



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

November 26, 2012

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Landmark Bank, NA  
Charter Number 1467

801 East Broadway  
Columbia, MO 65201

### **Office of the Comptroller of the Currency**

1027 South Main Street, Suite 405  
Joplin, MO 64801

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

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## OVERALL CRA RATING

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

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

Performance Levels	Landmark Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors supporting this rating include:

- Lending activities reflect an adequate level of responsiveness to meet community credit needs.
- The overall distribution of loans to borrowers of different income levels and to businesses of different sizes is adequate.
- The overall geographic distribution of loans is adequate. Lending opportunities are limited in applicable assessment areas (AAs) with low-income tracts.
- Branches and ATMs are readily accessible to geographies and individuals of different income levels.
- The overall level of qualified investments to meet community development needs is adequate.

## Definitions and Common Abbreviations

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

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

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

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. CTs are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

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

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

card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g. approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for pre-approval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinances, 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 metropolitan area/AA.

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

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

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

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

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

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

**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 MA. 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 MA, the institution will receive a rating for the multi-state MA.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting 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 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

Landmark Bank, N.A. (LMB) is a \$1.8 billion interstate financial institution headquartered in Columbia, Missouri. LMB is a subsidiary of the Landrum Company, a \$1.8 billion one-bank holding company. LMB is a full-service banking institution offering a wide range of products for individuals and businesses. The bank offers various loan and deposit products, along with trust accounts for individuals and corporations. LMB's primary business focus is commercial lending to small- and medium-sized businesses. Residential real estate lending is also a significant product for the bank.

The following financial information was reported as of June 30, 2012. The bank's \$1.2 billion loan portfolio consisted of 52 percent commercial and commercial real estate loans, 31 percent residential real estate loans, 11 percent agriculture loans, 5 percent consumer loans, and 1 percent other loans and leases. Tier one capital totaled \$145 million, or 8.6 percent of average assets.

LMB operates 41 banking offices throughout its five AAs in three states – Missouri, Oklahoma, and Texas. The AAs consists of one MA in Sherman-Dennison, Texas; a portion of the Columbia MSA – Boone County, Missouri; and three other non-MAs in Missouri, Oklahoma, and Texas.

LMB has no legal, financial, or other factors that impede its ability to help meet the credit needs of its AAs. LMB's performance was rated "Outstanding" at its last CRA evaluation dated October 19, 2009.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, excluding CD loans, was July 1, 2009 through December 31, 2011. We performed a separate analysis of the 2009 lending data in comparison to 2010-2011 data since 2009 information only contained data from July 1, 2009 through December 31, 2009. Products reviewed in the Lending Test include home mortgage loans, small loans to businesses, and small loans to farms. Our analysis did not include multifamily home mortgage loans; the number of reported loans for this product type was insufficient for a meaningful analysis in all AAs. A review of small loans to farms was only applicable for the southern Missouri and the non-MA Oklahoma AAs, as the volume was too low to rate in all other AAs. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

This lending analysis did not include 2012 data since it did not encompass a full year, and because the reporting requirements for 2012 will be in 2013. We will include a review of the bank's 2012 data during the next CRA evaluation period.

The evaluation period for CD loans, the Investment Test, and the Service Test was October 20, 2009 to September 4, 2012. The Investment Test included a review of the investments and donations originated in the bank's AAs that meet the definition of CD investments. The Service Test included a review of retail and CD services provided in the bank's AAs.

We used deposit information reported to the FDIC annually to determine LMB's deposit market share and market presence within its AAs. The most recent deposit share information available is as of June 30, 2012.

### **Data Integrity**

We were only able to determine the accuracy of LMB's lending data after several data verification attempts. Based on our initial review, we required bank management to make corrections to both the HMDA and small loans to businesses data. We subsequently performed a follow-up review and found the data acceptable for use under the Lending Test. We also evaluated the bank's CD loans, investments, and community service activities during the examination.

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

We selected an AA in each state where LMB has an office for a full-scope review. LMB has offices in three states: Missouri, Oklahoma, and Texas. AAs receiving a full-scope review include the Boone County and the southern Missouri AAs for the state of Missouri; the non-MA Oklahoma AA for the state of Oklahoma; and the Sherman-Dennison MA AA for the state of Texas. Please refer to the State Rating sections for details on how we selected areas for review.

### **Ratings**

The bank's overall rating is a blend of the state ratings. Performance in the state of Missouri received the most weight in the overall rating, as this area accounts for 60 percent of LMB's loan originations by number and 52 percent of its deposits. The state of Oklahoma received the next highest weight, with 31 percent of loan originations by number and 27 percent of its deposits. The state of Texas received the least weight, with 9 percent of loan originations by number and 21 percent of its deposits.

### **Inside/Outside Ratio**

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. Lending levels in the bank's AAs reflect good responsiveness to area credit needs. LMB originated 83 percent by number, and 81 percent by dollar, of loans within its five AAs.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

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

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

# STATE RATING

## STATE OF MISSOURI

**CRA Rating for Missouri:** Satisfactory

**The Lending Test is rated:** Low Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** High Satisfactory

The major factors supporting this rating include:

- LMB's overall lending performance for the state of Missouri is adequate.
- The level of qualified investments to meet CD needs is adequate.
- Retail delivery systems are readily accessible throughout the AAs and to individuals of different income levels.

### Description of LMB's Operations in Missouri

The bank's performance in this state had the greatest impact on its overall CRA rating. The Missouri AAs account for 52 percent of the bank's total deposit base, and 60 percent by number of total loan originations made during the evaluation period. LMB operates 18 branches and 36 ATMs within its AAs in the state of Missouri. Residential real estate loans are the primary business focus in the Boone County AA, which received a full-scope review. The Boone County AA is a portion of the Columbia, Missouri MA. The other AA in the state is the southern Missouri AA that represents the following counties: Howell and Texas and one CT in Shannon, Missouri.

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

### Scope of Evaluation in Missouri

We performed a full-scope review of the Boone County and southern Missouri AAs. Based on overall lending volumes and deposits, the Boone County AA received the most weight, followed by the southern Missouri AA.

The Boone County AA represents 58 percent of total deposits in the state of Missouri and 30 percent of total bank deposits. The AA has 56 percent of loans originations by number in the state of Missouri. LMB operates 10 branches and 28 ATMs in the AA. LMB ranked second for deposit market share among 32 FDIC-insured financial institutions in the AA, with 18 percent of the deposits. Major competitors include Boone County National Bank, Commerce Bank, and Shelter Bank, with a majority of the institutions headquartered in the state of Missouri.

The southern Missouri AA represents 42 percent of total deposits in the state of Missouri and 22 percent of total bank deposits. The AA has 44 percent of loan originations by number in the state of Missouri. LMB operates 8 branches and 14 ATMs in the AA. Lending in this AA is primarily residential real estate, followed by consumer loans. LMB ranked first for deposit market share among 16 FDIC-insured financial institutions in the AA, with 23 percent of the deposits. Major competitors include West Plains Bank and Trust Company, Community First Banking Company, West Plains Savings and Loan Association, and Cabool State Bank.

Three recent community contacts identified high quality affordable housing and capital for small business development as primary unmet community credit needs. Technical support and advisory services for small business entrepreneurship were also identified as a credit need. The community contacts were generally supportive of the financial institutions' record of providing financial services in the AA and described access to credit as adequate.

