



## **PUBLIC DISCLOSURE**

October 30, 2018

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

Central National Bank  
Charter Number 4284

802 N. Washington  
Junction City, KS 66441

Office of the Comptroller of the Currency

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

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

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## Overall CRA Rating: Satisfactory

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

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

Performance Levels	Central National Bank 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:

- Central demonstrated an excellent record of responsiveness to community credit needs based on the volume of lending. The overall geographic distribution of loans by income level of the geography is good. The overall distribution of loans to borrowers of different income levels is good. The level of community development loans had a positive impact on the Lending Test rating.
- Central’s level of qualified community development (CD) investments and grants exhibits an adequate responsiveness to community development needs.
- Central’s delivery systems are accessible to essentially all portions of the institution’s assessment areas. The bank’s services and hours are generally consistent throughout all locations. The institution provides a relatively high level of community development services.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

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

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

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

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

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

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

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

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

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

## Description of Institution

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

Central is an \$891 million interstate financial institution headquartered in Junction City, KS. The bank is a wholly owned subsidiary of Central of Kansas, Inc., of Junction City, KS. The holding company has \$125 million in assets as of June 30, 2018. The bank has no affiliates requiring consideration for CRA activities.

Central is a full-service banking institution that offers a broad range of commercial, real estate, and consumer credit products. Depending on the geographical location, the bank's primary lending activities focus on residential real estate loan products, agricultural operating and real estate products, and commercial operating and real estate loan products. On September 30, 2018, net loans and leases represented 54 percent of the bank's total assets. The bank's \$481 million loan portfolio consisted of 48 percent commercial loans; 30 percent agriculture loans; 17 percent residential real estate loans; four percent consumer loans; and less than one percent other loans. Tier one capital totaled \$111 million.

Central has six assessment areas (AAs) in Kansas and one AA in Nebraska. The Kansas AAs are comprised of five partial MSAs and one non-MSA. The Nebraska AA is also a non-MSA. As of December 31, 2017, Central has a total of 31 branches and 66 automated teller machines (ATMs). Thirty branches and 62 ATMs are in the state of Kansas. Nebraska has one branch and two ATMs. There are also two ATMs outside the bank's AAs.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The Office of the Comptroller of Currency last evaluated Central's CRA performance on September 23, 2015. The bank received an overall rating of "Outstanding".

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

There are two evaluation periods for the Lending Test. The performance years of 2015 and 2016 (period one) will be evaluated using data from the 2010 U.S. Census. This evaluation period will receive the most weight. The performance year of 2017 (period two) will be evaluated using the same Census data updated by the 2017 American Community Survey (ACS). The ACS is an ongoing survey that provides vital information on a yearly basis about demographic data including jobs and occupations, educational attainment, veterans, and whether people own or rent their homes. The ACS periodically releases new median income information used to calculate low-, moderate-, middle-, and upper-income brackets and determine the income status of census tracts.

The evaluation of lending products included home mortgage loans, small business loans, and small agricultural loans. Our analysis also included a review of CD loans. Bank-wide, loans for home mortgages represented 51 percent of the number of loans originated. Small farm loans represented 31 percent of the number and small business loans represented 18 percent. Each AA was evaluated based on its primary lending product(s). The institution had to originate at least 25 loans during the evaluation period for a loan product to be evaluated. The evaluation period for the Investment and Service Tests is August 29, 2015 – December 31, 2017.

### Data Integrity

We performed a data integrity review prior to this examination to test the accuracy of the residential loans subject to the Home Mortgage Disclosure Act and data on small loans to business and farms. We found the sampled data accurate. There have not been any changes to systems and controls. The bank's internal testing indicates that controls are maintained effectively. The data are presented and considered in this evaluation.

We reviewed the CD loan, investment, and service activity information provided by Central. Qualified activities with a CD purpose were considered in this evaluation.

### Selection of Areas for Full-Scope Review

We selected a sample of AAs in Kansas for full-scope reviews and performed a limited-scope review on the remaining Kansas AAs. We performed a full-scope review on the one AA in Nebraska. Refer to the "Scope" section under each state rating for details regarding how the areas were selected and why they are representative.

### Ratings

The bank's overall rating is a blend of the ratings for the states of Kansas and Nebraska. Performance in the state of Kansas received the most weight in the overall rating. The Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits dated June 30, 2017, reflects that Kansas accounts for 92 percent of Central's deposits and 97 percent of the branches. Ninety-five percent of the number of loans extended during the evaluation period were extended within the Kansas AAs. Within the state of Kansas, the most weight was given to

performance in the Kansas Non-MSA AA as sixty-seven percent of the number of all Central's loan originations in Kansas were made in that AA.

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

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

## State Rating

### State of Kansas

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

The major factors that support this rating include:

- Central demonstrated excellent responsiveness to community credit needs. The overall distribution of loans by income level of the geography is good. The distribution of loans to borrowers of different income levels and businesses of different sizes is good. Central provided \$13 million in community development (CD) loans over the evaluation periods. The volume and type of CD loans had a positive impact on the bank's lending test.
- Central demonstrated adequate responsiveness to community development investment needs. The institution provided \$7 million in qualified investments and donations to provide for affordable housing, community services for low- and moderate-income individuals and geographies, and for revitalization of low- and moderate-income areas.
- Central's delivery systems for products and services are accessible to essentially all individuals and geographies in the assessment areas. The institution provides a relatively high level of community development services.

### Description of Institution's Operations in Kansas

Refer to the community profiles for the state of Kansas in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Kansas AAs cover 18 counties in the state. The largest AA is comprised of eleven non-metropolitan counties located in the northern and mid-central part of the state. There are also AAs in the Wichita, Manhattan, Topeka, Lawrence, and Gardner MSA areas. Central's six AAs in Kansas held 92 percent of the bank's deposits on June 30, 2017, and originated 95 percent of the number of all loans originated during the evaluation periods. Ninety-seven percent of the number of branches were in Kansas on December 31, 2017. Therefore the State of Kansas will receive the most weight in the overall CRA rating.

### Scope of Evaluation in Kansas

Central has six AAs in Kansas with 30 branches and 64 ATMs. The Kansas Non-MSA AA is the largest AA consisting of eleven counties in central Kansas. On June 30, 2017, the Kansas Non-MSA AA held the largest share of Kansas deposits at 77 percent. Two Kansas AAs,

Wichita and Lawrence, are tied for second place in deposit share with approximately seven percent each. Other Kansas AAs by deposit share are the Topeka AA, Manhattan AA, and the Gardner AA. These AA's each have less than five percent of the Kansas deposits.

The Kansas Non-MSA AA originated 67 percent of all loans originated in Kansas during the evaluation periods. The Wichita AA originated 12 percent of loans with the Manhattan AA, the Topeka AA, and the Lawrence AA each originating eight percent, seven percent, and four percent, respectively. The Gardner AA originated two percent of loans in Kansas.

We performed full-scope reviews of all Kansas AAs with the exception of the Gardner AA. The Kansas Non-MSA AA represents the significant majority of deposits and loans in Kansas and will receive the most weight in the overall Kansas rating.

During this examination, the OCC utilized regulatory agency contacts with several community professionals in the banks AAs. The community contacts for the Kansas Non-MSA AA indicated that the primary credit needs of the AA continue to be small farm, small business, or residential loans, depending on the demographics of the counties. Contacts point out that local banks are good community partners.

Community contacts for the Wichita AA state commercial and residential loans are the primary lending needs for the AA. Wichita is the largest city in the AA and has the most housing need. Subsidized financing for both developers and homebuyers is available in Wichita and banks have the opportunity to make the base loan to these stakeholders. Per the contacts, banks are meeting the credit needs of the community.

The primary loan needs for Manhattan, Topeka, and Lawrence AA are loans for residential properties. Contacts in the Topeka AA indicate housing inventory is very low and that many low- and moderate-income borrowers do not have the ability to make the down payment even though prices are depressed. There is a need for lenders to support down payment and credit score clean-up programs. Central is mentioned as a bank that participates in the Topeka Opportunity to Own (TOTO) program, a first time homebuyer program offering a very low down payment.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS**

### **LENDING TEST**

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

The bank's performance under the lending test in Kansas is rated Outstanding. Based on full-scope reviews, the bank's performance in the Kansas Non-MSA, Wichita AA, and Lawrence AA is excellent. In the Manhattan and Topeka AAs, performance is good.

#### **Lending Activity**

Lending activity reflects excellent responsiveness to area credit needs.

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

### Rural Non-MSA AA

Central's lending levels reflect excellent responsiveness to small business, small farm, and residential real estate borrowers in relation to area credit needs and the bank's deposit market share. During the evaluation periods, the bank extended a total of 2,954 loans totaling \$271.4 million dollars in the Kansas Non-MSA AA. Specific lending levels for loan products are discussed below.

Central ranked number one in deposit share when compared to other institutions with branches in the AA. On June 30, 2016, the Federal Deposit Insurance Corporation (FDIC) reports that Central held a deposit market share of 11.67 percent. On June 30, 2017, market share was 10.64 percent, with Central still ranked number one.

Small loans to farms are the bank's primary product in this AA and lending responsiveness is excellent. Market share data for 2016 and 2017 reflects that Central's share of small loans to farms in the AA ranged from 43.6 to 48.4 percent. This percentage provides Central with the rank of number one in the AA for small loans to farms. The institution originated 1,674 loans totaling \$158 million to farms between January 1, 2015 and December 31, 2017.

Lending responsiveness for small loans to businesses is excellent. Ranking second in market share for both 2016 and 2017, small loans to businesses numbered 700 and totaled \$52.5 million during the evaluation periods.

Lending responsiveness for home mortgage loans is excellent. Central is most active in the residential purchase market and ranked third and second in 2016 and 2017, respectively. Loans to residential borrowers for home improvement, refinance, and purchase numbered 580 and totaled \$60.9 million during the evaluation periods.

### Wichita AA

Lending activity in the Wichita AA reflect excellent responsiveness in relation to area credit needs and the bank's deposit market share. During the evaluation periods, Central extended 529 loans representing \$77.2 million. Specific lending levels for loan products are discussed below.

On June 30, 2017, Central ranked 23<sup>rd</sup> in deposit share with 0.61 percent of market deposits. During the evaluation periods, deposit share ranged from 0.61 to 0.64 percent.

The bank's lending activity for businesses is excellent. Small business loans are Central's primary loan product in this AA. The bank's market share for small loans to businesses is higher than its deposit market share. Lending market share data for 2016 and 2017 reflects that Central's share of small loans to businesses by number was 1.07 and 1.02 percent in 2016 and 2017, respectively. Central ranked 20<sup>th</sup> out of 88 institutions in 2016 and 21<sup>st</sup> out of 81 institutions in 2017. The bank originated 255 small loans to business totaling \$41.6 million to borrowers in the AA between January 1, 2015 and December 31, 2017.

Lending activity for home mortgages was adequate. The bank improved market share from 2016 to 2017 for both home improvement loans and refinance loans. Central moved from a rank of 58<sup>th</sup> in home improvement loans to a rank of 35<sup>th</sup> in 2017. Refinance ranking went from 71<sup>st</sup> to 58<sup>th</sup>. Central's highest market share was 0.40 percent for home improvement loans in 2017. Competition for residential loans in the AA is very strong. The bank competes with over 100 residential lenders in the AA. Loans to residential borrowers for home mortgages numbered 145 and totaled \$21.8 million during the evaluation periods.

Lending activity for small loans to farms was excellent. The bank ranked second in a pool of 18 – 20 lenders in small loans to farms for both 2016 and 2017. Central had market share of 20.1 percent of the number and 33.2 percent of the farm dollars in 2016. The year 2017 was similar with 17.1 percent of the number of loans and 38.1 percent of the dollars. Small loans to farms numbered 129 and totaled \$13.8 million during the evaluation periods.

#### Manhattan AA

Lending activity in the Manhattan AA reflected good responsiveness in relation to area credit needs and the bank's deposit market share. June 30, 2017, FDIC reporting indicated Central ranked 17<sup>th</sup> in deposit market share with 0.91 percent of market deposits. During the evaluation periods, Central extended 364 loans representing \$54.7 million. Specific lending levels for loan products are discussed below.

Home mortgage lending activity volumes are excellent. Loans for residential purchase, refinance, and home improvement are the primary loan products in the Manhattan AA. The June 30, 2017 FFIEC market share data show Central as having an average market share of 2.48 percent of the number of loans in the AA when combining the number of home improvement, home purchase, and home refinances extended. Central averaged a combined market share of 2.52 percent based on dollar volume. Home purchase loans are the primary mortgage product for Central in the AA. Central ranked 5<sup>th</sup> and 6<sup>th</sup>, respectively, for the number of home purchase loans extended in the AA. The bank competed with over 140 institutions in 2016 and 2017 for these loans. Considering all mortgage loan products, the institution originated 251 loans totaling \$45.2 million to borrowers in the AA between January 1, 2015 and December 31, 2017.

Lending responsiveness for small loans to businesses is adequate. Based on the FFIEC's 2017 market share data, Central captured market share of 3.48 percent of the total number of business loans in the AA. Central ranked 10<sup>th</sup> and 11<sup>th</sup> in 2016 and 2017, respectively. The institution originated 92 loans totaling \$8 million to businesses during the evaluation periods.

Lending responsiveness for small loans to farms is adequate. Small loans to farms during the evaluation periods were minimal due to limited farm ground in the AA. However, Central ranked 4<sup>th</sup> in market share in both evaluation periods with over 10 percent of the number of loans originated. The institution originated 21 loans totaling \$1.5 million.

#### Topeka AA

Lending activity in the Topeka AA reflected adequate responsiveness in relation to area credit needs and the bank's deposit market share. On June 30, 2017, FDIC reporting conveyed Central ranked 17<sup>th</sup> in deposit market share with 0.66 percent of market deposits. During the

evaluation periods, Central extended 292 loans representing \$42.5 million. Specific lending levels for loan products are discussed below.

