.

The distribution of small loans to businesses of different sizes is good. LMB's percentage of loans to businesses with revenues of \$1 million or less is good; market share is excellent. The market share of loans to small businesses with revenues of \$1 million or less exceeds the bank's overall market share. In addition, 86 percent of business loans were in loan amounts of \$250 thousand or less. The bank's performance in 2012-2013 is consistent with the bank's 2014-2015 overall performance.

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

Refer to Table 12 in the State of Texas section of Appendix D for the facts and data used to evaluate borrower distribution of the bank's origination/purchase of small loans to farms.

The overall distribution of small loans to farms is good. The distribution of small loans to farms is good. LMB's percentage of loans to farms with revenues of \$1 million or less is good. Market share performance is excellent. The overall market share of loans to small farms with revenues of \$1 million or less exceeds the overall market share. In addition, 82 percent of farm loans were loan amounts of \$100,000 or less. The 2012-2013 data is consistent with the bank's overall lending in 2014-2015.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the State of Texas section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multi-family loans that also qualify as CD loans.

CD lending activities had a positive impact on the Texas lending test.

The bank's CD lending activity shows excellent responsiveness in meeting the AA credit needs. LMB's CD volume for this AA had a positive impact on the lending test. LMB made six loans totaling \$10.9 million during the review period in this AA. This includes a line of credit to an organization in the North Texas area that provides transportation within and between the communities for elderly, disabled, and low- and moderate-income families. The bank's level of CD lending to allocated tier 1 capital is 30 percent in the State of Texas.

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the lending test in the non-MA TX AA is weaker than with the bank's overall "excellent" performance under the lending test in Texas. Overall performance is good. The limited-scope AA performance had a neutral impact on the bank's overall rating within the state. Refer to the Tables 1 through 12 as applicable in the State of Texas section of Appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in the State of Texas is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Sherman-Denison MSA is satisfactory. During the evaluation period, LMB originated \$1,5 million in qualified investments. Current period investments represented four percent of allocated tier 1 capital for the Sherman-Denison MSA.

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

Based on a full-scope review, the bank's performance in the Sherman-Denison MSA is adequate. Qualified investments for the AA total \$1.5 million and represent 54 percent of the bank's CD investments within Texas. The investments are non-complex, but responsive to identified community development needs for community services and economic development. Current period investments total \$1.5 million. The investments primarily consist of:

- \$820 thousand invested in municipal bonds affecting moderate-income tracts;
- \$556 thousand invested in affordable housing;
- \$5 thousand in economic development donations; and
- \$86 thousand in charitable donations to area community services organizations that provide targeted services for low- and moderate-income individuals and families.

There are no prior period investments.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance in the non-MA TX AA is stronger than the bank's overall performance in the state due to an excellent level of qualified investments. The limited-scope AA performance had a neutral impact on the bank's overall rating in the state.

Refer to the Table 14 in the State of Texas section of Appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

LMB's performance under the service test in Sherman-Denison MSA is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Sherman-Denison MSA is rated is adequate.

Refer to Table 15 in the State of Texas 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.

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

### **Retail Banking Services**

The bank provided an adequate level of retail services in this AA.

LMB has nine branches plus two stand-alone ATMs in the AA, but none are located in moderate-income tracts. However, three branches in middle-income tracts are adjacent to moderate-income tracts. There are no low-income tracts in the AA. No branches were opened or closed in the AA during this evaluation period. One stand-alone ATM opened in a middle-income tract in the AA during the evaluation period.

There are two branch Video Tellers in the Sherman-Denison MSA, both of which are in middle-income tracts that are adjacent to moderate-income tracts. The Video Teller units are open seven days a week from 7 am to 7 pm and allow customers to interact with live tellers to answer banking questions.

LMB has no material differences in hours or services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA.

For additional information, refer to the Columbia MSA in the State of Missouri Service Test comment section for a detailed summary of LMB's alternative delivery systems.

### **Community Development Services**

LMB provided an adequate level of CD services in the Sherman-Denison MSA.

LMB staff provided their financial expertise to 18 organizations that promote CD initiatives in the AA. The organizations provide community services to low- and moderate-income individuals, such as programs for youth, affordable housing, and revitalization.

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

Refer to Table 15 in the State of Texas section of Appendix D for the facts and data that support these conclusions.