## **LENDING TEST**

LMB's performance under the Lending Test in the state of Missouri is rated "Low Satisfactory".

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

Based on full-scope reviews, the bank's performance in the Boone County AA is adequate. The bank's performance in the southern Missouri AA is good.

### **Lending Activity**

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

Overall lending performance reflects an adequate level of responsiveness in relation to area credit needs and the bank's deposit market share.

#### **Boone County AA**

Market share data for home purchase loans indicates LMB ranked seventh out of 150 lenders at 5 percent by dollar and 5 percent by number. For home refinance loans, LMB ranked second out of 196 lenders at 9 percent by dollar and 10 percent by number. For home improvement loans, LMB ranked seventeenth out of 45 lenders at 1 percent by dollar and 1 percent by number.

#### **Southern Missouri AA**

Market share data for home purchase loans indicates LMB ranked first out of 71 lenders at 18 percent by dollar and 25 percent by number. For home refinance loans, LMB ranked first out of 117 lenders at 16 percent by dollar and 19 percent by number. For home improvement loans, LMB ranked first out of 21 lenders at 40 percent by dollar and 46 percent by number.

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

LMB's overall geographic distribution of loans for the state of Missouri is adequate.

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

Refer to Tables 2, 3, 4, and 5 in the state of Missouri section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of home mortgage loans. In addition, refer to the Distribution of Loans by Income Level of Geography section for the weighting placed on the different loan products.

The overall geographic distribution of home mortgage loans for the state of Missouri is adequate.

### Boone County AA

The geographic distribution of home mortgage loans in the Boone County AA is poor.

Home refinance loans received the most weight in our analysis, followed by home purchase and home improvement loans. The loans represent 75 percent, 24 percent and 1 percent, respectively, of the bank's total home mortgage lending by number in the AA.

The geographic distribution of home refinance loans is poor. Loan penetration in moderate-income tracts at 8 percent is lower than area demographics of 13 percent. An analysis of penetration in low-income tracts is not meaningful due to the low level of owner-occupied housing units of one percent for area demographics. The majority of the bank's home refinance loans are in middle-income geographies. LMB's market share in moderate-income tracts is somewhat lower than the overall market share. LMB's market share in low-income tracts exceeds the overall market share.

The geographic distribution of home purchase loans is adequate. Penetration in moderate-income tracts is equal to area demographics of 13 percent. An analysis of penetration in low-income tracts is not meaningful due to the low level of owner-occupied housing units of one percent for area demographics. The majority of the bank's home purchase loans are in middle-income geographies. The bank's market share in moderate-income tracts exceeds the overall market share. The bank's market share in low-income tracts is significantly lower than the overall market share. Lending opportunities are limited in low-income tracts, as only one percent of the units are owner-occupied.

A geographical analysis of home improvement loans is not meaningful. During the evaluation period, LMB originated only 10 home improvement loans.

### Southern Missouri AA

The geographic distribution of home mortgage loans in the southern Missouri AA is excellent.

Home refinance loans received the most weight in our analysis, followed by home purchase and home improvement loans. The loans represent 70 percent, 25 percent and 5 percent, respectively, of the bank's total home mortgage lending by number in the AA. We based LMB's evaluation on its performance in the moderate-income tracts since none of the southern Missouri AA geographies consists of low-income tracts.

The geographic distribution of all three home mortgage products – home refinance, home purchase, and home improvement loans – is excellent. Loan penetration in moderate-income tracts exceeds area demographics for each product. In addition, LMB's moderate-income market share for each product exceeds the overall market share for each product.

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

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

The overall geographic distribution of small loans to businesses in the state of Missouri is good.

Boone County AA

The geographic distribution of small loans to businesses in the Boone County AA is adequate. Although the dispersion of small loans to businesses within low-income geographies exceeds area demographics, only eight of the bank's 65 loans of this type are located in low-income geographies. In addition, the bank's dispersion of small loans to businesses of 12 percent within moderate-income geographies is lower than area demographics of 18 percent.

Southern Missouri AA

The geographic distribution of small loans to businesses in the southern Missouri AA is excellent. The dispersion of small loans to businesses within moderate-income geographies significantly exceeds area demographics. The bank originated 226 small loans to businesses in this AA. A geographic analysis of the low-income geographies is not meaningful since none has a low-income tract designation.

***Small Loans to Farms***

Refer to Table 7 in the state of Missouri section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The overall geographic distribution of small loans to farms in the state of Missouri is good.

Boone County AA

A geographic analysis of small loans to farms is not applicable. Small loans to farms are not a primary credit need for this AA.

Southern Missouri AA

The geographic distribution of small loans to farms in the southern Missouri AA is excellent. The dispersion of small loans to businesses within moderate-income geographies significantly exceeds area demographics. A geographic analysis of low-income geographies is not applicable since none of the tracts has low-income designations.

***Lending Gap Analysis***

Our geographical distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any conspicuous lending gaps.

***Inside/Outside Ratio***

We performed an analysis of this ratio at the bank level. Refer to the Ratings section for details.

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

LMB's distribution of loans to borrowers of different income levels and to businesses of different sizes for the state of Missouri is adequate.

## ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in the state of Missouri section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and/or purchase of home mortgage loans.

The overall borrower distribution of home mortgage loans for the state of Missouri is adequate.

Refer to the Lending Activity section for a discussion about the weighting placed on the different loan products.

### Boone County AA

The distribution of home mortgage loans to borrowers of different income levels is poor.

The distribution of home refinance loans to borrowers of different income levels is poor. The bank's performance level of 4 percent for low-income borrowers is significantly lower than area demographics of 18 percent. The bank's market share for this category is lower than the overall market share. The bank's performance level of 14 percent for moderate-income borrowers is somewhat lower than area demographics of 19 percent. The bank's market share for this category is somewhat lower than the overall market share. The majority of the bank's refinance loans are to upper-income borrowers.

The distribution of home purchase loans to borrowers of different income levels is adequate. The bank's performance level of 4 percent for low-income borrowers is significantly lower than area demographics of 18 percent. Note that eight percent of families in the AA report income below the poverty level, making it difficult for borrowers at this income level to qualify for home purchase loans. LMB's market share for this category is significantly lower than the overall market share. However, the bank's performance level with moderate-income borrowers exceeds area demographics. The bank's market share for this category is near the overall market share. The majority of the bank's home purchase loans are to upper-income borrowers.

### Southern Missouri AA

The distribution of home mortgage loans to borrowers of different income levels is adequate.

The distribution of home refinance loans to borrowers of different income levels is adequate. The bank's performance level of 8 percent for low-income borrowers is significantly lower than area demographics of 26 percent. However, the bank's market share for this category exceeds the overall market share. The bank's performance level for moderate-income borrowers is near area demographics. LMB's market share for this category also exceeds the overall market share. The majority of the bank's refinance loans are to upper-income borrowers.

The distribution of home purchase loans to borrowers of different income levels is adequate. The bank's performance level of 14 percent for low-income borrowers is lower than area demographics of 26 percent. The bank's market share for this category is lower than the overall market share. However, the bank's performance level with moderate-income borrowers exceeds area demographics. LMB's market share for this category exceeds the overall market share. The majority of the bank's home purchase loans are to upper-income borrowers.

