



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

April 7, 2003

# **Community Reinvestment Act Performance Evaluation**

**The First National Bank of Olathe  
Charter Number: 3720**

**444 East Santa Fe  
Olathe, KS 66061**

**Office of the Comptroller of the Currency  
Kansas City South Field Office  
6700 Antioch Road, Suite 450  
Merriam, KS 66204-1200**

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

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## Overall CRA Rating

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

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- First National Bank of Olathe (FNB) demonstrated excellent responsiveness to the small business credit needs of its assessment area.
- FNB demonstrated excellent responsiveness to home improvement credit needs for both low- and moderate-income borrowers. In addition, the volume of refinanced loans to moderate-income borrowers is above demographics.
- FNB’s community development lending is significant, based on dollar volume, which has a positive impact on the Lending Test.
- The level of qualified investments is adequate given the limited community development investment opportunities.
- FNB’s delivery systems are reasonably accessible to individuals of different income levels in its assessment area. The level of community development services provided by bank personnel is adequate.

## Definitions and Common Abbreviations

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

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

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

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**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.

**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 or a block numbering area 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 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).

**Home Mortgage Loans:** such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

First National Bank of Olathe (FNB) is a \$491 million intrastate financial institution headquartered in Olathe, Kansas. First Olathe Bancshares, Inc., a \$1 billion multi-bank holding company located in Overland Park, Kansas, owns FNB. In addition to the main banking facility, the bank has eight branch locations and ten ATMs within its assessment area. Competition from other financial institutions is strong.

FNB is a full-service banking institution. The bank offers a full range of loan and deposit products at its main bank and seven branch locations. Because of its proximity to the main bank, loan and deposit products are not offered at the Kansas Avenue branch. The bank's primary lending focus is commercial lending. As of December 31, 2002, the bank's loan portfolio consisted of 85 percent commercial and commercial real estate loans, 7 percent residential real estate loans (including multi-family), and 8 percent consumer loans (including home equity).

Net loans represent 59 percent of total assets as of December 31, 2002. FNB's net loan to deposit ratio is 79 percent for the same time frame. There are no legal, financial, or other constraints that impede FNB's ability to help meet the credit needs in its assessment area.

FNB's last CRA examination is dated January 18, 2000 and the bank was rated "Satisfactory."

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period for the Lending Test (except CD loans) is January 1, 2000 through December 31, 2002. For CD loans, the Investment Test, and the Service Test, the evaluation period is January 1, 2000 to April 7, 2003.

For the lending test, we evaluated HMDA and small business loans originated and purchased. The volume of small farm loans originated during this evaluation period is minimal and accounts for 2 percent of total loan originations.

### **Data Integrity**

As part of the CRA evaluation, we tested FNB's publicly filed information on HMDA and small business loans from 2000-2002 for accuracy. The test included an evaluation of the bank's processes to ensure data is reliable.

Publicly reported HMDA data is accurate and reliable.

Significant errors were found in the revenue category for small business loans originated in 2002. To address the errors, bank management verified the accuracy of all 2002 small business loan originations prior to this examination. Based on our follow-up review, no exceptions were found. For our examination, small business loan data is accurate and reliable.

Information regarding CD loans, investments, and services was evaluated during the examination.

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

FNB has one assessment area, which received a full-scope review.

Refer to Appendix A for additional information.

### **Ratings**

The overall rating is based on FNB's performance in Johnson County, its only assessment area. More weight was given to small business loans since they represent a substantial majority of loans originated during the evaluation period. For HMDA loans, the primary products are refinanced and home improvement loans. The bank has not originated or purchased any multi-family loans in its assessment area. This weighting is reflective of FNB's primary lending focus, as well as loan volumes by product type over the evaluation period.

Our lending analysis placed more weight on the bank's borrower distribution. An analysis of the geographic distribution of loans is not meaningful since there are no low- or moderate-income census tracts in the assessment area.

## **Other**

We performed two community contacts during the evaluation in the city of Olathe, Kansas. One contact was with a grassroots community group and the other contact was with a business group. Primary credit needs are affordable housing and redevelopment of older areas in downtown Olathe with creative financing options. In addition, there is a need to offer financial seminars that address money management and how to repair credit standing.