Home mortgage lending activity volumes are good. Loans for residential purchase, refinance, and home improvement are the primary loan products in the Lawrence AA. The June 30, 2017 FFIEC market share data show Central as having an average market share of 1.61 percent of the number of loans in the AA when combining the number of home improvement, home purchase, and home refinances extended. Central averaged a combined market share of 1.85 percent based on dollar volume. Performance in 2015 – 2016 was similar to 2017. Considering all mortgage loan products, the institution originated 247 loans totaling \$38.1 million to borrowers in the AA between January 1, 2015 and December 31, 2017. Loans to purchase homes are the primary mortgage product for Central in the Topeka AA. The bank competed with over 155 institutions in 2016 and 2017 for these loans. Central ranked 14<sup>th</sup> and 11<sup>th</sup>, respectively, for the number of home purchase loans extended in the AA.

Lending responsiveness for small loans to businesses is adequate. Based on the FFIEC's 2017 market share data, Central captured a market share of 2.97 percent of the total number of business loans in the AA. The bank realized a moderate improvement in market share from 2016, which was at 2.18 percent. Central ranked 14<sup>th</sup> and 17<sup>th</sup> in 2016 and 2017, respectively. The institution originated 44 loans totaling \$4.3 million to businesses during the evaluation periods.

An analysis of small loans to farms during the evaluation periods would not be meaningful as there was not sufficient volume to analyze.

#### Lawrence AA

Lending activity in the Lawrence AA reflected adequate responsiveness in relation to area credit needs and the bank's deposit market share. On June 30, 2017, FDIC reporting conveyed Central ranked 12<sup>th</sup> in deposit market share with 2.21 percent of market deposits. During the evaluation periods, Central extended 187 loans representing \$31 million. Specific lending levels for loan products are discussed below.

Home mortgage lending activity volumes are adequate. Loans for residential purchase, refinance, and home improvement are the primary loan products extended in the Lawrence AA. The June 30, 2017 FFIEC market share data shows Central as having an average market share of 1.41 percent of the number of loans in the AA when combining all HMDA products originated. Central averaged a combined market share of 1.33 percent based on dollar volume. Considering all mortgage loan products, the institution originated 103 loans totaling \$24 million to borrowers in the AA between January 1, 2015 and December 31, 2017.

Lending responsiveness for small loans to businesses is adequate. Based on the FFIEC's 2017 market share data, Central captured market share of 1.43 percent of the total number of business loans in the AA with 2016 being slightly better at 1.7 percent. Central ranked 12<sup>th</sup> and 14<sup>th</sup> in 2016 and 2017, respectively. The institution originated 81 loans totaling \$6.8 million to businesses during the evaluation periods.

Small loans to farms during the evaluation periods were not sufficient enough in number or dollar volume to analyze lending activity.

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

Lending in Kansas reflects good distribution by income level of geography.

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

The overall performance for HMDA loans is good.

Refer to Table O in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

### Rural Non-MSA AA

Central's lending distribution in moderate-income tracts is good. There were no low-income tracts. During evaluation period one, Central's lending performance for all HMDA products in moderate-income tracts was good. Distribution of HMDA loans to consumer borrowers located in these tracts was near the census demographics and aggregate peer data. During evaluation period two, lending performance for HMDA products was excellent, exceeding the census demographics and aggregate peer data. Loans for the purchase of residential real estate were the bank's primary HMDA product. Based on FFIEC aggregate data, Central was ranked third in market share for 2016 and second in 2017 for residential purchase loans to borrowers in moderate-income tracts.

### Wichita AA

Central's distribution of HMDA loans to borrowers located in both low- and moderate-income tracts is adequate. Performance in low-income tracts is adequate, with good performance in period one and poor performance in period two. Performance is considered adequate due to the distant location of low-income tracts from the bank's branch.

Performance in moderate-income tracts is also adequate overall, with adequate performance in period one and very poor performance in period two. Period two performance was adversely impacted by the 2017 ASC median income update in which several moderate-income tracts located near the bank were reclassified to middle-income.

### Manhattan AA – Primary Product

Central's distribution of HMDA products in moderate-income tracts is good. There were no low-income tracts. During evaluation period one, the bank's distribution of home loans in moderate-income tracts was adequate. Distribution of home loans was below the census demographics and below the FFIEC aggregate lending level for competitor institutions. Home purchase loans were the primary residential real estate product in the moderate-income tracts. Central ranked 7<sup>th</sup> in moderate-income geographical market share for evaluation period one, but increased to a ranking of 3<sup>rd</sup> in market share for evaluation period two.

During the evaluation period two, Central's mortgage extensions were excellent inside moderate-income tracts. Distribution of home loans was more than double the census demographics. Additionally, the bank's percentage of lending in these tracts was significantly higher than the FFIEC aggregate lending level.

Topeka AA – Primary Product

Overall, Central offers adequate geographical distribution for mortgage loans. Geographical distribution in low-income tracts during both evaluation periods is adequate. While the bank's distribution was significantly below the census demographics, performance relative to the FFIEC aggregate lending data was good.

Central is lending in low-income tracts when possible, but opportunities are sparse. The majority of low-income tracts are situated in the downtown area of Topeka. The percentage of loan applications from low-income tracts is very low compared to total applications at all institutions in the AA. During the evaluation periods, applications for all home products in low-income tracts averaged 1.8 percent of total applications from the AA.

Geographical distribution in moderate-income tracts is adequate. Distribution in period one was very poor with the bank's performance well below the census demographic and the aggregate lending level. Distribution in period two was adequate as the bank more than doubled the number of loans originated in moderate-income tracts. During this period, performance was below the demographic, but near the aggregate lending level of competitor institutions.

It is commendable that the bank improved lending in moderate-income tracts during 2017 when the total number of applications in moderate-income geographies fell 22 percent over 2016. Three of the five moderate-income tracts located closest to the bank's downtown branches are industrial areas containing a production facility, the Kansas River and its floodway, farm land, and the municipal airport. There are a minimal number residential properties.

Lawrence AA – Primary Product

Overall, Central offers good geographical distribution for mortgage loans. During evaluation period one, distribution in low-income census tracts was adequate, with the bank's percentage of distribution below the census demographics and below the FFIEC's aggregate lending percentage. Central's distribution during period two was excellent with lending levels exceeding both demographic data and aggregate lending data. The application ratio for home mortgage loans in low-income census tracts is minimal with an average of 2.6 percent of all applications placed with lenders located in the AA. Home purchase loans were the most sought after loans with over 157 lenders in the AA competing for this product. Central shared the ranking of 4<sup>th</sup> with multiple lenders during 2017, indicative of the bank's effort to serve the low-income tracts in the AA.

During evaluation period one, the bank's distribution of home loans in moderate-income tracts was excellent. Distribution of home loans was significantly above census demographics and the FFIEC aggregate lending level derived from competitor institutions. Distribution during period two was good, with performance very near the demographics and aggregate levels. Home refinance loans were the primary HMDA product during both periods. Out of 126 lenders in the AA, Central ranked 10<sup>th</sup> during 2017 for mortgage refinance loan products.

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

The overall performance for business loans is good.

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

### Rural Non-MSA AA

A geographical analysis for low-income tracts would not be feasible as there were no low-income tracts located within the AA during the evaluation periods.

Overall, Central's lending performance for business loans reflects good distribution to borrowers in moderate-income tracts. During both evaluation periods, the percentage of loan distribution was near the AA demographics. Additionally, the bank's percentage of lending in these tracts was near to the FFIEC aggregate lending level in 2017 and exceeded aggregate peer data in 2015-2016. Based on this data, Central was ranked number two in market share for 2016 and 2017 for small loans to businesses in moderate-income tracts.

### Wichita AA – Primary Product

Overall, Central's distribution of loans to small businesses in low- and moderate-income tracts was good. Distribution of business loans to borrowers in low-income tracts was lower than demographics and aggregate lending data in period one; however, Central's distribution exceeded the demographic and was near to the aggregate lending data in period two.

For moderate-income tracts, distribution of loans is good, with performance near to the demographics in both evaluation periods. The bank's performance in period one was near the FFIEC's aggregate lending data, but was consistent with the aggregate data in period two. Notably, the bank's 2017 market share in low- and moderate-income tracts was 0.92 and 1.04 percent, which are consistent with the bank's overall market share of 1.02 percent in the AA.

### Manhattan AA

A geographical analysis for low-income tracts would not be feasible as there were no low-income tracts located within the AA during the evaluation periods.

Overall, Central's offers adequate geographical distribution for small loans to businesses in moderate-income tracts. During period one, geographical distribution was good. Central's distribution into moderate-income tracts was very near the AA demographics. Additionally, the bank's level of distribution was near the aggregate lending level. During period two, distribution was adequate. Central's total number of small loans to businesses decreased. The bank's distribution fell below the AA demographics and below the aggregate lending level.

### Topeka AA

Overall, Central offers good geographical distribution for small loans to businesses. Geographical distribution in low-income tracts is excellent during both evaluation periods. The bank's distribution of small loans to businesses was near to demographics during period one, but exceeded the demographics in period two. Lending in both periods exceeded the FFIEC's aggregate lending data and by a significant margin for period two.

Distribution in moderate-income tracts is adequate. During period one, Central did not originate any small loans to businesses in moderate-income tracts. The closest moderate-income tract to the branch contained primarily residential dwellings. During period two, there were a total of three additional moderate-income tracts in the AA. The bank's level of lending was below census demographics and below aggregate lending level.

#### Lawrence AA

Overall, Central offers good geographical distribution for small loans to businesses. Central's distribution of business loans to borrowers located in low-income tracts is adequate for both evaluation periods. While business loan distribution is lower than census demographics, the bank's performance was equal or better than the aggregate lending data.

For both evaluation periods, Central's distribution of loans in moderate-income tracts is good. Lending performance was near both the census demographics and the FFIEC's aggregate lending data.

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

The overall performance for farm loans is good.

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

#### Rural Non-MSA AA – Primary Product

Lending to farms in moderate-income geographies is excellent. During evaluation period one, Central's lending performance reflected excellent distribution to farms located in moderate-income geographies. The bank's percentage of lending in these geographies substantially exceeded the percentage of AA farms located in moderate-income tracts. Additionally, the bank's percentage of lending in these tracts significantly exceeded the aggregate lending level derived by the FFIEC from competitor lending data.

During evaluation period two, the bank's distribution to farms in moderate-income tracts was adequate. The bank's percentage of loans granted was significantly lower than the census demographics; however, this low performance level does not affect the bank's rating. The number and composition of moderate-income geographies changed due the ASC median income updates for 2017. During 2017, one large rural moderate-income tract was reclassified as middle-income. Additionally, the AA gained four new moderate-income tracts located inside cities such as Salina, Concordia, and Junction City. Farm lending in moderate-income tracts for 2017 was more difficult as all moderate-income tracts were contained within the boundaries of various cities; however, based on FFIEC aggregate data, Central was ranked number one in market share for 2016 and 2017 for small loans to farms in moderate-income tracts.

#### Wichita AA

A geographical analysis for farm loans would not be meaningful as the low- and moderate-income geographies for this AA are located within the city limits of Wichita where there are no farming activities. The outer edge of one moderate-tract might support farming activities, but it is located a significant distance from Central's branch location.

Manhattan AA; Topeka AA; Lawrence AA

The number of small loans to farms during the evaluation periods was not sufficient to analyze geographical distribution.

**Lending Gap Analysis**

Our geographic distribution analysis included a review for any unexplained lending gaps in the Kansas AAs. We did not identify any unexplained lending gaps in low- or moderate-income tracts.

**Inside/Outside Ratio**

For the geographic distribution analysis under the lending test, we performed an inside/outside analysis at the bank level. The information includes bank originations and purchases. An adequate percentage of the bank's loans were extended to borrowers within the bank's AAs. Sixty-four percent of the number and 58 percent of the dollar volume of loans originated by Central were granted within the AAs. By loan type, 38 percent of the number of residential real estate loans, 92 percent of the number of business loans, and 90 percent of farm loans were granted inside the AAs.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	457	35.8	819	64.2	1,276	61,138	35.4	111,459	64.6	172,597
2016	503	37.0	858	63.0	1,361	74,484	37.6	123,569	62.4	198,053
2017	445	40.4	656	59.6	1,101	66,460	39.9	100,141	60.1	166,601
<b>Subtotal</b>	<b>1,405</b>	<b>37.6</b>	<b>2,333</b>	<b>62.4</b>	<b>3,738</b>	<b>202,082</b>	<b>37.6</b>	<b>335,169</b>	<b>62.4</b>	<b>537,251</b>
Small Business										
2015	384	92.3	32	7.7	416	37,936	90.3	4,059	9.7	41,995
2016	423	94.0	27	6.0	450	41,101	87.0	6,161	13.0	47,262
2017	394	88.5	51	11.5	445	36,466	80.4	8,886	19.6	45,352
<b>Subtotal</b>	<b>1,201</b>	<b>91.6</b>	<b>110</b>	<b>8.4</b>	<b>1,311</b>	<b>115,503</b>	<b>85.8</b>	<b>19,106</b>	<b>14.2</b>	<b>134,609</b>
Small Farm										
2015	722	92.7	57	7.3	779	69,919	92.7	5,527	7.3	75,446
2016	688	90.2	75	9.8	763	69,673	88.5	9,022	11.5	78,695
2017	632	88.3	84	11.7	716	66,228	86.6	10,281	13.4	76,509
<b>Subtotal</b>	<b>2,042</b>	<b>90.4</b>	<b>216</b>	<b>9.6</b>	<b>2,258</b>	<b>205,820</b>	<b>89.2</b>	<b>24,830</b>	<b>10.8</b>	<b>230,650</b>
<b>Total</b>	<b>4,648</b>	<b>63.6</b>	<b>2,659</b>	<b>36.4</b>	<b>7,307</b>	<b>523,405</b>	<b>58.0</b>	<b>379,105</b>	<b>42.0</b>	<b>902,510</b>
Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0										

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

Lending in Kansas reflects good distribution by income level of the borrower.

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

The overall performance for HMDA loans is good.