The distribution of home improvement loans to borrowers of different income levels is good. The bank's performance level for low-income borrowers is near area demographics. The bank's market share for this category is also near the overall market share. The bank's performance

level for moderate-income borrowers exceeds area demographics. LMB's market share for this category also exceeds the overall market share. The majority of the bank's home improvement loans are to upper-income borrowers.

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

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

The borrower distribution of small loans to businesses for the state of Missouri is good.

#### Boone County AA

The distribution of small loans to businesses of different revenue sizes in the Boone County AA is adequate. The percentage of bank loans to businesses with revenues of \$1 million or less of 54 percent is somewhat lower than area demographics of 67 percent. For informational purposes using loan size as a proxy, 69 percent of the bank's loans have loan origination amounts of \$100 thousand or less and 20 percent have loan origination amounts ranging from \$100 thousand to \$250 thousand. Market share information was not available during this examination.

#### Southern Missouri AA

The distribution of small loans to businesses of different sizes in the southern Missouri AA is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds area demographics. For informational purposes using loan size as a proxy, 92 percent of the bank's loans have loan origination amounts of \$100 thousand or less and 6 percent have loan origination amounts ranging from \$100 thousand to \$250 thousand. Market share information was not available during this examination.

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

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

The borrower distribution of small loans to farms for the state of Missouri is good.

#### Boone County AA

An analysis of small loans to farms is not applicable for this AA. Small loans to farms are not a primary credit need for this area.

#### Southern Missouri AA

The distribution of small loans to farms of different revenue sizes in the southern Missouri AA is good. The percentage of loans to farms with revenues of \$500 thousand or less is near area demographics. For informational purposes using loan size as a proxy, 89 percent of the bank's loans have loan origination amounts of \$100 thousand or less and 9 percent have loan origination amounts ranging from \$100 thousand to \$250 thousand. Market share information was not available during this examination.

## **Community Development Lending**

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

CD lending activities, while not considered complex or innovative, had a positive impact on the Missouri Lending Test.

### Boone County AA

The bank originated three CD loans totaling \$5.3 million in the Boone County AA. This includes a loan to revitalize and stabilize a low-income CT in Columbia, Missouri by renovating a building providing commercial office space.

### Southern Missouri AA

The bank originated three CD loans totaling \$5 million in the southern Missouri AA. This includes a loan to promote economic development by financing the raw material inventory for a light manufacturing company. This allowed the company to expand its operations into a second shift, thereby supporting employment for low- and moderate-income individuals.

## **Product Innovation and Flexibility**

LMB bank did not participate in any CRA-qualified innovative or flexible loan programs.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the state of Missouri is rated "Low Satisfactory."

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

Based on full-scope reviews, the bank's performance in the Boone County AA is adequate and in the southern Missouri AA is good.

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

### Boone County AA

CRA-qualified investments for this AA total \$1.3 million to 32 organizations, consisting primarily of a \$1.2 million investment in the Community Capital Fund. This national investment fund specializes in purchasing and identifying specific residential mortgage loans to low- and moderate-income borrowers that reside within the bank's AA. The fund is a source of capital support for affordable housing. The remaining balance represents donations to local organizations that provide social services for low- and moderate-income borrowers.

Southern Missouri AA

CRA-qualified investments for this AA total \$523 thousand to 18 organizations, consisting primarily of a \$500 thousand investment in the Community Capital Fund. This investment fund purchases and identifies specific residential mortgage loans to low- and moderate-income borrowers that reside within the bank's AA. The remaining balance represents donations to local organizations that provide social services for low- and moderate-income borrowers.

**SERVICE TEST**

LMB's performance under the Service Test in Missouri is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Boone County and southern Missouri AAs is good.

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

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

Boone County AA

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

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

Southern Missouri AA

LMB's service delivery systems are readily accessible to geographies and individuals of different income levels in the southern Missouri AA. The percentage of branches in moderate-income tracts exceeds the percentage of population residing in those tracts. There are no low-income tracts in this AA. Based on percentages, the number of ATMs in moderate-income tracts is significantly higher than the percentage of the population residing in those tracts. The percentage of ATMs in low-income tracts is somewhat less than the percentage of the population residing in those tracts. LMB opened one branch during the evaluation period in a moderate-income tract. There were no branch closings during this evaluation period.

**Retail Banking Services**

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

Other alternative delivery systems offered by the bank include:

- E-Banking: LMB offers e-banking services through its website. Customers may access their accounts through the bank's website, as well as open personal checking, savings, money market, home, and personal loans on-line. Bill pay is offered as a free service.
- Bank by Phone: Customers may bank by phone through LMB's In-Touch phone system. This system also allows Spanish speaking customers to bank by phone.
- Bank by Mail: All branches accept deposits from customers by mail.
- Mi Coneccion Card: This program targets the Hispanic community by offering a reloadable PIN-based card with ATM access as a lower-cost way of sending money to Mexico, Latin American, or Caribbean countries. Customers can get cash back when using the card at stores where PIN-based cards are accepted. It also doubles as a long-distance telephone calling card and is FDIC-insured up to applicable limits.

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

### **Community Development Services**

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

#### Boone County AA

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

LMB's staff provided their financial expertise to 19 different organizations that promote CD initiatives in the AA. The majority of the organizations provide community services to low- and moderate-income individuals. These services include programs for domestic abuse victims, financial literacy, food, revitalization and stabilization of the community, and affordable housing.

#### Southern Missouri AA

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

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

## STATE RATING

### STATE OF OKLAHOMA

**CRA Rating for Oklahoma:** Satisfactory

**The lending test is rated:** Low Satisfactory

**The investment test is rated:** Low Satisfactory

**The service test is rated:** High Satisfactory

The major factors supporting this rating include:

- LMB's overall lending performance for the state of Oklahoma is adequate.
- The level of qualified investments to meet CD needs is adequate.
- Retail delivery systems are readily accessible throughout the AAs and to individuals of different income levels.

### Description of LMB's Operations in Oklahoma

LMB has one AA in southern Oklahoma (non-MA Oklahoma AA) that includes seven counties: Bryan, Carter, Garvin, Johnston, Marshall, Murray, and Pontotoc. The bank operates 12 branches and eight stand-alone ATMs in the AA. LMB ranks second in deposit market share among 25 institutions in the AA, with 27 percent of the deposit market share. The bank's primary lending focus in the AA is residential real estate loans and loans to small businesses. Competitors in the AA include First United Bank and Trust Company, Bank First, First National Bank and Trust Company of Ardmore, and Vision Bank, N.A.

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

### Scope of Evaluation in Oklahoma

We performed a full-scope review of the non-MA Oklahoma AA. This AA received the next highest weight after the state of Missouri. The deposit volume in the AA is 27 percent, and the loan volume by number is 31 percent at the bank level. Home mortgage loans received the most weight under the Lending Test. These loans represent 61 percent by number and 64 percent by dollar volume of total reported loans in the non-MA Oklahoma AA. Small loans to businesses received the next highest weight at 23 percent by number and 20 percent by dollar volume of total reported loans in the AA. Small loans to farms received the least weight at 16 percent by number and 8 percent by dollar of total reported loans in the AA.

Community contacts identified small business development needs and improved affordable housing as significant community credit needs. One community contact was concerned about the perception that financial institutions turn down a high percentage of small business loan applicants that they could have approved with additional effort. The contact stated that if financial institutions helped small business loan applicants correct errors in their loan applications, it would expand the availability of credit for small business owners.

