



## **PUBLIC DISCLOSURE**

June 5, 2017

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

Sunflower Bank, National Association  
Charter Number 4742

3025 Cortland Circle  
Salina, KS 67402-0000

Office of the Comptroller of the Currency

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Denver, CO 80023

**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.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>2</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>3</b>
<b>DESCRIPTION OF INSTITUTION.....</b>	<b>7</b>
<b>SCOPE OF THE EVALUATION .....</b>	<b>8</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....</b>	<b>9</b>
<b>STATE RATING .....</b>	<b>10</b>
<b>STATE OF KANSAS.....</b>	<b>10</b>
<b>STATE OF COLORADO.....</b>	<b>23</b>
<b>STATE OF MISSOURI.....</b>	<b>35</b>
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A1</b>
<b>APPENDIX B: SUMMARY OF MULTISTATE METROPOLITAN AREA AND STATE RATINGS .....</b>	<b>B1</b>
<b>APPENDIX C: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>C1</b>
<b>APPENDIX D: TABLES OF PERFORMANCE DATA .....</b>	<b>D1</b>

# Overall CRA Rating

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

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

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

\* The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- An overall adequate lending test performance. The geographic distribution and borrower distribution levels are adequate. CD lending is adequate, but considered good in the state of Colorado.
- An overall adequate level of CD investment and donation test performance.
- An overall adequate level of CD service test performance. Sunflower Bank’s service delivery systems are readily accessible to low- and moderate-income geographies and individuals.
- The bank made a substantial majority of loans within the bank’s AA.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is

further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

Sunflower Bank, National Association (Sunflower) is a \$1.9 billion interstate financial institution headquartered in Salina, Kansas during the evaluation period. The headquarters was recently relocated to Denver, Colorado. Sunflower is a wholly owned subsidiary of Sunflower Financial, Inc., a \$1.9 billion one-bank holding company headquartered in Salina, Kansas.

Sunflower is a full-service banking institution offering a wide variety of retail and commercial banking services. The primary lending focus is commercial real estate and home mortgage lending. As of December 31, 2016, Sunflower's loan portfolio by dollar volume consisted of \$615 million commercial real estate, \$502 million residential real estate, \$220 million of commercial, \$33 million agriculture, \$21 million consumer, and \$69 million of miscellaneous loans. Net loans represent 77 percent of total assets. Net Tier One Capital is \$159 million.

Sunflower operates 39 branches throughout 17 assessment areas (AAs) in the states of Kansas, Colorado, and Missouri. The AAs consist of four metropolitan areas in Kansas (Wichita, Manhattan, Lawrence, and Topeka) and three metropolitan areas in Colorado (Pueblo, Denver-Aurora-Lakewood, and Boulder). In addition, Sunflower has non-metropolitan AAs: seven in Kansas, two in Colorado, and one in Missouri. The bank operates 34 ATMs in Kansas, 10 ATMs in Colorado, and 2 in Missouri, which includes eight deposit taking ATMs in the three states.

During the evaluation period, Sunflower opened three new branches in Kansas and one in Colorado. The bank opened one in Lawrence (2016), Overland Park (2015), and Leawood (2015), Kansas. The new branch in Colorado is in Boulder (2015). One branch in Overland Park, Kansas was closed in April of 2017 and consolidated with the new branch at 7400 W 135<sup>th</sup> Street, Overland Park, Kansas. In addition, the bank moved the Denver Tech Center location (7400 E Orchard Road) to its current location at 5299 DTC Boulevard.

Other financial institutions provide strong competition throughout the institution's AAs. Sunflower's lending markets remain very competitive. In the Kansas non-MA AA, Sunflower is one of 52 lenders and has 14.4 percent market share. Leading competitors include The Bennington State Bank and Farmers Bank and Trust. In the Wichita, Kansas AA, the bank is one of 41 lenders and has 0.7 percent market share. Leading competitors include the Bank of America, Intrust Bank, and Fidelity Bank. In the Denver, Colorado AA, the bank is one of 70 lenders with a market share of 0.03 percent. Leading competitors include Wells Fargo, US Bank, FirstBank, and JP Morgan Chase. For the Pueblo, Colorado AA, the bank is one of 14 lenders with 5.4 percent market share. Leading competitors include Wells Fargo, US Bank, Zions Bank, and Pueblo Bank and Trust. For the Missouri AA, the bank is one of eight lenders with 1.5 percent market share. Leading competitors include Central Bank of Warrensburg, F & C Bank, Equity Bank, and UMB Bank. The other AAs have fewer deposits in Kansas or Colorado with market shares ranging from 0.03 percent to 8.2 percent.

There are no legal, financial, or other factors that impede Sunflower's ability to help meet credit needs in its AA. Sunflower received a "Satisfactory" rating at its last CRA examination dated March 31, 2014.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, excluding community development (CD) loans is January 1, 2013 to December 31, 2016. Our analysis included residential real estate loans, small loans to farmers, and small loans to businesses. Our analysis did not include multi-family home mortgage loans, as the number of reported loans for this product type is insufficient for meaningful analysis in all AAs.

For CD Loans, the Investment Test, and Service Test, the evaluation period is from March 31, 2014 through June 4, 2017. The Investment Test included a review of investments and donations originated in Sunflower's AAs that meet the definitions of CD investments. The Service Test included a review of retail and CD services provided in Sunflower's AAs that meet the definition of CD Services.

### Data Integrity

We verified the accuracy of 2013-2016 Home Mortgage Disclosure Act (HMDA) reportable loans and small loans to businesses and farms. The HMDA LAR and CRA data was found to be accurate and reliable. We evaluated CD loan, investment, and service information to determine eligibility and accuracy during this CRA evaluation. We discussed any CD loans, investments, or services that did not qualify for CD consideration with the bank during the evaluation.

### Selection of Areas for Full-Scope Review

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

### Ratings

Sunflower's overall rating is a blend of the state ratings. CRA performance in the state of Kansas received the most weight. This area constitutes 75 percent of Sunflower's total deposit base and 68 percent of total reported loans (by number) during the evaluation period. The state of Colorado received the next highest weighting followed by the state of Missouri. The state of Colorado constitutes 24 percent of total deposits and 31 percent of total reported loans (by number). The state of Missouri represents one percent of total deposits and one percent of reported loans (by number).

The multistate metropolitan area rating(s) and state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

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

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

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

## State Rating

### State of Kansas

#### CRA Rating for Kansas<sup>1</sup>: Satisfactory

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

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

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

The major factors that support this rating include:

- Lending test performance in the non-MA KS AA and Wichita AA are adequate. The overall geographic distribution of loans and distribution of loans by income level of the borrower are adequate. Lending activity is excellent in the Non-MA KS AA and adequate in the Wichita AA.
- The bank made a substantial majority of loans within the bank's AA.
- Investment test performance is adequate in the Kansas Non-MA AA and good in the Wichita AA.
- Service test performance is good in the Kansas Non-MA AA and adequate in the Wichita AA. Performance in the limited scope AAs had a negative impact on the overall rating.

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

## Description of Institution's Operations in Kansas

Sunflower operates 28 branches and 34 ATMs within its AAs in the state of Kansas. Residential real estate, small loans to businesses, and small loans to farms in the non-MA AA and residential real estate and small loans to businesses in the Wichita MA are the primary business focus, which received full-scope reviews. The state of Kansas represents 75 percent of Sunflower's total deposit base and 68 percent of total reported loans (by number) during the evaluation period. In addition, 53 percent of the dollar volume of total reported loans is in the Kansas AAs.

Non-MA AAs in Kansas were combined for analysis purposes and represents the entire counties of Saline, McPherson, Ellis, Russell, Osborne, Barton, Ford, Thomas, Seward, and Johnson. Sunflower AAs also consist of the entire Lawrence MSA (Douglas County), Shawnee county in the Topeka MSA, and Sedgwick county in the Wichita MSA. The Manhattan MSA AA includes Riley, Geary, and Pottawattamie Counties for 2013, but excludes Geary for 2014 through 2016. Geary County was a separate AA for 2014 through 2016.

The Kansas non-MA AA represents 75 percent of total deposits in the state of Kansas and 56.5 percent of total bank deposits. Sunflower ranks first in deposit market share in the non-MSA AA at 14.36 percent. The AA also has 70 percent of loan originations (by number) in the state of Kansas. Sunflower operates 17 branches and 24 ATMs in the AA. Competition is provided by 52 institutions. Primary competitors include Farmers Bank and Trust, Commerce Bank, Landmark National Bank, First Kansas Bank, Fidelity State Bank and Trust, and Bank of Hays.

The Wichita AA represents 8 percent of total deposits in the state of Kansas and 6 percent of total bank deposits. Sunflower ranks 16<sup>th</sup> in deposit market share in the AA at 0.69 percent. The MSA also has 13 percent of the loan originations (by number) in the state of Kansas. Sunflower operates three branches and two ATMs in the AA. Competition is provided by 41 institutions. Primary competitors include Cross First Holdings, Andover Financial, Equishare Credit Union, and Capital Federal.

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

## Scope of Evaluation in Kansas

We evaluated performance in the state of Kansas by performing a full-scope review in the non-MA KS AAs, which were combined for analysis purposes, and the Wichita AA. The non-MA KS AA and Wichita AA received full-scope reviews since they had the majority of deposits and loans in Kansas. We performed limited-scope reviews in the Geary, Johnson, Lawrence, Manhattan, and Topeka AAs. The state rating is based primarily on results of those areas that received full-scope reviews. Refer to Appendix A for more information.

Home mortgage loans received the most weight under the Lending Test since it is a primary business focus in the state of Kansas and has a majority of lending volume. These loans represent 58 percent by number and 57 percent by dollar volume of total reported loans in the

state of Kansas. Small business lending received the next highest weight at 30 percent by number and 35 percent by dollar volume of total reported loans in the state. Small farm lending received the least weight at 12 percent by number and 9 percent by dollar volume of total reported loans in the state. Multifamily lending is not a primary product for the bank; therefore, we did not perform an analysis of that type of lending.

In our analysis of home mortgage lending, home purchase loans received the most weight since they represent 49 percent of Sunflower's total home mortgage lending by number. The next highest weight was placed on home refinance loans, followed by home improvement loans, which are 28 percent and 22 percent of total home mortgage lending by number, respectively.

#### Non-MA KS AA

Home mortgage loans received the most weight under the Lending Test as it is the primary business focus in the AA and represents the majority of lending volume. These loans represent 58 percent by number and 57 percent by dollar volume of total reported loans in the state of Kansas. Small business lending received the next highest weight at 25 percent by number and 27 percent by dollar volume of total reported loans in the state. Small farm lending received the least weight at 17 percent by number and 15 percent by dollar volume of total reported loans in the state.

In our analysis of home mortgage lending, home purchase loans received the most weight since they represent 45 percent of Sunflower's total home mortgage lending by number. The next highest weight was placed on home refinance loans, followed by home improvement loans, which are 30 percent and 25 percent of total home mortgage lending by number, respectively.

To identify community credit needs, we considered a recent community contact conducted by another regulatory agency with a local government organization. The contact identified small business development loans, start-up business opportunities, mortgage lending, and home improvement loans as the primary banking needs.

#### Wichita AA

Small business lending received the most weight under the Lending Test since it is the primary business focus in the Wichita AA and represents the majority of lending volume. These loans represent 51 percent by number and 50 percent by dollar volume of total reported loans in the Wichita AA. Home mortgage lending received the next highest weight with 49 percent by number and 50 percent by dollar volume of total reported loans in the AA. Sunflower did not make any multifamily or small farm loans in the Wichita AA so analysis of these lending types was not meaningful.

In our analysis of home mortgage lending, home purchase loans received the most weight since they represent 66 percent of Sunflower's total home mortgage lending by number. The next highest weight was placed on home refinance loans at 20 percent, followed by home improvement loans at 14 percent of total home mortgage lending by number.

To identify community credit needs, we considered one community contact conducted by OCC staff in 2016 with a local consumer and civil rights organization. The contact communicated

that the economy is considered stagnant, and as a result, there is a need for reasonable small dollar loans to compete with payday lenders. The contact stated that unemployment is high in LMI neighborhoods and wages are not sufficient to maintain a living. It was stated that there is a need for volunteers for committees and grant dollars.

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

### **LENDING TEST**

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

Sunflower's performance under the lending test in Kansas is rated "Low Satisfactory". Based on full-scope reviews, Sunflower's performance in the Kansas non-MA AA and the Wichita AA are adequate.