Contacts stated tax abatement programs and programs that offer low interest rates for start-up businesses and to help upgrade homes are offered by the city of Olathe. Banks can participate in these programs. In addition, banks can donate money to agencies that support community development.

Community contacts also stated banks are interested in helping the community and do a good job.

## **Fair Lending Review**

An analysis of the most recent public comments, consumer complaint information, HMDA, small business, and small farm lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

The bank's performance under the lending test is rated "Outstanding". The dollar volume of community development loans is significant and has a positive impact.

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

Based on full-scope reviews, the bank's performance in the Johnson County MA is good.

### **Lending Activity**

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

Lending Activity is good. Small business lending is weighed most heavily in evaluating the bank's CRA performance. FNB ranks tenth in the market for deposits and has a deposit market share of 3.67 percent. For small business loans, FNB is ninth in the market with an overall market share of 2.94 percent. The overall market share for home improvement loans is 2.34 percent. For refinanced and home improvement loans, the overall market share is insignificant.

FNB's net loan-to-deposit ratio is 79.39 percent as of December 31, 2002.

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

An analysis of loans by income level of the geography is not meaningful. The assessment area is comprised entirely of middle- and upper-income census tracts.

### **Inside/Outside Ratio**

FNB originated or purchased a majority of reported loans within its assessment area (AA). For all loans evaluated from 2000-2002, the bank originated or purchased 80.91 percent by number within its AA. By loan product, FNB originated or purchased 81.74 percent of small business loans and 77.61 percent of HMDA loans within its AA.

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

### **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 overall borrower distribution of home mortgage loans is excellent.

The percentage of home purchase, home improvement, and refinanced loans to moderate-income borrowers exceeds demographics. FNB's market share to moderate-income borrowers exceeds the overall market share for home improvement loans.

The percentage of home improvement loans to low-income borrowers is above demographics. The percentage of home purchase and refinanced loans to low-income individuals is below demographics. However, with 2.53 percent of families below the poverty level, the bank's performance is good. FNB's market share to low-income borrowers exceeds the overall market share for home improvement loans.

The market share for home purchase and refinanced loans is less than 0.20 percent. The bank did not make any multi-family loans in its assessment area during the evaluation period.

### **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.

FNB's record of lending to businesses of different revenue sizes is excellent. The percentage of bank loans to businesses with revenues of \$1 million or less substantially meets demographics. FNB's market share of loans to businesses with revenues of \$1 million or less exceeds the overall market share.

### **Small Loans to Farms**

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

An analysis of FNB's small farm loan originations is not meaningful since this loan type represents 2 percent of the total number of reported loan originations. Small farm loans are not an identified credit need in the assessment area.

## **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.

CD lending performance is excellent, and has had a positive impact on the Lending Test conclusions. During the evaluation period, the bank made five CD loans totaling \$5.5 million, which is 14.61 percent of Tier 1 capital.

One loan for \$20 thousand benefits FNB's assessment area (AA). Loan proceeds benefited an organization that provides foster care for youth.

Community development opportunities in the AA are limited. FNB has adequately addressed community development needs in its AA and received consideration for four CD loans that benefit Wyandotte County. Wyandotte County is located in Kansas and is a part of the MA. All four loans provide affordable housing and were reported as multi-family loans on the HMDA-LAR report for 2002.

## **Product Innovation and Flexibility**

The bank offers a Special Purpose Loan Program. This program is specifically designed to serve low- and moderate-income borrowers. Underwriting standards are flexible to help qualify individuals that do not meet conventional lending standards. The purpose of the loans under the Program must be for basic human needs (i.e. food, shelter, transportation, and medical). Loan amounts range from \$200 - \$10,000 for secured loans. The maximum amount for unsecured loans is \$1,500. Credit history is not required. However, if the applicant has a credit history, reasonable discrepancies must have a reasonable explanation. Interest rates are 25 basis points below normal loan rates. During our evaluation period, the bank originated 77 loans totaling \$178 thousand.

## **INVESTMENT TEST**

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

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

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

During the evaluation period, FNB's investments totaled \$216 thousand in the AA, which is 0.57 percent of Tier 1 capital. Investments that directly benefit the AA total \$54 thousand. These investments consist of donations to organizations that primarily serve low- and moderate-income individuals. Community development opportunities in the AA are limited. FNB has adequately addressed community development needs in its AA.