Based on limited scope reviews, the bank's performance under the service test in the non-MA TX AA is consistent with the bank's overall "Low Satisfactory" performance under the service test for the State of Texas.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and 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>	Lending Test (excludes CD loans): (01/01/2012 to 12/31/2015) Investment and Service Tests and CD Loans: (09/04/2012 to 12/31/2015)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Landmark Bank, N.A, Columbia, Missouri	Home Mortgages, Small Loans to Businesses, Small Loans to Farms, Community Development Loans, Investments and Services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Missouri Columbia MSA #19860 Southern MO AA Oklahoma Non-MA OK AA Texas Sherman-Denison MSA #46680 Non-MA TX AA	Full Scope Full Scope  Full Scope  Full Scope Limited Scope	



## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

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RATINGS Landmark Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Landmark Bank, N.A.	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
State:				
Missouri	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Oklahoma	Outstanding	Outstanding	Low Satisfactory	Outstanding
Texas	Outstanding	Low Satisfactory	High 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 Missouri

#### Columbia MSA

Demographic Information for Full Scope Area: Columbia MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	29	13.79	20.69	41.38	24.14
Population by Geography	162,642	8.72	18.13	44.47	28.69
Owner-Occupied Housing by Geography	36,519	1.50	12.75	52.88	32.87
Business by Geography	13,150	14.63	17.03	38.00	30.33
Farms by Geography	725	0.83	13.52	68.00	17.66
Family Distribution by Income Level	36,273	20.50	16.81	22.27	40.42
Distribution of Low and Moderate Income Families throughout AA Geographies	13,534	7.00	22.71	49.73	20.56
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		63,489 65,300 18%	Median Housing Value Unemployment Rate (2010 US Census)	149,508 3.31%	

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

Demographic Information for Full Scope Area: Columbia MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	29	17.24	20.69	37.93	24.14
Population by Geography	162,642	9.78	19.24	42.29	28.69
Owner-Occupied Housing by Geography	36,519	2.00	14.90	50.23	32.87
Business by Geography	11,146	16.02	17.76	36.50	29.72
Farms by Geography	601	1.50	14.64	64.39	19.47
Family Distribution by Income Level	36,273	20.99	17.14	22.34	39.53
Distribution of Low and Moderate Income Families throughout AA Geographies	13,830	7.56	24.79	46.94	20.70
Median Family Income HUD Adjusted Median Family Income for 2015 Households Below Poverty Level		64,616 74,300 18%	Median Housing Value Unemployment Rate (2010 US Census)	149,508 3.31%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2015 HUD updated MFI

The Columbia MSA consists of 29 CTs in Boone County. The census boundaries changed between 2013 and 2014 and the tracts increased by one low-income tract and decreased by one middle-income tract. The new designation of the 29 CTs is five low-income tracts, six moderate-income tracts, eleven middle-income tracts, and seven upper-income tracts.

LMB has 11 branch locations and 29 stand-alone ATMs (including 16 cash-dispensing ATMs) in the MSA. The Columbia MSA represents 73 percent of total deposits in the state of Missouri and 38 percent of total bank deposits. Eighteen percent of households and 9.5 percent of families are below the poverty level

Competition in the AA is strong with 32 financial institutions competing for deposits. LMB ranks second at 11.73 percent of the AA deposit market share. The top five banks with a combined deposit market share of 83.16 percent are Central Bank of Boone County, Landmark Bank, N.A., Commerce Bank, Bank of America, and The Bank of Missouri.

### Employment and Economic Factors

The local economy has been somewhat stronger than the national economy. As of April 2016, the AA unemployment rate of 3.6 percent was lower than the state and national averages of 4.3 percent and 4.7 percent, respectively. Median family income in 2013 was \$66,522 and increased in 2015 to \$74,300. The percentage of households below the poverty level is 18 percent and the percentage of families below the poverty level is 9.5 percent.

Primary industries in the Columbia MSA are services, education, and healthcare. Primary employers in the MSA are the University of Missouri, University of Missouri Health Care, Columbia Public Schools, Boone Hospital Center, and City of Columbia.

### Housing

The median housing value in the MSA from the 2010 census is \$149,508. Owner-occupied housing units comprise 53.24 percent of total housing units in the AA.