#### **Lending Activity**

Refer to Table 1 Lending Volume in the state of Kansas section of appendix D for the facts and data used to evaluate Sunflower's lending activity. For purposes of this review, we used deposit information as of June 30, 2016. We did not perform an analysis of multifamily lending since this is not a primary product of the bank.

Based on full-scope reviews, Sunflower's performance in the State of Kansas is adequate.

#### *Non-MA KS AA*

Sunflower's lending activity in the non-MA KS AA is excellent. As of June 30, 2016, Sunflower ranks first in deposit market share at 14.36 percent among 52 depository institutions.

Based on 2016 peer data, Sunflower ranks third (by number) for home purchase loans at 4.83 percent out of 141 lenders. They rank first (by number) for home improvement loans at 39.75 percent out of 45 lenders in the AA; and the bank ranks second (by number) out of 132 lenders for home refinance loans at 6.14 percent. Competition is strong for home purchase and home refinance loans with 141 and 132 lenders in the AA, respectively.

For small loans to businesses, Sunflower ranks 13<sup>th</sup> (by number) at 2.61 percent. Sunflower ranks in the top 25 percent of lenders in the market. The top five lenders are nationwide credit card companies with a combined market share of 53 percent.

For small loans to farms, Sunflower ranks fourth (by number) at 8.82 percent. Sunflower ranks in the top 20 percent of lenders in the market. The top lenders in the market are midsize banks with a combined market share of 67 percent.

#### *Wichita AA*

Sunflower's lending activity in the Wichita AA is adequate. As of June 30, 2016, Sunflower ranks 16<sup>th</sup> in deposit market share at 0.69 percent among 41 depository institutions.

Based on 2016 peer data, Sunflower ranks 82nd (by number) for home purchase loans at 0.13 percent out of 219 lenders. They rank 32nd (by number) for home improvement loans at 0.44 percent out of 83 lenders in the AA; and the bank ranks 116th (by number) out of 219 lenders for home refinance loans at 0.08 percent. Competition is strong for home purchase and home refinance loans with 219 lenders in the AA for both loan products.

For small loans to businesses, Sunflower ranks in the top third of the market in 25<sup>th</sup> place with 0.39 percent of the lending market. The top five lenders are three nationwide credit card companies and two larger financial institutions headquartered in the Wichita market with a combined market share of 56 percent.

For small loans to farms, Sunflower is not ranked among top lenders in the AA. The top lenders in the market are midsize banks with a combined market share of 67 percent.

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

The overall geographic distribution of loans is adequate.

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

Refer to Tables 2, 3, 4, and 5 in the state of Kansas section of appendix D for the facts and data used to evaluate the geographic distribution of Sunflower's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is adequate.

#### **Non-MA KS AA**

The overall geographic distribution of home mortgage loans in the non-MA KS AA is adequate. There are no low-income census tracts in the non-MA KS AA.

The overall geographic distribution of home purchase loans is adequate. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies and is poor. Sunflower's market share in these geographies is excellent and exceeds the overall market share.

The overall geographic distribution of home improvement loans is good. The percentage of loans in moderate-income geographies is good and slightly exceeds the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is below the overall market share, but is still considered adequate.

The overall geographic distribution of home refinance loans is poor. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is below the overall market share, but is still considered adequate.

Wichita AA

The overall geographic distribution of home mortgage loans in the Wichita AA is poor.

The overall geographic distribution of home purchase loans is poor. The percentage of loans in low-income and moderate-income geographies was poor and significantly below the percentage of owner-occupied units in the AA. Sunflower's has no market share in low-income geographies, thus an analysis is not meaningful. The market share in moderate-income geographies is good and near the overall market share.

The overall geographic distribution of home improvement loans is poor. The percentage of loans in low-income geographies is significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in the AAs. Sunflower has no market share in the Wichita AA for LMI geographies, so an analysis is not meaningful.

The overall geographic distribution of home refinance loans is very poor. The percentage of loans in low-income and moderate-income geographies is significantly below the percentage of owner-occupied units in these geographies. Sunflower's overall market share is less than one percent; therefore, an analysis is not meaningful.

***Small Loans to Businesses***

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

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

Non-MA KS AA

Sunflower's geographic distribution of small loans to businesses in non-MA KS AA is excellent. There are no low-income CTs in the non-MA KS AA. The percentage of loans in moderate-income geographies exceeds the percentage of businesses in these areas. Sunflower's market share in these geographies is excellent and also exceeds the overall market share.

Wichita AA

Sunflower's geographic distribution of small loans to businesses in Wichita AA is excellent. The percentage of loans in low-income geographies significantly exceeds the percentage of businesses in these geographies. The percentage of moderate-income geographies is near to the percentage of businesses in these areas. Sunflower's market share in these geographies also exceeds the overall market share and is excellent.

***Small Loans to Farms***

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

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

#### Non-MA KS AA

Sunflower's geographic distribution of small loans to farms in non-MA KS AA is poor. There are no low-income CTs in the non-MA KS AA. The percentage of loans in moderate-income geographies is significantly below the percentage of farms in these areas. Sunflower has no market share in these geographies, thus an analysis would not be meaningful. There are 56 farms located in moderate-income geographies and with the market competition, finding loans to originate is difficult.

#### Wichita AA

A geographic analysis in the Wichita AA is not meaningful. Sunflower made no small farm loans during the review period. It is not a primary product in the AA.

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

We reviewed summary reports to analyze Sunflower's home mortgage, small business, and small farm lending activity over the evaluation period to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. Sunflower's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- and moderate-income areas.

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

For the evaluation period, Sunflower made a substantial majority of all loan products inside its AAs (73.69 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home purchase (69.13 percent), home improvement (83.33 percent), home refinance (62.98 percent), small loans to businesses (83.66 percent), and small loans to farms (69.25 percent). This ratio is a bank-wide calculation and is not calculated by individual AAs. Analysis is limited to bank originations and purchases and does not include any affiliate data.

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

The overall borrower distribution of Sunflower's lending is adequate.

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

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

The overall borrower distribution of home mortgage loans is good.

Non-MA KS AA

The overall borrower distribution of home mortgage loans in the non-MA KS AA is good. The percentage of households below poverty level is 13 percent based on 2010 census data. This information is considered in the analysis.

The overall borrower distribution of home purchase loans is excellent. The percentage of loans to low-income borrowers is poor and significantly below demographics. However, the percentage of loans to moderate-income borrowers is excellent and exceeds demographics. The market share of loans to low-income borrowers is also excellent and exceeds the overall market share. While the market share of loans to moderate-income borrowers is below the overall market share, it is considered adequate.

The overall borrower distribution of home improvement loans is excellent. Sunflower's percentage of loans to low-income borrowers is poor and significantly below demographics. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics. The market share of loans to low- and moderate-income borrowers is excellent and exceeds the overall market share.

The overall borrower distribution of home refinance loans is adequate. The percentage of loans to low-income borrowers is poor and significantly below demographics. The percentage of loans to moderate-income borrowers is good and near demographics. The market share of loans to low-income borrowers is excellent and exceeds overall market share. The market share of loans to moderate-income borrowers is good and slightly below the overall market share.

Wichita AA

The overall borrower distribution of home mortgage loans in the Wichita AA is adequate. The percentage of households below poverty level is 13 percent based on 2010 census data. This information is considered in the analysis.

The overall borrower distribution of home purchase loans is adequate. The percentage of loans to low-income borrowers is significantly below demographics, but it is adequate considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics. Market share analysis is not meaningful since overall market share represents less than 1 percent.

The overall borrower distribution of home improvement loans is poor. Sunflower's percentage of loans to low- and moderate-income borrowers is poor and below demographics. An analysis of market share is not meaningful since the overall market share is less than 1 percent.

The overall borrower distribution of home refinance loans is poor. The percentage of loans to low-income borrowers is poor and significantly below demographics. The percentage of loans to moderate-income borrowers is adequate, but below demographics. An analysis of market share is not meaningful considering the overall market share is less than 1 percent.

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

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

The overall borrower distribution of small loans to businesses is adequate.

#### *Non-MA KS AA*

Sunflower's overall distribution of small loans to businesses is adequate. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is poor and significantly below demographics. However, Sunflower made 87 percent of business loans to borrowers regardless of business size in the amount of \$250 thousand or less. The market share of these loans is excellent and exceeds the overall market share.

#### *Wichita AA*

Sunflower's overall distribution of small loans to businesses is adequate. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is poor and significantly below demographics. Sunflower made 76 percent of loans to borrowers regardless of business size in amounts of \$250 thousand or less. The market share of these loans is excellent and exceeds the overall market share.

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

Refer to Table 12 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of Sunflower's origination and purchase of small loans to farms.

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

#### *Non-MA KS AA*

Sunflower's borrower distribution of small loans to farms in non-MA KS AA is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less is good and near to demographics. The market share of these loans is excellent and significantly exceeds the overall market share.

#### *Wichita AA*

In the Wichita AA, small loans to farms is not a primary product. Therefore, an analysis is not meaningful.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Kansas section of appendix D for the facts and data used to evaluate Sunflower's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

CD lending had a neutral impact on lending performance in the state of Kansas. Sunflower did not originate any CD loans in the non-MA KS or Wichita AA during the evaluation period.

### **Product Innovation and Flexibility**

Sunflower offers a traditional mix of lending products in the state of Kansas. We did not consider any bank products or services innovative. Impact on the Lending Test rating is neutral.

Sunflower offers flexible mortgage loan programs that assist borrowers by providing loans up to 100 percent of the value of a home, reduced closing costs, and fixed rates. Sunflower also offers programs to assist beginning farmers by offering lower rates and down payment assistance. Impact on the Lending Test is neutral.

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

Based on limited-scope reviews, Sunflower's performance under the lending test in the Johnson, Lawrence, and Manhattan AAs is stronger than Sunflower's overall "Low Satisfactory" performance under the lending test in Kansas. In the Geary and Topeka AAs, performance is not inconsistent with Sunflower's overall performance in the state. In the Geary and Topeka AAs, the overall borrower distribution of loans is poor. Performance in limited-scope AAs does not impact the overall conclusions.

Refer to the Tables 1-13 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **State of Kansas**

Sunflower Bank's performance under the Investment Test in the state of Kansas is rated "Low Satisfactory". The bank provided an adequate level of investment in the Kansas Non-MA AA, and the level of investments in the Wichita AA is good. However, the bank's performance in the majority of the limited-scope AAs is very poor.

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

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

#### *Kansas Non-MA AA*

The bank provided an adequate level of qualified CD investments in the Kansas Non-MA AA. During the review period, the bank provided 53 investments and donations totaling \$1.2 million. This represents 1.39 percent of allocated tier one capital. The investments are responsive to a need for services to LMI individuals. One major donation to a college represents 80 percent of the total dollar volume of investments. The donation provides a campus-wide technology infrastructure upgrades to facilitate information and instruction to

students in rural areas, and provides online courses for students. The college serves a student population that is greater than 50 percent LMI individuals. None of the investments is innovative or complex. This area is primarily rural in nature, and as a result, investment opportunities are somewhat limited.

#### Wichita AA

Sunflower Bank provided a good level of qualified CD investments in the Wichita AA. During the review period, the bank provided 22 investments and donations totaling \$471 thousand. This represents 4.94 percent of allocated tier one capital. The majority of the investments (65 percent) provided affordable housing, which is responsive to a significant need in the AA. Another large investment revitalized a low-income area. The remaining seven percent provided CD services to LMI individuals. Although the investments are responsive to CD needs in the AA, none of the investments is considered innovative or complex.

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

The bank's performance in areas that received limited-scope reviews is weaker than the bank's overall "Low Satisfactory" performance under the Investment Test in Kansas. In the Johnson County AA, performance is stronger. However, performance is very poor in the Lawrence, Topeka, Geary, and the Manhattan AAs as the bank made very limited qualified investments or donations in these AAs. The bank did not make any qualified investments or donations in the Geary AA. The combined full and limited-scope AAs with the poor performance represent 17 percent of total deposits and 12 percent of tier one capital in the state.

Performance in limited-scope AAs did not impact the overall conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Kansas is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Kansas Non-MA AA is good and performance in the Wichita AA is adequate. The limited-scope AAs had weaker performance, and had a negative impact on the overall service test rating. Numerous opportunities exist in the limited-scope MAs to provide CD services.

### **Retail Banking Services**

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

#### Kansas Non-MA AA

Sunflower's delivery systems are readily accessible to geographies and individuals of different income levels in the Non-MA AA. There are no low-income geographies in this AA. Sunflower operates 17 branches and 24 ATMs within the AA. Three branches and seven ATMs are located in moderate-income geographies.