## LENDING TEST

The bank's performance under the Lending Test in Oklahoma is rated "Low Satisfactory."

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the non-MA Oklahoma AA is adequate.

### Lending Activity

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

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. LMB ranked second in the non-MA Oklahoma AA with a deposit market share of 11 percent. For home purchase loans, LMB ranked fourth out of 128 lenders at 5 percent by dollar and 6 percent by number. For home refinance loans, LMB ranked sixth out of 161 lenders at 3 percent by dollar and 4 percent by number. For home improvement loans, LMB ranked fifth out of 46 lenders at 11 percent by dollar and 9 percent by number. The bank does not have any market share data for small loans to businesses and small loans to farms.

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

The overall geographic distribution of loans in the state of Oklahoma is rated "Adequate".

#### *Home Mortgage Loans*

Refer to Tables 2, 3, 4, and 5 in the state of Oklahoma in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of home mortgage loans.

The geographic distribution of home mortgage loans in the non-MA Oklahoma AA is adequate.

Home refinance loans received the most weight in our analysis, followed by home purchase and home improvement loans. The loans represent 45 percent, 42 percent, and 13 percent, respectively, of the bank's total home mortgage lending by number in the AA.

The geographic distribution of home refinance loans is adequate. Loan penetration in moderate-income tracts at 6 percent is somewhat lower than area demographics of 8 percent. An analysis of low-income tracts is not applicable. None of the tracts have a low-income designation. The bank's market share in moderate-income tracts is lower than the overall market share.

The geographic distribution of home purchase loans is good. Loan penetration in moderate-income tracts of 7 percent is near area demographics of 8 percent. An analysis of low-income tracts is not applicable. None of the tracts have a low-income designation. The bank's market share in moderate-income tracts is lower than the overall market share.

The geographic distribution of home improvement loans is very poor. Loan penetration in moderate-income tracts at 4 percent is significantly lower than area demographics of 8 percent. A geographic analysis of the low-income geographies is not applicable since none are low-

income tracts. The bank's market share in moderate-income tracts is significantly lower than the overall market share.

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

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

The geographic distribution of small loans to businesses in the non-MA Oklahoma AA is excellent.

The geographic distribution of small loans to business in the non-MA Oklahoma AA is excellent. The dispersion of small loans to businesses within moderate-income geographies exceeds area demographics. A geographic analysis of low-income geographies is not applicable since none of the tracts has low-income designations.

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

Refer to Table 7 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of small loans to farms.

The geographic distribution of small loans to farms in the non-MA Oklahoma AA is adequate. The dispersion of small loans to farms at 3 percent within moderate-income geographies is somewhat lower than area demographics of 4 percent. A geographic analysis of the low-income geographies is not applicable since none are low-income tracts.

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

Our geographical distribution analysis included a review for any unexplained lending gaps, particularly in low-and moderate-income areas. We did not identify any conspicuous lending gaps.

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

We performed an analysis of this ratio at the bank level. Refer to the Ratings section for details.

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

The overall borrower distribution of loans in the state of Oklahoma is rated "Adequate."

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

Refer to Tables 8, 9 and 10 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and/or purchases of home mortgage loans. In addition, refer to the Distribution of Loans by Income Level of Geography section for the weighting placed on the different loan products.

The distribution of home refinance loans to borrowers of different income levels is adequate. The bank's performance level of 6 percent for low-income borrowers is significantly lower than area demographics of 21 percent. However, the bank's market share for this category exceeds

the overall market share. The bank's performance level of 13 percent for moderate-income borrowers is somewhat lower than area demographics of 19 percent. The bank's market share for this category also exceeds the overall market share. The majority of the bank's refinance loans are to upper-income borrowers.

The distribution of home purchase loans to borrowers of different income levels is adequate. The bank's performance level of 6 percent for low-income borrowers is significantly lower than area demographics of 21 percent. The bank's market share for this category is near the overall market share. The bank's performance level for moderate-income borrowers is near area demographics. The bank's market share for this category is somewhat lower than the overall market share.

The distribution of home improvement loans to borrowers of different income levels is good. The bank's performance level of 9 percent for low-income borrowers is significantly lower than area demographics of 21 percent. However, the bank's market share for this category exceeds the overall market share. The bank's performance level of 19.1 percent for moderate-income borrowers is slightly above area demographics of 18.7 percent. The bank's market share for this category also exceeds the overall market share.

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

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

The borrower distribution of small loans to businesses in the state of Oklahoma is excellent.

The distribution of small loans to businesses of different revenue sizes in the non-MA Oklahoma AA is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds area demographics. For informational purposes using loan size as a proxy, 83 percent of the bank's loans have loan origination amounts of \$100 thousand or less and 10 percent have loan origination amounts ranging from \$100 thousand to \$250 thousand. Market share information was not available during the examination.

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

Refer to Table 12 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of small loans to farms.

The borrower distribution of small loans to farms in the state of Oklahoma is good.

The distribution of small loans to farms of different revenue sizes in the non-MA Oklahoma AA is good. The percentage of loans to farms with revenues of \$500 thousand or less is near area demographics. For informational purposes using loan size as a proxy, 89 percent of the bank's loans have loan origination amounts of \$100 thousand or less and 8 percent have loan origination amounts ranging from \$100 thousand to \$250 thousand. Market share information was not available during this examination.

## **Community Development Lending**

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

The bank's CD lending activity is highly responsive to the credit needs in the non-MA Oklahoma AA. LMB made five CD loans totaling \$9 million during the review period in this AA. This includes a loan to promote economic development by supporting employment for low- and moderate-income individuals by financing an expansion of production facilities for a light manufacturing company. The bank also provided a letter of credit for another single-family affordable housing project that qualified for low-income housing tax credits.

## **Product Innovation and Flexibility**

LMB bank did not participate in any CRA-qualified innovative or flexible loan programs.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the state of Oklahoma is rated "Low Satisfactory".

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

Based on full-scope reviews, the bank's performance in the non-MA Oklahoma AA is adequate.

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

CRA-qualified investments for this AA total \$2.2 million to 33 organizations, consisting primarily of a \$1 million investment in the National Investment Capital Fund. The investment fund supports CD activities such as low-income housing, affordable healthcare, and job training within the AA. Investments also include two school district bonds. The bonds provided transportation for low- and moderate-income students, and funds to purchase technology equipment and to remodel/repair school buildings. The remaining balance represents donations to local organizations that provide social services for low- and moderate-income borrowers.

## **SERVICE TEST**

The bank's performance under the Service Test in Oklahoma is rated "High Satisfactory".

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

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

Based on a full-scope review, the bank's performance in the non-MA Oklahoma AA is good.

LMB's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the non-MA Oklahoma AA. The level of CD services provided by bank staff is relatively high.

### **Retail Banking Services**

The percentage of branches in moderate-income tracts is slightly lower than the percentage of the population residing in those tracts. LMB does not have any low-income tracts. However, five of its 12 branches are located next to moderate-income tracts, helping to provide reasonable access to residents in those areas.

The bank did not open or close any branches in this AA during the evaluation period. LMB opened a loan processing office in a middle-income tract. Two branches also offer bilingual services in Spanish. The percentage of ATMs in moderate-income tracts is slightly higher than the percentage of population residing in those tracts. Each branch has an ATM at each of the branch locations. There are seven additional stand-alone ATMs in the AA, with one in a moderate-income tract and the others in middle-income tracts.