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

### **Rural Non-MSA AA**

Overall lending performance for HMDA products was good during both evaluation periods. Lending to low-income borrowers was adequate in both periods as performance was below census demographics; however, the bank's level of lending to low-income borrowers compared to peer institutions was excellent, significantly above the FFIEC aggregate level. Lending opportunities to low-income borrowers for HMDA products are minimal. Per 2017 FFIEC HMDA information, low-income applicants represented approximately seven percent of all loan applicants while moderate -income applicants represented 18 percent of the families in the AA.

Performance for lending to moderate-income borrowers was excellent in period one and excellent in period two. When compared to the census demographics, the bank's level of lending was very near the demographic in period one and significantly exceeded the demographic in period two. The bank's level of lending to moderate-income borrowers compared to peer institutions was excellent, significantly above the FFIEC aggregate level.

### **Wichita AA**

Overall lending performance for HMDA products was adequate. Mortgage lending to low-income borrowers is adequate. Lending levels are lower than the census demographics in period one and significantly lower in period two. Lending significantly exceeded the FFIEC's aggregate lending data in period one, but was below aggregate in period two. Central has a small presence in the AA and competes with up to 236 lenders for HMDA loan products. Additionally, applications from low-income borrowers represented only 7.4 percent of all HMDA applications in the AA during the evaluation periods.

Although Central's level of lending to low-income borrowers was below the census demographics, Central's market share of loans to low-income borrowers was near its overall market share for HMDA loans originated in the AA. Market share for home purchase and home refinance loans in the AA was 0.18 and 0.47 percent, respectively. The bank's overall market share for low-income borrowers for all HMDA products averaged 0.28 percent during the evaluation periods.

Mortgage lending to moderate-income borrowers is adequate. Lending levels in both periods are lower than the demographics. The bank's level of lending is also lower than the aggregate lending data in both periods. Similar to low-income applications, the volume of applications from moderate-income borrowers is low, representing only 16.3 percent of all applications at reporting institutions in the AA during the evaluation periods. Also contributing to a lower

penetration, the percentage of moderate-income families declined slightly in 2017. While the bank originated approximately the same number of loans during the second evaluation period, fewer borrowers were considered moderate-income.

#### Manhattan AA – Primary Product

Overall lending performance for HMDA products was good. Central's distribution to low-income borrowers is adequate. Distribution to low-income borrowers was significantly below the demographics for both evaluation periods. During period one, lending was above the aggregate level; however, for period two, the bank's lending level was below the aggregate level. Home purchase loans were the primary HMDA product for the bank. Lending opportunities are limited. On average, only 4.2 percent of total home purchase applications in the AA were from low-income borrowers. Supporting the rating of adequate, Central ranked 5<sup>th</sup> in market share during both evaluation periods with an average of 3.5 percent of market share for home purchase loans. Over 140 lenders are available for home purchase loans. There were substantially fewer applications in the AA among all lenders for home improvement and home refinance loans.

Distribution to moderate-income borrowers is excellent. During both evaluation periods, lending to moderate-income borrowers was significantly above demographics and significantly above the FFIEC's aggregate lending level. Home purchase loans were the primary HMDA product for these borrowers. Central was ranked 4<sup>th</sup> and 3<sup>rd</sup> in market share for 2016 and 2017, respectively. The bank's market share for home purchase loans to moderate-income borrowers was 7.5 percent, well above the bank's 4.6 percent market share for all home purchase loans.

#### Topeka AA – Primary Product

Overall lending performance for HMDA products was good. Distribution of HMDA loan products to low-income borrowers is adequate. Lending performance in period one is significantly below the census demographics. In period two, lending levels are below the census demographics. Central did perform near its peers as its lending level is only slightly below the FFIEC's aggregate lending data. Loans for home purchases were the primary HMDA product requested by low-income borrowers. Only 8.6 percent of home purchase loans were requested by low-income borrowers. Home purchase loans were the primary HMDA product originated by Central. The bank ranked 11<sup>th</sup> and 9<sup>th</sup> in 2016 and 2017, respectively, from a pool of 157 lenders. Market share for home purchase loans originated to low income borrowers was 1.5 percent, compared to the bank's overall market share of home purchase loans at 2.0 percent.

Overall distribution of HMDA loan products to moderate-income borrowers is excellent. Lending performance in both periods was excellent with distribution slightly above the demographics. Central's lending level was slightly below the FFIEC's aggregate lending level. Home purchase loans were also the primary product requested by moderate-income borrowers. Despite heavy competition for home purchase loans, Central ranked 17<sup>th</sup> and 11<sup>th</sup> in moderate-income market share for 2016 and 2017, respectively.

#### Lawrence AA

Overall lending performance for HMDA products was good. Central's distribution of HMDA loans to low-income borrowers is adequate. Distribution in period one was poor with a lending

level significantly below demographics and below the FFIEC's aggregate lending level. Distribution in period two was adequate with lending significantly below the census demographics, but significantly above the aggregate lending level.

Several factors help support the adequate rating for distribution to low-income borrowers in spite of performance below demographics. Lending opportunities are limited with only six percent of all applications coming from low-income borrowers. Additionally, Central competed with 157 lenders for home purchase loans and 126 lenders for home refinance loans. In spite of high competition, the bank ranked 9<sup>th</sup> in 2016 for home purchase loans and 3<sup>rd</sup> in 2017 for home refinance loans in the AA.

Distribution of HMDA loans to moderate income borrowers is good. Lending levels in period one are excellent with distribution significantly above the demographics and the aggregate lending level. Lending levels in period two are adequate with distribution somewhat below demographics and the aggregate lending level. Opportunities are more readily available with moderate-income borrowers who submitted an average of 17.1 percent of all applications in the AA. Central captured 0.95 percent of the home purchase market and 1.83 percent of the home refinance market for moderate-income borrowers. This is consistent with the bank's overall market share in the AA of 1.03 and 1.31 percent for home purchase and home refinance loans, respectively.

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

The overall performance for business loans is good. The bank made a significant number of loans, approximately 39 percent, where lenders did not collect business revenues. These loans are excluded from this analysis.

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

### **Rural Non-MSA AA**

Lending performance for both periods reflects good distribution of loans to small businesses with gross revenues equal to or less than \$1 million. The bank's extension of loans to small businesses was below the demographics. The bank's percentage of lending to small borrowers is near the FFIEC aggregate lending level. Two institutions rank higher in market share than Central; however, Central's average loan size is \$63 thousand while the competitors loan sizes average \$10 and \$8 thousand. The smaller loan size suggests operating lines of credit as opposed to the more intensive process of funding capital expenditures.

### **Wichita AA – Primary Product**

Central's lending to businesses of different sizes is good. Lending to businesses with gross revenues equal to or below \$1 million was lower than the demographic in both periods but exceeded the FFIEC's aggregate data in period one and significantly exceeded the aggregate data in period two. Central's 2017 market share of loans to small businesses is 1.11 percent, which exceeds the bank's overall market share of loans to businesses of 1.02 percent. Further demonstrating a commitment to small businesses, during 2017 Central's average loan size was \$123 thousand, indicative of more expansive underwriting for capital expenditures. Nine of

the competitors with rankings higher Central had average loan sizes below \$15 thousand, indicative of credit lines requiring less involvement from lenders.

#### Manhattan AA

Central's distribution of loans to businesses of different sizes is adequate. During both evaluation periods, lending to small businesses was below the demographics but above the FFIEC's aggregate lending level. Central's 2016 and 2017 average market share of loans to small business is 3.1 percent, which is slightly higher than the bank's 2.8 percent market share for all its business loans originated in the AA.

#### Topeka AA

Central's distribution of loans to small businesses is poor. Lending distribution is significantly below the census demographics in both evaluation periods. Central also performed below peer based on the FFIEC's aggregate lending data. The small business data filed by Central could be enhanced to more accurately represent small business lending. Central did not collect gross revenues on 64.7 percent of the loans to businesses in 2017, and as such, does not receive credit for these loans. Based on bank reporting and in the bank's favor, there were no loans made to businesses with gross revenues greater than \$1 million. Therefore, the adverse rating for loans to small businesses will not significantly impact the bank's overall rating in the AA.

#### Lawrence AA

Distribution of loans to small businesses was adequate. Central's level of lending was below the census demographics. The bank's lending level was near to the FFIEC's aggregate level. Notably, during 2017, Central ranked 14<sup>th</sup> in overall business loan market share, but ranked 12<sup>th</sup> in market share to small businesses.

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

The overall performance for farm loans is good.

Refer to Table T in the state of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

#### Rural Non-MSA AA – Primary Product

During both evaluation periods, Central's lending performance reflected excellent distribution of loans to small farms with gross revenues equal to or less than \$1 million. The bank's extension of loans to farms was adequate due to distribution that was lower than the census demographics for the AA; however, the bank's percentage of lending to these borrowers exceeded the FFIEC aggregate lending level, which impacts the conclusion favorably. Additionally, based on FFIEC market data, Central was ranked number one in market share for 2016 and 2017 obtaining slightly above 50 percent of the market for loans to small farmers.

#### Wichita AA

Central's lending to small farms during the evaluation periods was excellent. Distribution of loans to small farms was below demographics; however, Central's level of lending significantly exceeded the FFIEC's aggregate lending level. Additionally, market share was excellent. During 2016 and 2017 there were 18 and 22 lenders, respectively, lending to small farms.

Central ranked first in both years with 30.4 and 21.6 percent of the market share in 2016 and 2017, respectively.

#### Manhattan AA; Topeka AA; Lawrence AA

The number of small loans to farms during the evaluation periods was not sufficient to analyze revenue distribution.

### **Community Development Lending**

Central's level of community development lending had a positive impact on the Lending Test rating for the Kansas Non-MSA, Wichita AA, and Lawrence AA. During the evaluation period, the bank originated 12 loans representing \$9.2 million in these AAs having a community development purpose. CD lending had a neutral effect on the Manhattan AA performance with one CD loan and a negative impact on the Topeka AA performance with zero CD loans. Central also originated three CD loans for \$3.7 million having a statewide benefit.

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

#### KS Non-MSA AA

Central's level of CD lending had a positive impact on the overall lending performance in the Kansas Non-MSA AA.

During the evaluation period, Central made a \$1 million construction loan to a company that provides electrical engineering services for agricultural, commercial, and homeowner needs. The company is located in Beloit, KS and operates within Mitchell County. Mitchell County has been designated as an underserved middle-income nonmetropolitan geography. The company provides low- and moderate income jobs within an underserved geography.

Central also provided over \$600 thousand to organizations for the purchase, rehabilitation, or construction of affordable housing. The housing units were low-income housing tax credit properties provided in conjunction with a certified Community Housing Development Organization. These loans promote affordable housing for low- to moderate-income individuals. CD loans benefitting the AA total \$1,618,500.

#### Wichita AA

Central's level of CD lending had a positive impact on the overall lending performance in the Wichita AA.

During the evaluation period, Central provided loans of \$5.3 million for the redevelopment of business districts in low- and moderate income geographies. The loans were used to renovate multi-tenant real estate. Revitalization/stabilization efforts will help attract and retain jobs and families. An additional \$998 thousand was loaned to fund the construction of affordable housing within a moderate-income tract. CD loans benefitting the AA total \$6,297,500.

### Manhattan AA

Central's level of CD lending had a neutral impact on the overall lending performance in the Manhattan AA.

During the evaluation period, the bank provided one economic development loan for \$150 thousand to a transportation company providing low cost fares to the residents in the AA.

### Topeka AA

Central's level of CD lending had a negative impact on the overall lending performance in the Topeka AA. During the evaluation period, Central did not extend any community development loans.

### Lawrence AA

Central's level of CD lending had a positive impact on the overall lending performance in the Lawrence AA.

During the evaluation period, the bank provided \$855 thousand in loans to a non-profit organization that provides community services such as financial literacy training to high school students in the AA. Additionally, \$466 thousand in loans were provided to Habitat for Humanity, Inc. for affordable housing. Funds were used both for purchasing lots for new construction and for purchasing existing structures for renovation. CD loans benefitting the AA total \$1, 321,004.

### Statewide

The bank's level of CD lending statewide that included areas within the bank's AAs had a positive impact on the overall lending performance. Central originated loans totaling \$3.7 million to housing development firms that specialize in properties that meet the requirements of Housing and Urban Development Section 8, low-income housing tax credits, and the United States Department of Agriculture Rural Development.

## **Product Innovation and Flexibility**

Central offers Freddie Mac Home Possible and Home Possible Advantage loans, which offer flexible underwriting standards for first-time home buyers, families in low-income census tracts, and low- and moderate- income borrowers. These loans along with Federal Housing Administration (FHA) and Veterans Administration (VA) offerings expand the flexible and innovative loans available at Central. During the evaluation period, Central originated 643 of these types of loans totaling \$96,667,439.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Gardner AA is weaker than the bank's overall "Outstanding" rating under the lending test in Kansas. Central did not originate any community development loans in this AA. This performance did not adversely affect the lending test rating for Kansas.

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

## INVESTMENT TEST

Performance under the investment test in the state of Kansas is Low Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Wichita and Topeka AAs is excellent and the Kansas Non-MSA AA is adequate. In the Manhattan and Lawrence AAs, performance is poor. Central exhibits adequate responsiveness to credit and community development needs.

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

#### KS Non-MSA AA

Central has an adequate level of qualified community development investments and grants in the KS Non-MSA AA. Central provided \$420 thousand in investments to the AA during the evaluation period. The investment helped to fund traffic improvements in an underserved non-metropolitan geography. There are no prior period investments outstanding. Central granted \$27.3 thousand to nine organizations that provide community development services, including medical and legal, to low- and moderate-income individuals in the AA. Qualified investments and grants total less than one percent of allocated tier one capital.

#### Wichita AA

Central has an excellent level of qualified community development investments and grants in the Wichita AA. Central did not initiate any new investments during the evaluation periods; however, the bank has \$756.4 thousand in qualified investments from the previous CRA evaluation period. This investment was discussed in the prior CRA Performance Evaluation. Central granted \$6.4 thousand to four organizations that provide food, housing, and educational services to low- and moderate-income individuals in the AA. Qualified investments and grants total 11 percent of allocated tier one capital.