Wichita AA

Sunflower's delivery systems in the Wichita AA are also readily accessible to geographies and individuals of different income levels in the Wichita AA. Sunflower operates three branches and two ATMs within the AA. All the branches and ATMs are located in a moderate-income CT.

For these two AAs, Sunflower did not open or close any branches during the evaluation period. There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours during the week days and Saturdays and ATMs offer 24-hour service.

Sunflower provides other alternative delivery services such as online banking, telephone banking, mobile banking, remote deposit capture, and consumer mobile remote deposit. The bank has begun to track the activity of some alternate delivery systems based on the location at which the account is opened. However, the information provided did not specify the impact on or use of these alternate delivery systems for LMI individuals. Therefore, these services did not impact the service test rating for the Kansas non-MA AA.

**Community Development Services**Kansas Non-MA AA

Sunflower provided a good level of community development services in the Kansas non-MA AA. Seventeen Sunflower staff provided 2,627 hours of financial expertise to various organizations that promote community development initiatives in the AA. Most of the organizations provided services to small businesses. Following are some examples of CD services provided:

- Family Crisis Center of Great Bend – provides financial expertise to the organization by serving as a board member and treasurer. This organization provides domestic violence victims assistance with shelter, advocacy, and supportive counseling services.
- Kansas Children Service League – provides financial education classes to low and moderate-income individuals.

Wichita AA

Sunflower provided an adequate level of community development services in the Wichita AA. Three Sunflower employees provided 214 hours of financial expertise to various organizations that promote community development initiatives in the AA. Some examples of those CD services included:

- Wichita Children's Home – provides financial expertise as chairman of a committee of the board. The organization provides shelter for abused and neglected children, along with counseling services in the AA.
- Boys and Girls Club of South Central Kansas – provides financial expertise as a board member of the youth program. This organization targets primarily children from low- and moderate-income families and individuals.

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

Based on limited-scope reviews, the bank's performance under the service test in the Geary, Johnson, Lawrence, Manhattan, and Topeka AAs is weaker than the bank's overall "Low Satisfactory" performance in the state. Lawrence and Topeka AAs provided one service each with a total of 93 hours. Geary, Johnson, and Manhattan AAs provided no services during the review period. CD Services in limited-scope AAs had a negative impact on the overall state CD services rating.

## State Rating

### State of Colorado

#### **CRA Rating for Colorado<sup>2</sup>: Satisfactory**

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

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

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

The major factors that support this rating include:

- Lending activity in the State of Colorado is adequate. In both the Pueblo and Denver AAs, the geographic distribution of loans is good. The borrower distribution of loans is adequate in the Pueblo and Denver AAs. The level of community development lending in the Pueblo and Denver AAs is excellent and had a significant positive impact on Sunflower's lending testing rating.
- The bank made a substantial majority of loans within the bank's AA.
- Investment test performance is good. The level of CD investments in the Pueblo AA was adequate and excellent in the Denver AA.
- CD services test performance is adequate. Performance in the Pueblo AA was adequate but poor in the Denver AA.

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

## Description of Institution's Operations in Colorado

Sunflower operates 10 branches and 10 ATMs within its AAs in the state of Colorado. Residential real estate and small loans to businesses are the primary business focus for the Denver and Pueblo AAs, which received full-scope reviews. The state of Colorado represents 24 percent of Sunflower's total deposit base and 31 percent of total reported loans (by number) during the evaluation period. In addition, 47 percent of the dollar volume of total reported loans is in the Colorado AAs.

The Pueblo AA represents the entire MSA, which is the county of Pueblo. The Pueblo AA represents 27 percent of total deposits in the state of Colorado and 6 percent of Sunflower's total deposit base. The Pueblo AA has 39 percent of loan volume (by number) and 23 percent by dollar volume in the State of Colorado. Sunflower ranks sixth in the deposit market with a 5.4 percent market share. The bank operates three branches and three ATMs in the AA. Primary competitors include ENT Credit Union, Security Services Federal Credit Union, SunWest Educational Credit Union, and Minnequa Works Credit Union.

The Denver AA represents the entire MSA and includes the counties of Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson. The Denver AA represents 7 percent of total deposits in the state of Colorado and 2 percent of Sunflower's total deposit base. The Denver AA has 28 percent of loan volume (by number) and 49 percent by dollar volume in the State of Colorado. Sunflower ranks 54<sup>th</sup> in the market with a 0.03 percent market share. The bank operates two branches and two ATMs in the AA. Primary direct competitors include Guaranty Bancorp, CoBiz Financial, and BOK Financial.

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

## Scope of Evaluation in Colorado

We evaluated performance in the state of Colorado by performing full-scope reviews in the Denver and Pueblo AAs. Pueblo had the second highest level (behind the Fremont AA) of deposits from the bank branches in the state and the highest number of loans (by number). Denver had the second highest number of loans (by number). We performed limited-scope reviews on the Boulder and non-MA CO AAs during this evaluation period. Refer to Appendix A for more information.

Small business and home mortgage loans received the most weight under the lending test since they are the bank's primary lending focus in the state and a majority of the lending volume. In the state of Colorado, small loans to businesses represent 47 percent by number and 31 percent by dollar of the lending volume, while home mortgage loans hold 45 percent by number and 48 percent by dollar of the lending volume. Small loans to farms comprises 7 percent by number and 4 percent by dollar of the lending volume.

In our analysis of home lending, home refinance loans received the most weight with 43 percent by number of mortgage loans in the state of Colorado. The next highest weight was

home purchase loans, followed by home improvement loans, which are 41 percent and 15 percent of total home mortgage lending by number, respectively.

#### Pueblo AA

Small loans to businesses received the most weight under the Lending Test in the Pueblo AA followed by home mortgage loans. Small loans to businesses represent 50 percent by number of total reported loans the bank made in the AA. Home mortgage loans represented 44 percent by number of total reported loans, while small loans to farms received the least weight with 5 percent of loans the bank made in the Pueblo AA.

In the Pueblo AA, home purchase loans received the most weight since they represent 47 percent of total home mortgage loans (by number) in the AA. The next highest weight was placed on home refinance loans followed by home improvement loans, which are 36 percent and 15 percent of home mortgage lending (by number), respectively.

To identify community credit needs, we considered one recent community contact in the Pueblo AA. The contact was with a government organization that identified a need for small business financing such as loans for start-up capital using a combination of grants and traditional lending. Affordable housing and agricultural lending were also identified as community needs.

#### Denver AA

Home mortgage loans received the most weight under the Lending Test in the Denver AA. These loans represent 56 percent by total number of loans the bank made in the AA. Small loans to businesses received the next highest weight with 43 percent of total reported loans by number in the Denver AA. Sunflower made no small loans to farms during the review period so an analysis would not be meaningful.

In our analysis of home mortgage lending in the Denver AA, home refinance loans received the most weight since they represent 53 percent of the total home mortgage loans (by number) in the AA. The next highest weight was placed on home purchase loans followed by home improvement loans, which are 33 percent and 12 percent of home mortgage lending (by number), respectively.

There was one community contact conducted during the evaluation period with an economic development organization. The contact stated that access to capital is a main credit need for small businesses and in Pueblo's recruitment of business. Other credit needs are for the significant low income population, school funding issues, and the lack of funding for transportation for area improvement projects.

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

### **LENDING TEST**

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

Sunflower's performance under the lending test in Colorado is rated "High Satisfactory". Based on full-scope reviews, Sunflower's performance in the Denver-Aurora-Lakewood and Pueblo

AAs is adequate. Performance in the Pueblo AA is given greater weight because it represents a higher level of Sunflower's deposit and lending operations in Colorado. Community development loans in both the Denver and Pueblo AAs made a positive impact on the overall rating in Colorado.

## **Lending Activity**

Refer to Table 1 Lending Volume in the state of Colorado section of appendix D for the facts and data used to evaluate Sunflower's lending activity. For purposes of this review, we used deposit information as of June 30, 2016.

Sunflower's overall lending activity in the state of Colorado is adequate.

### Pueblo AA

Sunflower's lending activity in the Pueblo AA is adequate. As of June 30, 2016, Sunflower ranks sixth in deposit market share at 5.4 percent among 14 depository institutions.

Based on 2016 peer data, Sunflower ranks 22<sup>nd</sup> (by number) for home purchase loans and 28<sup>th</sup> (by number) for home refinance loans at 1.01 percent and 0.77 percent, respectively. For both loan products, Sunflower ranks in the top 15 percent of lenders in the market. Competition is strong for home purchase and home refinance loans with 189 and 183 lenders in the AA, respectively. For home purchase and home refinance loans, the top five lenders in the market accounted for 52.47 percent and 45.99 percent of the market, respectively. Three of the top five home purchase lenders and four of the top five home refinance lenders have a nationwide presence. For home improvement loans, Sunflower ranks fourth (by number) at 5.34 percent.

For small loans to businesses, Sunflower ranks tenth (by number) at 2.63 percent. Sunflower ranks in the top 23 percent of lenders in the market. The top five lenders are nationwide credit card companies with a combined market share of 68.02 percent.

For small loans to farms, Sunflower ranks second (by number) at 15.63 percent. Sunflower ranks in the top 22 percent of lenders in the market. The top lender has a market share of 31.25 percent.

### Denver AA

Sunflower's lending activity in the Denver AA is adequate. As of June 30, 2016, Sunflower ranks 54<sup>th</sup> in deposit market share at 0.03 percent among 70 depository institutions.

Based on 2016 peer data, Sunflower ranks 54<sup>th</sup> (by number) for home purchase loans at 0.03 percent; this ranks within the 77<sup>th</sup> percent of lenders in the market. For home refinance loans, Sunflower ranks 235<sup>th</sup> (by number) at 0.03 percent, this is within the top 40 percent of market lenders. Competition is strong for home purchase and home refinance loans with 183 and 603 lenders in the AAs, respectively. For home improvement loans, Sunflower ranks 80<sup>th</sup> (by number) at 0.21 percent, which is in the top 30 percent of lenders in the market. For home purchase, home improvement, and home refinance loans, the top five lenders in the market accounted for 24.42 percent, 34.29 percent, and 25.23 percent, respectively. Four of the five top lenders are nationwide lenders.

For small loans to businesses, Sunflower ranks 45<sup>th</sup> (by number) at 0.06 percent. Sunflower ranks in the top 28 percent of lenders in the market. The top five lenders are nationwide credit card companies with a combined market share of 69.32 percent.

We did not analyze small loans to farms since there were no loans made in the Denver AA during the evaluation period and it is not a primary product for the bank.

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

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

Refer to Tables 2, 3, 4, and 5 in the state of Colorado section of appendix D for the facts and data used to evaluate the geographic distribution of Sunflower's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is good.

#### *Pueblo AA*

The overall geographic distribution of home mortgage loans in the Pueblo AA is good.

The overall geographic distribution of home purchase loans is good. The percentage of loans to low-income geographies is adequate, but below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income tracts is excellent and exceeds the percentage of owner-occupied units in these geographies. Sunflower's market share in low-income geographies is adequate, but slightly below the overall market share, while moderate-income geographies is good and near the overall market share.

The overall geographic distribution of home improvement loans is adequate. The percentage of loans in low-income geographies is excellent and exceeds owner-occupied units in these geographies. The percentage of loans made in moderate-income geographies is poor and significantly below the percentage of owner-occupied units in these geographies. Sunflower has no market share to low- and moderate-income borrowers; therefore, an analysis is not meaningful.

The overall geographic distribution of home refinance loans is good. The percentage of loans to low-income geographies is excellent and exceeds owner-occupied units. The moderate-income geography percentage of loans is good and slightly below the percentage of owner-occupied units. Sunflower's market share in these geographies is excellent and exceeds the overall market share.

#### *Denver AA*

The overall geographic distribution of home mortgage loans in the Denver AA is good.

The overall geographic distribution of home purchase loans is good. The percentage of loans to low-income geographies is excellent and exceeds the percentage of owner-occupied units in these geographies. The percentage of loans to moderate-income geographies is poor and below owner-occupied units. Market share meets the overall market share of loans in low- and moderate-income geographies.

The overall geographic distribution of home improvement loans is excellent. Low-income geography percentage of loans exceeds the percentage of owner-occupied units. The percentage of loans in moderate-income geographies significantly exceeds the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies exceeds the overall market share.

The overall geographic distribution of home refinance loans is good. Low-income percentage of loans is good and consistent with the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies is poor and significantly below the percentage of owner-occupied units in these geographies. Sunflower exceeds overall market share in low-income geographies, while it meets the overall market share in moderate-income geographies.