### Community Needs

We considered performance context information from one local government organization as part of our full-scope review in this AA. Identified community needs include affordable housing and economic development for small businesses.

Southern Missouri AA

Demographic Information for Full Scope Area: Southern MO AA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	17	0.00	35.29	64.71	0.00
Population by Geography	90,271	0.00	31.87	68.13	0.00
Owner-Occupied Housing by Geography	25,035	0.00	32.31	67.69	0.00
Business by Geography	6,832	0.00	29.24	70.76	0.00
Farms by Geography	863	0.00	33.72	66.28	0.00
Family Distribution by Income Level	24,191	24.87	21.59	22.79	30.76
Distribution of Low and Moderate Income Families throughout AA Geographies	11,239	0.00	38.10	61.90	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		45,840 48,200 21%	Median Housing Value Unemployment Rate (2010 US Census)		90,437 3.08%

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

Demographic Information for Full Scope Area: Southern MO AA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	17	0.00	35.29	64.71	0.00
Population by Geography	90,271	0.00	31.87	68.13	0.00
Owner-Occupied Housing by Geography	25,035	0.00	32.31	67.69	0.00
Business by Geography	5,464	0.00	30.53	69.47	0.00
Farms by Geography	689	0.00	35.56	64.44	0.00
Family Distribution by Income Level	24,191	24.80	21.54	22.77	30.89
Distribution of Low and Moderate Income Families throughout AA Geographies	11,211	0.00	38.13	61.87	0.00
Median Family Income HUD Adjusted Median Family Income for 2015 Households Below Poverty Level		45,746 49,700 21%	Median Housing Value Unemployment Rate (2010 US Census)		90,437 3.08%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2015 HUD updated MFI

This AA includes the counties of Howell, Texas, and Wright, and one CT in southern Shannon County in south central Missouri. The AA includes six moderate-income and 11 middle-income CTs. All middle-income CTs are distressed due to poverty. The Southern MO AA did not have any 2013 boundary changes.

LMB has nine branches and 16 stand-alone ATMs, including six cash-dispensing ATMs, in the AA. There are 18 financial institutions with branches in the AA. LMB ranked second in the market, with deposit market share at 17.3 percent. The top five banks, with a combined deposit market share of 56.13 percent, are West Plains Bank and Trust Company, Landmark Bank, N.A., Community First Banking Company, Town & Country Bank, and Progressive Ozark Bank.

The Southern MO AA represents 26 percent of the bank's total deposits in the State of Missouri and 13 percent of bank's total deposits. The AA has 29 percent of loan originations, by number, in the State of Missouri. Lending in this AA is primarily residential real estate followed by small farm loans.

### Employment and Economic Factors

In April 2016, the unemployment rate for the AA averaged 5.9 percent, with a low of 5.1 percent and a high of 6.6 percent. The State of Missouri unemployment rate was 4.3 percent and the national rate was 4.7 percent. The HUD updated median family income is \$49,700, increasing from the 2013 HUD updated median family income of \$48,200.

Primary industries in the AA are government, education, and manufacturing. The AA's largest employers include the South Central Correctional Center, local school districts, the Durham Company, the Texas County Memorial Hospital, and state and local governments. The number of households below the poverty level is 21 percent, and families below the poverty level is 16.3 percent.

### Housing

In 2015, the median housing value was \$90,437. According to the 2010 census, owner-occupied housing units comprise 61.96 percent in the AA.

### Community Needs

We considered performance context information from one organization, which provides small business and economic development in the AA. Identified community needs include financing for small business and agricultural related loans.

# State of Oklahoma

## Non-MA OK AA

Demographic Information for Full Scope Area: non-MA OK AA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	51	5.88	7.84	78.43	7.84
Population by Geography	195,326	3.03	8.93	80.04	8.00
Owner-Occupied Housing by Geography	52,119	1.63	6.51	83.35	8.51
Business by Geography	14,487	5.65	7.03	78.90	8.43
Farms by Geography	1,074	1.40	4.38	84.92	9.31
Family Distribution by Income Level	50,082	20.65	19.03	20.84	39.48
Distribution of Low and Moderate Income Families throughout AA Geographies	19,874	4.57	11.04	78.43	5.95
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		47,891 49,900 17%	Median Housing Value Unemployment Rate (2010 US Census)		83,668 2.41%

