



# LARGE BANK

---

Comptroller of the Currency  
Administrator of National Banks

---

Washington, DC 20219

## PUBLIC DISCLOSURE

July 13, 2009

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Kansas  
Charter Number: 22644

6201 College Boulevard  
Overland Park, KS 66211-0000

Office of the Comptroller of the Currency

MIDSIZE BANK SUPERVISION  
440 South LaSalle Street, Suite 2700  
Chicago, IL. 60605-1073

**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>FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>10</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS .....</b>	<b>11</b>
LENDING TEST .....	11
INVESTMENT TEST .....	13
SERVICE TEST .....	14
<b>APPENDIX A: SCOPE OF EXAMINATION .....</b>	<b>A-1</b>
<b>APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS .....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## Overall CRA Rating

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

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

Performance Levels	First National Bank of Kansas Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Good geographic distribution of loans.
- Adequate penetration to businesses of different sizes.
- Excellent penetration of home mortgage loans to borrowers of different income levels.
- Good level of community development investments.
- Branch locations are reasonably accessible to low- and moderate-income individuals.

## 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 usually have between 2,500 and 8,000 persons, and 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Tier 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

First National Bank of Kansas (FNB Kansas) is an intrastate bank headquartered in Overland Park, Kansas with total assets of \$1 billion as of December 31, 2008. FNB Kansas is a wholly owned subsidiary of First National of Nebraska, Inc. (FNNI), a \$16.7 billion multi-bank holding company headquartered in Omaha, Nebraska. FNNI operates one state bank and four national banks in Nebraska. In addition, FNNI operates one national bank in each of the following states: Colorado, Illinois, Kansas, Georgia, and South Dakota. Affiliate loans are not included in our analysis of the bank's CRA performance.

FNB Kansas is a full-service banking institution offering a wide range of financial services. The bank operates seven full-service branches and 21 automated teller machines (ATMs) in its designated assessment area of Johnson County, Kansas.

The bank's primary business focus is small business and consumer lending. Net loans represent 86 percent of total assets as of December 31, 2008. The loan portfolio (by dollar volume) is comprised of 65 percent commercial and commercial real estate, 24 percent consumer, 9 percent residential real estate, and 1 percent agricultural loans. Other miscellaneous loans represent 1 percent of the loan portfolio. Tier 1 capital is \$67 million.

There are no legal or financial constraints that impede the bank's ability to help meet the credit needs in its AA.

FNB Kansas received a "Satisfactory" rating at its last CRA examination dated May 22, 2006, which was performed under the Strategic Plan option. This is the bank's first examination using Large Bank CRA examination procedures.



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, excluding community development (CD) loans, is January 1, 2006 through December 31, 2008. This included a review of home mortgage and small loans to businesses.

For CD loans, the Investment Test, and Service Test, the evaluation period is from May 22, 2006 through July 13, 2009. The Investment Test included a review of investments, donations, and grants originated in the bank's assessment area (AA) that meets the definition of CD investments. The Service Test included a review of retail and CD services provided in the bank's AA.

The scope of our review did not include home improvement loans since this product is only three percent of total reported loans during the evaluation period. We also did not evaluate performance regarding multifamily home mortgage loans due to limited loan volumes. Overall market share for all loan products is insignificant at less than one percent and was not part of our analysis. In addition, our scope did not include small farm loans since the bank did not originate or purchase any of these loans in the AA during the evaluation period. We did not evaluate consumer loans as they do not constitute a substantial majority of the bank's business.

### Data Integrity

We verified the accuracy of 2006-2008 data for Home Mortgage Disclosure Act (HMDA) reportable loans and small loans to businesses. Based on a sample of each loan type, data is accurate and reliable. We evaluated CD loan, investment, and service information during the examination.

### Selection of Areas for Full-Scope Review

We performed a full-scope review in the bank's only AA of Johnson County, Kansas, which is located in the Kansas City, MO-KS metropolitan area (MA). Refer to the table in Appendix A for additional information.

### Ratings

The bank's overall rating is based on our full-scope review in the bank's only AA. The Lending Test is more heavily weighted than the Investment and Service Tests. Within the Lending Test, small loans to businesses received more weight as they represent 59 percent of the total number of reported loans during the evaluation period. Home mortgage loans represent 40 percent of the total number of reported loans.