#### Manhattan AA

Central has a poor level of qualified community development investments and grants in the KS Non-MSA AA. Central did not initiate any new investments during the evaluation periods and has no qualified investments in the AA from the previous CRA evaluation period. Central granted \$7.5 thousand to three organizations that provide food, shelter, and counseling to low- and moderate-income persons. Qualified investments and grants total less than one percent of allocated tier one capital.

#### Topeka AA

Central has an excellent level of qualified community development investments and grants in the Topeka AA. Central did not initiate any new investments during the evaluation periods; however, the bank has two qualified investments for \$1 million from the previous CRA evaluation period that provide an ongoing benefit to the AA. These investments were discussed in the prior CRA Performance Evaluation. Central granted \$8.8 thousand to three organizations that shelter and education to low- and moderate- income persons in the AA. Qualified investments and grants total 27 percent of allocated tier one capital.

Lawrence AA

Central has a poor level of qualified community development investments and grants in the KS Non-MSA AA. Central did not initiate any new investments during the evaluation periods and has no qualified investments in the AA from the previous CRA evaluation period. Central granted \$7.5 thousand to four organizations that community development services such as housing, education, and job placement in the AA. Qualified investments and grants total less than one percent of allocated tier one capital.

Statewide

Central receives community development credit for statewide investments. During the evaluation period, one bond totaling \$352 thousand was purchased for a school district where over 60 percent of students participate in the free and reduced lunch program. Regarding prior period investments, the bank has \$3.4 million in investments outstanding that also support school districts where the majority of students participate in the free and reduced lunch programs. Central also has an affordable housing investment of \$990 thousand outstanding from the prior evaluation period. Housing projects from this investment will directly impact the Topeka, Lawrence, and Wichita AAs, as well as other areas throughout Kansas. Statewide qualified investments total \$4.8 million and represent five percent of total Kansas tier one capital.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Gardner AA is weaker than the bank's overall rating of "Low Satisfactory" under the investment test in Kansas. Central did not originate any community development investments in this AA. Grants were limited to \$30 to a community development organization providing food assistance. This limited level of investments in the Gardner AA did not adversely affect the overall investment test rating for Kansas.

**SERVICE TEST**

Performance in Kansas is rated High Satisfactory.

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

Based on full-scope reviews, the bank's performance in the Kansas Non-MSA is excellent. Performance in the Wichita, Manhattan, Topeka, and Lawrence AAs is adequate.

**Retail Banking Services**

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

State of Kansas Summary

Central currently has a total of 30 branches located inside the Kansas AAs. The majority of the branches are full service facilities. Any branch that is limited to teller operations is in close

proximity to a branch that offers full service. Drive-up service is offered at generally all branches except those located in retail stores (Walmart). Branches in all assessment areas are open five days a week with extended lobby and/or drive-through hours in most locations. Most AAs have services available on Saturday. Loan and deposit services are accessible at each branch or through Central's website.

There are 62 ATMs located within the Kansas AAs. Approximately 24 percent of the ATMs contain newer technology and are known as Interactive Teller Machines (ITMs). The ITMs can function as a straight ATM machine or the customer may use the machine in the ITM mode, which allows the customer to talk to a teller. The customer can conduct their transaction as if they were face-to-face with a teller. This service allows for the cashing of checks, selling of money orders and various other transactions normally conducted at a teller window. These ATMs will also sell stamps. Approximately 48 percent of the ATM machines accept deposits. Approximately 50 percent of the ATMs only dispense cash.

Products and services do not vary widely among the AAs. Central offers 24-hour access to services via telephone banking, internet banking, and mobile banking. The telephone banking service offers Spanish-speaking options. Multilingual personnel can be available upon request and are on-site at several locations throughout Kansas. Internet banking service includes access to existing accounts, opening deposit accounts, applying for consumer loans, and applying for mortgage loans. Central helps meet the needs of low- and moderate-income individuals by offering several checking account products that have no fee and/or require no minimum balance. Central also offers cashing of government checks and checks from local businesses for non-customers for a nominal fee.

Branch and ATM closures have not had an adverse impact on low- or moderate-income persons.

#### KS Non-MSA AA

Central has 16 branches in the Kansas Non-MSA AA as of December 31, 2017. The bank had six branches in moderate-income tracts, eight branches in middle-income tracts, and two branches in upper-income tracts. There were no low-income census tracts in the AA. The bank's percentage of branches in the moderate-income tracts significantly exceeded the percent of population within the moderate-income tracts.

During the two review periods of 2015-2017, Central closed one branch in 2015 and two additional branches in 2017. The overall effect resulted in three fewer branches located in middle-income census tracts. The 2015 closure, the Burlington North branch, was a drive-thru only location that offered limited services. Management concluded the area location could be adequately supported by the existing full-service branch located less than one mile away. The two 2017 branch closings, Glen Elder and White City, were sold to another institution.

The bank currently has 38 ATMs in the AA. There are 21 ATMs in moderate-income tracts, 13 in middle-income tracts, and 4 in upper-income tracts. The bank's percentage of ATMs located in moderate-income tracts significantly exceeds the demographics for the population located within-moderate-income tracts. Four ATMs located in middle-income tracts were closed during the evaluation period. The closures resulted from the loss of a customer relationship with a convenience store.

Wichita AA

Central has four branches in the Wichita AA as of December 31, 2017. The bank had one branch in a moderate-income tract in each period with the remaining branches in middle- and high-income tracts. The bank's percentage of branches in the moderate-income tracts is near to the percent of population within the moderate-income tracts. No branches opened or closed during either assessment period.

The bank had six ATMs in the AA during both assessment periods. One ATM was in a moderate income-tract in each assessment period with the remaining in middle- or upper-income census tracts. Of the five ATMs Central operates in the AA, three only dispense cash, one accepts deposits, and one is a multi-function ITM. The bank's percentage of ATMs in the moderate-income tracts is somewhat lower than the percent of population within the moderate-income tracts. No ATMs opened or closed during either assessment period.

Manhattan AA

On December 31, 2017, the Manhattan AA had two branches both in middle-income tracts. There are no branches in the moderate-income geographies. There were no branches open or closed during the evaluation period.

As of the above date, the AA had four ATMs. One is located in a moderate-income tract and the other three are located in middle-income geographies. Four ATMs located in middle-income tracts were closed during the evaluation period. The closures resulted from the loss of a customer relationship with a convenience store; however, the bank's percentage of ATMs in the moderate-income tracts still significantly exceeds the percentage of population within the moderate-income tract.

Topeka AA

As of December 31, 2017, the Topeka AA had two branches. One branch is in a low-income tract and one in an upper-income tract. There are no branches in moderate-income tracts. The bank's percentage of branches in low-income tracts exceeds the percent of population located within low-income tracts. There have been no branches opened or closed during the evaluation periods.

As of the above date, there are four ATMs in the Topeka AA with one in a low-income tract, one in a middle-income tract, and two in upper-income tracts. The two ATMs located in the upper-income tracts are ITMs. If the customer chooses, they can operate the machine in ATM mode or ITM mode, which allows the customer to talk to a teller and conduct their transaction as if they were face-to-face at a teller window. The ATM located in the middle-income tract accepts deposit while the one located in a low-income tract is cash dispensing only. The bank's percentage of ATMs in low-income tracts exceeds the percent of population located within low-income tracts. There have been no ATMs opened or closed during the evaluation periods.

Lawrence AA

As of December 31, 2017, the Lawrence AA had four branches; one each in low- moderate-middle- and upper-income tracts. This is a shift from evaluation period one as the bank had two branches in moderate-income tracts. With the 2017 ACS income update, one moderate-income census tract became a low-income tract. The bank's percentage of branches in low-

income tracts exceeds the percent of population located within low-income tracts, while the percent of branches in moderate-income tracts is slightly below the percent of population. There were no branches closed in either period for the Lawrence AA.

As of the above date, there were six ATMs in the Lawrence AA; one in the low-income tract, two in the moderate-income tracts, two in the middle-income tracts, and one in the upper-income tracts. All ATMs located in the Lawrence AA are ITMs. The bank's percentage of ATMs in low- and moderate-income tracts exceed the percent of population residing in those tracts. There were no ATMs closed in either period for the Lawrence AA.

## **Community Development Services**

Central provided a relatively high level of community development services in the Kansas AAs.

### KS Non-MSA AA

Central's record of providing community development services in the AA is excellent. Nine employees provided 847 hours to 11 qualified community development organizations during the evaluation period. Examples of services provided by bank staff include:

- Vice-Chair board member for an organization that provided funding to various organizations to improve the health, education, and financial stability serving primarily low- and moderate-income individuals.
- Board member of an organization that focuses on small businesses with bank employee providing underwriting services using a local small business E-Community revolving loan fund.
- One bank associate serves as a board member of the local economic development corporation that provides assistance primarily to small businesses and small farms in underserved and distressed middle-income tracts.

### Wichita AA

The level of community development services in the AA is adequate. One employee provided 75 hours of services to one organization. The employee serves on the board of directors for an organization that provides services to help improve the health, education, and financial stability of low- and middle-income children in the AA.

### Manhattan AA

Central's record of providing community development services in the AA is adequate. Four employees provided 108 hours to two qualified community development organizations during the evaluation period. Examples of services include:

- Bank employee is a member of the Advisory Board and provides technical financial assistance for an organization that promotes community involvement in the local school district, which is primarily low- and moderate-income students.
- Bank staff assist the Chamber of Commerce with financial expertise on funding, budgets, and incentives for the attraction and retention of small businesses.

### Topeka AA

Central's level of community development services in the AA are adequate. Two employees provided 34 hours to two community development organizations. Services provided to the

organization consisted of financial education to low- and moderate-income individuals in the AA presented through schools, and housing and credit counseling outreach programs.

Lawrence AA

Community development services in the Lawrence AA are adequate. One employee provided twelve hours of financial expertise as Chairman of the Board for an organization providing free and low tuition, free therapy, and free legal services to low- and moderate-income children.

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

Based on limited-scope reviews, the bank's performance under the service test in the Gardner AA is weaker than the bank's overall "High Satisfactory" rating in the state. Central did not provide any community development services in the Gardner AA. This did not negatively impact the overall services test conclusion for Kansas.

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

## State Rating

### State of Nebraska

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

The major factors that support this rating include:

- Central demonstrated good responsiveness to community credit needs. The overall distribution of loans by income level of the geography is excellent. The distribution of loans to borrowers of different income levels and businesses of different sizes is good. Central did not provide any CD loans over the evaluation periods. This had a neutral impact on the bank's lending test.
- Central demonstrated adequate responsiveness to community development investment needs. The institution did not provide any current investments; however, Central receives credit for \$1.1 million outstanding from the prior evaluation period.
- Central's delivery systems for products and services are reasonably accessible to essentially all individuals and geographies in the assessment areas. The institution provides an adequate level of community development services.

### Description of Institution's Operations in Nebraska

The bank has one AA in Nebraska, the county of Nuckolls. As of December 31, 2017, Central operates one branch and two ATM within the State of Nebraska. On June 30, 2017, the FDIC reports that Central is ranked first in deposit market share with 37 percent of the deposits in Nuckolls County. Central, with one banking location, is the largest institution operating in the AA; however, competition is strong due to four other banks with five locations competing for business.

Refer to the community profiles for the state of Nebraska in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

### Scope of Evaluation in Nebraska

The State of Nebraska held eight percent of the bank's total deposits and originated six percent of the number of loans during the assessment periods. As of December 31, 2017, only three percent of Central's branches and three percent of its ATMs are located in the Nuckolls County (Nuckolls) AA. Therefore, the State of Nebraska will receive minimal weight in the overall CRA rating.

We performed a full-scope review of the Nuckolls AA, which is a non-metropolitan area. For both evaluation periods, small loans to farms were the primary product granted. Farm loans represented 84 percent of the number and 92 percent of the dollars of all loans extended during the evaluation periods. The volume of HMDA loans and small business loans is too small for a meaningful analysis. As a result, the Lending Test rating for the Nuckolls NE AA will be based on farm loans.

During this examination, the OCC contacted a community professional. The community contact indicated that the primary credit needs for the Nuckolls AA were agriculture loans and affordable housing. There is a need for lower dollar mortgage loans in some areas. Banks are generally meeting the credit needs of the community. All banks actively seek small business and farm lending opportunities and are engaged and supportive of the economic development programs.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEBRASKA**

### **LENDING TEST**

The bank's performance under the lending test in Nebraska rated High Satisfactory.

#### **Lending Activity**

Lending activity reflects good responsiveness to area credit needs.

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

Lending activity in the Nuckolls AA reflects good responsiveness in relation to area credit needs and the bank's deposit market share. The June 30, 2017 FDIC Summary of Deposits reflects that Central ranks first in deposit market share in the AA with 37 percent. The institution originated 256 loans totaling \$35 million to borrowers between January 1, 2015 and December 31, 2017. Specific lending levels for loan products are discussed below.

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

Central's lending levels reflect excellent responsiveness to farms in relation to area credit needs and the bank's deposit market share. Market share data reflects that Central's captured the first place rank. The bank's share of farm loans in the AA ranged from 37 to 40 percent of all farm loans originated in the AA, a level that is similar to the bank's deposit market share. The institution originated 214 loans totaling \$32.2million to businesses during the evaluation periods.

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

The overall geographic distribution of loans by income level of the geography is excellent based on analysis of period one. Pursuant to the 2017 income update by the ACS, the census

tracts in the AA changed from moderate-income to middle-income geographies. During evaluation period two, a geographical analysis would not be meaningful.

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

Distribution of loans to farms is excellent.

Refer to Table S in the state of Nebraska section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Central's lending distribution of small loans to farms in moderate-income tracts is excellent. The bank's performance was equal to both the demographics and the aggregate lending level. Based on 2016 FFIEC data, Central had a solid ranking of first in market share for farm loans.

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

The geographic distribution analysis for any unexplained lending gaps in the Nuckolls AA would not be relevant. For evaluation period one, all tracts were moderate-income. For evaluation period two, all tracts were middle-income.

