



PUBLIC DISCLOSURE

September 16, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Midstates Bank, National Association
Charter Number 10354
1851 Madison Avenue, Suite 732
Council Bluffs, IA 51503-3602

Office of the Comptroller of the Currency
13710 FNB Parkway, Suite 110
Omaha, NE 68154-5298

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, nor should it 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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

- Midstates Bank's (Midstates) loan-to-deposit ratio is reasonable.
- A majority of Midstates' primary loan products are made within its assessment areas (AAs).
- Midstates' distribution of agricultural and residential real estate loans represents a reasonable geographic penetration among census tracts of all income levels.
- Midstates' distribution of agricultural and residential real estate loans represents a reasonable penetration among individuals of all income levels and farms of different sizes.
- Midstates' responsiveness to community development needs and opportunities in its AA is adequate given its capacity and performance context.

Scope of Examination

This evaluation of Midstates' Community Reinvestment Act (CRA) performance is based on intermediate small bank examination procedures. These procedures include the evaluation of the institution's CRA results based on five lending performance criteria. The lending performance tests include loan-to-deposit ratio, lending in the AA, borrower distribution of loans by borrower income, geographic distribution of loans, and responsiveness to CRA complaints.

Midstates' primary loan products are farm loans and residential real estate loans. A sample of 80 farm loans was selected, which includes 20 loans from the Pottawattamie/Harrison County AA in 2011, 20 loans from the Pottawattamie/Harrison County AA in 2012/2013, 20 loans from the Shelby County AA in 2011, and 20 loans from the Shelby County AA in 2012/2013. The bank reports residential real estate lending data under the requirements of the Home Mortgage Disclosure Act (HMDA). HMDA data was tested and found to be reliable at a previous data integrity examination. Therefore, HMDA data was used to evaluate the bank's residential real estate lending performance. The sampling period used for the lending test is October 1, 2010 through March 31, 2013. The loan samples are representative of Midstates' business strategy since the previous examination.

In addition to lending performance, we conducted a test evaluating the bank's responsiveness to community development (CD) needs. The CD test reviews the quantity and quality of CD loans, investments, and services. The evaluation is from September 28, 2010 through September 15 2013, which is the start of the current evaluation.

Description of Institution

Midstates is a nationally chartered bank headquartered in Council Bluffs, Iowa. As of June 30, 2013, Midstates had total assets of \$352 million and tier one capital of \$37 million. Midstates is wholly owned by Midstates Bancshares, Inc. In addition to the main office in Council Bluffs, Midstates operates five full-service branches and four automated teller machines (ATMs). There have not been any significant changes to Midstates' corporate structure, including mergers or acquisitions, since the previous CRA examination.

Midstates has two AAs. The two AAs include the Pottawattamie/Harrison County AA, which is within the Omaha-Council Bluffs, Nebraska-Iowa Metropolitan Statistical Area (Omaha-Council Bluffs MSA); as well as the Shelby County AA. The two AAs include all offices, branch locations, and ATMs. In addition to the main office, four branches are in the Pottawattamie/Harrison County AA, and one branch in the Shelby County AA.

Midstates offers a full range of loan and deposit services to its customers. Midstates' focus is community banking, specializing in agricultural and residential real estate lending. Within the residential mortgage portfolio, the bank originated mortgages for sale in the secondary market.

There are no legal or financial impediments to Midstates' ability to meet the credit and community development needs of its AAs. The bank was rated Satisfactory at its last CRA examination dated September 27, 2010.

The following table summarizes the percentage of each loan type originated or purchased from October 1, 2010 through March 31, 2013.

Loan Portfolio Summary by Loan Product		
Loan Category	% of Number Volume	% of Dollar Volume
Farm Loans	30	58
Home Loans	27	25
Consumer Loans	32	2
Business Loans	11	15

Source: Bank Reports – Loan Originations 10/1/2010 to 3/31/2013

Description of Assessment Area(s)

Midstates has two AAs in western Iowa, which are described below.

Pottawattamie/Harrison County Assessment Area

The Pottawattamie/Harrison County AA consists of all census tracts in Pottawattamie County and four census tracts in Harrison County. Pottawattamie and Harrison Counties are located in western Iowa and comprise a portion of the Omaha-Council Bluffs MSA. The entire AA consists of 34 census tracts. As of the 2010 US Census,

two census tracts are upper-income tracts, 20 are middle-income, 11 are moderate-income, and one is low-income. The AA complied with the requirements of the regulation and did not arbitrarily exclude any low- or moderate-income areas. A map of the AA can be obtained from the bank's CRA Public File.