There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. A majority of branches and several drive-up facilities offer extended hours on Friday and Saturday, and ATMs offer 24-hour service.

For additional information, refer to the state of Missouri Service Test comment section for a detailed summary of LMB alternative delivery systems.

### **Community Development Services**

LMB provided a relatively high level of CD services in the non-MA Oklahoma AA.

LMB's staff provided their financial expertise to 40 different organizations that promote CD initiatives in the AA. The majority of the organizations provide community services to low- and moderate-income individuals. These service programs include affordable housing, youth programs, small business financing, and revitalization and stabilization of the community in low- and moderate-income geographies.

## STATE RATING

### STATE OF TEXAS

**CRA Rating for Texas:** Satisfactory

**The lending test is rated:** Low Satisfactory

**The investment test is rated:** Low Satisfactory

**The service test is rated:** High Satisfactory

The major factors supporting this rating include:

- LMB's overall lending performance for the state of Texas is adequate.
- The level of qualified investments to meet CD needs is adequate.
- Retail delivery systems are reasonably accessible throughout the AAs and to individuals of different income levels.

### Description of LMB's Operations in Texas

LMB has two AAs in the state of Texas. The Sherman-Denison MA AA is comprised of Grayson County in north central Texas. The bank has nine branches in this AA. LMB ranked third for deposit market share among 14 FDIC-insured financial institutions in the AA with 13 percent of the deposits. The non-MA Texas AA is comprised of Cooke County in north central Texas. The bank has two branches in the non-MA Texas AA. LMB ranked fifth in deposit market share among eight institutions in the non-MA Texas AA. Major competitors in both AAs include American Bank of Texas, J.P. Morgan Chase Bank, N.A., and Woodforest National Bank. The bank's primary business focus in both AAs is home mortgage lending.

Management provided information indicating the recent recession had a significant impact on both the AAs in Texas. The AAs include a major food processing base that has been one of the first economic sectors to improve in the current economy. The housing markets in the AAs continue to struggle, although low housing prices provide opportunity for future growth.

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

### Scope of Evaluation in Texas

We performed a full-scope review of the Sherman-Denison MA AA and a limited-scope review of the non-MA Texas AA. The Sherman-Denison MA AA received the most weight in our overall rating for the state of Texas. Home mortgage loans received the most weight under the Lending Test. These loans represent 73 percent by number and 63 percent by dollar volume of total reported loans in the Sherman-Denison MA AA.

Small loans to businesses received the next highest weight at 24 percent by number and 29 percent by dollar volume of total reported loans in the AA. Small loans to farms received the least weight with 2 percent by number and 1 percent by dollar volume of total reported loans in the AA. Community contacts identified the need for workforce development and affordable housing. One community contact stated that financial institutions participate in CD activities but do not show significant leadership.

## LENDING TEST

LMB's performance under the Lending Test in Texas is rated "Low Satisfactory".

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

Based on full-scope reviews, the bank's performance in the Sherman-Denison MA AA is adequate.

#### **Lending Activity**

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

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. LMB ranked third in deposit market share in the Sherman-Denison MA AA with 15 percent of the deposits. For home purchase loans, LMB ranked twelfth out of 161 lenders at 2 percent by dollar and 2 percent by number. For home refinance loans, LMB ranked ninth out of 170 lenders at 2 percent by dollar and 3 percent by number. For home improvement loans, LMB ranked third out of 43 lenders at 8 percent by dollar and 9 percent by number. LMB did not have any market share data for small loans to businesses and farms.

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

The overall geographic distribution of loans for the state of Texas is adequate.

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

Refer to Tables 2, 3, 4, and 5 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of home mortgage loans.

LMB's overall geographic distribution of home mortgage loans for the state of Texas is adequate.

Home refinance loans received the most weight in our analysis, followed by home purchase and home improvement loans. The loans represent 46 percent, 39 percent, and 15 percent, respectively, of the bank's total home mortgage loans in the AA. We also gave primary rating weight to the bank's performance in moderate-income tracts, since an analysis of low-income tracts is not applicable. None of the tracts have a low-income designation.

The geographic distribution of home refinance loans is poor. Loan penetration in moderate-income tracts of 6 percent is significantly lower than area demographics of 14 percent. However, the bank's market share in moderate-income tracts exceeds the overall market share.

The geographic distribution of home purchase loans is excellent. Loan penetration in moderate-income tracts exceeds area demographics. The bank's market share in moderate-income tracts also exceeds the overall market share for this geography.

The geographic distribution of home improvement loans is excellent. Loan penetration in moderate-income tracts exceeds area demographics. The bank's market share in moderate-income tracts is significantly lower than the overall market share.

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

The geographic distribution of small loans to businesses in the state of Texas is excellent.

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

The geographic distribution of small loans to businesses in the Sherman-Denison MA AA is excellent. The dispersion of small loans to businesses within moderate-income geographies exceeds area demographics. A geographic analysis of the low-income geographies is not applicable since none are low-income tracts.

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

Refer to Table 7 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination and/or purchase of small loans to farms.

An analysis of small loans to farms is not applicable. Small loans to farms are not a primary credit need for this AA.

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

Our geographical distribution analysis included a review for lending gaps, particularly in low- and moderate-income areas. We did not identify any conspicuous lending gaps.

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

We performed an analysis of this ratio at the bank level. Refer to the Ratings section for details.

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

The overall borrower distribution of loans in the Sherman-Dennison MA AA is adequate.

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

Refer to Tables 8, 9 and 10 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and/or purchases of home mortgage loans. In addition, refer to the Distribution of Loans by Income Level of Geography section for the weighting placed on the different loan products.

The distribution of home mortgage loans to borrowers of different income levels is adequate.

The distribution of home refinance loans to borrowers of different income levels is adequate. The bank's performance level of 6 percent for low-income borrowers is significantly lower than area demographics of 19 percent. The bank's market share percent for this category is zero. The bank's performance level for moderate-income borrowers of 15 percent is near area demographics of 18 percent. The bank's market share for this category exceeds the overall market share.

The distribution of home purchase loans to borrowers of different income levels is very poor. The bank's performance level of 6 percent for low-income borrowers is significantly lower than area demographics of 19 percent. The bank's market share for this category is zero. The bank's performance level of 9 percent for moderate-income borrowers is significantly lower than area demographics of 18 percent. The bank's market share for this category is near the overall market share.

The distribution of home improvement loans to borrowers of different income levels is adequate. The bank's performance level of 3 percent for low-income borrowers is significantly lower than area demographics of 19 percent. The bank's market share for this category is zero. The bank's performance level of 17 percent for moderate-income borrowers is somewhat lower than area demographics of 18 percent. The bank's market share for this category exceeds the overall market share.

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

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

The borrower distribution of small loans to businesses in the Sherman-Denison MA AA is good.

The distribution of small loans to businesses of different revenue sizes in the Sherman-Denison MA AA is good. The percentage of loans to businesses with revenues of \$1 million or less is slightly below area demographics. For informational purposes using loan size as a proxy, 60 percent of the bank's loans have loan origination amounts of \$100 thousand or less and 25 percent have loan origination amounts ranging from \$100 thousand to \$250 thousand.

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

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

An analysis of small loans to farms is not applicable. Small loans to farms are not a primary credit need for this AA.