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

For the geographic distribution analysis under the lending test, we performed an inside/outside analysis at the bank level. The information includes bank originations and purchases. An adequate percentage of the bank's loans were extended to borrowers within the bank's AAs. Sixty-four percent of the number of loans originated by Central were granted within the AAs. By loan type, 38 percent of the number of residential real estate loans, 92 percent of the number of business loans, and 90 percent of farm loans were granted inside the AAs. See Table D earlier in this report.

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

Central's distribution of loans to borrowers of different income levels and businesses of different sizes is good.

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

Refer to Table T in the state of Nebraska section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Central's lending performance reflects good distribution of loans to small farms with gross revenues equal to or less than \$1 million. During period one, lending performance was good, below demographics, but slightly above the aggregate lending level. FFIEC data reflects that in 2016, Central ranked first out of nine institutions with an average loan size of \$148 thousand compared to the second place average of \$114 thousand. During period two, performance was also good. The bank's distribution was below demographics but somewhat higher than the

aggregate lending level. Additionally, FFIEC data reflects that Central was ranked second out of 18 lenders and had the largest average loan size of all 18 lenders.

### **Community Development Lending**

Community development lending had a neutral effect on the bank's overall lending test. Central did not extend any community development loans in the AA during the evaluation period.

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

### **Product Innovation and Flexibility**

As noted earlier in this report, Central offers Freddie Mac Home Possible and Home Possible Advantage loans, which offer flexible underwriting standards for first-time home buyers, families in low-income census tracts, and low- and moderate- income borrowers. These loans along with Federal Housing Administration (FHA) and Veterans Administration (VA) offerings expand the flexible and innovative loans available at Central.

## **INVESTMENT TEST**

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

### Nuckolls AA

Central has an adequate level of qualified community development investments and grants in the Nuckolls AA. The bank did not initiate any new investments during the evaluation period; however there are three outstanding investments from the prior evaluation period. These investments total \$1.1 million. Funds were to school districts with a majority of students in free and reduced lunch programs. Central granted \$50 to one organization that provides food services in the AA.

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

## **SERVICE TEST**

The bank's performance under the Service Test in Nebraska is rated Low Satisfactory.

### **Retail Banking Services**

### Nuckolls AA

Retail banking services are reasonably accessible to geographies and individuals of different income levels in its assessment area. The bank has one branch and two ATMs in the AA.

Central has not closed any branches in the AA, which has helped preserve accessibility. Services, including business hours, are consistent with other AA branch locations and do not vary in a way that inconveniences its low- and moderate-income geographies or individuals.

Refer to Table 15 in the state of Nebraska 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.

## **Community Development Services**

### Nuckolls AA

The level of community development services is adequate. Two employees provided 48 hours of services to two organizations. Employees are serving as members on planning commissions and with the Chamber of Commerce. The AA's two census tracts are both distressed and underserved middle-income geographies. These organizations work to provide economic development and revitalization to areas of the AA.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): January 1, 2015 to December 31, 2017  Investment and Service Tests and CD Loans: August 29, 2015 to December 31, 2017	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Central National Bank Junction City, KS	HMDA, business, and farm loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
<u>Kansas</u> Kansas Non-MSA  Wichita (MA #48620 partial) Manhattan (MA #31740) Topeka (MA #458209 partial) Lawrence (MA #29940 partial) Gardner (MA 28140 partial)	Full Scope  Full-Scope Full-Scope Full-Scope Limited-Scope	<u>Counties</u> Dickinson, Geary; Marion; Morris; Saline; Cloud; Jewell; Mitchell; Republic; Coffey; Barton  Sedgwick; Harvey Pottawatomie; Riley Shawnee Douglas Johnson (City of Gardner)
<u>Nebraska</u> Nuckolls County	Full Scope	Nuckolls

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

RATINGS				
Central National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Multistate Metropolitan Area or State:				
Kansas	Outstanding	Low Satisfactory	High Satisfactory	Satisfactory
Nebraska	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

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

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

### State of Kansas

#### Kansas Non-MSA AA

The Kansas Non-MSA AA is comprised of eleven counties: Barton; Cloud; Coffey; Dickenson; Geary; Jewell; Marion; Mitchell; Morris; Republic; and Saline. The 2017 ACS income update prompted the reclassification of some census tracts. Moderate-income tracts increased from 14.8 percent in period one to 18.5 percent in period two. Other examples of demographic fluctuations can be identified by comparing the tables below.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: KS Non-MSA 2015-2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	54	0.0	14.8	72.2	13.0	0.0
Population by Geography	188,543	0.0	14.3	68.3	17.4	0.0
Housing Units by Geography	85,395	0.0	13.9	70.4	15.7	0.0
Owner-Occupied Units by Geography	51,728	0.0	8.1	73.6	18.4	0.0
Occupied Rental Units by Geography	22,220	0.0	25.2	61.9	12.9	0.0
Vacant Units by Geography	11,447	0.0	18.3	72.5	9.2	0.0
Businesses by Geography	11,237	0.0	17.7	68.1	14.2	0.0
Farms by Geography	1,733	0.0	6.8	81.3	11.9	0.0
Family Distribution by Income Level	49,798	17.1	18.6	23.0	41.3	0.0
Household Distribution by Income Level	73,948	20.5	16.3	20.7	42.5	0.0
Median Family Income Non-MSAs - KS		\$52,419	Median Housing Value			\$89,271
			Median Gross Rent			\$619
			Families Below Poverty Level			8.6%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: KS Non-MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	54	0.0	18.5	64.8	16.7	0.0
Population by Geography	189,414	0.0	20.7	57.8	21.5	0.0
Housing Units by Geography	86,840	0.0	19.3	60.7	20.0	0.0
Owner-Occupied Units by Geography	49,590	0.0	12.6	62.7	24.7	0.0
Occupied Rental Units by Geography	25,793	0.0	31.0	54.0	15.0	0.0
Vacant Units by Geography	11,457	0.0	21.5	67.3	11.1	0.0
Businesses by Geography	10,929	0.0	22.1	58.8	19.2	0.0
Farms by Geography	1,754	0.0	3.1	79.9	16.9	0.0
Family Distribution by Income Level	49,444	18.0	20.3	21.6	40.0	0.0
Household Distribution by Income Level	75,383	21.5	17.1	20.0	41.4	0.0
Median Family Income Non-MSAs - KS		\$56,877	Median Housing Value			\$99,468
			Median Gross Rent			\$746
			Families Below Poverty Level			9.7%
<i>Source: 2017 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

As of December 31, 2017, the KS Non-MSA AA consisted of 11 counties located primarily in central and northern Kansas as follows: Barton; Cloud; Coffey; Dickenson; Geary; Jewell; Marion; Mitchell; Morris; Republic; and Saline. There were no low-income tracts, ten moderate-income tracts, 35 middle-income tracts, and nine upper income tracts. While there were no low- and few moderate-income census tracts, several middle-income tracts were designated as distressed, underserved, or both. Locations included two census tracts each in Jewell and Mitchell Counties, and three census tracts in Republic County. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

According to the FDIC's June 30, 2017 Deposit Market Share Report, 54 financial institutions operate 128 offices in the area. The level of competition has increased from the last CRA evaluation when there were 48 institutions with 105 office. Central is the market leader, but deposit market share has fallen from a 14 percent deposit market share at last evaluation period to 10.6 percent this period. Central still maintains 17 offices and has current deposits of \$512.9 million. Sunflower Bank, N.A. ranks second with 8.2 percent in market share, seven offices, and \$399.0 million in deposits. The top six institutions captured 39.4 percent of the deposit market share.

The AA consists primarily of rural areas. Agriculture loans were the primary loan product originated in the AA by Central. Based on Standard Industrial Classification (SIC) Code, Services represent the largest number of businesses at 37.4 percent, Retail Trade is second at 13.9 percent, and Agriculture, Forestry & Fishing is third at 13.8 percent.

The October 2018 economic analysis for Kansas prepared by Moody's Analytics indicates the Kansas business cycle is considered in mid-expansion and its economy is expanding at its fastest pace since the late 1990s. However, as with many rural areas, central and north-central Kansas face economic challenges. The bank's AA is reliant upon farming and cattle operations. In Kansas, crop and animal production represents approximately 30 percent of the state's exports. As agricultural goods account for an above-average share of overseas shipments, they are especially at risk from retaliatory Chinese tariffs. Trade data show weakening foreign demand for all goods produced in Kansas.

The AA also has a few urban/metropolitan areas. The city of Salina is at the junction of I-70 and I-135. Salina serves as a center for trade, transportation, and industry in north-central Kansas. The Fort Riley military base, one of the largest Army bases in the country, is located in Geary and Riley Counties. The daytime population of the base is over 24 thousand. The Army still views Fort Riley as strategically crucial as personnel cuts for both military and civilians are expected to be minimal. Governments, education and health services, professional services, and retail establishments provide the AA with other significant employment opportunities. Some large employers include Armour-Eckrich Meats, Foot Locker, New Horizons (high-end RV manufacturer), and Advanced Call Center Technologies, LLC.

As of December 2017, the unemployment rate for the various counties in the AA range from 2.1 percent for Republic County to 4.3 for Coffey and Geary Counties. With the exception of these two counties, all counties had unemployment rates below the national unemployment rate of 4.1 percent and the Kansas rate of 3.5 percent.

**Wichita AA**

The Wichita AA consists of Harvey and Sedgwick Counties. These counties are part of the Wichita MSA, which consists of five counties. The 2017 ACS income adjustment caused changes in the census tract categorizations from the first evaluation period. The percentage of low-income tracts increased from 9.2 percent in period one to 12.3 percent. The number of moderate-income tracts decreased from 32.3 percent in period one to 28.5 percent in period two. Other examples of demographic fluctuations can be identified by comparing the tables below.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Wichita 2015-2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	130	9.2	32.3	29.2	29.2	0.0
Population by Geography	533,049	6.9	28.5	32.1	32.5	0.0
Housing Units by Geography	223,132	7.8	31.1	32.2	28.9	0.0
Owner-Occupied Units by Geography	137,515	3.5	24.0	33.9	38.5	0.0
Occupied Rental Units by Geography	66,569	13.7	42.1	30.7	13.5	0.0
Vacant Units by Geography	19,048	18.7	43.1	24.4	13.7	0.0
Businesses by Geography	27,461	11.7	21.6	32.4	34.3	0.0
Farms by Geography	1,056	2.4	10.8	45.3	41.6	0.0
Family Distribution by Income Level	134,008	21.0	18.3	21.0	39.7	0.0
Household Distribution by Income Level	204,084	23.5	16.8	18.7	41.1	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$61,402	Median Housing Value			\$115,621
			Median Gross Rent			\$646
			Families Below Poverty Level			10.1%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Wichita 2017</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	130	12.3	28.5	31.5	27.7	0.0
Population by Geography	541,364	9.1	24.8	33.1	33.0	0.0
Housing Units by Geography	228,302	10.1	26.6	33.9	29.4	0.0
Owner-Occupied Units by Geography	133,110	5.6	19.8	34.4	40.2	0.0
Occupied Rental Units by Geography	73,432	15.8	35.6	34.8	13.9	0.0
Vacant Units by Geography	21,760	18.9	37.9	27.6	15.6	0.0
Businesses by Geography	27,884	6.7	28.2	32.7	32.4	0.0
Farms by Geography	1,093	2.1	11.4	31.9	54.5	0.0
Family Distribution by Income Level	134,008	21.4	17.9	21.1	39.6	0.0
Household Distribution by Income Level	206,542	24.2	16.7	18.4	40.7	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$64,897	Median Housing Value			\$123,274
			Median Gross Rent			\$742
			Families Below Poverty Level			10.8%
<i>Source: 2017 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Wichita AA included 130 census tracts of which 16 were low-income, 37 moderate-income, 41 middle-income, and 36 upper-income as of December 31, 2017. There were no middle-income tracts designated as distressed or underserved. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

According to the June 30, 2017 FDIC Deposit Market Share Report, 47 institutions operate 187 offices in the area. Central ranks 23rd with a 0.61 percent market share, four offices, and \$83 million in deposits. Bank of America, N.A. is the market leader with a 25.56 percent deposit market share, 11 offices, and \$3.4 billion in deposits. The top five institutions captured 70 percent of the deposit market share.

The June 2018 economic analysis performed by Moody's Analytics for the Wichita MSA (located within the bank's AA) concludes that the business cycle is still in the recovery status. Payroll employment declined between mid-2016 and late 2017, but has reversed most of the losses since December 2017. Annual job growth has picked up to nearly one percent, placing Wichita near the median of Midwestern city job growth. A poor job mix has kept hourly earning flat since early 2017. Housing price appreciation is in the bottom quintile of Midwest metro areas.

Current economic drivers are aerospace, manufacturing, and defense industries. Wichita State University's innovation campus will facilitate public-private partnerships with technology and aerospace companies to support educated students and potentially spin-off companies. Aerospace continues to be Wichita's most important segment. However, it is noted that Wichita is susceptible to trade problems as nearly 10 percent of gross metro product is exported.

Spirit AeroSystems, Inc. is the area's largest employer with 11,500 employees. Spirit plans to add 1,000 workers by 2019. Textron Aviation is the second largest with 9,000 employees. Textron plans to add another 250 jobs to support three new aircrafts being added to their production line. McConnell Air Force Base is third with 6,687 employees, followed by Via Christi Regional Medical Center at 5,426 employees, and Koch Industries, Inc. at 3,263 employees.

Federal, state, and local governments, including universities are significant employers with approximately 41,000 employees. Healthcare facilities, such as the Wesley Medical Center, Robert J. Dole VA Medical Center, and Newton Medical Center also provide a significant levels of employment. Koch Industries, Inc., Dillons Food Stores, Johnson Controls, Inc., and AGCO Corp.-Hesston Operations provide some business diversity with each employing over 1,100 individuals.

As of December 2018, the unemployment rate for Sedgwick and Harvey Counties was 3.6 percent and 3.4 percent, respectively. These levels are below the national unemployment rate of 4.1 percent but are near the Kansas rate of 3.5 percent.