According to the US Census, the total population of Pottawattamie County was estimated at 92,913 in 2012. The largest city within the county is Council Bluffs, with an estimated population of 62,115 in 2012. The estimated population of Harrison County was 14,548 in 2012. The 2010 weighted average of Housing and Urban Development (HUD) median family income for the Omaha-Council Bluffs MSA was \$72,700. Eleven percent of the households in the AA are below the poverty level. Of the 41,311 families in the AA, 26 percent are low-income, 19 percent are moderate-income, 19 percent are middle-income, and 11 percent are upper-income.

The major employers in Council Bluffs include Tyson Inc., Ameristar Casino Hotel, Horseshoe Casino, Harrah's Casino Hotel, Alegent Health Mercy Hospital, Con Agra, and Google. The unemployment rates in Pottawattamie and Harrison Counties are approximately four percent, which is below the national average.

Competition from other financial institutions was high in the AA, primarily due to a large presence of financial institutions in Council Bluffs. The AA was served by 16 financial institutions. Midstates ranked fourth, with eight percent of FDIC insured deposits in the market area.

Shelby County Assessment Area

The Shelby County AA is comprised of all of Shelby County, which is located in rural southwestern Iowa. All four census tracts in the AA are middle-income. This AA complies with the requirements of the regulation as it did not arbitrarily exclude any low- or moderate-income areas. A map of the AA is located the bank's CRA Public File.

According to the US Census, the population of Shelby County was estimated to be 12,069 in 2012. The largest city within the AA is Harlan, which had a population of 5,106 in 2010. The 2010 weighted average of HUD median family income for non-metropolitan statistical areas in Iowa was \$59,800. Approximately 11 percent of families in the AA are below the poverty level. Of the 5,070 households living in the AA, 24 percent are low-income, 18 percent are moderate-income, 20 percent are middle income, and 38 percent are upper-income.

The major industry in Shelby County is agriculture. Major employers in Shelby County include Mytrue Medical Center, Communication Data Services, West Central Community Action, and Harlan County Schools. The unemployment rate of Shelby County is four percent, which is below the national average.

Competition in Shelby County from other financial institutions is moderate. Six financial institutions service the AA. Midstates ranked second with approximately 19 percent market share of FDIC insured deposits. The bank faces additional competition from non-bank entities such as Farm Credit Services.

We conducted one community contact during the CRA examination. While the contact is located in the Shelby County AA, the contact's organization also conducts operations in the bank's other AA. The contact stated that financial institutions in the AAs were serving the community adequately. The contact stated the most significant need for low- and moderate-income families in the AAs is affordable housing, particularly affordable multi-family housing developments. The contact also stated there are opportunities for financial institutions in the AA to conduct financial literacy outreach events.

Conclusions with Respect to Performance Tests

LENDING TEST

The lending test is rated Satisfactory. The rating is based on the five performance areas described below. This examination did not include an analysis of geographic distribution for the Shelby County AA, as this would not be meaningful because all census tracts are middle-income.

Loan-to-Deposit Ratio

The loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and performance context. The bank's average LTD ratio from the last CRA examination to June 30, 2013 is 76 percent. This compares favorably to three peer banks operating in the same geography with similar asset size. Peer banks had an average LTD ratio of 61 percent. The lowest quarterly average of the three peer banks over the same period was 46 percent, while the highest was 71 percent. Midstates' lowest quarterly average during the evaluation period was 69 percent and the highest was 80 percent.

Lending in Assessment Area

A majority of Midstates' primary loan products were made within the bank's AAs. Of the bank's 494 loans, nearly 79 percent were originated in the bank's AAs. Overall, 79 percent of loans by number and 65 percent of loans by dollar amount were originated within the bank's AAs. The following table details Midstates' lending within the AAs.

Lending in Pottawattamie/Harrison County and Shelby County AAs										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	132	75.4	43	24.6	175	10,898	72.4	4,155	27.6	15,053
Home Refinance	208	73.2	76	26.8	284	25,606	59.2	17,655	40.8	43,261
Home Improvement	34	97.1	1	2.9	35	2,300	98.7	31	1.3	2,331
Farm Loans	16	80.0	4	20.0	20	1,963	83.7	382	16.3	2,345
Total	390	78.9	104	21.1	494	40,767	64.7	22,223	35.3	62,990

Source: 2011-2013 HMDA; Bank reports

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The analysis of lending to borrowers of different incomes and businesses of different sizes is split between 2011 and 2012/2013 due to updated US Census and Business Geodemographic data.