### **Community Development Lending**

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

CD lending for the Sherman-Denison MA AA is excellent. LMB's CD volume for this AA had a positive impact on the lending test. LMB made two loans totaling \$2.9 million during the review period in this AA. The loans resulted in the creation of 120 permanent full-time jobs for low- and moderate-income individuals.

### **Product Innovation and Flexibility**

LMB bank did not participate in any CRA-qualified innovative or flexible loan programs.

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

Refer to Tables 1 through 15 in the state of Texas section of Appendix D for the facts and data that support these conclusions.

Based on limited-scope reviews, the bank's performance under the Lending Test in the non-MA Texas AA is consistent with the bank's overall "Low Satisfactory" performance under the Lending Test in Texas.

## **INVESTMENT TEST**

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

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

The bank's performance under the Investment Test in the state of Texas is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Sherman-Denison MA AA is adequate. LMB participates in an investment fund that provides affordable housing for low-and moderate-income borrowers the AA. The total for this AA is \$402 thousand. In addition, CRA qualified donations originated during the review period for this AA total \$10 thousand.

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

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the non-MA Texas AA is consistent with the bank's overall "Low Satisfactory" performance under the Investment Test for the state of Texas. The bank's performance in the non-MA Texas AA is weaker than the bank's overall state performance.

Investments during the review period for this AA total \$123 thousand. Investments primarily consist of donations of \$25 thousand and one investment fund totaling \$98 thousand to provide affordable housing for low-and moderate-income borrowers in the AA.

## **SERVICE TEST**

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

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

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

Based on a full-scope review, the bank's performance in the Sherman-Denison MA AA is adequate.

LMB's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Sherman-Denison MA AA. The level of CD services provided by bank staff is adequate.

### **Retail Banking Services**

There are nine branches and ATMs in the AA, but none are located in moderate-income tracts. There are no low-income tracts in the MSA. Of the nine branches in the MSA, three of the branches are adjacent to moderate-income tracts. LMB opened three branches during the review period, two in middle-income tracts and one in an upper-income tract. No branches were closed during the same period. Each branch has a deposit-taking ATM attached, making the distribution of ATMs the same as the branches with one additional cash-only ATM in a middle-income tract.

There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours on Friday and Saturday and ATMs offer 24-hour service.

For additional information, refer to the state of Missouri Service Test section for a detailed summary of LMB's alternative delivery systems.

### **Community Development Services**

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

LMB staff provided their financial expertise to 10 organizations that promote CD initiatives in the AA. The organizations provide community services to low- and moderate-income individuals such as programs for youth, affordable housing, and revitalization.

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

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

Based on limited-scope reviews, the bank's performance under the Service Test in the non-MA Texas AA is inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test for the state of Texas. The bank's performance in the non-MA Texas AA is stronger than the bank's overall state performance.

## 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): 7/01/2009 to 12/31/2011 Investment and Service Tests and CD Loans: 10/20/2009 to 09/04/2012	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Landmark Bank, N.A. Columbia, Missouri	Residential Real Estate Loans, Commercial Loans, Agriculture Loans	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Missouri Boone County AA Southern Missouri AA	FS FS	Portion of Columbia MA #17860 Howell, Shannon, and Texas Counties
Oklahoma Non-MA Oklahoma AA	FS	Bryan, Carter, Garvin, Johnston, Marshall, Murray, and Pontotoc Counties
Texas Sherman-Denison MA AA #43300 Non-MA Texas AA	FS LS	Grayson County Cooke County

## Appendix B: Summary of State Ratings

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

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

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

### State of Missouri: Boone County AA

Demographic Information for Full-scope Area: Boone County AA					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	23	8.70	21.74	52.17	17.39
Population by Geography	105,085	4.04	19.67	55.46	20.83
Owner-occupied Housing by Geography	24,882	1.12	13.00	63.48	22.40
Business by Geography	11,743	8.98	17.55	51.98	21.49
Farms by Geography	669	0.75	8.22	81.32	9.72
Family Distribution by Income Level	25,459	18.19	19.12	23.70	38.98
Distribution of Low and Moderate Income Families throughout AA Geographies	9,499	5.12	23.26	57.85	13.78
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		50,099 65,100 15%		Median Housing Value  Unemployment Rate (June 2012 US Census)	99,834  4.8%

LMB defines its portion of the Columbia, Missouri MSA as all of Boone County. The Boone County AA is in the central part of the state and includes all of Boone County, Missouri.

The AA is a middle-income geography and includes two low-, five moderate-, 12 middle-, and four upper-income CTs.

The local economy has been somewhat stronger than the national economy. As of June 2012, the 5 percent unemployment rate for Boone County was lower than the state average of 7 percent and the national average of 8 percent. The University of Missouri is located in the AA and is the AA's largest employer.

LMB has 10 branch locations and six stand-alone ATMs in the AA. There are 35 banks with branches in the AA. LMB has the second largest deposit market share at 17 percent. Boone County National Bank of Columbia has the largest deposit market share at 34 percent.

**State of Missouri: Southern Missouri AA**

<b>Demographic Information for Full-scope Area: Southern Missouri AA</b>					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	13	0.00	38.46	61.54	0.00
Population by Geography	65,244	0.00	36.71	63.29	0.00
Owner-occupied Housing by Geography	19,546	0.00	34.83	65.17	0.00
Business by Geography	6,903	0.00	32.99	67.01	0.00
Farms by Geography	512	0.00	33.59	66.41	0.00
Family Distribution by Income Level	18,847	26.40	22.79	22.30	28.50
Distribution of Low and Moderate Income Families throughout AA Geographies	9,272	0.00	41.65	58.35	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		35,821 47,200 20%		Median Housing Value  Unemployment Rate (June 2012)	62,835  7.1%

This AA includes two counties, Texas and Howell, and one CT in southern Shannon County in rural south central Missouri.

The AA is a middle-income geography and includes four moderate- and nine middle-income CTs. All middle-income CTs have been identified as distressed due to poverty.

The poverty rate in this primarily rural AA is high, however, the population is stable, and many residents have lived in the AA all of their lives. There are a substantial number of community-based organizations providing community services, affordable housing, and small business development support. The challenge facing the AA is meeting future demands for affordable housing, small business development, and workforce development.

LMB has eight branches and five stand-alone ATMs in the AA. There are 15 banks with branches in the AA. LMB has the largest deposit market share at 24 percent. West Plains Bank and Trust has the second largest deposit market share at 22 percent.

Based on a community contact conducted in the AA, access to credit is adequate, and financial institutions support the development of affordable housing and small business development.

**State of Oklahoma: non-MA Oklahoma AA**

<b>Demographic Information for Full-scope Area: non-MA Oklahoma AA</b>					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	49	0.00	12.24	79.59	8.16
Population by Geography	180,828	0.00	10.93	75.45	13.62
Owner-occupied Housing by Geography	51,137	0.00	7.84	78.02	14.14
Business by Geography	20,383	0.00	10.20	70.98	18.81
Farms by Geography	1,057	0.00	4.16	84.67	11.16
Family Distribution by Income Level	50,324	20.75	18.67	21.67	38.90
Distribution of Low and Moderate Income Families throughout AA Geographies	19,841	0.00	13.17	77.49	9.33
Median Family Income HUD Adjusted Median Family Income for 2011		35,517 48,800	Median Housing Value		53,246
Households Below Poverty Level		18%	Unemployment Rate (June 2012)		6.8%

This AA includes seven counties in southern Oklahoma: Bryan, Carter, Garvin, Johnston, Marshall, Murray, and Pontotoc.