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

Demographic Information for Full Scope Area: non-MA OK AA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	51	5.88	7.84	78.43	7.84
Population by Geography	195,326	3.03	8.93	80.04	8.00
Owner-Occupied Housing by Geography	52,119	1.63	6.51	83.35	8.51
Business by Geography	11,868	6.00	6.73	79.14	8.13
Farms by Geography	811	2.10	3.08	84.96	9.86
Family Distribution by Income Level	50,082	20.63	19.03	20.83	39.51
Distribution of Low and Moderate Income Families throughout AA Geographies	19,862	4.57	11.04	78.43	5.96
Median Family Income HUD Adjusted Median Family Income for 2015 Households Below Poverty Level		47,864 52,700 17%	Median Housing Value Unemployment Rate (2010 US Census)		83,668 2.41%

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

The non-MA Oklahoma AA includes all tracts in Bryan, Carter, Garvin, Johnston, Marshall, Murray, and Pontotoc. The AA has three low-income, four moderate-income, 40 middle-income, and four high-income CTs. Two of the middle-income tracts in Johnston County are distressed due to poverty.

The bank operates 13 branches and 18 stand-alone ATMs, including four cash-dispensing ATMs, in the AA. LMB ranks second in deposit market share among 18 institutions in the AA, with 11.73 percent of the deposit market share. Competition in the AA is strong with 23 financial institutions. The top five banks, with a combined deposit market share of 64.35 percent, are First United Bank and Trust Company, Landmark Bank, N.A., BancFirst, Vision

Bank, N.A., and First National Bank and Trust Company of Ardmore. LMB's primary lending focus in the AA is residential real estate loans and loans to small businesses.

### Employment and Economic Factors

In April 2016, the combined unemployment rate for the AA was 4.4 percent, with the highest rate in Johnston County at 5.6 percent and the lowest rate in Pontotoc County at 3.6 percent. The state and national rates are both 4.7 percent. Because of improvements in the agricultural economy and energy production, employment in the AA is improving.

The largest industry sectors include tribal government and related entities, light manufacturing and health care in the AA. The major employers in the AA are the Chickasaw Nation Headquarters and Chickasaw Division of Commerce, Mercy Hospital Ada, East Central University, Walmart, Choctaw Casino Resort, and Cardinal Glass. The median income is \$47,253.

The percentage of households below the poverty level is 17.2 percent, and the percentage of families below the poverty level is 13.2 percent.

### Housing

The median housing value in the AA is \$83,668. According to the 2010 census, owner-occupied units comprise 57.24 percent of total housing units in the AA.

### Community Needs

We considered performance context information from one governmental organization that provides economic development in the AA. Identified community needs include affordable housing and small business loans.

# State of Texas

## Sherman-Denison MSA

Demographic Information for Full Scope Area: Sherman-Denison MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	26	0.00	30.77	57.69	11.54
Population by Geography	120,877	0.00	25.43	56.28	18.29
Owner-Occupied Housing by Geography	32,076	0.00	23.02	57.35	19.64
Business by Geography	10,480	0.00	24.18	59.82	16.00
Farms by Geography	796	0.00	7.29	66.21	26.51
Family Distribution by Income Level	31,768	20.83	18.13	21.26	39.78
Distribution of Low and Moderate Income Families throughout AA Geographies	12,377	0.00	34.59	53.12	12.29
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		57,623 61,700 13%	Median Housing Value Unemployment Rate (2010 US Census)		101,895 3.65%

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

Demographic Information for Full Scope Area: Sherman-Denison MSA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	26	0.00	30.77	57.69	11.54
Population by Geography	120,877	0.00	25.43	56.28	18.29
Owner-Occupied Housing by Geography	32,076	0.00	23.02	57.35	19.64
Business by Geography	8,248	0.00	25.13	59.21	15.65
Farms by Geography	600	0.00	8.50	65.83	25.67
Family Distribution by Income Level	31,768	20.83	18.13	21.26	39.78
Distribution of Low and Moderate Income Families throughout AA Geographies	12,377	0.00	34.59	53.12	12.29
Median Family Income HUD Adjusted Median Family Income for 2015 Households Below Poverty Level		57,623 62,600 13%	Median Housing Value Unemployment Rate (2010 US Census)		101,895 3.65%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2015 HUD updated MFI

The Sherman-Denison MSA comprises all of Grayson County in north central Texas. The AA includes eight moderate-income, 15 middle-income, and three upper-income CTs. LMB has nine branches and 12 ATMs, including 2 cash-dispensing ATMs, in the AA. Competition is strong in the AA, with 14 financial institutions. LMB ranked third for deposit market share at 16.45 percent. The top five banks, with a combined deposit market share of 86.03 percent, are American Bank of Texas, Independent Bank, Landmark Bank, N.A., J.P. Morgan Chase Bank, N.A., and Texas Star Bank.