Pottawattamie/Harrison County AA – 2011

Midstates has reasonable distribution among farms of different sizes in the Pottawattamie/Harrison County AA. The bank originated 85 percent by number and 75 percent by dollar volume to farms with gross annual revenues less than \$1 million in 2011. The bank's lending is below the demographic comparator; however, the strength of the agricultural economy and strong grain prices bolstered farm revenues. Additionally, existing farms are continually expanding and consolidating their operations.

The following table shows the distribution of loans to farms of different sizes compared to AA demographics.

Borrower Distribution of Loans to Farms: Pottawattamie/Harrison County AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Farms	99.2	0.5	0.3	100.0
% of Bank Loans in AA by #	85.0	15.0	0.0	100.0
% of Bank Loans in AA by \$	75.0	25.0	0.0	100.0

Source: 2011 Business Geographic Data; bank farm loan data

The distribution of home purchase, home improvement, and home refinance loans to borrowers of different income levels in the Pottawattamie/Harrison County AA is reasonable for 2011. The bank's percentage of home purchase, home improvement, and home refinance loans to moderate-income borrowers was good, as it reasonably reflects the demographic comparator. The percentage of home purchase and home refinance loans to low-income borrowers is below the demographic comparator; however, distribution remains reasonable as eight percent of AA households are below the poverty level. The bank did not make any home improvement loans to low-income families. Given the AA poverty level, borrowers would have difficulty qualifying for these loans due to their limited income.

The following table shows the distribution of home loan products among borrowers of different income levels as compared to the percent of families in each income category.

Borrower Distribution of Residential Real Estate Loans: Pottawattamie/Harrison County AA									
Borrower Income Level	Low		Moderate		Middle		Upper		N/A*
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of Number of Loans w/o Income Data
Home Purchase	21.1	5.0	24.2	22.5	25.7	12.5	29.0	32.5	27.5
Home Improvement	21.1	0.0	24.2	12.5	25.7	0.0	29.0	62.5	25.0
Home Refinance	21.1	6.9	24.2	24.1	25.7	13.8	29.0	13.8	41.4

Source: 2000 U.S. Census data; 2011 HMDA

* Legal entity borrowers are not included in the borrower distribution, because personal income data for legal entity borrowers is not reported on the HMDA loan application register. Legal entity borrowers are businesses that own the residential real estate and rent the properties to tenants.

Shelby County AA – 2011

Midstates has reasonable distribution among farms of different sizes in the Shelby County AA. The bank originated 80 percent by number and 61 percent by dollar volume to farms with gross annual revenues less than \$1 million in 2011. The bank's lending is below the demographic comparator; however, the strength of the agricultural economy coupled with strong grain prices bolstered farm revenues to all-time highs. Additionally, existing farms are continually expanding and consolidating their operations.

The following table shows the distribution of loans to farms of different sizes compared to AA demographics.

Borrower Distribution of Loans to Farms: Shelby County AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Farms	99.4	0.2	0.4	100.0
% of Bank Loans in AA by #	80.0	20.0	0.0	100.0
% of Bank Loans in AA by \$	60.9	39.1	0.0	100.0

Source: 2011 Business Geographic Data; bank farm loan data

The distribution of home purchase, home improvement, and home refinance loans to borrowers of different income levels in the Shelby County AA is reasonable for 2011. The bank's percentage of home purchase, home improvement, and home refinance loans to moderate-income borrowers and home refinance loans to low-income borrowers was good, as it reasonably reflects or exceeds the demographic comparator. The bank did not make any home purchase or home improvement loans to low-income families. Given the AA poverty level, borrowers would have difficulty qualifying for these loans due to their limited income.

The following table shows the distribution of home loan products among borrowers of different income levels as compared to the percent of families in each income category.

Borrower Distribution of Residential Real Estate Loans: Shelby County AA									
Borrower Income Level	Low		Moderate		Middle		Upper		N/A*
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of Number of Loans w/o Income Data
Home Purchase	15.2	0.0	20.5	25.0	25.7	0.0	38.6	50.0	25.0
Home Improvement	15.2	0.0	20.5	33.3	25.7	33.4	38.6	33.3	0.0
Home Refinance	15.2	20.0	20.5	10.0	25.7	20.0	38.6	40.0	10.0

Source: 2000 U.S. Census data; 2011 HMDA

* Legal entity borrowers are not included in the borrower distribution, because personal income data for legal entity borrowers is not reported on the HMDA loan application register. Legal entity borrowers are businesses that own the residential real estate and rent the properties to tenants.