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

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

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

#### **Pueblo AA**

The overall geographic distribution of small loans to businesses in the Pueblo AA is excellent. Sunflower's percentage of loans in low- and moderate-income geographies significantly exceeds the percentage of businesses in these areas. Sunflower's market share for low-income geographies exceeds overall market share while moderate-income geographies is slightly below overall market share but remains good.

#### **Denver AA**

The overall geographic distribution of small loans to businesses in the Denver AA is excellent. The percentage of loans to low-income geographies exceeds the percent of businesses in these geographies. The percentage of loans to moderate-income geographies significantly exceeds the percentage of businesses in these geographies. While Sunflower's market share in low-income tracts is poor and significantly below overall market share, it exceeds overall market share in moderate-income geographies and is excellent.

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

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

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

Denver AA

A geographic analysis of small loans to farms is not meaningful since this is not a primary product in the Denver AA. The overall market share is less than 1 percent so analysis of market share is not meaningful either.

Pueblo AA

The overall geographic distribution of small loans to farms in the Pueblo AA is very poor. Sunflower made no loans to low-income geographies in the review period. The percentage of loans in moderate-income geographies is very poor and significantly below the percentage of farms in these areas. Based on peer data, Sunflower does not have any market share in low- and moderate-income geographies. Sunflower only made a total of twenty-five small loans to farms in this AA during 2013-2016, which somewhat mitigates performance in the AA.

***Lending Gap Analysis***

We reviewed summary reports to analyze Sunflower's home mortgage, small business, and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. Sunflower's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- and moderate-income areas.

***Inside/Outside Ratio***

We performed an analysis of the inside/outside ratio at bank level. A substantial majority of Sunflower's loans were originated within Sunflower's defined AAs. Refer to conclusions in the State of Kansas Rating section of this document for detail regarding overall lending percentages for each loan product.

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

The overall borrower distribution of Sunflower's lending is adequate.

***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of Sunflower's home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans is adequate.

Pueblo AA

The overall borrower distribution of home mortgage loans in the Pueblo AA is adequate. The percentage of households below poverty is 17 percent per the 2010 Census. This information is considered in the analysis.

The overall distribution of home purchase loans is adequate considering the percent of families living below the poverty level. The percentage of loans to low-income borrowers is poor and significantly below demographics. The percentage of loans to moderate-income borrowers is

adequate but below demographics. The market share to low-income borrowers is good and slightly below the overall market share. Sunflower's market share to moderate-income borrowers is poor and below the overall market share.

The overall distribution of home improvement loans is adequate considering the percent of families living below the poverty level. The percentage of loans to low-income borrowers is poor and significantly below demographics. The percentage of loans to moderate-income borrowers is poor and also below demographics. The market share of loans to low-income borrowers is excellent and exceeds the overall market share. Sunflower has no market share to moderate-income borrowers; therefore, an analysis is not meaningful.

The overall distribution of home refinance loans is adequate considering the percent of families living below the poverty level. The percentage of loans to low-income borrowers is very poor and significantly below demographics. The percentage of loans to moderate-income borrowers reflects poor performance and is below demographics. The market share of these loans is not meaningful since the overall market share is less than one percent.

#### Denver AA

The overall borrower distribution of home mortgage loans in the Denver AA is adequate. The percentage of households below poverty is 11 percent per the 2010 Census. This information is considered in the analysis.

The overall distribution of home purchase loans is adequate considering the percent of families that live below the poverty level and the high housing prices. The percentage of bank loans to low-income borrowers is very poor and significantly below demographics. The percentage of loans to moderate-income borrowers is below demographics, but still adequate. Sunflower has no market share to low-income borrowers. Sunflower meets the market share for moderate-income borrowers and performance is good.

The overall distribution of home improvement loans is adequate considering the percent of families that live below the poverty level. The percentage of loans to low-income borrowers is significantly below demographics and performance is poor. The percentage of loans to moderate-income borrowers is poor and below demographics. Sunflower has no market share to low-income borrowers. Sunflower is below the market share for moderate-income borrowers, but at such a low level that an analysis is not meaningful.

The overall distribution of home refinance loans is adequate considering the percent of families that live below the poverty level. Sunflower's percentage of loans to low-income borrowers is very poor and significantly below demographics. The percentage of loans to moderate-income borrowers is below demographics and performance is poor. Sunflower has no market share to low-income borrowers. The market share to moderate-income borrowers is poor and below the overall market share.

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

Refer to Table 11 in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of Sunflower's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is adequate. More weight is given to performance in the Pueblo AA since 50 percent of small business loans are in this AA.

Pueblo AA

The overall borrower distribution of small business loans in the Pueblo AA is adequate. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is poor and below demographics. However, 91 percent of Sunflower’s small loans to businesses were \$250 thousand or less regardless of business size. The market share of these loans is excellent and exceeds the overall market share.

Denver AA

The overall borrower distribution of small business loans in the Denver AA is poor. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is poor and significantly below demographics. Loans to borrowers with original loan amounts less than \$250 thousand is 59 percent of total loans regardless of business size. The market share of these loans is not meaningful since the overall market share is less than one percent.

**Small Loans to Farms**

Refer to Table 12 in the state of Colorado section of appendix D for the facts and data used to evaluate the borrower distribution of Sunflower’s origination/purchase of small loans to farms.

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

Denver AA

The overall borrower distribution of small farm loans in the Denver AA is not meaningful. Sunflower did not make any loans to small farms in this AA.

Pueblo AA

The overall borrower distribution of small farm loans in the Pueblo AA is good. The percentage of small loans to farms with gross annual revenue of \$1 million or less is below demographics, but considered adequate. The market share of these loans is excellent and exceeds the overall market share.

**Community Development Lending**

Refer to Table 1 Lending Volume in the state of Colorado section of appendix D for the facts and data used to evaluate Sunflower’s level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Overall, CD lending is excellent. Sunflower’s level of community development lending had a significant positive impact on its overall lending performance in the Denver and Pueblo AAs. The level of CD loans in the Denver AA represents 91.74 percent of allocated tier one capital in the state of Colorado. The level of CD loans in the Pueblo AA represents 36.73 percent of allocated tier one capital in the state of Colorado. Sunflower provided a total of \$18.3 million in

CD loans to organizations outside their full-scope AAs that provide CD Services to LMI individuals. The loans funded construction bonds and facility improvements.

### Pueblo AA

Sunflower's level of CD lending had a significant positive impact on the overall lending performance in the Pueblo AA. During the evaluation period, Sunflower originated three loans totaling \$14 million. Two of these loans, for \$10 million financed the building and equipping of a non-profit healthcare facility to provide community development services to low- and moderate-income individuals in the AA. The other loan for \$4 million provides financing to the Housing Authority for the City of Pueblo to rehabilitate and provide affordable housing.

### Denver AA

CD lending had a significant positive impact on lending performance in the Denver AA. Sunflower made one loan for \$35 million in a moderate-income census tract that is to revitalize/stabilize the area. The loan was made in conjunction with the Aurora Urban Renewal Authority to create full- and part-time jobs that will help to attract new and retain existing businesses.

## **Product Innovation and Flexibility**

Sunflower offers a traditional mix of lending products in the Denver and Pueblo AAs. We did not consider any bank products or services innovative. Impact on the Lending Test rating is neutral.

Sunflower offers flexible mortgage loan programs that assist borrowers by providing loans up to 100 percent of the value of a home, reduced closing costs, and fixed rates. Impact on the Lending Test rating is neutral.

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

Based on limited-scope reviews, Sunflower's performance under the lending test in the non-MA CO AA is consistent with Sunflower's overall "High Satisfactory" rating in Colorado. The Boulder AA is weaker than Sunflower's overall "High Satisfactory" performance under the lending test in Colorado. In the Boulder AA, the overall lending performance is adequate. Boulder had one CD loan for \$10 thousand to an organization that provides CD services to LMI in the AA. In the non-MA CO AA, the bank provided three loans totaling \$631 thousand. Two loans for \$620 thousand were to renovate facilities that provide medical and dental services to LMI individuals and families. The other loan for \$11 thousand was to an organization that provides temporary shelter, food, and clothing to the homeless and transient population within the AA.

## INVESTMENT TEST

The bank's performance under the Investment Test in the state of Colorado is rated "High Satisfactory". The bank provided an adequate level of qualified investments in the Pueblo AA and an excellent level in the Denver AA. Performance in the limited-scope AAs is not inconsistent with the full-scope AAs.

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

### Conclusions for Areas Receiving Full-Scope Reviews

#### Pueblo AA

The bank provided an adequate level of qualified investments in the Pueblo AA. During the review period, the bank provided ten investments and donations totaling \$287.7 thousand. This represents 2.83% of allocated tier one capital. The majority of the dollar volume of investments consists of two FNMA mortgage backed securities totaling just over \$278 thousand. These investments are responsive to the needs for affordable housing for LMI individuals.

#### Denver AA

The bank provided a high level of qualified CD investments in the Denver-Aurora-Lakewood MSA, demonstrating excellent performance. During the review period, the bank provided nine investments and donations totaling \$4.1 million. This represents 148 percent of allocated tier one capital. The majority of the investments consist of four FNMA mortgage backed securities totaling \$4.1 million. These investments are responsive to a need for affordable housing for LMI individuals. The remaining five donations totaling \$6 thousand provided services to LMI individuals. None of the investments is considered innovative or complex.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the limited-scope AAs is consistent with the bank's "High Satisfactory" performance in the bank's full-scope AAs. Performance in the Boulder AA is at an excellent level. However, performance in the Colorado Non-MA AA is very poor. The bank provided a very small dollar volume of qualified investments in this AA. Poor performance in this AA is mainly because the AA is primary rural in nature, and as a result, provides limited CD investment opportunities.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the service test in Colorado is rated "Low Satisfactory". Based on full-scope reviews, Sunflower's performance in the Pueblo AA is adequate, but poor in the Denver AA. Pueblo performance received higher weighting for this rating since the AA had a higher volume of deposits and lending during the evaluation period. Service delivery systems are reasonably accessible in the Denver, Pueblo, Boulder, and the Colorado non-MA AAs.

## **Retail Banking Services**

Refer to Table 15 in the state of Colorado 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.

### Pueblo AA

Sunflower's delivery systems are accessible to geographies and individuals of different income levels in the Pueblo AA. Sunflower operates three branches and three ATMs in this AA. One branch and one ATM are located in a moderate-income CT. This CT also borders four other moderate-income CTs. One other branch borders one moderate-income CTs. There is one branch and one ATM in a low- or moderate-income CT. There are four low-income and 16 moderate-income CTs in this AA.

### Denver AA

Sunflower's service delivery systems are readily accessible to geographies and individuals of different income levels in the Denver AA. The bank operates two branches and two ATMs within the AA. There are numerous low-and moderate-income CTs in this AA. Both branches are within high-income CTs. However, one branch borders one moderate-income CT and a second branch borders two moderate-income CTs.

For these two AAs, the bank did not open or close any branches during the evaluation period. There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. ATMs offer 24-hour service.

Refer to the Service Test comment for the State of Kansas Rating section of this document for detail on Sunflower's other alternative delivery systems.

## **Community Development Services**

### Pueblo AA

Sunflower provided an adequate level of CD services in the Pueblo AA. Four bank staff provided 427 hours of their financial expertise to two organizations. These organizations provided CD services targeted to low- and moderate-income individuals.

### Denver AA

Sunflower provided a poor level of CD services in the Denver AA. Two bank staff provided 41 hours of their financial expertise to two organizations that promote CD initiatives. These organizations provided community services targeted to low- and moderate-income individuals.

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

Based on limited-scope reviews, the bank's performance under the service test in the Boulder and Colorado Non-MA AAs is consistent with Sunflower's overall "Low Satisfactory" performance in the state. CD services in limited-scope AAs had no impact on the overall CD services rating.

## State Rating

### State of Missouri

#### **CRA Rating for Missouri<sup>3</sup>: Satisfactory**

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

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

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

The major factors that support this rating:

- Lending test performance in the non-MA AA is adequate. Lending activity is adequate. The overall borrower distribution of loans is adequate.
- The investment test performance is adequate. The level of investments is low as opportunities in the AA are very limited.
- The service test performance is adequate. The level of services is low as opportunities in the AA are very limited.