### Employment and Economic Factors

In the Sherman-Denison MSA, the unemployment rate in April 2016 was 3.5 percent, compared to the State of Texas at 4.4 percent and the national unemployment rate of 4.7 percent. The percentage of households below the poverty level was 13.3 percent, and the percentage of families below the poverty level was 10.2 percent.

Sherman-Denison's economy is growing with the following industries: manufacturing, food processing, healthcare, and government. Primary employers in the AA are Tyson Foods, Texoma Medical Center, Ruiz Foods, Texas Instruments, Sherman Independent School District, Grayson County, and the City of Sherman.

In 2013, the HUD updated median family income was \$61,700 and increased in 2015 to \$62,600.

### Housing

As of the 2010 census, the median housing value was \$101,895. Owner-occupied housing units comprise 60.40 percent in the AA.

### Community Needs

We considered performance context from one organization that provides economic development in this AA. They identified community development, financing programs, and lending for other credit projects related to small business development.

## 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 Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family 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 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.

**Tables of Performance Data**

**State of Missouri**

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: MISSOURI												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015												
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Columbia MSA	45.95	1,136	228,669	178	39,404	2	196	9	12,767	1,325	281,036	74.45
Southern MO AA	54.05	576	52,153	472	24,859	500	29,985	18	28,036	1,566	135,033	25.55
MO Statewide with no P/M/F								2	10,400	2	10,400	

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from September 4, 2012 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME														
Geography: MISSOURI														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015														
Assessment Area (2015):	% 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 AA****
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Columbia MSA	74.43	361	79,359	361	79,359	0	0	0	0	0	0	0	0	74.45
Southern MO AA	25.57	124	9,715	124	9,715	0	0	0	0	0	0	0	0	25.55

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from September 4, 2012 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: MISSOURI		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Columbia MSA	784	72.93	2.00	3.06	14.90	12.37	50.23	45.03	32.87	39.54	10.45	20.41	6.80	10.11	12.42						
Southern MO AA	291	27.07	0.00	0.00	32.31	34.71	67.69	65.29	0.00	0.00	21.35	0.00	21.15	21.46	0.00						

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT															Geography: MISSOURI					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Columbia MSA	39	43.82	2.00	0.00	14.90	7.69	50.23	51.28	32.87	41.03	7.58	0.00	0.00	7.92	10.29									
Southern MO AA	50	56.18	0.00	0.00	32.31	36.00	67.69	64.00	0.00	0.00	13.97	0.00	15.79	12.66	0.00									

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: MISSOURI					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Columbia MSA	307	56.85	2.00	1.30	14.90	8.79	50.23	43.97	32.87	45.93	7.61	5.71	4.62	7.32	9.47									
Southern MO AA	233	43.15	0.00	0.00	32.31	35.19	67.69	64.81	0.00	0.00	20.55	0.00	19.02	21.41	0.00									

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015							Market Share (%) by Geography*				
Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Columbia MSA	6	75.00	22.02	50.00	29.36	16.67	18.36	16.67	30.27	16.67	7.41	11.11	14.29	0.00	0.00	
Southern MO AA	2	25.00	0.00	0.00	38.69	0.00	61.31	100.00	0.00	0.00	100.00	0.00	0.00	100.00	0.00	

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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.