Pottawattamie/Harrison County AA – 2012/2013

Midstates has reasonable distribution among farms of different sizes in the Pottawattamie/Harrison County AA. The bank originated 80 percent by number and 83 percent by dollar volume to farms with gross annual revenues less than \$1 million in 2012 and the first quarter of 2013. The bank’s lending is below the demographic comparator; however, the strength of the agricultural economy and strong grain prices bolstered farm revenues. Additionally, existing farms are continually expanding and consolidating their operations.

Borrower Distribution of Loans to Farms: Pottawattamie/Harrison County AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Farms	99.1	0.6	0.3	100.0
% of Bank Loans in AA by #	80.0	15.0	5.0	100.0
% of Bank Loans in AA by \$	83.6	13.9	2.5	100.0

Source: 2011 Business Geographic Data; bank farm loan data

The distribution of home purchase, home improvement, and home refinance loans to borrowers of different income levels in the Pottawattamie/Harrison County AA is reasonable for 2012 and the first quarter of 2013. The bank’s percentage of home purchase, home improvement, and home refinance loans to moderate-income borrowers was good, as it reasonably reflects the demographic comparator. The percentage of home purchase and home refinance loans to low-income borrowers is below the demographic comparator; however, distribution remains reasonable as eight percent of AA households are below the poverty level. The bank did not make any home improvement loans to low-income families. Given the assessment area poverty level, borrowers would have difficulty qualifying for these loans due to their limited income.

The following table shows the distribution of home loan products among borrowers of different income levels as compared to the percent of families in each income category.

Borrower Distribution of Residential Real Estate Loans: Pottawattamie/Harrison County AA									
Borrower Income Level	Low		Moderate		Middle		Upper		N/A*
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of Number of Loans w/o Income Data
Home Purchase	24.0	10.3	20.8	13.8	24.8	10.3	30.4	24.1	41.5
Home Improvement	24.0	0.0	20.8	62.5	24.8	0.0	30.4	37.5	0.00
Home Refinance	24.0	4.2	20.8	12.5	24.8	13.9	30.4	18.1	51.3

Source: 2010 U.S. Census data; 2012-2013 HMDA

* Legal entity borrowers are not included in the borrower distribution, because personal income data for legal entity borrowers is not reported on the HMDA loan application register. Legal entity borrowers are businesses that own the residential real estate and rent the properties to tenants.

Shelby County AA – 2012/2013

Midstates has reasonable distribution among farms of different sizes in the Shelby County AA. The bank originated 85 percent by number and 75 percent by dollar volume to farms with gross annual revenues less than \$1 million in 2012 and the first quarter of 2013. The bank’s lending is below the demographic comparator; however, the strength of the agricultural economy coupled with strong grain prices bolstered farm revenues to all time highs. Additionally, existing farms are continually expanding and consolidating their operations.

The following table shows the distribution of loans to farms of different sizes compared to AA demographics.

Borrower Distribution of Loans to Farms: Shelby County AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Farms	99.4	0.2	0.4	100.0
% of Bank Loans in AA by #	85.0	5.0	10.0	100.0
% of Bank Loans in AA by \$	75.2	1.2	23.6	100.0

Source: 2011 Business Geographic Data; bank farm loan data

The distribution of home purchase, home improvement, and home refinance loans to borrowers of different income levels in the Shelby County AA is excellent for 2012 and the first quarter of 2013. The bank’s percentage of home purchase, home improvement, and home refinance loans to moderate-income borrowers and home refinance loans to low-income borrowers was good, as it reasonably reflects or exceeds the demographic comparator. The bank did not make any home purchase loans to low-income families. Given the AA poverty level, borrowers would have difficulty qualifying for home purchase loans due to their limited income.

The following table shows the distribution of home loan products among borrowers of different income levels as compared to the percent of families in each income category.

Borrower Distribution of Residential Real Estate Loans: Shelby County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	17.7	0.0	19.5	50.0	25.5	16.7	37.3	33.3
Home Improvement	17.7	50.0	19.5	25.0	25.5	25.0	37.3	0.0
Home Refinance	17.7	30.8	19.5	30.8	25.5	30.7	37.3	7.7

Source: 2010 U.S. Census data; 2012-2013 HMDA

Geographic Distribution of Loans

Pottawattamie/Harrison County AA – 2011

The distribution of business loans in census tracts (CTs) of different income levels is reasonable. Midstates originated five percent of its farm loans to farms in a moderate-income CT, which is consistent with the demographic comparator. The following table shows the distribution of farm loans among CTs of different income levels as compared to the percent of farms in each category.