## Other

We contacted a local small business development organization in Overland Park, Kansas. The organization helps small business owners and entrepreneurs through professional counseling, workshops and technical resources. Our contact indicated a need for active financing and technical assistance for small businesses in the AA.

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

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the lending test is rated "High Satisfactory". Based on our full-scope review, the bank's performance in the Johnson County AA is good.

Small loans to businesses carry the most weight as they represent 59 percent of the total number of reported loans during the evaluation period. For HMDA loans, primary weight is placed on home purchase loans followed by refinance loans, which represent 58 percent and 33 percent of home mortgage loans, respectively, during the evaluation period.

#### Lending Activity

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. FNB Kansas has a deposit market share of 6.49 percent, which ranks fifth in the AA.

Small business loan activity in the AA is adequate. Based on 2007 peer small business data, FNB Kansas is ranked 19<sup>th</sup> in small business loans with a market share of 3.97 percent based on dollar volume. The bank is one of many lenders in the AA. Large banks represent over 70 percent of the market by number of loans and over 20 percent by dollar volume. These banks range in asset size of \$17 billion to \$147 billion.

Home mortgage loan activity in the AA is adequate. Based on 2007 peer mortgage data, FNB Kansas is ranked 82<sup>nd</sup> out of over 400 lenders in the market. The bank's market share is not significant at less than .50 percent for all loan products. Mortgage loan competition is very strong and includes large banks, mortgage companies, and non-bank competitors. Only the top seven lenders have a market share over four percent by number of loans and only 17 banks have a market share over one percent by dollar volume.

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

The geographic distribution of loans by income level is good. There are no low-income census tracts in the AA.

#### *Home Mortgage Loans*

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

The overall geographic distribution of home mortgage loans is excellent.

The geographic distribution of home purchase loans is excellent. Penetration in moderate income geographies is above demographics. The geographic distribution of home refinance loans is good as the penetration in moderate-income geographies is near the demographics.

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

Refer to Table 6 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. Performance in moderate-income tracts is good.

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

A lending gap analysis was conducted for this evaluation period. There were no unexplained or conspicuous gaps identified.

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

FNB Kansas originated a majority of its loans (by number), 59 percent, within its AA. By dollar volume, 52 percent of loans are within the bank's AA. The number of HMDA and small business loans originated within the AA are 53 percent and 64 percent, respectively. The number of home purchase and refinance loans within the AA are 56 percent and 47 percent, respectively.

This information only includes bank originations and purchases. The impact of this performance into the overall analysis of the geographic distribution of lending by income level of geography is neutral.

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

The distribution of loans to borrowers of different income levels and businesses of different sizes is good.

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent. The percentage of families below poverty levels is 2.14 percent.

For all product types, the distribution of loans is excellent. The percentage of home purchase, refinance, and home improvement loans to moderate-income individuals exceeds demographics. The bank's performance to low-income individuals for these loans is adequate considering the percentage of families below poverty level.

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

Refer to Table 11 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is adequate. The percentage of loans to businesses with revenues of \$1 million or less is below demographics.

### **Community Development Lending**

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

Community development lending performance is adequate and has a neutral impact on the lending test rating.

During the evaluation period, FNB Kansas originated ten CD loans totaling \$1.5 million in the AA. Of this dollar amount, \$820 thousand represent loan renewals. A majority of CD lending is with two related non-profit organizations that provide assisted living facilities and prescription drugs to low-income individuals with chronic mental illness. The bank also provided CD loans to a non-profit affordable housing developer and a non-profit organization that provides housing for women who are victims of domestic violence.

### **Product Innovation and Flexibility**

FNB Kansas participates in a First time Home Buyers Program as a preferred lender with the Kansas Housing Resource Corp. This program provides down payment assistance to qualified Kansas buyers for the purchase of their first home. The program is for persons with incomes at or below 80 percent of the median income for their area. The loan may be from 15-30 percent of the purchase price of the home. The bank does not track its performance with this flexible loan program. Therefore, the impact on the Lending Test rating is neutral.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Johnson County AA is good.