## Manhattan AA

The Manhattan AA consists of Pottawatomie and Riley Counties. The AA is classified by the U.S. Census Bureau as an MSA. The 2017 ACS update identified several changes in the census tract categorizations from the prior period. The change resulted in fewer moderate-income tracts. Additional demographic trends can be evidenced in the following two tables, which reflect both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Manhattan 2015-2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	18	0.0	27.8	50.0	16.7	5.6
Population by Geography	92,719	0.0	23.4	57.1	19.5	0.0
Housing Units by Geography	35,669	0.0	22.4	58.9	18.6	0.0
Owner-Occupied Units by Geography	17,151	0.0	9.2	65.1	25.7	0.0
Occupied Rental Units by Geography	15,451	0.0	37.4	50.6	12.0	0.0
Vacant Units by Geography	3,067	0.0	21.4	65.9	12.7	0.0
Businesses by Geography	4,567	0.0	21.9	53.7	24.3	0.0
Farms by Geography	364	0.0	2.5	77.7	19.8	0.0
Family Distribution by Income Level	18,945	18.9	19.3	22.6	39.3	0.0
Household Distribution by Income Level	32,602	25.9	14.2	17.4	42.6	0.0
Median Family Income MSA - 31740 Manhattan, KS MSA		\$59,787	Median Housing Value			\$143,938
			Median Gross Rent			\$767
			Families Below Poverty Level			9.5%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Manhattan 2017</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	18	0.0	16.7	61.1	11.1	11.1
Population by Geography	97,647	0.0	16.9	67.5	12.8	2.8
Housing Units by Geography	38,475	0.0	13.5	71.3	13.9	1.4
Owner-Occupied Units by Geography	17,445	0.0	3.7	79.8	16.1	0.4
Occupied Rental Units by Geography	17,214	0.0	23.0	63.0	11.7	2.3
Vacant Units by Geography	3,816	0.0	15.2	69.9	13.8	1.2
Businesses by Geography	4,569	0.0	13.0	74.8	11.4	0.8
Farms by Geography	362	0.0	1.9	93.1	5.0	0.0
Family Distribution by Income Level	20,034	20.5	17.8	21.2	40.5	0.0
Household Distribution by Income Level	34,659	23.7	17.3	17.3	41.7	0.0
Median Family Income MSA - 31740 Manhattan, KS MSA		\$67,332	Median Housing Value			\$165,100
			Median Gross Rent			\$868
			Families Below Poverty Level			6.7%
<i>Source: 2017 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

As of December 31, 2017, the Manhattan AA encompassed all of Pottawatomie County and Riley County. The AA included 18 total census tracts: zero low-income, three moderate-income, 11 middle-income, two upper-income, and two census tracts not yet assigned to income classifications. There were no middle-income tracts designated as distressed or underserved. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

According to the June 30, 2017 FDIC Deposit Market Share Report, Central ranked 17<sup>th</sup> among 22 institutions in the Manhattan AA with 0.91 percent of market share reflected across \$23.3 million of deposits, serviced out of two market offices. Kansas State Bank continued to control significant market share across both evaluation periods, averaging \$963 million deposits and 37.9 percent market share. The top five institutions captured 67 percent of market share.

The June 2018 Moody's Analytics report for the Manhattan, KS MSA (which includes the bank's AA) indicates that the respective business cycle is in late expansion, but the economy appears to have plateaued; evidenced by flat output, stagnant payroll employment, and a slightly weakened housing market. Moody predicts that Manhattan will be one of Kansas' weakest performers in 2019, as job growth remains dependent on private services and renewed population growth. Long-term economic stability will remain dependent on Kansas State University (KSU), Fort Riley, and the ability of the MSA to nurture growth in higher value-added service industries.

A combination of federal, state, and local government entities employ over 31.9 percent of the Manhattan MSA, which equates to over 13,000 employees. KSU serves as the metro area's largest private sector employer with over 6,000 positions. Additional employer diversification is provided by retail, education/health services, leisure/hospitality, and manufacturing.

As of December 31, 2017, the Manhattan AA unemployment rate was 3.16 percent. This remains below the national unemployment rate of 4.1 percent, but near the Kansas rate of 3.5 percent.

## Topeka AA

The Topeka AA is comprised of the full Kansas county of Shawnee. Shawnee County is one of five counties in the Topeka MSA. The 2017 ACS update identified several changes in the census tract categorizations from the first evaluation period. A low-income and a moderate-income tract were reclassified as middle-income tracts. There were no changes to the upper-income tracts. Additional demographic trends can be evidenced in the following two tables, which reflect both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Topeka 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	14.0	25.6	34.9	25.6	0.0
Population by Geography	177,934	10.7	22.8	36.0	30.6	0.0
Housing Units by Geography	78,651	11.2	24.0	36.8	28.0	0.0
Owner-Occupied Units by Geography	48,838	5.3	19.7	38.3	36.6	0.0
Occupied Rental Units by Geography	24,228	19.7	30.6	35.7	14.0	0.0
Vacant Units by Geography	5,585	25.5	33.1	28.7	12.7	0.0
Businesses by Geography	9,510	20.1	17.1	37.1	25.7	0.0
Farms by Geography	336	2.4	8.6	34.5	54.5	0.0
Family Distribution by Income Level	46,676	21.9	16.5	22.2	39.3	0.0
Household Distribution by Income Level	73,066	24.2	17.1	18.6	40.1	0.0
Median Family Income MSA - 45820 Topeka, KS MSA		\$61,110	Median Housing Value			\$111,440
			Median Gross Rent			\$657
			Families Below Poverty Level			11.1%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Topeka 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	11.6	23.3	39.5	25.6	0.0
Population by Geography	178,792	8.2	18.8	39.7	33.3	0.0
Housing Units by Geography	79,425	9.0	20.6	41.1	29.3	0.0
Owner-Occupied Units by Geography	45,873	4.6	15.3	39.1	41.0	0.0
Occupied Rental Units by Geography	25,495	14.2	26.6	45.9	13.3	0.0
Vacant Units by Geography	8,057	18.0	31.1	37.2	13.7	0.0
Businesses by Geography	9,424	17.1	18.5	39.0	25.4	0.0
Farms by Geography	328	3.4	8.2	25.6	62.8	0.0
Family Distribution by Income Level	44,654	20.8	17.2	21.8	40.3	0.0
Household Distribution by Income Level	71,368	24.0	17.2	18.1	40.7	0.0
Median Family Income MSA - 45820 Topeka, KS MSA		\$64,984	Median Housing Value			\$116,437
			Median Gross Rent			\$752
			Families Below Poverty Level			10.5%
<i>Source: 2017 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

According to the June 30, 2017 FDIC Deposit Market Share Report, Central ranked 17<sup>th</sup> among 22 institutions in the Topeka AA with a 0.66 percent of market share reflected across \$29.2 million of deposits, serviced out of two branch offices. Capitol Federal Savings Bank was ranked as the market leader at 33.09 percent market share, seven offices, and \$1.5 billion in deposits. The top five institutions captured 67.3 percent of the deposit market share.

The June 2018 Moody’s Analytics report for the Topeka, KS MSA states the business cycle status is in mid-expansion. Although Kansas is kicking into higher gear, the state capital has not benefited much. Employment has fallen off in recent months, leaving payrolls at their lowest level in about three years. While losses in the outsized public sector are certainly not helping, the private sector is largely to blame for the recent drop. Retail, leisure/hospitality, and business/professional services have suffered steep declines of late. Topeka will have trouble sustaining faster growth if it cannot adequately increase its labor force. Population gains are below 0.1 percent for 2017, the first time the metro area has added residents since 2011. Seniors accounted for nearly all of the increase. Low living costs and a large healthcare presence appeal to retirees, and by 2020, one out of every five Topeka residents will be 65 or older.

Stormont-Vail Regional Medical Center is the top employer in Topeka with 4,400 employees. Saint Francis Hospital and Medical Center and Goodyear Tire and Rubber Co. place in second and third as top employers. Other significant employers include Blue Cross Blue Shield, Wal-Mart Stores Inc., BNSF Railway, Dillons Food Stores, Colmery-O’Neil VA Hospital, and Washburn University, all with over 1,000 employees.

According to Moody's, the Topeka AA had an unemployment rate of 3.5 percent as of December 2017. This is below the national unemployment rate of 4.1 percent, but near the Kansas unemployment rate of 3.5 percent.

## Lawrence AA

The Lawrence AA is comprised of the full county of Douglas. The AA is classified by the U.S. Census Bureau as an MSA. The 2017 ACS update identified census tract changes from the prior period. Two middle-income tracts were reclassified as moderate-income tracts. There were no changes to the lower- and upper-income tracts between the two periods. Other examples of demographic fluctuations can be identified by comparing the tables below.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Lawrence 2015-2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	22	9.1	22.7	45.5	22.7	0.0
Population by Geography	110,826	9.0	20.2	48.4	22.5	0.0
Housing Units by Geography	46,037	7.7	20.6	48.5	23.2	0.0
Owner-Occupied Units by Geography	22,987	2.2	16.1	51.0	30.7	0.0
Occupied Rental Units by Geography	19,956	13.5	24.8	46.7	15.0	0.0
Vacant Units by Geography	3,094	10.4	26.9	41.5	21.2	0.0
Businesses by Geography	6,170	7.2	24.4	42.3	26.1	0.0
Farms by Geography	260	2.3	10.8	45.4	41.5	0.0
Family Distribution by Income Level	23,335	21.6	16.2	21.9	40.3	0.0
Household Distribution by Income Level	42,943	26.3	14.7	16.6	42.5	0.0
Median Family Income MSA - 29940 Lawrence, KS MSA		\$68,282	Median Housing Value			\$183,385
			Median Gross Rent			\$787
			Families Below Poverty Level			8.1%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lawrence 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	9.1	31.8	36.4	22.7	0.0
Population by Geography	114,967	10.2	29.2	31.9	28.6	0.0
Housing Units by Geography	47,812	6.3	33.6	31.6	28.5	0.0
Owner-Occupied Units by Geography	22,806	1.3	25.4	36.9	36.3	0.0
Occupied Rental Units by Geography	20,923	11.2	41.0	25.8	22.0	0.0
Vacant Units by Geography	4,083	9.0	40.9	31.9	18.2	0.0
Businesses by Geography	6,304	6.8	31.0	32.8	29.4	0.0
Farms by Geography	264	0.8	17.4	59.1	22.7	0.0
Family Distribution by Income Level	23,794	19.1	19.6	20.6	40.7	0.0
Household Distribution by Income Level	43,729	26.4	15.1	17.5	41.0	0.0
Median Family Income MSA - 29940 Lawrence, KS MSA		\$72,755	Median Housing Value			\$188,808
			Median Gross Rent			\$854
			Families Below Poverty Level			8.1%
<i>Source: 2017 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

As of December 31, 2017, the Lawrence AA consisted of Douglas County located in northeast Kansas. There were two low-income tracts, seven moderate-income tracts, eight middle-income tracts, and five upper-income tracts.

According to the FDIC’s June 30, 2017 Deposit Market Share Report, 23 institutions operate 52 offices in the area. Central is ranked 12th in the market with a 2.21 percent deposit market share, four offices, and \$50.2 million in deposits. U.S. Bank N.A. was ranked as the market leader a 20.48 percent market share, five offices, and \$466 million in deposits. The top five institutions captured 64 percent of the deposit market share.

The June 2018 Moody’s Analytics report for Lawrence, KS states the business cycle status is in late-expansion. The economy has slowed considerably despite a noticeable uptick in the statewide performance. Payroll employment has flat lined over the past 18 months. Private Service providers are the main drag on growth, and government payrolls, which account for an outsized portion of the economy, have been largely stagnant for more than three years.

The University of Kansas’s (KU) budget struggles will prevent the university from directly driving economic growth in the near term, but spillover effects will still be a net positive. Construction projects on the campus will provide a modest temporary boost to construction payrolls, lifting what has been sluggish growth to a near-average rate moving in 2019. The share of tech jobs in Lawrence has more than doubled since the beginning of the decade; thanks in no small part to KU providing a supply of talented labor and drawing investment to the area.

The KU continues to be the top employer with 10,809 employees. General Dynamics Information Technology and Lawrence Memorial Hospital rank second and third for top employers. Other significant employers include Hallmark Cards, Berry Plastics, Amarr Garage Doors, HyVee, Baker University, Dillon's, and Boston Financial Data Services, all with over 400 employees.

According to Moody's Analytics, the Lawrence AA had an unemployment rate of 3.2 percent as of December 2017. This is below the national unemployment rate of 4.1 percent, but near the Kansas unemployment rate of 3.5 percent.

**State of Nebraska**

**Nuckolls County AA**

The Nuckolls AA is comprised of Nuckolls County, Nebraska. Based on changing demographics, the 2017 ACS income update reflects changes in the income designation of the census tracts. The two moderate-income tracts were updated to middle-income tracts. There are no low-income tracts. Other examples of demographic fluctuations can be identified by comparing the tables below.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Nuckolls County 2015-2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2	0.0	100.0	0.0	0.0	0.0
Population by Geography	4,500	0.0	100.0	0.0	0.0	0.0
Housing Units by Geography	2,488	0.0	100.0	0.0	0.0	0.0
Owner-Occupied Units by Geography	1,641	0.0	100.0	0.0	0.0	0.0
Occupied Rental Units by Geography	419	0.0	100.0	0.0	0.0	0.0
Vacant Units by Geography	428	0.0	100.0	0.0	0.0	0.0
Businesses by Geography	415	0.0	100.0	0.0	0.0	0.0
Farms by Geography	128	0.0	100.0	0.0	0.0	0.0
Family Distribution by Income Level	1,356	29.3	22.6	24.5	23.6	0.0
Household Distribution by Income Level	2,060	26.2	27.2	18.2	28.3	0.0
Median Family Income Non-MSAs - NE		\$54,221	Median Housing Value			\$53,771
			Median Gross Rent			\$470
			Families Below Poverty Level			12.3%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Nuckolls County 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	4,391	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	2,444	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	1,530	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	538	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	376	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	395	0.0	0.0	100.0	0.0	0.0
Farms by Geography	111	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	1,293	22.1	20.5	25.1	32.3	0.0
Household Distribution by Income Level	2,068	25.6	22.9	17.5	34.1	0.0
Median Family Income Non-MSAs - NE		\$61,382	Median Housing Value			\$55,040
			Median Gross Rent			\$509
			Families Below Poverty Level			7.4%
<i>Source: 2017 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Nuckolls AA includes all of Nuckolls County Nebraska. Nuckolls County is located in the south central portion of Nebraska on the border with the state of Kansas. The AA complies with the regulation.