Geographic Distribution of Loans to Farms: Pottawattamie/Harrison County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans
Farm Loans	0.0	0.0	5.1	5.0	87.0	90.0	7.9	5.0

Source: 2000 U.S. Census data

The distribution of home purchase, home improvement, and home refinance loans in CTs of different income levels is reasonable. While the percentage of home improvement and home refinance loans to moderate-income CTs is below the demographic comparator, it remains reasonable because the percentage of home purchase loans to moderate-income CTs exceeds the demographic comparator. The following table shows the distribution of home loan products among CTs of different income levels as compared to the percent of owner-occupied housing in each category.

Geographic Distribution of Residential Real Estate Loans: Pottawattamie/Harrison County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.0	0.0	32.3	37.5	58.8	55.0	8.9	7.5
Home Improvement	0.0	0.0	32.3	12.5	58.8	87.5	8.9	0.0
Refinancing	0.0	0.0	32.3	17.2	58.8	75.9	8.9	6.9

Source: 2000 U.S. Census data; 2011 HMDA

Pottawattamie/Harrison County AA – 2012/2013

The distribution of business loans in CTs of different income levels is reasonable. While Midstates did not originate any loans in the low- or moderate-income CT, the opportunity to do so is limited given the small number of farms in those CTs. The following table shows the distribution of farm loans among CTs of different income levels as compared to the percent of farms in each category.

Geographic Distribution of Loans to Farms: Pottawattamie/Harrison AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans	% of AA Farms	% of Number of Loans
Farm Loans	0.3	0.0	3.6	0.0	87.7	95.0	8.4	5.0

Source: 2010 U.S. Census data

The distribution of home purchase, home improvement, and home refinance loans in CTs of different income levels is excellent. While the percentage of refinance loans to moderate-income CTs is below the demographic comparator, it remains reasonable because the overall volume of home improvement loans is minimal. The following table shows the distribution of home loan products among CTs of different income levels as compared to the percent of owner-occupied housing in each category.

Geographic Distribution of Residential Real Estate Loans: Pottawattamie/Harrison County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.2	0.0	28.7	31.0	65.4	69.0	5.7	0.0
Home Improvement	0.2	0.0	28.7	0.0	65.4	100.0	5.7	0.0
Refinancing	0.2	2.8	28.7	48.6	65.4	45.8	5.7	2.8

Source: 2010 U.S. Census data; 2012 HMDA

Responses to Complaints

We reviewed the bank's public file for complaints and complaints reported to the OCC through the Customer Assistance Group. There were no complaints received by the bank or the OCC related to the bank's CRA performance during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The community development test resulted in overall satisfactory conclusions with adequate community responsiveness. Midstates originated nine community development loans for a total of \$2,188,159. Additionally, the bank made 31 qualified community development investments totaling \$276,444. Midstates employees provided 447 hours of community development services in the AAs. The following narratives support our assessment of the bank's performance.

Number and Amount of Community Development Loans

Midstates' community development lending activities are satisfactory within the designated AAs. There is limited opportunity for community development loans within the bank's AAs. The largest loan was a \$1.5 million municipal loan, which partially benefitted affordable housing developments. Other qualified lending activity included loans to businesses and non-profit organizations that provide services to low- and moderate-income individuals.

Number and Amount of Qualified Investments

Midstates' community development investments and donation activity is reasonable within the designated AAs. There is limited opportunity for investments within the AA that is consistent with the bank's investment portfolio management strategy. The largest investment was a municipal bond that funded a school district with the majority of students on a free or reduced cost lunch program. The bank made several donations to organizations whose primary purpose was to promote economic development or provide services to low- and moderate-income individuals.

Extent to Which the Bank Provides Community Development Services

Midstates provides satisfactory community development services with the AAs. Bank services are available to all residents within the AA. The bank has one full-service facility within a low-income census tract in the Pottawattamie/Harrison County AA. The remaining full service banking facilities are located in middle-income CTs within the AAs. Bank officers provide financial and investment advice to non-profit organizations that provide services to low- and moderate-income individuals, provide affordable housing, and support economic development.

Responsiveness to Community Development Needs

Midstates demonstrates satisfactory responsiveness to community development needs within its AAs. The quantity and breadth of community development loans, investments, and services meet the needs of Midstates' community.

Fair Lending or Other Illegal Credit Practices Review

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

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