The AA is a middle-income geography and includes six moderate-, 39 middle-, and four upper-income CTs. Two of the middle-income CTs in Johnston County have been identified as distressed due to poverty,

Because of improvements in the agricultural economy and energy production, employment in the AA is improving. Light manufacturing and health care are also two of the AA's largest employment sectors.

LMB has 12 branches and seven stand-alone ATMs in the AA. There are 25 banks with branches in the AA. LMB has the second largest deposit market share at 12 percent. First United Bank and Trust Company has the largest deposit market share at 25 percent.

Community contacts identified small business development needs and improved affordable housing as significant community credit needs. One community contact was concerned about the perception that financial institutions turn down a high percentage of small business loan applications that they could have approved with additional effort.

**State of Texas: Sherman-Denison MA AA**

<b>Demographic Information for Full-scope Area: Sherman-Denison MA AA</b>					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts/BNAs)	26	0.00	26.92	65.38	7.69
Population by Geography	110,595	0.00	17.24	73.81	8.94
Owner-occupied Housing by Geography	30,228	0.00	13.89	75.65	10.46
Business by Geography	13,131	0.00	16.31	74.75	8.93
Farms by Geography	932	0.00	4.83	89.38	5.79
Family Distribution by Income Level	30,297	19.46	18.09	23.05	39.40
Distribution of Low and Moderate Income Families throughout AA Geographies	11,377	0.00	23.33	70.13	6.54
Median Family Income HUD Adjusted Median Family Income for 2011		45,043 59,000	Median Housing Value		68,675
Households Below Poverty Level		12%	Unemployment Rate (June 2012)		7.9%

This AA is comprised of Grayson County in north central Texas.

The AA is a middle-income geography and includes seven moderate-, 17 middle-, and two upper-income CTs.

The recent recession had a significant effect on the AA. The AA has a major food processing base that has been one of the first economic sectors to improve in the current economy. The housing market in the AA continues to struggle although low housing prices provide opportunity for future growth.

LMB has nine branches in the AA. There are 14 banks with branches in the AA. LMB has the third largest deposit market share at 14 percent. American Bank of Texas has the largest deposit market share at 35 percent.

Community contacts identified the need for workforce development as a primary unmet community need. Workforce limitations could be an impediment to the capacity of the AA to expand light manufacturing and food processing. One community contact stated that local financial institutions participate in CD activities but do not show significant leadership. Recommendations were for increased financial institution support of community housing development organizations and increased support of small business development corporations and other small business development programs.

## 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 MAs are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (2) Partially geo-coded loans (loans where no CT is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7; and (3) Partially geo-coded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12. Deposit data are compiled by the FDIC and are available as of June 30 of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. CD loans to statewide or regional entities or made outside the bank’s AA 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.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic

areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/AA.
- 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 AA. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

**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.

## State of Missouri

**Table 1. Lending Volume**

LENDING VOLUME		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
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 Scope Review:</b>												
Boone County AA	55.78	1,469	239,303	65	7,386	3	258	3	5,341	1,540	252,288	58.36
Southern MO AA	44.22	762	71,098	226	7,637	230	10,007	3	5,293	1,221	94,042	41.64

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

\*\* The evaluation period for Community Development Loans is from October 20, 2009 to September 4, 2012.

\*\*\* Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	351	64.52	1.12	0.57	13.00	13.11	63.48	59.26	22.40	27.07	4.87	0.00	5.52	4.58	5.45
Southern MO AA	193	35.48	0.00	0.00	34.83	38.86	65.17	61.14	0.00	0.00	20.94	0.00	28.79	17.67	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	10	21.27	1.12	10.00	13.00	40.00	63.48	50.00	22.40	0.00	1.83	25.00	7.14	0.95	0.00
Southern MO AA	37	78.72	0.00	0.00	34.83	48.65	65.17	51.35	0.00	0.00	53.45	0.00	80.00	39.47	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	1,107	67.67	1.12	0.90	13.00	7.95	63.48	58.36	22.40	32.79	9.50	16.67	8.15	9.09	10.93
Southern MO AA	529	32.33	0.00	0.00	34.83	40.08	65.17	59.92	0.00	0.00	23.37	0.00	34.54	19.28	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	1	25.00	17.04	0.00	38.44	100.00	16.15	0.00	28.36	0.00	4.35	0.00	20.00	0.00	0.00
Southern MO AA	3	75.00	0.00	0.00	54.59	0.00	45.41	100.00	0.00	0.00	50.00	0.00	0.00	50.00	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA		22.34	8.98	12.31	17.55	12.31	51.98	55.38	21.49	20.00	0.00	0.00	0.00	0.00	0.00
Southern MO AA	65 226	77.66	0.00	0.00	32.99	55.75	67.01	44.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	3	1.29	0.75	0.00	8.22	0.00	81.32	66.67	9.72	33.33	0.00	0.00	0.00	0.00	0.00
Southern MO AA	230	98.71	0.00	0.00	33.59	48.70	66.41	51.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	351	64.52	18.19	4.41	19.12	21.47	23.70	21.18	38.98	52.94	5.47	1.49	5.36	4.88	7.57
Southern MO AA	193	35.48	26.40	14.29	22.79	24.87	22.30	21.69	28.50	39.15	21.67	13.79	23.23	15.70	28.87

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: HOME IMPROVEMENT		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	10	21.28	18.19	12.50	19.12	0.00	23.70	50.00	38.98	37.50	1.29	5.00	0.00	0.00	1.52
Southern MO AA	37	78.72	26.40	22.86	22.79	28.57	22.30	14.29	28.50	34.29	51.79	50.00	55.56	50.00	50.00

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Boone County AA	1,107	67.67	18.19	3.61	19.12	13.88	23.70	22.66	38.98	59.85	10.77	6.63	9.09	9.92	12.18
Southern MO AA	529	32.33	26.40	8.37	22.79	19.77	22.30	24.71	28.50	47.15	27.42	40.91	31.20	23.18	25.95

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: LANDMARK BANK NA			Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Scope Review:</b>									
Boone County AA	65	22.34	66.68	53.85	69.23	20.00	10.77	0.00	0.00
Southern MO AA	226	77.66	70.62	88.50	91.59	6.19	2.21	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.69% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: LANDMARK BANK NA			Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Scope Review:</b>									
Boone County AA	3	1.29	98.80	100.00	66.67	33.33	0.00	0.00	0.00
Southern MO AA	230	98.71	99.80	97.39	88.70	8.70	2.61	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.86% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: LANDMARK BANK NA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Scope Review:</b>									
Boone County AA	0	0	32	1,280	32	1,280	70.99	0	0
Southern MO AA	0	0	18	523	18	523	29.01	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: LANDMARK BANK NA Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>																	
Boone County AA	58.00	10	100.00	20.00	20.00	20.00	40.00	0	0	0	0	0	0	4.04	19.67	55.46	20.83
Southern MO AA	42.00	8	100.00	0.00	37.50	62.50	0.00	1	0	0	1	0	0	0.00	36.71	63.29	0.00

## State of Oklahoma

**Table 1. Lending Volume**

LENDING VOLUME		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Scope Review:</b>												
nonMA OK AA	100.00	861	74,601	326	23,535	219	9,103	5	8,974	1,411	116,239	100.00

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

\*\* The evaluation period for Community Development Loans is from October 20, 2009 to September 4, 2012.