FNB received consideration for qualified investments made to organizations that benefit geographies or individuals in the MA or the state of Kansas. These investments total \$161 thousand. This includes a prior period investment of \$47 thousand in a venture capital company that provides financing to small businesses and remains outstanding. During the evaluation period, FNB invested \$102 thousand in a Kansas Equity Fund that was created to enhance affordable housing in the State. Remaining investments represent donations to organizations that serve low- and moderate-income individuals.

## **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 MA 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.

FNB has adequate distribution of branches. There are no low- or moderate-income geographies in the AA. FNB opened four branches during the evaluation period. Two of the new branches are located in middle-income tracts and two are in upper-income tracts. No branches were closed.

Hours of operation and services offered are good. The bank offers a full range of loan and deposit products at its main bank and seven branch locations. Because of its proximity to the main bank, loan and deposit products are not offered at the Kansas Avenue branch. Three branches have bilingual employees that can help communicate with the growing Hispanic population in the AA. Also, the bank's Personal Banking Brochure and Truth In Savings disclosure is printed in both English and Spanish.

For branch locations, lobby hours generally range from 8 a.m. to 5 p.m. Monday-Friday, and 9:00 a.m. to noon on Saturday. Two branches open at 8 a.m. on Saturday. One branch opens at 9 a.m. Monday-Friday. The Texaco Star Mart and Price Chopper branches are open from 7 a.m. to 7 p.m. Monday-Friday, and from 8 a.m. to 2 p.m. on Saturday. One branch is open from 7 a.m. to 6 p.m. Monday-Friday and 7 a.m. to noon on Saturday.

Drive-up hours generally begin at 7 a.m. Monday-Saturday and end at 6 p.m. Monday-Thursday, 7 p.m. on Friday, and noon on Saturday. Two branches close at 1 p.m. on Saturday. Two branches close at 6 p.m. on Friday and one branch opens at 9 a.m. on Saturday. The Texaco Star Mart and Price Chopper branches close at 7 p.m. Monday-Friday and are open from 8 a.m. to 2 p.m. on Saturday. One branch does not have drive-up facilities; however, it is in a grocery store.

Alternative delivery systems include ten 24-hour ATM locations in the AA. An automated telephone inquiry/transfer System allows customers to verify account information and transfer funds between accounts. FNB offers a bank-by-mail program, in which deposit tickets and envelopes are provided to customers to use in making deposits. In addition, access to an Internet Banking System is available for checking and savings account customers. Customers can transfer funds between accounts, verify account information, export history to personal financial software, request stop payments, order savings bonds, request an address change, and order checks. The system also offers an online bill payment service for a monthly fee. We were not able to evaluate the use of the above services by LMI individuals.

### **Community Development Services**

FNB's performance in providing CD services is adequate. A majority of CD services are provided to organizations that primarily serve low- and moderate-income individuals.

FNB offers Electronic Transfer Accounts via an agreement with the U.S. Treasury to accept specific government payments electronically. Bank employees provide financial advice and small business lending expertise to organizations with a CD purpose. They also provide money management seminars that primarily benefit low- and moderate-income individuals, including the growing Hispanic community.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): January 1, 2000 to December 31, 2002 Investment and Service Tests and CD Loans: January 1, 2000 to April 7, 2003	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
The First National Bank of Olathe (FNB) Olathe, Kansas	Small business and HMDA loans	
<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, Kansas	Full-Scope	Part of the Kansas City, MO-KS MA

# Appendix B: Market Profiles for Full-Scope Areas

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### Market Profiles for Areas Receiving Full-Scope Reviews

Johnson County, Kansas .....	B-2
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**Johnson County, Kansas**

Demographic Information for Full-Scope Area: Johnson County MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	75	0.00	0.00	38.67	61.33	0.00
Population by Geography	355,054	0.00	0.00	35.94	64.06	0.00
Owner-Occupied Housing by Geography	94,666	0.00	0.00	32.66	67.34	0.00
Businesses by Geography	33,488	0.00	0.00	30.47	69.53	0.00
Farms by Geography	678	0.00	0.00	35.99	64.01	0.00
Family Distribution by Income Level	98,746	8.04	12.57	21.99	57.40	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	20,357	0.00	0.00	56.50	43.50	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$37,652 = \$64,500 = 3.98%	Median Housing Value Unemployment Rate (January 2003)				= \$96,321 = 4.1%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

FNB’s AA consists of Johnson County in its entirety. FNB is a full service institution with nine locations and ten ATM’s in the AA. The bank’s primary business focus is commercial lending.