According to the FDIC’s June 30, 2017 Deposit Market Share Report, five financial institutions operate seven offices in the area. Central National Bank is the market leader with a 36.6 percent of the deposit market share, one branch and \$63 million in deposits. Commercial Bank ranks second with a 21.54 percent market share, two offices and \$37 million in deposits. The top two institutions captured 58 percent of the deposit market share.

The population of the AA continues to decline; however, the census data reflect increasing median family income, increasing median housing values, and declining poverty levels. A community contact states the local economy in Superior, which is where the bank’s branch is located, is stable. Main street store occupancy is generally sound and the businesses carry little debt. The area has some new development such as a new Co-op Elevator, new Casey’s General Store, and a new Dollar General Store. Housing is in limited supply but Superior recently received an economic development grant to rehabilitate and build some residential properties.

The local economy consists largely of agriculture, both cattle and crop farming. The state of Nebraska is now the second largest beef producer in the U.S. providing over \$6.5 billion in cattle sales each year. Economic growth in Nebraska slowed in 2017. Agricultural commodity prices have remained relatively low since 2014. The low price environment for commodities

has limited the potential for growth in the farm sector and export issues are a concern. Other major industries include health care and education.

As of December 2017, the unemployment rate for Nuckolls County is 3.2percent. This is somewhat above the Nebraska unemployment rate of 2.9 percent, but well below the national rate of 4.1 percent.

## 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; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems. [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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of

families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.

**Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

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

Table 1. Lending Volume

LENDING VOLUME		Geography: KANSAS						Evaluation Period: January 1, 2015 to December 31, 2017				
Kansas Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
KS Non-MSA AA	67.3	580	60,879	700	52,518	1,674	157,986	4	1,619	2,954	271,383	76.6
Wichita AA	12.0	145	21,768	255	41,565	129	13,839	3	6,298	529	77,172	7.3
Manhattan AA	8.3	251	45,182	92	7,981	21	1,503	1	150	364	54,666	3.3
Topeka AA	6.6	247	38,090	44	4,267	1	94	0	0	292	42,451	4.1
Lawrence AA	4.3	103	24,027	81	6,784	3	221	6	1,321	187	31,032	7.1
<b>Limited Review:</b>												
Gardner AA	1.5	61	10,984	5	595	0	0	0	0	66	11,579	1.6
<b>Total</b>	100.0	1,387	200,930	1,177	113,710	1,828	173,643	14	9,388	4,392	488,283	100.0

\* Loan Data as of December 31, 2017. Rated area refers to the assessment area within the state.

\*\* The evaluation period for Community Development Loans is August 29, 2015 to December 31, 2017.

Data does not include \$3.7 million in loans having a statewide impact.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to the assessment area within the state.

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-2016**

Kansas Assessment Area	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>Full Review:</b>																			
KS Non-MSA AA	414	43,236	43.8	3,363	0.0	0.0	0.0	8.1	7.2	8.5	73.6	78.7	63.6	18.4	14.0	27.9	0.0	0.0	0.0
Wichita AA	96	14,476	10.1	18,375	3.5	3.1	1.7	24.0	16.7	17.5	33.9	63.5	32.5	38.5	16.7	48.3	0.0	0.0	0.0
Manhattan AA	163	28,851	17.2	2,879	0.0	0.0	0.0	9.2	5.5	8.6	65.1	52.8	51.9	25.7	41.7	39.5	0.0	0.0	0.0
Topeka AA	168	25,872	17.8	5,081	5.3	2.4	2.3	19.7	5.4	14.8	38.3	36.3	38.8	36.6	56.0	44.1	0.0	0.0	0.0
Lawrence AA	71	16,177	7.5	3,490	2.2	1.4	2.9	16.1	18.3	14.3	51.0	43.7	52.1	30.7	36.6	30.7	0.0	0.0	0.0
<b>Limited Review:</b>																			
Gardner AA	34	6,116	3.6	1,533	0.0	0.0	0.0	16.0	5.9	7.2	70.0	64.7	72.1	14.0	29.4	20.7	0.0	0.0	0.0
<b>Total</b>	<b>946</b>	<b>134,728</b>	<b>100.0</b>	<b>34,721</b>	<b>2.8</b>	<b>0.8</b>	<b>1.6</b>	<b>18.7</b>	<b>8.4</b>	<b>14.7</b>	<b>45.9</b>	<b>62.1</b>	<b>41.8</b>	<b>32.6</b>	<b>28.8</b>	<b>42.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

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

Kansas Assessment Area	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>Full Review:</b>																			
KS Non-MSA AA	166	17,643	37.6	3,020	0.0	0.0	0.0	12.6	13.9	13.2	62.7	65.1	56.3	24.7	21.1	30.4	0.0	0.0	0.0
Wichita AA	49	7,292	11.1	16,438	5.6	2.0	3.4	19.8	8.2	17.2	34.4	38.8	35.1	40.2	51.0	44.3	0.0	0.0	0.0
Manhattan AA	88	16,331	20.0	2,555	0.0	0.0	0.0	3.7	8.0	5.4	79.8	68.2	72.4	16.1	23.9	21.3	0.4	0.0	0.8
Topeka AA	79	12,218	17.9	4,664	4.6	1.3	1.6	15.3	10.1	12.6	39.1	38.0	40.3	41.0	50.6	45.5	0.0	0.0	0.0
Lawrence AA	32	7,850	7.3	2,900	1.3	12.5	2.7	25.4	25.0	27.2	36.9	25.0	32.2	36.3	37.5	37.9	0.0	0.0	0.0
<b>Limited Review:</b>																			
Gardner AA	27	4,868	6.1	1,330	0.0	0.0	0.0	0.0	0.0	0.0	66.7	77.8	60.6	33.3	22.2	39.4	0.0	0.0	0.0
<b>Total</b>	<b>441</b>	<b>66,202</b>	<b>100.0</b>	<b>30,907</b>	<b>3.6</b>	<b>1.4</b>	<b>2.3</b>	<b>16.8</b>	<b>11.3</b>	<b>15.4</b>	<b>44.1</b>	<b>55.8</b>	<b>41.9</b>	<b>35.5</b>	<b>31.5</b>	<b>40.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-2016		
Kansas Assessment Area	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
<b>Full Review:</b>																					
KS Non-MSA AA	414	43,236	43.8	3,363	17.1	7.5	5.4	18.6	25.4	16.6	23.0	22.9	19.8	41.3	38.9	32.4	0.0	5.3	25.8		
Wichita AA	96	14,476	10.1	18,375	21.0	10.4	7.0	18.3	13.5	16.9	21.0	20.8	21.1	39.7	50.0	32.5	0.0	5.2	22.6		
Manhattan AA	163	28,851	17.2	2,879	18.9	4.9	4.1	19.3	20.9	13.3	22.6	23.3	22.0	39.3	46.6	41.0	0.0	4.3	19.6		
Topeka AA	168	25,872	17.8	5,081	21.9	6.0	6.3	16.5	17.9	18.9	22.2	22.6	21.0	39.3	50.0	36.3	0.0	3.6	17.6		
Lawrence AA	71	16,177	7.5	3,490	21.6	5.6	7.9	16.2	23.9	19.0	21.9	23.9	21.0	40.3	42.3	39.3	0.0	4.2	12.8		
<b>Limited Review:</b>																					
Gardner AA	34	6,116	7.6	1,533	15.9	2.9	3.9	15.3	17.6	15.5	25.8	38.2	27.5	43.0	38.2	31.4	0.0	2.9	21.7		
<b>Total</b>	<b>946</b>	<b>134,728</b>	<b>100.0</b>	<b>34,721</b>	<b>20.3</b>	<b>6.8</b>	<b>6.4</b>	<b>17.9</b>	<b>21.7</b>	<b>17.0</b>	<b>21.8</b>	<b>23.4</b>	<b>21.3</b>	<b>40.0</b>	<b>43.6</b>	<b>34.4</b>	<b>0.0</b>	<b>4.7</b>	<b>20.9</b>		
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017
Kansas Assessment Area	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
<b>Full Review:</b>																			
KS Non-MSA AA	166	17,643	37.6	3,020	18.0	8.4	7.4	20.3	22.9	18.3	21.6	23.5	20.4	40.0	33.7	30.6	0.0	11.4	23.2
Wichita AA	49	7,292	11.1	16,438	21.4	6.1	8.0	17.9	8.2	18.0	21.1	34.7	20.8	39.6	46.9	31.6	0.0	4.1	21.6
Manhattan AA	88	16,331	20.0	2,555	20.5	2.3	4.8	17.9	25.0	14.3	21.2	19.3	22.9	40.5	47.7	40.7	0.0	5.7	17.3
Topeka AA	79	12,218	17.9	4,664	20.8	8.9	9.1	17.2	20.3	21.1	21.8	30.4	19.8	40.3	39.2	31.2	0.0	1.3	18.8
Lawrence AA	32	7,850	7.3	2,900	19.1	6.3	4.8	19.6	12.5	16.3	20.6	15.6	22.4	40.7	56.3	43.7	0.0	9.4	12.9
<b>Limited Review:</b>																			
Gardner AA	27	4,868	6.1	1,330	9.8	3.7	3.8	23.5	14.8	18.3	23.9	55.6	25.7	42.8	25.9	32.1	0.0	0.0	20.2
<b>Total</b>	<b>441</b>	<b>66,202</b>	<b>100.0</b>	<b>30,907</b>	<b>20.2</b>	<b>6.6</b>	<b>7.4</b>	<b>18.5</b>	<b>20.0</b>	<b>18.0</b>	<b>21.3</b>	<b>26.5</b>	<b>21.1</b>	<b>40.0</b>	<b>40.1</b>	<b>33.3</b>	<b>0.0</b>	<b>6.8</b>	<b>20.1</b>
<i>Source: 2017 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>																			

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-2016	
Kansas Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
KS Non-MSA AA	469	36,718	59.4	1,932	0.0	0.0	0.0	17.5	16.6	15.5	68.0	71.2	68.0	14.5	12.2	16.6	0.0	0.0	0.0	
Wichita AA	173	28,279	21.9	8,537	11.5	6.4	12.7	21.5	18.5	21.8	32.3	54.9	28.0	34.7	20.2	37.5	0.0	0.0	0.0	
Manhattan AA	62	5,705	7.8	1,173	0.0	0.0	0.0	21.1	21.0	21.3	55.0	40.3	45.2	23.8	38.7	33.5	0.1	0.0	0.0	
Topeka AA	27	2,325	6.5	2,032	19.5	18.5	16.6	16.8	0.0	19.6	37.4	55.6	39.8	26.3	25.9	23.9	0.0	0.0	0.0	
Lawrence AA	56	4,337	7.1	1,860	7.1	3.6	3.3	23.9	21.4	24.1	42.8	28.6	44.4	26.3	46.4	28.2	0.0	0.0	0.0	
<b>Limited Review:</b>																				
Gardner AA	3	545	0.8	319	0.0	0.0	0.0	9.0	33.3	7.5	68.4	66.7	61.1	22.7	0.0	31.3	0.0	0.0	0.0	
<b>Total</b>	<b>790</b>	<b>77,909</b>	<b>100.0</b>	<b>15,853</b>	<b>9.1</b>	<b>2.3</b>	<b>9.4</b>	<b>20.0</b>	<b>17.2</b>	<b>20.7</b>	<b>43.2</b>	<b>61.6</b>	<b>38.2</b>	<b>27.7</b>	<b>18.9</b>	<b>31.7</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017
Kansas Assessment Area	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
<b>Full Review:</b>																			
KS Non-MSA AA	231	15,800	59.7	1,770	0.0	0.0	0.0	22.1	19.9	19.8	58.8	65.4	58.0	19.2	14.7	22.2	0.0	0.0	0.0
Wichita AA	82	13,286	21.2	7,935	6.7	7.3	8.2	28.2	26.8	26.8	32.7	34.1	33.0	32.4	31.7	32.0	0.0	0.0	0.0
Manhattan AA	30	2,276	7.8	1,033	0.0	0.0	0.0	13.0	10.0	12.9	74.8	56.7	69.8	11.4	30.0	17.1	0.8	3.3	0.2
Topeka AA	17	1,942	4.4	1,982	17.1	17.6	12.3	18.5	11.8	19.4	39.0	29.4	39.9	25.4	41.2	28.5	0.0	0.0	0.0
Lawrence AA	25	2,447	6.5	1,735	6.8	4.0	4.0	31.0	28.0	31.5	32.8	32.0	34.2	29.4	36.0	30.3	0.0	0.0	0.0
<b>Limited Review:</b>																			
Gardner AA	2	50	0.5	272	0.0	0.0	0.0	0.0	0.0	0.0	58.0	50.0	57.4	42.0	50.0	42.6	0.0	0.0	0.0
<b>Total</b>	<b>387</b>	<b>35,801</b>	<b>100.0</b>	<b>14,727</b>	<b>6.5</b>	<b>2.6</b>	<b>6.5</b>	<b>24.2</b>	<b>20.7</b>	<b>24.0</b>	<b>42.1</b>	<b>54.3</b>	<b>40.1</b>	<b>27.2</b>	<b>22.2</b>	<b>29.3</b>	<b>0.1</b>	<b>0.3</b>	<b>0.0</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>																			