\*\*\* Deposit Data as of June 20, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	362	100.00	0.00	0.00	7.84	6.91	78.02	82.60	14.14	10.50	6.03	0.00	3.48	7.38	2.75

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	109	100.00	0.00	0.00	7.84	3.67	78.02	87.16	14.14	9.17	9.47	0.00	2.70	11.08	9.21

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	385	100.00	0.00	0.00	7.84	6.49	78.02	81.82	14.14	11.69	4.63	0.00	1.89	5.56	3.13

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	5	100.00	0.00	0.00	21.92	0.00	49.92	80.00	28.16	20.00	42.86	0.00	0.00	40.00	50.00

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: LANDMARK BANK NA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	326	100.00	0.00	0.00	10.20	13.80	70.98	76.69	18.81	9.51	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	219	100.00	0.00	0.00	4.16	3.20	84.67	93.61	11.16	3.20	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	362	100.00	20.75	5.85	18.67	16.37	21.67	20.47	38.90	57.31	6.05	5.95	3.98	6.24	6.88

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: HOME IMPROVEMENT		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	109	100.00	20.75	8.57	18.67	19.05	21.67	21.90	38.90	50.48	9.64	10.71	11.27	6.31	10.59

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
nonMA OK AA	385	100.00	20.75	6.42	18.67	13.41	21.67	19.83	38.90	60.34	4.93	9.68	6.31	3.60	4.86

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: LANDMARK BANK NA		Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Scope Review:</b>									
nonMA OK AA	326	100.00	63.63	76.69	82.52	10.43	7.06	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.69% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: LANDMARK BANK NA			Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Scope Review:</b>									
nonMA OK AA	219	100.00	98.86	97.26	88.58	8.22	3.20	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.86% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: LANDMARK BANK NA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Scope Review:</b>									
nonMA OK AA	0	0	33	2,244	33	2,244	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: LANDMARK BANK NA Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>																	
nonMA OK AA	100.00	11	100.00	0.00	8.33	83.34	8.33	0	0	0	0	0	0	0.00	10.93	75.45	13.62

## State of Texas

**Table 1. Lending Volume**

LENDING VOLUME		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Sherman-Denison MA AA	78.46	254	24,962	84	11,427	6	281	2	2,868	346	39,538	84.16
<b>Limited Review:</b>												
nonMA TX AA	21.54	54	5,057	30	2,477	9	884	0	0	95	8,418	15.84

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

\*\* The evaluation period for Community Development Loans is from October 20, 2009 to September 4, 2012.

\*\*\* Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Sherman-Denison MA AA	98	84.48	0.00	0.00	13.89	15.31	75.65	74.49	10.46	10.20	1.54	0.00	3.33	1.30	1.65
<b>Limited Review:</b>															
nonMA TX AA	18	15.52	0.00	0.00	10.27	11.11	41.39	27.78	48.33	61.11	1.42	0.00	3.57	0.60	1.77

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Sherman-Denison MA AA	38	70.37	0.00	0.00	13.89	18.42	75.65	78.95	10.46	2.63	7.74	0.00	15.79	7.69	0.00
<b>Limited Review:</b>															
nonMA TX AA	16	29.63	0.00	0.00	10.27	6.25	41.39	43.75	48.33	50.00	8.20	0.00	0.00	8.00	9.09

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Sherman-Denison MA AA	118	85.51	0.00	0.00	13.89	5.93	75.65	83.90	10.46	10.17	3.05	0.00	6.94	2.84	2.73
<b>Limited Review:</b>															
nonMA TX AA	20	14.49	0.00	0.00	10.27	10.00	41.39	50.00	48.33	40.00	1.41	0.00	14.29	2.08	0.80

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Sherman-Denison MA AA	0	0.00	0.00	0.00	14.38	0.00	83.30	0.00	2.32	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
nonMA TX AA	0	0.00	0.00	0.00	31.13	0.00	62.78	0.00	6.09	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES				Geography: LANDMARK BANK NA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Sherman-Denison MA AA	84	73.68	0.00	0.00	16.31	17.86	74.75	76.19	8.93	5.95	0.00	0.00	0.00	0.00	0.00
<b>Limited Scope Review:</b>															
nonMA TX AA	30	26.32	0.00	0.00	16.75	43.33	37.84	33.33	45.41	23.33	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Sherman-Denison MA AA	6	40.00	0.00	0.00	4.83	0.00	89.38	100.00	5.79	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Scope Review:</b>															
nonMA TX AA	9	60.00	0.00	0.00	3.41	0.00	30.65	0.00	65.94	100.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: LANDMARK BANK NA								Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Sherman-Denison MA AA	98	84.48	19.46	6.38	18.09	8.51	23.05	22.34	39.40	62.77	1.52	0.00	1.20	1.05	2.47
<b>Limited Scope Review:</b>															
nonMA TX AA	18	15.52	15.27	0.00	13.91	5.88	19.39	11.76	51.43	82.35	1.34	0.00	0.00	1.06	1.98

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchased by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: HOME IMPROVEMENT		Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Sherman-Denison MA AA	38	70.37	19.46	2.78	18.09	16.67	23.05	25.00	39.40	55.56	7.55	0.00	8.33	6.67	9.59
<b>Limited Scope Review:</b>															
nonMA TX AA	16	29.63	15.27	12.50	13.91	12.50	19.39	18.75	51.43	56.25	8.62	0.00	25.00	0.00	9.30

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: LANDMARK BANK NA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>															
Sherman-Denison MA AA	118	85.51	19.46	5.77	18.09	15.38	23.05	20.19	39.40	58.65	3.12	0.00	3.68	4.42	2.74
<b>Limited Scope Review:</b>															
nonMA TX AA	20	14.49	15.27	0.00	13.91	0.00	19.39	5.88	51.43	94.12	1.32	0.00	0.00	0.00	1.63

\* Based on 2010 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchased by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: LANDMARK BANK NA			Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Scope Review:</b>									
Sherman-Denison MA AA	84	73.68	68.68	59.52	59.52	25.00	15.48	0.00	0.00
<b>Limited Scope Review:</b>									
nonMA TX AA	30	26.32	70.79	70.00	80.00	13.33	6.67	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.69% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: LANDMARK BANK NA			Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Scope Review:</b>									
Sherman-Denison MA AA	6	40.00	99.14	50.00	100.00	0.00	0.00	0.00	0.00
<b>Limited Scope Review:</b>									
nonMA TX AA	9	60.00	99.38	100.00	66.67	22.22	11.11	0.00	0.00

\* Based on 2010 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.86% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: LANDMARK BANK NA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Scope Review:</b>									
Sherman-Denison MA AA	0	0	11	412	11	412	100.00	0	0
<b>Limited Scope Review:</b>									
nonMA TX AA	0	0	28	122	28	122	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: LANDMARK BANK NA Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Scope Review:</b>																	
Sherman-Denison MA AA	84.16	9	100.00	0.00	0.00	66.67	33.33	3	0	0	0	2	1	0.00	17.24	73.81	8.94
<b>Limited Scope Review:</b>																	
nonMA TX AA	15.84	2	100.00	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	15.47	42.99	41.54