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

Qualified investments and donations total \$2.3 million during the evaluation period. Of this amount \$710 thousand were prior period investments. Approximately \$400 thousand of the prior period investments provides continued funding to Community Development Financial Institutions for ongoing activities. The impact of the remaining investment is nominal.

Current period investments total \$1.6 million and includes a \$750 thousand allocated share of a bank holding company owned CD investment fund. This allocation represents a qualified first mortgage loan located in the AA. FNB Kansas also has three certificates of deposit totaling \$540 thousand with a local Community Development Financial Institution; two are renewals. Qualified donations total \$275 thousand and represent contributions to non-profit organizations that provide community services to low- and moderate-income (LMI) individuals in the AA.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Johnson County AA is adequate.

### **Retail Banking Services**

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

The bank's branches are reasonably accessible to geographies and individuals of different income levels in its AA. All branch locations are in middle- and upper-income geographies. The AA includes two moderate-income geographies, in which less than two percent of the population resides. There are no low-income geographies in the AA. There were no branch openings or closings during the evaluation period.

The hours of operation are convenient. Bank lobby hours are Monday through Friday from 9 a.m. to 5 p.m. and from 9 a.m. to noon on Saturday. One branch is not open on Saturday. Drive-up hours are from 7 a.m. to 7 p.m. Monday through Friday and 8 a.m. to 1 p.m. on Saturday. The bank's telephone customer service center is open until 7 p.m. Monday through Friday and 1 p.m. on Saturday.

A variety of products and services are available at all branch locations. There are no material differences in the availability or cost of services. FNB Kansas has 21 ATMs in the AA located in middle- and upper-income geographies.

### **Community Development Services**

The level of CD services provided by bank employees is adequate considering LMI credit needs in the AA and the bank's capacity. CD services included the participation of bank staff in a community development advisory committee responsible for the review of requests for CD block grant funds in the AA. In addition, bank staff provided financial expertise to non-profit

organizations that offer health services, affordable housing, and financial literacy training in the AA.



## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (01/01/06 to 12/31/08) Investment and Service Tests and CD Loans: (05/22/06 to 07/13/09)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank of Kansas (FNB Kansas) Overland Park, Kansas	Home Mortgage, Small Business, and Community Development Loans; Qualified Investments; Community Development 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>
Johnson County AA (Part of the Kansas City, MO-KS MSA #28140)	Full-Scope	

## Appendix B: Market Profiles for Full-Scope Areas

### Johnson County AA

Demographic Information for Full-Scope Area: Johnson County AA (part of Kansas City, MO-KS MSA #28140)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	107	0.00	1.87	38.32	59.81	0.00
Population by Geography	451,086	0.00	1.64	37.21	61.15	0.00
Owner-Occupied Housing by Geography	126,231	0.00	0.97	33.40	65.63	0.00
Businesses by Geography	41,475	0.00	2.45	33.41	64.14	0.00
Farms by Geography	849	0.00	2.00	37.57	60.42	0.00
Family Distribution by Income Level	122,280	8.46	12.92	21.87	56.75	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	26,143	0.00	3.56	56.46	39.98	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below the Poverty Level	= \$ 55,031 = \$ 67,800 = 3.58%				Median Housing Value = \$ 165,532 Unemployment Rate = 4.4% (2008)	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2008 HUD updated MFI.

The Johnson County assessment area (AA) is part of the Kansas City, MO-KS MA. This AA complies with the regulation and does not arbitrarily exclude any LMI areas. The bank's primary business focus is small business and consumer lending. Johnson County is located in northeast Kansas and has the fastest growing population in the state. The county seat is in Olathe and the largest city is Overland Park. There are two moderate-income, 41 middle-income, and 64 upper-income census tracts in the AA. None of the census tracts are designated low-income.

The local economy has experienced declining trends as the overall U.S. economy, including real estate values, deteriorated. Unemployment is increasing; however, it remains below the national average. Competition is strong with over 400 mortgage lenders and 64 institutions in the AA. FNB Kansas ranked 5<sup>th</sup> (6.49%) in deposit market share in the AA as of June 30, 2008. In 2007, the bank ranked 19<sup>th</sup> (3.97%) in small business loans. FNB Kansas is not a significant HMDA lender in the market. There were no small farm loans originated in the AA during the evaluation period.