\*\*\*\* Multi-family loan distribution includes Home Purchases, Home Improvement, and Refinances.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: MISSOURI		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Columbia MSA	178	27.38	16.02	25.28	17.76	8.99	36.50	37.64	29.72	28.09	3.21	4.67	1.56	3.02	3.77						
Southern MO AA	472	72.62	0.00	0.00	30.53	37.50	69.47	62.50	0.00	0.00	21.73	0.00	29.18	20.99	0.00						

\* Based on 2014 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: MISSOURI					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Columbia MSA	2	0.40	1.50	0.00	14.64	0.00	64.39	100.00	19.47	0.00	0.88	0.00	0.00	1.30	0.00									
Southern MO AA	500	99.60	0.00	0.00	35.56	41.80	64.44	58.20	0.00	0.00	66.57	0.00	65.94	67.98	0.00									

\* Based on 2014 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: MISSOURI					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families 4	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Columbia MSA	784	72.93	20.99	8.22	17.14	19.97	22.34	22.38	39.53	49.43	10.51	6.85	8.17	9.59	13.69									
Southern MO AA	291	27.07	24.80	13.12	21.54	26.24	22.77	30.14	30.89	30.50	24.48	25.40	23.08	33.56	18.75									

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 8.1% 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 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families <sup>5</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Columbia MSA	39	43.82	20.99	2.70	17.14	35.14	22.34	10.81	39.53	51.35	8.24	0.00	16.67	2.70	9.52	
Southern MO AA	50	56.18	24.80	12.77	21.54	23.40	22.77	25.53	30.89	38.30	13.53	11.54	3.33	19.23	17.65	

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 5.6% 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 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: MISSOURI					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families <sup>6</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Columbia MSA	307	56.85	20.99	10.70	17.14	19.56	22.34	22.88	39.53	46.86	8.30	8.28	8.06	5.86	9.85									
Southern MO AA	233	43.15	24.80	15.32	21.54	18.47	22.77	27.93	30.89	38.29	23.48	25.37	25.00	28.72	19.47									

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 8.7% 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 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbia MSA	178	27.38	76.41	61.24	44.94	29.78	25.28	3.21	4.15
Southern MO AA	472	72.62	76.92	91.53	88.98	6.99	4.03	21.73	40.17

\* Based on 2014 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 - 2015).

\*\*\*\* 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 0.31% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Columbia MSA	2	0.40	97.50	100.00	50.00	50.00	0.00	0.88	1.11
Southern MO AA	500	99.60	99.56	95.60	83.80	12.40	3.80	66.57	71.72

\* Based on 2014 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 - 2015).

\*\*\*\* 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									
Geography: MISSOURI			Evaluation Period: SEPTEMBER 4, 2012 TO DECEMBER 31, 2015						
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Columbia MSA	0	0	36	3,297	36	3,297	49.14	0	0
Southern MO AA	1	0	37	3,412	38	3,412	50.86	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																	
Geography: MISSOURI								Evaluation Period: SEPTEMBER 4, 2012 TO DECEMBER 31, 2015									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Columbia MSA	74.45	9	50.00	22.22	33.33	11.11	33.34	0	1	0	0	-1	0	9.78	19.24	42.29	28.69
Southern MO AA	25.55	9	50.00	0.00	22.22	77.78	0.00	1	0	0	0	1	0	0.00	31.87	68.13	0.00

# State of Oklahoma

Table 1. Lending Volume

LENDING VOLUME												
Geography: OKLAHOMA												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015												
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
<b>Full Review:</b>												
non-MA OK AA	100.00	552	60,230	464	40,484	385	22,052	17	36,036	1,418	158,802	100.00

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from September 4, 2012 to December 31, 2015.

\*\*\* Deposit Data as of June 15, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME														
Geography: OKLAHOMA														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015														
Assessment Area (2015):	% 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 AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
non-MA OK AA	100.00	258	28,787	258	28,787	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2014 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: OKLAHOMA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015												
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*																		
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp														
<b>Full Review:</b>																													
non-MA OK AA	325	100.00	1.63	2.77	6.51	11.69	83.35	79.08	8.51	6.46	7.29	11.43	15.11	6.78	6.04														

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															Geography: OKLAHOMA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
non-MA OK AA	54	100.00	1.63	1.85	6.51	7.41	83.35	88.89	8.51	1.85	4.12	12.50	3.57	4.78	0.00						

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: OKLAHOMA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
non-MA OK AA	171	100.00	1.63	0.58	6.51	11.11	83.35	83.04	8.51	5.26	8.76	0.00	10.53	8.89	7.78						

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: OKLAHOMA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015										
Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
non-MA OK AA	2	100.00	8.51	0.00	15.45	50.00	65.61	50.00	10.42	0.00	14.29	0.00	33.33	0.00	0.00

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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.