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2015-2016</b>	
<b>Kansas Assessment Areas:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
<b>Full Review:</b>												
KS Non-MSA AA	469	36,718	59.4	1,932	75.5	38.0	37.7	6.4	17.9	18.1	44.1	
Wichita AA	173	28,279	21.9	8,537	78.4	39.9	35.6	8.3	39.9	13.3	20.2	
Manhattan AA	62	5,705	7.8	1,173	76.7	45.2	41.9	6.8	11.3	16.5	43.5	
Topeka AA	27	2,325	3.4	2,032	76.3	25.9	37.1	7.5	7.4	16.3	66.7	
Lawrence AA	56	4,337	7.7	1,860	81.2	41.1	45.5	6.1	19.6	12.6	39.3	
<b>Limited Review:</b>												
Gardner AA	3	545	0.5	319	85.7	100.0	52.4	4.6	0.0	9.7	0.0	
<b>Total</b>	<b>790</b>	<b>77,909</b>	<b>100.0</b>	<b>15,853</b>	<b>77.8</b>	<b>39.0</b>	<b>38.0</b>	<b>7.4</b>	<b>21.9</b>	<b>14.8</b>	<b>39.1</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
Kansas Assessment Areas	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>Full Review:</b>											
KS Non-MSA AA	231	15,800	59.7	1,770	74.7	41.1	42.5	6.8	15.6	18.4	43.3
Wichita AA	82	13,286	21.2	7,935	78.4	45.1	41.5	8.3	31.7	13.3	23.2
Manhattan AA	30	2,276	7.8	1,033	76.2	60.0	47.8	7.3	0.0	16.5	40.0
Topeka AA	17	1,942	4.4	1,982	75.4	35.3	44.7	7.7	0.0	16.9	64.7
Lawrence AA	25	2,447	6.5	1,735	81.1	48.0	51.9	6.1	24.0	12.9	28.0
<b>Limited Review:</b>											
Gardner AA	2	50	0.5	272	86.3	100.0	51.5	4.2	0.0	9.5	0.0
<b>Total</b>	<b>387</b>	<b>35,801</b>	<b>100.0</b>	<b>14,727</b>	<b>77.5</b>	<b>43.9</b>	<b>43.9</b>	<b>7.6</b>	<b>17.6</b>	<b>14.9</b>	<b>38.5</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015-2016	
Kansas Assessment Area	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
KS Non-MSA AA	1,157	107,614	91.7	1,164	0.0	0.0	0.0	5.8	9.4	5.8	82.0	79.0	78.4	12.2	11.6	15.7	0.0	0.0	0.0	
Wichita AA	90	9,666	7.1	208	2.3	0.0	0.5	9.9	0.0	2.4	45.4	98.9	58.7	42.4	1.1	38.5	0.0	0.0	0.0	
Manhattan AA	13	983	1.0	55	0.0	0.0	0.0	2.2	0.0	0.0	78.4	69.2	80.0	19.4	30.8	20.0	0.0	0.0	0.0	
Topeka AA	0	0	0.0	21	2.0	0.0	0.0	7.8	0.0	0.0	34.5	0.0	19.0	55.7	0.0	81.0	0.0	0.0	0.0	
Lawrence AA	2	90	0.2	30	2.1	0.0	0.0	10.2	0.0	6.7	45.2	0.0	36.7	42.5	100.0	56.7	0.0	0.0	0.0	
<b>Limited Review:</b>																				
Gardner AA	0	0	0.0	11	0.0	0.0	0.0	9.0	0.0	0.0	74.2	0.0	63.6	16.9	0.0	36.4	0.0	0.0	0.0	
<b>Total</b>	<b>1,262</b>	<b>118,353</b>	<b>100.0</b>	<b>1,489</b>	<b>0.9</b>	<b>0.0</b>	<b>0.1</b>	<b>7.1</b>	<b>8.6</b>	<b>5.0</b>	<b>65.0</b>	<b>80.2</b>	<b>73.9</b>	<b>27.0</b>	<b>11.2</b>	<b>21.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>																				

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

Kansas Assessment Area	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
<b>Full Review:</b>																			
KS Non-MSA AA	517	50,372	91.3	1,214	0.0	0.0	0.0	3.1	0.4	0.5	79.9	92.3	89.3	16.9	7.4	10.2	0.0	0.0	0.0
Wichita AA	39	4,173	6.9	228	2.1	0.0	0.4	11.4	0.0	1.8	31.9	61.5	32.5	54.5	38.5	65.4	0.0	0.0	0.0
Manhattan AA	8	520	1.4	76	0.0	0.0	0.0	1.9	0.0	1.3	93.1	100.0	90.8	5.0	0.0	7.9	0.0	0.0	0.0
Topeka AA	1	94	0.2	31	3.4	0.0	0.0	8.2	0.0	3.2	25.6	0.0	6.5	62.8	100.0	90.3	0.0	0.0	0.0
Lawrence AA	1	131	0.2	55	0.8	0.0	0.0	17.4	0.0	3.6	59.1	0.0	72.7	22.7	100.0	23.6	0.0	0.0	0.0
<b>Limited Review:</b>																			
Gardner AA	0	0	0.0	8	0.0	0.0	0.0	0.0	0.0	0.0	51.2	0.0	0.0	48.8	0.0	100.0	0.0	0.0	0.0
<b>Total</b>	<b>566</b>	<b>55,290</b>	<b>100.0</b>	<b>1,612</b>	<b>0.9</b>	<b>0.0</b>	<b>0.1</b>	<b>6.8</b>	<b>0.4</b>	<b>0.9</b>	<b>61.1</b>	<b>89.9</b>	<b>78.7</b>	<b>31.2</b>	<b>9.7</b>	<b>20.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015-2016	
Kansas Assessment Area	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
<b>Full Review:</b>												
KS Non-MSA AA	1,157	107,614	91.7	1,164	98.0	59.8	57.3	1.2	8.0	0.8	32.2	
Wichita AA	90	9,666	7.1	208	97.0	67.8	44.2	1.9	8.9	1.1	23.3	
Manhattan AA	13	983	1.1	55	95.1	30.8	38.2	1.9	0.0	3.0	69.2	
Topeka AA	0	0	0.0	21	97.6	0.0	19.0	1.8	0.0	0.6	0.0	
Lawrence AA	2	90	0.2	30	96.5	100.0	33.3	2.3	0.0	1.2	0.0	
<b>Limited Review:</b>												
Gardner AA	0	0	0.0	11	97.4	0.0	45.5	0.0	0.0	2.6	0.0	
<b>Total</b>	<b>1,262</b>	<b>118,353</b>	<b>100.0</b>	<b>1,489</b>	<b>97.3</b>	<b>60.1</b>	<b>53.7</b>	<b>1.6</b>	<b>8.0</b>	<b>1.1</b>	<b>31.9</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>												

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017
Kansas Assessment Area	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
<b>Full Review:</b>											
KS Non-MSA AA	517	50,372	91.3	1,214	98.0	60.9	50.0	1.1	10.1	0.9	29.0
Wichita AA	39	4,173	6.9	228	97.0	56.4	44.7	1.7	12.8	1.3	30.8
Manhattan AA	8	520	1.4	76	95.0	37.5	44.7	1.9	0.0	3.0	62.5
Topeka AA	1	94	0.2	31	97.0	100.0	19.4	2.4	0.0	0.6	0.0
Lawrence AA	1	131	0.2	55	96.2	100.0	43.6	2.7	0.0	1.1	0.0
<b>Limited Review:</b>											
Gardner AA	0	0	0.0	8	97.6	0.0	50.0	0.0	0.0	2.4	0.0
<b>Total</b>	<b>566</b>	<b>55,290</b>	<b>100.0</b>	<b>1,612</b>	<b>97.2</b>	<b>60.4</b>	<b>48.2</b>	<b>1.6</b>	<b>10.1</b>	<b>1.2</b>	<b>29.5</b>
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>											

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: KANSAS									
Evaluation Period: August 29, 2015 to December 31, 2017									
Kansas 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>									
KS Non-MSA AA	0	0	1	420	1	420	6	0	0
Wichita AA	1	756	0	0	1	756	11	0	0
Manhattan AA	0	0	0	0	0	0	0	0	0
Topeka AA	2	1,032	0	0	1	1,032	15	0	0
Lawrence AA	0	0	0	0	0	0	0	0	0
Statewide	10	4,429	1	352	11	4,781	68	0	0
<b>Limited Review:</b>									
Gardner AA	0	0	0	0	0	0	0	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: KANSAS				Evaluation Period: January 1, 2015 to December 31, 2017			
Kansas 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							
KS Non-MSA AA	76.6	16	53	0	38	50	12	0	3	0	0	-3	0	0	20.7	57.8	21.5							
Wichita AA	7.3	4	13	0	25	50	25	0	0	0	0	0	0	9.1	24.8	33.1	33.0							
Manhattan AA	3.3	2	7	0	0	100	0	0	0	0	0	0	0	0	16.9	67.5	12.8							
Topeka AA	4.1	2	7	50	0	0	50	0	0	0	0	0	0	8.2	18.8	39.7	33.3							
Lawrence AA	7.1	4	13	25	25	25	25	0	0	0	0	0	0	10.2	29.2	31.9	28.6							
<b>Limited Review:</b>																								
Gardner AA	1.6	2	7	0	0	50	50	0	0	0	0	0	0	0										

## State of Nebraska

Table 1. Lending Volume

LENDING VOLUME		Geography: NEBRASKA						Evaluation Period: January 1, 2015 to December 31, 2017				
Nebraska Assessment Area	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Nuckolls County	100.0	18	1,152	24	1,793	214	32,177	0	0	256	35,122	100.0

\* Loan Data as of December 31, 2017. Rated area refers to the assessment area within the state.

\*\* The evaluation period for Community Development Loans is August 29, 2015 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the assessment area within the state.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-2016	
Nebraska Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	14	894	100.0	55	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>14</b>	<b>894</b>	<b>100.0</b>	<b>55</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																				

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017	
Nebraska Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	4	258	100.0	58	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>4</b>	<b>258</b>	<b>100.0</b>	<b>58</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
Source: 2017 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-2016	
Nebraska Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	14	894	200.0	55	29.3	21.4	10.9	22.6	14.3	21.8	24.5	14.3	25.5	23.6	42.9	25.5	0.0	7.1	16.4	
<b>Total</b>	<b>14</b>	<b>894</b>	<b>200.0</b>	<b>55</b>	<b>29.3</b>	<b>21.4</b>	<b>10.9</b>	<b>22.6</b>	<b>14.3</b>	<b>21.8</b>	<b>24.5</b>	<b>14.3</b>	<b>25.5</b>	<b>23.6</b>	<b>42.9</b>	<b>25.5</b>	<b>0.0</b>	<b>7.1</b>	<b>16.4</b>	
Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017	
Nebraska Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	4	258	100.0	58	22.1	25.0	15.5	20.5	0.0	13.8	25.1	0.0	19.0	32.3	50.0	31.0	0.0	25.0	20.7	
<b>Total</b>	<b>4</b>	<b>258</b>	<b>100.0</b>	<b>58</b>	<b>22.1</b>	<b>25.0</b>	<b>15.5</b>	<b>20.5</b>	<b>0.0</b>	<b>13.8</b>	<b>25.1</b>	<b>0.0</b>	<b>19.0</b>	<b>32.3</b>	<b>50.0</b>	<b>31.0</b>	<b>0.0</b>	<b>25.0</b>	<b>20.7</b>	
Source: 2017 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0																				

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2015-2016**

Nebraska Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	17	1,128	100.0	93	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>17</b>	<b>1,128</b>	<b>100.0</b>	<b>93</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017**

Nebraska Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	7	665	100.0	75	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>665</b>	<b>100.0</b>	<b>75</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-2016	
Nebraska Assessment Area	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
<b>Full Review:</b>												
Nuckolls County AA	17	1,128	100.0	93	78.8	52.9	60.2	3.6	23.5	17.6	23.5	
<b>Total</b>	<b>17</b>	<b>1,128</b>	<b>100.0</b>	<b>93</b>	<b>78.8</b>	<b>52.9</b>	<b>60.2</b>	<b>3.6</b>	<b>23.5</b>	<b>17.6</b>	<b>23.5</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Nebraska Assessment Area	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
<b>Full Review:</b>												
Nuckolls County AA	7	665	100.0	75	77.0	71.4	48.0	4.1	14.3	19.0	14.3	
<b>Total</b>	<b>7</b>	<b>665</b>	<b>100.0</b>	<b>75</b>	<b>77.0</b>	<b>71.4</b>	<b>48.0</b>	<b>4.1</b>	<b>14.3</b>	<b>19.0</b>	<b>14.3</b>	
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015-2016	
Nebraska Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	148	21,239	100.0	188	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>148</b>	<b>21,239</b>	<b>100.0</b>	<b>188</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017	
Nebraska Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
<b>Full Review:</b>																				
Nuckolls County AA	66	10,938	100.0	177	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>66</b>	<b>10,938</b>	<b>100.0</b>	<b>177</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015-2016	
Nebraska Assessment Area	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
<b>Full Review:</b>												
Nuckolls County AA	148	21,239	100.0	188	100.0	78.4	75.5	0.0	8.8	0.0	12.8	
<b>Total</b>	<b>148</b>	<b>21,239</b>	<b>100.0</b>	<b>188</b>	<b>100.0</b>	<b>78.4</b>	<b>75.5</b>	<b>0.0</b>	<b>8.8</b>	<b>0.0</b>	<b>12.8</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>												

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017	
Nebraska Assessment Area	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
<b>Full Review:</b>												
Nuckolls County AA	66	10,938	100.0	177	100.0	71.2	58.2	0.0	9.1	0.0	19.7	
<b>Total</b>	<b>66</b>	<b>10,938</b>	<b>100.0</b>	<b>177</b>	<b>100.0</b>	<b>71.2</b>	<b>58.2</b>	<b>0.0</b>	<b>9.1</b>	<b>0.0</b>	<b>19.7</b>	
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data.                      Due to rounding, totals may not equal 100.0</i>												

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NEBRASKA				Evaluation Period: August 29, 2015 to December 31, 2017			
Nebraska 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>									
Nuckolls County AA	3	1,105	0	0	3	1,105	0.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: NEBRASKA				Evaluation Period: January 1, 2015 to December 31, 2017				
Nebraska 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>																		
Nuckolls County AA	100	1	100	0	0	100	0	0	0	0	0	0	0	0	0	0	100	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.