FNB Kansas has seven full-service branches and 21 ATMs. Major industries in Johnson County are retail trade, services and public administration. Major employers include Sprint Nextel, Embarq Corporation, various school districts, and hospitals/medical centers. Identified needs in the community include active financing and technical assistance for small businesses. Opportunities to participate in CD activities are readily available.

## Appendix C: Tables of Performance Data

---

### Content of Standardized 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. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank 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 \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

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

Tables 7 and 12 are not applicable. Therefore, they are not included in this section.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: JOHNSON COUNTY, KS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008				
MA/Assessment Area (2008):	% 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>												
Johnson County	100.00	320	54,723	478	85,035	0	0	10	1,516	808	141,274	100.00

\* Loan Data as of December 31, 2008. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from May 22, 2006 to July 13, 2009.

\*\*\* Deposit Data as of June 30, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: JOHNSON COUNTY, KS								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Johnson County	185	100.00	0.00	0.00	0.97	1.62	33.40	28.65	65.63	69.73	0.12	0.00	0.50	0.07	0.14

\* Based on 2007 Peer Mortgage Data (Western)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: JOHNSON COUNTY, KS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/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>															
Johnson County	28	100.00	0.00	0.00	0.97	0.00	33.40	35.71	65.63	64.29	0.48	0.00	0.00	0.37	0.54

\* Based on 2007 Peer Mortgage Data (Western)

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

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

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



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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: JOHNSON COUNTY, KS				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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>																
Johnson County	106	100.00	0.00	0.00	0.97	0.94	33.40	25.47	65.63	73.58	0.18	0.00	0.00	0.09	0.22	

\* Based on 2007 Peer Mortgage Data (Western)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: JOHNSON COUNTY, KS								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/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	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Johnson County	1	100.00	0.00	0.00	3.84	0.00	53.21	100.00	42.95	0.00	3.57	0.00	0.00	5.56	0.00		

\* Based on 2007 Peer Mortgage Data (Western)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: JOHNSON COUNTY, KS					Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008				
MA/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>																								
Johnson County	478	100.00	0.00	0.00	2.45	2.09	33.41	11.92	64.14	85.98	0.64	0.00	0.77	0.25	0.80									

\* Based on 2007 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 (2008).

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

Borrower Distribution: HOME PURCHASE		Geography: JOHNSON COUNTY, KS								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Johnson County	185	100.00	8.46	2.92	12.92	25.15	21.87	26.90	56.75	45.03	0.12	0.00	0.10	0.12	0.14

\* Based on 2007 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 7.6% of loans originated and purchased by bank.

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

\*\*\*\* 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.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: JOHNSON COUNTY, KS						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>1**</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Johnson County	28	100.00	8.46	4.76	12.92	28.57	21.87	14.29	56.75	52.38	0.25	0.00	0.45	0.00	0.33

\* Based on 2007 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 25.0% of loans originated and purchased by bank.

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

\*\*\*\* 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.

<sup>1</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: JOHNSON COUNTY, KS				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					Market Share				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>2*</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Johnson County	106	100.00	8.46	5.21	12.92	15.63	21.87	20.83	56.75	58.33	0.20	0.00	0.11	0.19	0.24	

\* Based on 2007 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 9.4% of loans originated and purchased by bank.

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

\*\*\*\* 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.

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

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: JOHNSON COUNTY, KS			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008				
MA/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****	\$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>									
Johnson County	478	100.00	64.31	44.35	61.09	17.36	21.55	0.64	1.01

\* Based on 2007 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 - 2008).

\*\*\*\* 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 10.46% of small loans to businesses originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: JOHNSON COUNTY, KS				Evaluation Period: MAY 22, 2006 TO JULY 13, 2009			
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>									
Johnson County	4	710	57	1,565	61	2,275	100.00	0	0

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

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



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: JOHNSON COUNTY, KS Evaluation Period: MAY 22, 2006 TO JULY 13, 2009																	
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>																	
Johnson County	100.00	7	100.00	0.00	0.00	14.29	85.71	0	0	0	0	0	0	0.00	1.64	37.21	61.15