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

## **Description of Institution's Operations in Missouri**

Sunflower operates one branch and two ATMs within its AA in the state of Missouri. Residential real estate and small loans to farms are the primary business focus in the state's only AA. The state of Missouri represents one percent of Sunflower's total deposit base and two percent of total reported loans (by number) during the evaluation period. In addition, less than one-half percent of the dollar volume of total reported loans is in the Missouri AA.

The State of Missouri AA consists of Johnson County. This AA represents 100 percent of the bank's deposits and loans within the state. Sunflower ranks eighth or last in the AA and accounts for 1.5 percent of the total market share. Competition is provided by seven institutions. Primary competitors include Central Bank of Warrensburg, Equity Bancshares, and Hawthorn Bank.

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

## **Scope of Evaluation in Missouri**

We evaluated performance in the state of Missouri by performing a full-scope review in the non-MA MO AA. This is the only AA in the state of Missouri. Refer to Appendix A for more information.

Small loans to farms received the most weight under the Lending Test since it is the primary focus in the AA and has the higher level of lending volume. These loans represent 46 percent by number and 50 percent by dollar volume of total reported loans in the non-MA MO AA. Home mortgage lending received the next highest weight at 43 percent in number and dollar volume, and small business lending received the least weight at 10 percent by number and 7 percent by dollar volume of total reported loans in the AA. We did not analyze home purchase, home refinance, and small business loans as Sunflower originated less than ten of these loans and an analysis would not be meaningful.

To identify credit needs, we made one community contact during the evaluation with a local government organization. The contact stated that community development opportunities are limited, and agricultural and consumer loans are the primary needs. The economy in Leeton, Missouri is stagnate. Investment activities are limited in the city, but there may be some investment opportunities in other areas of the county such as in the county seat, which is located 10 miles away. Housing stock is older and there is a need for home improvement lending.

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

### **LENDING TEST**

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

Sunflower's performance under the lending test in Missouri is rated "Low Satisfactory". Based on the full-scope review, Sunflower's performance in the non-MA MO AA is adequate.

### **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 Sunflower's lending activity. For purposes of this review, we used deposit information as of June 30, 2016.

Sunflower's lending activity in the non-MA MO AA is adequate. As of June 30, 2016, Sunflower ranks eighth in deposit market share at 1.54 percent among eight depository institutions.

For small loans to farms, Sunflower ranked seventh at 2.55 percent among 12 lenders. The top four lenders in the market accounted for 80.61 percent.

Sunflower ranks sixth by number for home improvement loans at 4.92 percent among 24 lenders. For home purchase and home refinance loans, Sunflower ranks 89th and 81st, by number, at 0.12 percent and 0.18 percent, respectively. Competition is strong for home purchase and home refinance loans with 106 and 101 lenders, respectively, in the AA. Sunflower ranks within the top 25 percent of lenders in the market for home improvement loans. For home improvement, home purchase, and home refinance loans, the top five lenders in the market accounted for 59.02 percent, 44.63 percent, and 36.79 percent, respectively.

For small business loans, Sunflower ranked 30<sup>th</sup> with a 0.17 percent market share among 36 lenders. Four nationwide credit card lenders dominated the market with a combined market share of 50 percent. The top five lenders in the market hold 67.85 percent of the market share.

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

An analysis of the geographic distribution of loans is not meaningful since there are no low- or moderate-income census tracts in the non-MA MO AA.

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

We reviewed summary reports to analyze Sunflower's home mortgage and small farm lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. Sunflower's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- and moderate-income areas.

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

We performed an analysis of the inside/outside ratio at bank level. A majority of Sunflower's loans originated within Sunflower's defined AAs. Refer to conclusions in the State of Kansas Rating section of this document for detail regarding lending percentages overall and for each loan product.

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

The overall borrower distribution of Sunflower's lending is adequate.

As previously noted, we did not evaluate home purchase, home refinance, or small business loans as Sunflower originated less than ten loans during the evaluation period and an analysis would not be meaningful.

### ***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 Sunflower's home mortgage loan originations and purchases.

The overall borrower distribution of home improvement loans is adequate. The borrower distribution of these loans to low-income borrowers is poor and below demographic comparators. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics. Sunflower has no market share to low-income borrowers. Moderate-income borrower's market share is excellent and exceeds demographics.

### ***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 Sunflower's origination/purchase of small loans to farms.

The overall borrower distribution of small loans to farms is good. Sunflower's borrower distribution of loans during the review period is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less is near to demographics and shows adequate distribution. The market share of small loans to farms is excellent and exceeds demographics.

## **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 Sunflower's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

CD lending had a neutral impact on lending performance in the non-MA Missouri AA. Sunflower did not originate any CD loans in the AA during the evaluation period. CD Lending opportunities in a predominantly rural area are very limited.

## **Product Innovation and Flexibility**

Sunflower offers a traditional mix of lending products in the non-MA MO AA. We did not consider any bank products or services innovative. Impact on the Lending Test rating is neutral.

Sunflower offers flexible mortgage loan programs that assist borrowers by providing loans up to 100 percent of the value of a home, reduced closing costs and fixed rates. Sunflower also offers programs to assist beginning farmers by offering lower rates and down payment assistance. Impact on the Lending Test rating is neutral.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in the state of Missouri is rated "Low Satisfactory". The bank made only one small donation. This AA is primarily rural and there are no low- or moderate-income CTs in the AA resulting in limited CD investment opportunities.

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

#### Missouri Non-MA AA

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.

Sunflower Bank provided a poor level of qualified investments in its Missouri Non-MA AA. The bank donated \$100 dollars to a school where the majority of the students are LMI. This represents 0.01 percent of allocated tier one capital. The donation is not innovative or complex; and it is not particularly responsive to the stated needs in the AA. Opportunities for qualified investments are not abundant in this AA.

## **SERVICE TEST**

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

Sunflower's overall performance under the service test in Missouri is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Missouri non-MA AA is adequate. There are very limited CD service opportunities available in the AA.

#### **Retail Banking Services**

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.

Sunflower's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The bank operates one branch and two ATMs within the AA. There are no low- and moderate-income geographies in the AA. The bank did not open or close any branches during the evaluation period in this AA.

Refer to the Service Test comment for the State of Kansas Rating section of this document for detail on Sunflower's other alternative delivery system.

## **Community Development Services**

Sunflower provided an adequate level of CD services in the Missouri non-MA AA. The bank provided 37 hours of services to two organizations. One organization provides business start-up services along with site location assistance to small businesses. The other organization provides financial education to prevent senior citizen financial exploitation. CD service opportunities in this AA are very limited.

## 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): 01/01/2013 to 12/31/2016 Investment and Service Tests and CD Loans: (03/31/2014 to 06/04/2017)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Sunflower Bank, National Association (Sunflower) Salina, Kansas	Home Purchase, Home Improvement, Home Refinance, Small Business, Small Farm, CD Loans, CD Investments, and CD Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Kansas: Kansas Non-MA AA	Full-Scope	Saline, McPherson, Ellis, Russell, Osborne, Ford, Thomas, Barton, and Seward Counties
Wichita AA	Full-Scope	Sedgwick
*Manhattan MSA	Limited-Scope	Riley, Geary, Pottawatomie Counties
Geary 2014-2016	Limited-Scope	Geary County
Lawrence MSA	Limited-Scope	Douglas County
Johnson County AA	Limited-Scope	Johnson County
Topeka AA	Limited-Scope	Shawnee County
State of Colorado: Denver MSA	Full-Scope	Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson Counties
Pueblo MSA	Full-Scope	Pueblo County
Boulder MSA	Limited-Scope	Boulder County

Colorado Non-MA AA State of Missouri Missouri Non-MA	Limited-Scope  Full-Scope	Freemont and Rio Grande Counties  Johnson County
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\*Geary County only included in this AA for 2013.

## Appendix B: Summary of State Ratings

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RATINGS Sunflower Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Sunflower Bank, National Association	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
Kansas	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Colorado	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Missouri	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: Community Profiles for Full-Scope Areas

### State of Kansas

### Kansas Non-MA AA

Demographic Information for Full-Scope Area: (Name of Multistate Metropolitan Area)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	50	0.00	14.00	60.00	26.00	0.00
Population by Geography	216,440	0.00	14.09	55.80	30.10	0.00
Owner-Occupied Housing by Geography	57,793	0.00	9.26	57.80	32.94	0.00
Businesses by Geography	13,140	0.00	16.00	54.46	29.54	0.00
Farms by Geography	1,550	0.00	3.61	68.39	28.00	0.00
Family Distribution by Income Level	55,111	17.22	16.91	22.14	43.73	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	18,812	0.00	21.05	57.56	21.40	0.00
Median Family Income HUD Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$52,419 = \$57,300 = 13%	Median Housing Value Unemployment Rate		= \$96,556 2.35%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The Kansas Non-MA AA includes the entire counties of Saline, McPherson, Ellis, Russell, Osborne, Barton, Ford, Thomas, and Seward. This AA has 50 CTs including 0 low-income, 7 moderate-income, 30 middle-income, and 13 upper-income CTs. The bank has served the counties in this AA for the entire CRA evaluation period.

The population within the AA totaled 216,440 per the 2010 Census. As of June 30, 2016, there were 52 depository institutions in the AA. Sunflower ranks first with a deposit market share of 14.36 percent. Adjusted median family income totaled \$57,300 for 2016. Households below the poverty level totaled 13 percent. Sunflower has 17 branches and 24 ATMs in the AA. The AA represents 56.5 percent of total deposits for the bank.

### Employment and Economic Factors

As of December of 2016, the unemployment rates in the AA are primarily below both the state and national averages. The Bureau of Labor Statistics reports Barton County at 4.5 percent, Ellis County at 2.8 percent, Ford County at 3.4 percent, McPherson County at 3.0 percent, Osborne County at 3.1 percent, Russell County at 4.1 percent, Saline County at 3.5 percent, Seward County at 3.9 percent, and Thomas County at 3.0 percent. Most of the counties have

shown improvements from the prior CRA evaluation in 2014. The state and national unemployment rates totaled 4.3 percent and 4.7 percent, respectively.

While still a major agricultural center, there is a diversification of businesses in the AA including manufacturing, wholesale trade, retail trade, professional and business services, education and health services, and leisure and hospitality services. Major employers include USD 428, USD 489 Hays, Barton Community College, Hays Medical Center, Fort Hays State University, Wal-Mart, Cargill Meat Solutions, Dodge City Public Schools, National Beef, and local governments.

### Housing

The median housing value increased 34 percent from the 2000 Census to \$96,556 per the 2010 Census. The counties in the non-MA AA have a foreclosure rate of 0.03 percent or less compared to 0.04 percent in Kansas and the national average of 0.06 percent.

### Community Contacts

A local economic development organization was contacted by another regulatory agency. Its primary goal is to create a business climate that enhances growth and expansion opportunities for existing businesses, and also attracting new businesses. Affordable single family residences and apartments, and small business lending are primary banking needs.

## Wichita AA

Demographic Information for Full-Scope Area: Wichita AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	124	9.68	33.87	25.81	30.65	0.00
Population by Geography	498,365	7.42	30.47	27.40	34.72	0.00
Owner-Occupied Housing by Geography	127,710	3.75	25.88	28.86	41.50	0.00
Businesses by Geography	25,619	12.59	23.10	27.50	36.81	0.00
Farms by Geography	838	2.98	13.60	31.03	52.39	0.00
Family Distribution by Income Level	125,002	21.25	18.14	20.81	39.80	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	49,235	11.36	45.57	25.24	17.83	0.00
Median Family Income HUD Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$61,402 = \$65,000 = 13%	Median Housing Value Unemployment Rate			= \$116,537 = 3.92%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The Wichita AA includes the county of Sedgwick. This AA does not include the remaining counties of Butler, Harvey, Sumner, and Kingman within the Wichita MSA. The Wichita AA has a total of 124 CTs. They include 12 low-income, 42 moderate-income, 32 middle-income, and 38 upper-income CTS. The bank has served the Wichita AA for the entire CRA evaluation period.

The population within the AA totaled 498,365 per the 2010 Census. As of June 30, 2016, there were 41 depository institutions in the AA. Sunflower ranks 16<sup>th</sup> with a deposit market share of 0.69 percent. Adjusted median family income totaled \$65,000 for 2016. Households below the poverty level totaled 13 percent. Sunflower has three branches and two ATMs in the AA. The AA represents six percent of total deposits for the bank.

### Employment and Economic Factors

Growth in the economy has slowed since mid-2016. Services are driving job creation, led by leisure/hospitality, healthcare, and business/professional services. Average hourly earnings are well below average because the makeup of job gains favors low-paying service jobs.