Economic conditions are good. The unemployment rate is below the national, state, and MA rates. The housing sector remains strong. Major employment industries are government and manufacturing.

Primary credit needs identified by community contacts are affordable housing and redevelopment of older areas in downtown Olathe with creative financing options. Community development loan opportunities are limited in the AA. A majority of CD investment opportunities available to financial institutions are through donations, grants, or in-kind contributions to established organizations.

## Appendix C: Tables of Performance Data

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### 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: 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 (AA). 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/AA. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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/AA. 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 AA.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/AA column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**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 2, 3, 4, 5, 6, 7, and 13 are not applicable. Therefore, they are not included in this section.

### Table 1. Lending Volume

LENDING VOLUME 2002		Geography: JOHNSON COUNTY						Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31,				
MA/Assessment Area (2002):	% 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	100.00	260	25,040	1,106	130,615	33	2,741	1	20	1,400	158,416	100.00
Out								4	5,514	4	5,514	

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From January 1, 2000 to April 07, 2003.

\*\*\* Deposit Data as of December 31, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

### Table 1. Other Products

LENDING VOLUME 2002		Geography: JOHNSON COUNTY						Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31,						
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>														
Johnson	100.00	29	2,974	29	2,974	0	0	0	0	0	0	0	0	100.00

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is From January 01, 2000 to December 31, 2002.

\*\*\* Deposit Data as of December 31, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Borrower Distribution: HOME PURCHASE 31, 2002			Geography: JOHNSON COUNTY						Evaluation Period: JANUARY 1, 2000 TO DECEMBER						
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****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Johnson County	54	100.0 0	8.04	5.00	12.57	15.00	21.99	30.00	57.40	50.00	0.14	0.17	0.04	0.17	0.15

\* Based on 2001 Peer Mortgage Data: Midwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 25.93% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 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 DECEMBER 31, 2002		Geography: JOHNSON COUNTY								Evaluation Period: JANUARY 1, 2000 TO					
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* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Johnson County	100	100.00	8.04	18.09	12.57	21.28	21.99	31.91	57.40	28.72	2.38	7.29	4.30	2.45	1.07

\* Based on 2001 Peer Mortgage Data: Midwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 6.00% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 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.

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

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2002			Geography: JOHNSON COUNTY								Evaluation Period: JANUARY 1, 2000 TO				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Johnson County	106	100.00	8.04	3.23	12.57	21.51	21.99	24.73	57.40	50.54	0.15	0.18	0.14	0.22	0.11

\* Based on 2001 Peer Mortgage Data: Midwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 12.26% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2002		Geography: JOHNSON COUNTY				Evaluation Period: JANUARY 1, 2000 TO			
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 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>									
Johnson County	1,106	100.00	66.23	61.66	70.80	16.55	12.66	2.94	5.60

\* Based on 2001 Peer Small Business Data: US&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 - 2002).

\*\*\*\* 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 2.53% 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 DECEMBER 31, 2002		Geography: JOHNSON COUNTY				Evaluation Period: JANUARY 1, 2000 TO			
MA/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 \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Johnson County	33	100.00	91.00	100.00	72.73	12.12	15.15	8.45	9.68

\* Based on 2001 Peer Small Business Data: US&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 - 2002).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: JOHNSON COUNTY				Evaluation Period: JANUARY 1, 2000 TO APRIL 7, 2003			
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	0	0	46	54	46	54	25.00	0	0
Regional/Statewide	1	47	11	114	12	161	74.54	0	0
Outside AA	0	0	1	1	1	1	0.46	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 JANUARY 1, 2000 TO DECEMBER 31, 2002								Geography: JOHNSON COUNTY				Evaluation Period:					
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	9	100.00	0.00	0.00	66.67	33.33	4	0	0	0	2	2	0.00	0.00	35.94	64.06