\*\*\*\* Multi-family loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
non-MA OK AA	464	100.00	6.00	3.23	6.73	10.78	79.14	80.82	8.13	5.17	9.37	5.80	14.65	10.43	5.02									

\* Based on 2014 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: OKLAHOMA		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
<b>Full Review:</b>																					
non-MA OK AA	385	100.00	2.10	0.00	3.08	11.69	84.96	81.56	9.86	6.75	24.18	0.00	56.76	24.45	15.79						

\* Based on 2014 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families 7	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
non-MA OK AA	325	100.00	20.63	6.87	19.03	16.84	20.83	28.18	39.51	48.11	7.84	11.24	6.71	8.42	7.63									

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 10.5% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: OKLAHOMA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families*	% BANK Loans****	% Families <sup>8</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
<b>Full Review:</b>															
non-MA OK AA	54	100.00	20.63	16.00	19.03	24.00	20.83	18.00	39.51	42.00	4.04	6.12	5.95	1.59	4.21

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 7.4% of loans originated and purchased by bank.

<sup>8</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families** *	% BANK Loans****	% Families <sup>9</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
non-MA OK AA	171	100.00	20.63	6.00	19.03	20.00	20.83	26.67	39.51	47.33	8.92	2.38	9.01	11.76	8.20									

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 12.3% of loans originated and purchased by bank.

<sup>9</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OKLAHOMA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
Assessment Area:	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
non-MA OK AA	464	100.00	74.72	79.96	80.39	9.05	10.56	9.37	14.03

\* Based on 2014 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 - 2015).

\*\*\*\* 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 0.22% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OKLAHOMA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
non-MA OK AA	385	100.00	99.51	97.92	84.68	11.43	3.90	24.18	26.34

\* Based on 2014 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 - 2015).

\*\*\*\* 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 0.26% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: OKLAHOMA		Evaluation Period: SEPTEMBER 4, 2012 TO DECEMBER 31, 2015					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
non-MA OK AA	3	131	60	9,070	63	9,201	100.00	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 Geography: OKLAHOMA Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
non-MA OK AA	100.00	13	100.00	0.00	7.69	84.62	7.69	1	0	0	0	+1	0	3.03	8.93	80.04	8.00

# State of Texas

Table 1. Lending Volume

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015												
Assessment Area (2015):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Sherman-Denison MSA	78.43	400	56,471	160	21,774	34	2,013	6	10,946	600	91,204	83.23
<b>Limited Review:</b>												
non-MA TX AA	21.57	76	11,796	59	4,964	28	3,417	2	35	165	20,212	16.77

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from September 04, 2012 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME														
Geography: TEXAS														
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015														
Assessment Area (2015):	% 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 AA****
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
Sherman-Denison MSA	78.43	80	9,980	80	9,980	0	0	0	0	0	0	0	0	83.23
<b>Limited Review:</b>														
non-MA TX AA	21.57	22	1,309	22	1,309	0	0	0	0	0	0	0	0	16.77

\* Loan Data as of December 31, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2015 to December 31, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Sherman-Denison MSA	261	84.47	0.00	0.00	23.02	14.56	57.35	73.56	19.64	11.88	5.97	0.00	6.42	7.44	2.67	
<b>Limited Review:</b>																
non-MA TX AA	48	15.53	0.00	0.00	5.20	4.17	43.87	39.58	50.93	56.25	3.59	0.00	0.00	4.64	2.94	

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Sherman-Denison MSA	20	68.97	0.00	0.00	23.02	0.00	57.35	75.00	19.64	25.00	5.49	0.00	0.00	9.30	2.70
<b>Limited Review:</b>															
non-MA TX AA	9	31.03	0.00	0.00	5.20	0.00	43.87	55.56	50.93	44.44	11.43	0.00	0.00	20.00	5.26

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Sherman-Denison MSA	119	86.23	0.00	0.00	23.02	9.24	57.35	79.83	19.64	10.92	7.07	0.00	6.80	9.33	2.80						
<b>Limited Review:</b>																					
non-MA TX AA	19	13.77	0.00	0.00	5.20	0.00	43.87	42.11	50.93	57.89	3.77	0.00	0.00	5.13	3.01						

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 5. Geographic Distribution of Multi-family Loans

Geographic Distribution: MULTI-FAMILY		Geography: TEXAS				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					Market Share (%) by Geography*				
Assessment Area:	Total Multi-family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
<b>Full Review:</b>															
Sherman-Denison MSA	0	0.00	0.00	0.00	17.49	0.00	77.42	0.00	5.09	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
non-MA TX AA	0	0.00	0.00	0.00	34.78	0.00	53.12	0.00	12.10	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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.