As of December 31, 2016, the unemployment rate in the AA is above the State of Kansas rate (4.3 percent) but below the national rate (4.7 percent). The Bureau of Labor Statistics reports unemployment in Sedgwick County as 4.5 percent. Major employers in the area include Spirit AeroSystems, Inc., Textron Aviation, McConnell AFB, Via Christi Regional Medical Center, and

Koch Industries, Inc. Top industries include manufacturing, education and health services, professional and business services, leisure and hospitality services, and retail trade.

### Housing

The median housing value totaled \$116,537 per the 2010 Census. Residential construction and housing related employment is expected to pick up over the medium term. Stronger wage growth and a faster rate of household formation will help lift single-and multifamily construction. Relative affordability in Wichita will help attract first time home buyers.

### Community Contacts

To identify community credit needs, we considered one community contact conducted by OCC staff in 2016 with a local consumer and civil rights organization. The contact communicated that the economy is considered stagnant, and as a result, there is a need for reasonable small dollar loans to compete with payday lenders. The contact stated that unemployment is high in LMI neighborhoods and wages are not sufficient to maintain a living. It was stated that there is a need for volunteers for committees and grant dollars.

**Pueblo MSA**

Demographic Information for Full-Scope Area: Pueblo, Colorado MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	55	7.27	29.09	30.91	27.27	5.45
Population by Geography	159,063	7.79	23.43	35.03	32.43	1.33
Owner-Occupied Housing by Geography	42,914	4.85	18.98	36.89	39.29	0.00
Businesses by Geography	9,499	5.20	26.77	30.53	37.18	0.32
Farms by Geography	328	3.66	18.90	39.02	37.50	0.91
Family Distribution by Income Level	40,247	21.63	17.82	19.67	40.88	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	15,879	13.11	34.19	34.13	18.57	0.00
Median Family Income = \$50,503		Median Housing Value = \$134,796				
HUD Adjusted Median Family Income for 2016 = \$50,600		Unemployment Rate = 4.38%				
Households Below the Poverty Level = 17%						

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The Pueblo AA includes all of Pueblo County in south central Colorado. Pueblo County includes all of the city of Pueblo along with a large amount of rural land. Sunflower has served the Pueblo AA during this entire evaluation period. The population totaled 159,063 per the 2010 US Census. Sunflower ranks sixth with a deposit market share of 5.4 percent in the AA. The top four banks with a combined deposit market share of 68.9 percent are Wells Fargo, US Bank, Zions Bank, and The Pueblo Bank and Trust Company.

The adjusted median family income for 2016 in the AA totaled \$50,600, which is very consistent with the 2010 Census figure. There are four low-income, 16 moderate-income, 17 middle-income, 15 upper-income, and three marked as NA CTs. Based on the 2010 Census, households below the poverty level are 17 percent.

Sunflower has three branches and three ATMs in the AA. The AA represent 6 percent of total bank deposits.

Employment and Economic Factors

The unemployment rate in the Pueblo AA is above both the state and national averages. Moody’s Analytics reports the 2016 unemployment rate for Pueblo County at 4.9 percent, with the state of Colorado at 3.0 percent and the national average at 4.7 percent.

The economy in Pueblo is growing at a faster pace than the State of Colorado. Recent job growth outpaced Colorado by the widest margin in seven years. Healthcare, retail, and construction have made major strides. However, while manufacturing has stabilized over the

past few months, it remains a sore spot. Although 30 percent below those of the state, average hourly earnings have gained ground over the past year.

The top employers in the AA are Parkview Medical Center, Evraz, Inc., St Mary-Corwin Medical Center, Wal-Mart Stores, Colorado Mental Health Institute, Express Scripts, Colorado State University-Pueblo, and RMS. Top employment industries include government, education and health services, retail trade, professional and business service, and leisure and hospitality services.

### Housing

The median housing value in the AA is \$134,796 per the 2010 Census. Strengthening population growth is supporting residential construction, and although house price appreciation remains slower than Colorado, it is keeping pace with the U. S. average.

### Community Contacts

There was one community contact conducted during the evaluation period that we reviewed with an economic development organization. The contact stated that access to capital is a main credit need for small businesses and in Pueblo's recruitment of business. Other credit needs are for the significant low income population, school funding issues, and the lack of funding for transportation for area improvement projects.

## STATE OF COLORADO

### Denver-Aurora-Lakewood MSA

Demographic Information for Full-Scope Area: Sunflower – Denver-Aurora-Lakewood MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	605	11.40	22.64	32.56	32.23	1.16
Population by Geography	2,489,661	11.39	23.34	32.64	32.59	0.05
Owner-Occupied Housing by Geography	631,576	6.50	19.37	35.18	38.95	0.00
Business by Geography	262,565	8.50	20.36	30.14	40.59	0.33
Farms by Geography	4,843	7.66	18.40	32.48	41.40	0.06
Family Distribution by Income Level	605,228	22.09	17.11	20.18	40.62	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	237,240	19.73	34.43	29.58	16.25	0.00
Median Family Income		=\$75,101	Median Housing Value		=\$265,725	
HUD Adjusted Median Family Income for 2016		=\$80,100	Unemployment Rate (2010 US Census)		3.73%	
Households Below Poverty Level		11%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2016 FFIEC updated MFI

The Denver AA includes Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson counties. The AA consists of Denver and several of the surrounding suburbs. The Denver AA includes two branches and two ATMs. The Denver branches were opened in 2013. In July of 2016, the branch in Greenwood Village was moved to another location approximately two miles from the original location. As of June 30, 2016, Sunflower ranks 54th with a deposit market share of 0.03 percent. This AA represents 7 percent of total deposits in the state of Colorado and 2 percent of total bank deposits. Primary direct competitors include Guaranty Bancorp, CoBiz Financial, and BOK Financial. The population of the AA totaled 2.5 million per the 2010 Census.

The adjusted median family income for 2016 in the AA totaled \$80,100. The AA has 605 CTS and consists of 69 low-income, 137 moderate-income, 197 middle-income, and 195 upper-income CTS. Seven CTs are noted as NA. Based on the 2010 Census, households below the poverty level total 11 percent.

#### Employment and Economic Factors

A tight labor market is adding friction to the AA's pace of expansion, but the metro area remains on firm footing. Job growth is well above the U.S. average, but it has decelerated substantially over the past year. Job gains are particularly strong in logistics, healthcare, and leisure/hospitality. Low-wage positions have dominated recent job creation and driven down Denver's average earnings over the past year. The average hourly wage is near the highest in the State of Colorado and is well above the national average.

As of December 2016, the unemployment rate in the Denver-Aurora-Lakewood MSA was slightly higher than the state average but lower than national averages. Moody's Analytics reports the unemployment rate in the Denver AA at 3.1 percent in 2016. The state and national unemployment rates were 3.0 percent and 4.7 percent, respectively.

### Housing

The AA has a strong housing market with a new price peak. The median housing value in the Denver-Aurora-Lakewood MSA for 2010 was \$265,725. It is difficult for LMI individual to find affordable housing in the AA. A majority of vacant homes are in the middle-income census tracts. The AA has a foreclosure rate of approximately 0.04 percent, which is less than the national average of 0.06 percent.

### Community Contacts

To identify community credit needs, we considered one recent community contact in the Denver AA. The contact was with a government organization that identified affordable housing as a credit need along with financial education. The contact noted that the economy continues to improve. There are plenty of opportunities for banks to participate in small business and affordable housing lending.

## State of Missouri

### State of Missouri AA

Demographic Information for Full-Scope Area: State of Missouri AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0.00	0.00	0.00	0.00	0.00
Population by Geography	52,595	0.00	0.00	20.68	79.32	0.00
Owner-Occupied Housing by Geography	12,383	0.00	0.00	12.93	87.07	0.00
Businesses by Geography	2,629	0.00	0.00	31.23	68.77	0.00
Farms by Geography	228	0.00	0.00	10.53	89.47	0.00
Family Distribution by Income Level	12,614	12.68	15.17	19.67	52.48	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,513	0.00	0.00	30.77	69.23	0.00
Median Family Income HUD Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$45,746 = \$48,200 = 14%	Median Housing Value Unemployment Rate				= \$129,143 = 3.51%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, and 2016 HUD updated MFI.

The State of Missouri AA includes Johnson County in Missouri. The population of the AA totaled 52,595 per the 2010 Census. As of June 30, 2016, there are 8 financial institutions in the AA. Sunflower ranks eighth with a market share of 1.5 percent. The AA has 9 CTS, which include 0 low-income, 0 moderate-income, 3 middle-income, and 6 upper-income tracts. Adjusted 2016 Median family income in the AA totaled \$48,200 per the Census. Based on the 2010 Census, households below the poverty level total 14 percent. Sunflower has one branch and two ATMs in the AA. The AA represents 1 percent of total bank deposits.

#### Employment and Economic Factors

The unemployment rate in the AA was below both the state and national averages. The Bureau of Labor Statistics reports Johnson County at 4.3 percent, with the state of Missouri at 4.4 percent and the national average at 4.7 percent.

Johnson Country is close to Kansas City, Missouri. Major employers in the AA include Whiteman Air Force Base, University of Central Missouri, EnerSys Energy Products, Inc., Western Missouri Medical Center, Warrensburg R-VI School District, Stahl Specialty Company, and Wal-Mart Supercenter. There is a diversification of businesses including Federal Government-National Security, manufacturing, schools, restaurants, hospitals and long-term care, and retail.

Housing

The median housing value in the AA totaled \$129,143 per the 2010 Census, which was a 57 percent increase since the 2000 Census.

Community Contacts

We made one community contact during the evaluation with a local government organization. It was stated that the local economy remains stagnant and that agricultural and consumer lending are the largest community needs.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

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

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Tables of Performance Data**

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**State of Kansas**  
**State of Colorado**  
**State of Missouri**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: KANSAS				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016						
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Non-MA KS AA	69.58	1,165	120,711	507	57,778	346	32,631	0	0	2,018	211,120	74.98
Wichita AA	13.21	188	35,257	195	35,611	0	0	0	0	383	70,868	7.97
<b>Limited Review:</b>												
Geary AA----	1.41	30	3,247	11	2,257	0	0	0	0	41	5,504	3.11
Johnson County AA	2.13	40	11,193	27	9,180	0	0	0	0	67	20,373	5.00
Lawrence MSA	5.48	75	21,221	84	18,267	0	0	0	0	159	39,488	3.23
Manhattan MSA----	5.31	125	20,582	28	6,540	1	250	0	0	154	27,372	4.35
Topeka AA	1.86	54	7,273	23	2,730	1	27	0	0	78	10,030	1.36
<b>Statewide</b>												
Statewide with no P/M/F to serve the AAs	0	0	0	0	0	0	0	1	3,536	1	3,536	0

\* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from March 31, 2014 to June 5, 2017.

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

----Geary AA and Manhattan MSA show the evaluation period January 1, 2014 through December 31, 2016.