\*\*\*\* Multi-family loan distribution includes Home Purchases, Home Improvement, and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015								
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*														
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp										
<b>Full Review:</b>																									
Sherman-Denison MSA	160	73.06	0.00	0.00	25.13	36.25	59.21	50.00	15.65	13.75	4.04	0.00	4.98	3.84	4.55										
<b>Limited Review:</b>																									
non-MA TX AA	59	26.94	0.00	0.00	12.59	5.08	43.58	55.93	43.83	38.98	4.48	0.00	0.00	4.55	5.93										

\* Based on 2014 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 (2015).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Sherman-Denison MSA	34	54.84	0.00	0.00	8.50	2.94	65.83	73.53	25.67	23.53	6.74	0.00	0.00	10.10	3.03						
<b>Limited Review:</b>																					
non-MA TX AA	28	45.16	0.00	0.00	2.68	0.00	28.86	14.29	68.46	85.71	23.38	0.00	0.00	15.38	25.00						

\* Based on 2014 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 (2015).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: TEXAS					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families 10	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Sherman-Denison MSA	261	84.47	20.83	7.53	18.13	16.32	21.26	21.34	39.78	54.81	7.04	6.60	5.84	7.02	7.61									
<b>Limited Review:</b>																								
non-MA TX AA	48	15.53	16.62	2.44	15.41	14.63	17.71	17.07	50.27	65.85	3.87	9.09	7.41	2.06	3.65									

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 9.4% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: TEXAS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015										
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families* **	% BANK Loans****	% Families <sup>11</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Sherman-Denison MSA	20	68.97	20.83	0.00	18.13	12.50	21.26	31.25	39.78	56.25	5.07	0.00	0.00	6.06	6.76
<b>Limited Review:</b>															
non-MA TX AA	9	31.03	16.62	0.00	15.41	42.86	17.71	0.00	50.27	57.14	11.54	0.00	20.00	0.00	10.53

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 20.7% of loans originated and purchased by bank.

<sup>11</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: TEXAS															
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015															
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families**	% BANK Loans****	% Families <sup>12</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Sherman-Denison MSA	119	86.23	20.83	2.83	18.13	15.09	21.26	22.64	39.78	59.43	8.52	6.90	9.00	9.09	8.28
<b>Limited Review:</b>															
non-MA TX AA	19	13.77	16.62	0.00	15.41	0.00	17.71	11.11	50.27	88.89	4.88	0.00	0.00	0.00	6.40

\* Based on 2014 Peer Mortgage Data -- US and PR

\*\* 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 10.1% of loans originated and purchased by bank.

<sup>12</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TEXAS		Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Sherman-Denison MSA	160	73.06	79.06	68.75	58.13	27.50	14.37	4.04	5.31
<b>Limited Review:</b>									
non-MA TX AA	59	26.94	80.20	86.44	76.27	16.95	6.78	4.48	8.98

\* Based on 2014 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 - 2015).

\*\*\*\* 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 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: TEXAS			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2015						
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Sherman-Denison MSA	34	54.84	99.67	85.29	82.35	17.65	0.00	6.74	8.46
<b>Limited Review:</b>									
non-MA TX AA	28	45.16	98.66	92.86	50.00	42.86	7.14	23.38	28.81

\* Based on 2014 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 - 2015).

\*\*\*\* 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 1.61% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: TEXAS		Evaluation Period: SEPTEMBER 4, 2012 TO DECEMBER 31, 2015					
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Sherman-Denison MSA	1	0	39	1,467	40	1,467	65.00	0	0
<b>Limited Review:</b>									
non-MA TX AA	1	0	14	790	15	790	35.00	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 Geography: TEXAS Evaluation Period: SEPTEMBER 4, 2012 TO DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Sherman-Denison MSA	83.23	9	81.82	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	25.43	56.28	18.29
<b>Limited Review:</b>																	
non-MA TX AA	16.77	2	18.18	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	9.39	48.13	42.49