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

Geographic Distribution: HOME PURCHASE		Geography: KANSAS				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Non-MA KS AA	525	63.87	0.00	0.00	9.26	2.86	57.80	43.05	32.94	54.10	4.83	0.00	4.97	3.67	6.21	
Wichita AA	124	15.09	3.75	1.61	25.88	12.10	28.86	24.19	41.50	62.10	0.13	0.00	0.11	0.07	0.18	
<b>Limited Review:</b>																
Geary AA	13	1.58	0.00	0.00	14.22	0.00	61.95	69.23	23.83	30.77	1.35	0.00	0.00	1.58	1.44	
Johnson County AA	24	2.92	0.28	0.00	7.54	8.33	27.86	20.83	64.32	70.83	0.03	0.00	0.00	0.02	0.04	
Lawrence MSA	44	5.35	2.25	4.55	16.14	18.18	50.96	45.45	30.65	31.82	0.38	1.33	0.00	0.53	0.19	
Manhattan MSA	63	7.66	0.00	0.00	9.18	11.11	65.14	49.21	25.68	39.68	0.64	0.00	1.33	0.61	0.53	
Topeka AA	29	3.53	5.35	0.00	19.69	17.24	38.32	48.28	36.64	34.48	0.26	0.00	0.71	0.17	0.18	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT															
Geography: KANSAS					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016										
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MA KS AA	285	76.20	0.00	0.00	9.26	9.47	57.80	53.33	32.94	37.19	39.75	0.00	29.17	38.81	44.44
Wichita AA	27	7.22	3.75	0.00	25.88	14.81	28.86	40.74	41.50	44.44	0.44	0.00	0.00	0.91	0.38
<b>Limited Review:</b>															
Geary AA	13	3.48	0.00	0.00	14.22	7.69	61.95	53.85	23.83	38.46	12.12	0.00	14.29	10.53	14.29
Johnson County AA	5	1.34	0.28	0.00	7.54	0.00	27.86	20.00	64.32	80.00	0.10	0.00	0.00	0.00	0.14
Lawrence MSA	11	2.94	2.25	0.00	16.14	27.27	50.96	36.36	30.65	36.36	1.84	0.00	2.78	1.32	2.04
Manhattan MSA	27	7.22	0.00	0.00	9.18	11.11	65.14	59.26	25.68	29.63	7.04	0.00	5.00	6.58	8.70
Topeka AA	6	1.60	5.35	0.00	19.69	0.00	38.32	66.67	36.64	33.33	0.84	0.00	0.00	1.06	0.97

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: KANSAS				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016						Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Non-MA KS AA	353	74.16	0.00	0.00	9.26	4.53	57.80	46.46	32.94	49.01	6.14	0.00	4.84	6.19	6.25	
Wichita AA	37	7.77	3.75	0.00	25.88	2.70	28.86	24.32	41.50	72.97	0.08	0.00	0.00	0.07	0.12	
<b>Limited Review:</b>																
Geary AA	4	0.84	0.00	0.00	14.22	0.00	61.95	25.00	23.93	75.00	0.70	0.00	0.00	0.64	1.02	
Johnson County AA	11	2.31	0.28	0.00	7.54	0.00	27.86	18.18	64.32	81.82	0.03	0.00	0.00	0.04	0.03	
Lawrence MSA	18	3.78	2.25	5.56	16.14	16.67	50.96	38.89	30.65	38.89	0.30	0.00	0.00	0.29	0.48	
Manhattan MSA	34	7.14	0.00	0.00	9.18	2.94	65.14	50.00	25.68	47.06	1.66	0.00	0.00	1.38	2.51	
Topeka AA	19	3.99	5.35	0.00	19.69	0.00	38.32	57.89	36.64	42.11	0.11	0.00	0.00	0.29	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: KANSAS					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Non-MA KS AA	2	40.00	0.00	0.00	20.23	0.00	42.69	0.00	37.08	100.00	0.00	0.00	0.00	0.00	0.00	
Wichita AA	0	0.00	14.03	0.00	36.40	0.00	33.38	0.00	16.18	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Geary AA	0	0.00	0.00	0.00	35.76	0.00	59.18	0.00	5.06	0.00	0.00	0.00	0.00	0.00	0.00	
Johnson County AA	0	0.00	0.70	0.00	19.50	0.00	35.22	0.00	44.58	0.00	0.00	0.00	0.00	0.00	0.00	
Lawrence MSA	2	40.00	19.69	0.00	18.15	50.00	42.99	50.00	19.17	0.00	3.13	0.00	0.00	9.09	0.00	
Manhattan MSA	1	20.00	0.00	0.00	27.84	0.00	53.83	100.00	18.33	0.00	4.35	0.00	0.00	9.09	0.00	
Topeka AA	0	0.00	20.75	0.00	29.03	0.00	37.52	0.00	12.70	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Multi Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 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: KANSAS		Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*										
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Non-MA KS AA	507	58.01	0.00	0.00	16.00	17.16	54.46	48.52	29.54	34.32	2.61	0.00	3.10	2.83	2.33						
Wichita AA	195	22.31	12.59	25.13	23.10	19.49	27.50	23.59	36.81	31.79	0.39	0.43	0.43	0.28	0.44						
<b>Limited Review:</b>																					
Geary AA	11	1.26	0.00	0.00	33.03	54.55	53.92	45.45	13.06	0.00	0.38	0.00	1.59	0.00	0.00						
Johnson County AA	26	2.97	0.55	0.00	9.00	7.69	23.24	7.69	63.90	84.62	0.05	0.00	0.00	0.00	0.06						
Lawrence MSA	84	9.61	7.16	2.38	24.36	29.76	42.33	38.10	26.14	29.76	1.17	1.09	1.33	1.00	1.35						
Manhattan MSA	28	3.20	0.00	0.00	21.92	28.57	53.73	32.14	24.30	39.29	0.68	0.00	0.90	0.19	1.23						
Topeka AA	23	2.63	20.13	0.00	17.07	17.39	37.14	52.17	25.67	30.43	0.16	0.00	0.00	0.13	0.41						

\* Based on 2015 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 (2016).

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: KANSAS					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Non-MA KS AA	346	99.43	0.00	0.00	3.61	0.58	68.39	74.28	28.00	25.14	8.82	0.00	0.00	9.47	7.14	
Wichita AA	0	0.00	2.98	0.00	13.60	0.00	31.03	0.00	52.39	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Geary AA	0	0.00	0.00	0.00	5.56	0.00	61.11	0.00	33.33	0.00	0.00	0.00	0.00	0.00	0.00	
Johnson County AA	0	0.00	0.20	0.00	7.78	0.00	29.56	0.00	61.97	0.00	0.00	0.00	0.00	0.00	0.00	
Lawrence MSA	0	0.00	2.31	0.00	10.77	0.00	45.38	0.00	41.54	0.00	0.00	0.00	0.00	0.00	0.00	
Manhattan MSA	1	0.29	0.00	0.00	2.47	0.00	77.75	0.00	19.78	100.00	2.00	0.00	0.00	2.44	0.00	
Topeka AA	1	0.29	2.38	100.00	8.63	0.00	34.52	0.00	54.46	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 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 (2016).

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

Borrower Distribution: HOME PURCHASE		Geography: KANSAS					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families 4	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Non-MA KS AA	525	63.87	17.22	4.99	16.91	17.37	22.14	25.95	43.73	51.70	5.49	8.47	3.58	4.21	7.41	
Wichita AA	124	15.09	21.25	3.33	18.14	30.83	20.81	15.00	39.80	50.83	0.17	0.12	0.05	0.15	0.29	
<b>Limited Review:</b>																
Geary AA	13	1.58	17.79	7.69	19.88	30.77	25.27	23.08	37.06	38.46	1.98	0.00	3.17	1.34	2.22	
Johnson County AA	24	2.92	10.75	0.00	13.05	8.70	20.10	26.09	56.11	65.22	0.04	0.00	0.00	0.06	0.05	
Lawrence MSA	44	5.35	21.60	2.50	16.23	17.50	21.87	32.50	40.30	47.50	0.31	0.00	0.27	0.27	0.43	
Manhattan MSA	63	7.66	18.89	1.72	19.25	17.24	22.58	27.59	39.28	53.45	0.70	0.00	1.00	0.47	0.80	
Topeka AA	29	3.53	21.95	7.14	16.53	28.57	22.24	25.00	39.28	39.29	0.31	0.00	0.17	0.32	0.50	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.6% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: KANSAS					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families <sup>5</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Non-MA KS AA	285	76.20	17.22	5.02	16.91	22.94	22.14	26.16	43.73	45.88	44.50	57.14	48.89	50.00	38.68	
Wichita AA	27	7.22	21.25	7.69	18.14	11.54	20.81	3.85	39.80	76.92	0.47	0.00	0.00	0.00	1.06	
<b>Limited Review:</b>																
Geary AA	13	3.48	17.79	0.00	19.88	23.08	25.27	23.08	37.06	53.85	13.33	0.00	11.11	25.00	20.00	
Johnson County AA	5	1.34	10.75	0.00	13.05	0.00	20.10	0.00	56.11	100.00	0.11	0.00	0.00	0.00	0.18	
Lawrence MSA	11	2.94	21.60	0.00	16.23	10.00	21.87	40.00	40.30	50.00	2.00	0.00	0.00	2.86	2.60	
Manhattan MSA	27	7.22	18.89	7.69	19.25	11.54	22.58	19.23	39.28	61.54	7.87	5.26	0.00	7.69	10.94	
Topeka AA	6	1.60	21.95	0.00	16.53	16.67	22.24	50.00	39.28	33.33	0.93	0.00	0.00	2.08	0.95	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: KANSAS		Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*										
	#	% of Total**	% Families**	% BANK Loans****	% Families <sup>6</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
Non-MA KS AA	353	74.16	17.22	6.34	16.91	16.14	22.14	23.34	43.73	54.18	7.71	8.96	6.67	8.41	7.62						
Wichita AA	37	7.77	21.25	2.78	18.14	13.89	20.81	16.67	39.80	66.67	0.10	0.00	0.24	0.10	0.06						
<b>Limited Review:</b>																					
Geary AA	4	0.84	17.79	0.00	19.88	23.08	25.27	23.08	37.06	53.85	13.33	0.00	11.11	25.00	20.00						
Johnson County AA	11	2.31	10.75	10.00	13.05	10.00	20.10	10.00	56.11	70.00	0.03	0.23	0.08	0.05	0.00						
Lawrence MSA	18	3.78	21.60	0.00	16.23	12.50	21.87	12.50	40.30	75.00	0.36	0.00	0.47	0.37	0.37						
Manhattan MSA	34	7.14	18.89	7.69	19.25	11.54	22.58	19.23	39.28	61.54	7.87	5.26	0.00	7.69	10.94						
Topeka AA	19	3.99	21.95	0.00	16.53	5.26	22.24	5.26	39.28	89.47	0.14	0.00	0.33	0.00	0.16						

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: KANSAS					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MA KS AA	507	58.01	74.69	49.70	72.98	14.40	12.62	2.61	3.78
Wichita AA	195	22.31	78.45	42.56	54.87	21.03	24.10	0.39	0.50
<b>Limited Review:</b>									
Geary AA	11	1.26	77.21	45.45	36.36	36.36	27.27	0.38	0.00
Johnson County AA	26	2.97	82.22	48.15	25.93	33.33	40.74	0.05	0.02
Lawrence MSA	84	9.61	81.25	40.48	54.76	15.48	29.76	1.17	0.98
Manhattan MSA	28	3.20	76.68	35.71	50.00	14.29	35.71	0.68	0.83
Topeka AA	23	2.63	76.26	56.52	65.22	17.39	17.39	0.16	0.15

\* Based on 2015 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 - 2016).

\*\*\*\* 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 22.37% 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: KANSAS			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MA KS AA	346	99.43	97.16	86.42	74.57	16.18	9.25	8.82	15.06
Wichita AA	0	0.00	96.54	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Geary AA	0	0.00	96.67	0.00	0.00	0.00	0.00	0.00	0.00
Johnson County AA	0	0.00	93.69	0.00	0.00	0.00	0.00	0.00	0.00
Lawrence MSA	0	0.00	96.54	0.00	0.00	0.00	0.00	0.00	0.00
Manhattan MSA	1	0.29	95.05	0.00	0.00	100.00	0.00	2.00	0.00
Topeka AA	1	0.29	97.62	100.00	100.00	0.00	0.00	0.00	0.00

\* Based on 2015 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 - 2016).

\*\*\*\* 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 5.19% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: Kansas				Evaluation Period: MARCH 31, 2014 TO JUNE 4, 2017			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Kansas Non-MA AA	0	0	53	1,243	53	1,243	51.5%	0	0
Wichita AA	0	0	22	471	22	471	19.5%	0	0
<b>Limited Review:00</b>									
Manhattan MSA	0	0	5	6	5	6	0.3%	0	0
Johnson County AA	0	0	4	687	4	687	28.5%	0	0
Lawrence MSA	0	0	3	3	3	3	0.1%	0	0
Topeka AA	0	0	4	2	4	2	0.1%	0	0
Geary AA	0	0	0	0	0	0	0.0%	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: KANSAS				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Non-MA KS AA	74.98	17	60.71	0.00	17.65	47.06	35.29	0	0	0	0	0	0	0.00	14.09	55.80	30.10
Wichita AA	7.97	3	10.71	0.00	100.00	0.00	0.00	0	0	0	0	0	0	7.42	30.47	27.40	34.72
<b>Limited Review:</b>																	
Geary AA	3.11	1	3.58	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	33.82	48.62	17.56
Johnson County AA	5.00	2	7.14	0.00	0.00	0.00	100.00	2	1	0	0	0	+1	0.68	10.13	28.43	60.75
Lawrence MSA	3.23	2	7.14	0.00	0.00	50.00	50.00	1	0	0	0	+1	0	8.96	20.19	48.38	22.46
Manhattan MSA	4.35	2	7.14	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	23.40	57.05	19.55
Topeka AA	1.36	1	3.58	0.00	0.00	100.00	0.00	0	0	0	0	0	0	10.67	22.77	35.97	30.59

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: COLORADO												
Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016												
Assessment Area (2016):	% 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>												
Denver AA	27.80	206	88,678	158	46,548	0	0	1	35,000	365	170,226	7.31
Pueblo MSA	39.07	227	35,428	258	30,501	25	861	3	14,014	513	80,804	26.57
<b>Limited Review:</b>												
Boulder MSA	7.16	31	19,676	62	16,211	0	0	1	10	94	35,897	8.86
Non-MA CO AA	25.97	131	15,654	134	14,378	73	12,726	3	631	341	43,389	57.26
<b>Statewide:</b>												
Statewide with no P/M/F to serve the AAs	0	0	0	0	0	0	0	2	18,256	2	18,256	0

\* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from March 31, 2014 to June 5, 2017.

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

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

Geographic Distribution: HOME PURCHASE		Geography: COLORADO				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Denver AA	68	28.22	6.50	7.35	19.37	13.24	35.18	26.47	38.95	52.94	0.02	0.02	0.02	0.02	0.03	
Pueblo MSA	107	44.40	4.85	3.74	18.98	19.63	36.89	33.64	39.29	42.99	1.01	0.79	0.97	1.04	1.02	
<b>Limited Review:</b>																
Boulder MSA	12	4.98	2.83	0.00	14.95	8.33	45.76	25.00	36.45	66.67	0.07	0.00	0.00	0.04	0.16	
Non-MA CO AA	54	22.41	0.00	0.00	54.66	53.70	41.92	33.33	3.42	12.96	1.07	0.00	0.90	0.49	6.25	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: COLORADO				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Denver AA	24	26.97	6.50	8.33	19.37	37.50	35.18	16.67	38.95	37.50	0.21	0.29	0.34	0.04	0.28
Pueblo MSA	33	37.08	4.85	9.09	18.98	6.06	36.89	33.33	39.29	51.52	5.34	0.00	0.00	5.19	6.86
<b>Limited Review:</b>															
Boulder MSA	6	6.74	2.83	0.00	14.95	0.00	45.76	83.33	36.45	16.67	0.00	0.00	0.00	0.00	0.00
Non-MA CO AA	26	29.21	0.00	0.00	54.66	57.69	41.92	38.46	3.42	3.85	14.86	0.00	14.29	16.67	0.00

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: COLORADO				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Denver AA	110	43.48	6.50	6.36	19.37	11.82	35.18	24.55	38.95	57.27	0.03	0.05	0.03	0.01	0.05	
Pueblo MSA	81	32.02	4.85	4.94	18.98	16.05	36.89	35.80	39.29	43.21	0.77	1.45	1.16	0.49	0.84	
<b>Limited Review:</b>																
Boulder MSA	12	4.74	2.83	0.00	14.95	0.00	45.76	33.33	36.45	66.67	0.04	0.00	0.00	0.03	0.08	
Non-MA CO AA	50	19.76	0.00	0.00	54.66	64.00	41.92	32.00	3.42	4.00	1.81	0.00	1.64	2.26	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: COLORADO					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016									
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>																
Denver AA	4	33.33	20.66	25.00	32.10	50.00	32.63	0.00	14.61	25.00	0.19	0.63	0.00	0.00	0.00	
Pueblo MSA	6	50.00	19.35	0.00	36.32	16.67	35.89	66.67	8.44	16.67	10.53	0.00	16.67	0.00	100.00	
<b>Limited Review:</b>																
Boulder MSA	1	8.33	8.66	0.00	30.19	0.00	46.97	100.00	14.18	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MA CO AA	1	8.33	0.00	0.00	63.51	0.00	35.48	100.00	1.02	0.00	33.33	0.00	0.00	50.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Multi Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 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: COLORADO		Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
<b>Full Review:</b>																		
Denver AA	158	25.82	8.58	8.86	20.36	37.97	30.14	18.99	40.59	34.18	0.06	0.01	0.13	0.03	0.05			
Pueblo MSA	258	42.16	5.20	12.02	26.77	31.78	30.53	17.05	37.18	39.15	2.63	6.67	2.48	1.69	3.03			
<b>Limited Review:</b>																		
Boulder MSA	62	10.13	3.72	8.06	21.84	37.10	42.37	38.71	32.07	16.13	0.15	0.31	0.12	0.15	0.15			
Non-MA CO AA	134	21.90	0.00	0.00	54.58	48.51	41.48	47.01	3.54	4.48	3.77	0.00	3.48	4.35	5.00			

\* Based on 2015 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 (2016).

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: COLORADO					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Denver AA	0	0.00	7.66	0.00	18.40	0.00	32.48	0.00	41.40	0.00	0.38	0.00	0.00	0.00	0.79	
Pueblo MSA	25	25.51	3.66	0.00	18.90	4.00	39.02	64.00	37.50	32.00	15.63	0.00	0.00	18.18	25.00	
<b>Limited Review:</b>																
Boulder MSA	0	0.00	3.76	0.00	15.49	0.00	47.46	0.00	33.30	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MA CO AA	73	74.49	0.00	0.00	37.46	5.48	61.13	93.15	1.41	1.37	28.57	0.00	0.00	37.84	0.00	

\* Based on 2015 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 (2016).

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

Borrower Distribution: HOME PURCHASE		Geography: COLORADO					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families 7	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver AA	68	28.22	22.09	0.00	17.11	13.56	20.18	13.56	40.62	72.88	0.02	0.00	0.02	0.01	0.03	
Pueblo MSA	107	44.40	21.63	10.10	17.82	12.12	19.67	13.13	40.88	64.65	1.05	1.03	0.62	0.72	1.49	
<b>Limited Review:</b>																
Boulder MSA	12	4.98	22.09	0.00	16.59	0.00	20.06	0.00	41.26	100.00	0.07	0.00	0.00	0.00	0.16	
Non-MA CO AA	54	22.41	24.35	7.69	25.34	15.38	20.45	34.62	29.86	42.31	1.47	1.04	1.95	0.90	1.79	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 9.1% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: COLORADO					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families <sup>8</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Denver AA	24	26.97	22.09	8.33	17.11	12.50	20.18	8.33	40.62	70.83	0.22	0.00	0.16	0.12	0.35	
Pueblo MSA	33	37.08	21.63	6.45	17.82	9.68	19.67	25.81	40.88	58.06	4.64	9.09	0.00	8.51	3.70	
<b>Limited Review:</b>																
Boulder MSA	6	6.74	22.09	0.00	16.59	0.00	20.06	0.00	41.26	100.00	0.00	0.00	0.00	0.00	0.00	
Non-MA CO AA	26	29.21	24.35	16.00	25.34	16.00	20.45	40.00	29.86	28.00	14.08	11.76	0.00	26.09	10.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.6% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: COLORADO					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families <sup>9</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Denver AA	110	43.48	22.09	1.09	17.11	9.78	20.18	8.70	40.62	80.43	0.03	0.00	0.01	0.01	0.06	
Pueblo MSA	81	32.02	21.63	3.23	17.82	8.06	19.67	22.58	40.88	66.13	0.60	0.00	0.39	0.88	0.58	
<b>Limited Review:</b>																
Boulder MSA	12	4.74	22.09	0.00	16.59	0.00	20.06	0.00	41.26	100.00	0.05	0.00	0.00	0.00	0.11	
Non-MA CO AA	50	19.76	24.35	8.16	25.34	16.33	20.45	18.37	29.86	57.14	2.73	0.00	2.70	1.59	4.19	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.4% of loans originated and purchased by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: COLORADO					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Denver AA	158	25.82	87.68	27.85	36.08	22.78	41.14	0.06	0.02
Pueblo MSA	258	42.16	84.61	51.55	71.71	19.38	8.91	2.63	3.53
<b>Limited Review:</b>									
Boulder MSA	62	10.13	89.08	48.39	27.42	45.16	27.42	0.15	0.16
Non-MA CO AA	134	21.90	85.70	43.28	69.40	18.66	11.94	3.77	4.94

\* Based on 2015 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 - 2016).

\*\*\*\* 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 28.10% 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: COLORADO			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Denver AA	0	0.00	95.17	0.00	0.00	0.00	0.00	0.38	0.71
Pueblo MSA	25	25.51	97.26	80.00	100.00	0.00	0.00	15.63	19.05
<b>Limited Review:</b>									
Boulder MSA	0	0.00	96.46	0.00	0.00	0.00	0.00	0.00	0.00
Non-MA CO AA	73	74.49	94.70	79.45	31.51	46.58	21.92	28.57	38.89

\* Based on 2015 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 - 2016).

\*\*\*\* 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 9.18% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
		Geography: COLORADO				Evaluation Period: MARCH 31, 2014 TO JUNE 4, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Denver AA	0	0	9	4,135	9	4,135	78.58%	0	0
Pueblo MSA	0	0	10	288	10	288	5.47%	0	0
<b>Limited Review:</b>									
Boulder MSA	0	0	20	815	20	815	15.49%	0	0
Non-MA CO AA	0	0	10	24	10	24	0.46%	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: COLORADO Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Denver AA	7.31	2	20.00	0.00	0.00	0.00	100.00	1	1	0	0	0	0	11.39	23.34	32.64	32.59
Pueblo MSA	26.57	3	30.00	0.00	33.33	33.33	33.33	0	0	0	0	0	0	7.79	23.43	35.03	32.43
<b>Limited Review:</b>																	
Boulder MSA	8.86	1	10.00	0.00	100.00	0.00	0.00	1	0	0	+1	0	0	6.89	18.39	45.80	28.91
Non-MA CO AA	57.26	4	40.00	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	47.73	35.78	2.98

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016						
Assessment Area (2016):	% 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)	
Full Review:												
Non-MA MO AA	100.00	29	1,265	7	213	31	1,493	0	0	67	2,971	100.00

\* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from March 31, 2014 to June 5, 2017.  
 \*\*\* Deposit Data as of June 30, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016						Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Non-MA MO AA	3	100.00	0.00	0.00	0.00	0.00	12.93	0.00	87.07	100.00	0.12	0.00	0.00	0.00	0.15	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Non-MA MO AA	21	100.00	0.00	0.00	0.00	0.00	12.93	0.00	87.07	100.00	4.92	0.00	0.00	0.00	6.00

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Non-MA MO AA	5	100.00	0.00	0.00	0.00	0.00	12.93	20.00	87.07	80.00	0.18	0.00	0.00	1.09	0.00

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
<b>Full Review:</b>															
Non-MA MO AA	0	0.00	0.00	0.00	0.00	0.00	33.31	0.00	66.69	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2015 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Multi Family Units is the number of multi-family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 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: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of Business S***	% BANK Loans	% of Business S***	% BANK Loans	% of Business S***	% BANK Loans	% of Business S***	% BANK Loans					
<b>Full Review:</b>															
Non-MA MO AA	7	100.00	0.00	0.00	0.00	0.00	31.23	0.00	68.77	100.00	0.17	0.00	0.00	0.00	0.23

\* Based on 2015 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 (2016).

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
<b>Full Review:</b>																
Non-MA MO AA	31	100.00	0.00	0.00	0.00	0.00	10.53	9.68	89.47	90.32	2.55	0.00	0.00	5.88	2.23	

\* Based on 2015 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 (2016).

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

Borrower Distribution: HOME PURCHASE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families 10	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Non-MA MO AA	3	100.00	12.68	0.00	15.17	0.00	19.67	100.00	52.48	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 66.7% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families* **	% BANK Loans****	% Families <sup>11</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Non-MA MO AA	21	100.00	12.68	4.76	15.17	33.33	19.67	19.05	52.48	42.86	5.26	0.00	16.67	18.18	0.00	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families** *	% BANK Loans****	% Families <sup>12</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Non-MA MO AA	5	100.00	12.68	0.00	15.17	20.00	19.67	0.00	52.48	80.00	0.29	0.00	0.00	0.00	0.44	

\* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MA MO AA	7	100.00	82.12	42.86	100.00	0.00	0.00	0.17	0.32

\* Based on 2015 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 - 2016).

\*\*\*\* 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 57.14% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Non-MA MO AA	31	100.00	99.12	87.10	93.55	6.45	0.00	2.55	3.09

\* Based on 2015 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 - 2016).

\*\*\*\* 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 9.68% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
			Geography: MISSOURI		Evaluation Period: MARCH 31, 2014 TO JUNE 4, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Non-MA MO AA	0	0	1	0	1	0	0.00	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: MISSOURI Evaluation Period: JANUARY 1, 2013 TO DECEMBER 31, 2016																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Non-MA MO AA	100.00	1	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	20.68	79.32