



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

July 20, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sunflower Bank, National Association
Charter Number: 4742

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Office of the Comptroller of the Currency

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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

Sunflower’s CRA Rating: This institution is rated “**Satisfactory**”.

The following table indicates the performance level of Sunflower Bank, National Association (Sunflower) with respect to the lending, investment, and service tests:

Performance Levels	Sunflower Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
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 and borrower distribution of HMDA/CRA lending products.
- Excellent level of CD investments in Kansas.
- A majority of the loans (80 percent by number and 77 percent by dollar volume) originated or purchased during the evaluation period were made inside the AAs.

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 statistical 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 (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 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, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for 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 (LI): 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 (MDI): 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 (MI): 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 (UI): Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

Sunflower is a \$1.8 billion interstate bank headquartered in Salina, Kansas. Sunflower is a wholly-owned subsidiary of Sunflower Banks, Inc., a one-bank holding company also headquartered in Salina, Kansas. Sunflower has 34 branches located in 20 communities across central and western Kansas and southern Colorado. Many of the branches are in rural non-MA areas with the exception of one in the Lawrence Kansas MA, three in the Manhattan Kansas MA, one in the Topeka Kansas MA, four in the Wichita Kansas MA, and three in the Pueblo CO, MA. Historically, Sunflower expanded into new markets through acquisition of banks. A new branch was acquired in Leeton, Missouri during 2010. Its CRA performance is not part of this evaluation due to the timing of the acquisition, but will be included in the next CRA evaluation.

Sunflower is a full service institution offering various loan and deposit products. Sunflower has six assessment areas (AAs) in the state of Kansas and two in the state of Colorado.

During the lending evaluation period of January 1, 2007 thru December 31, 2009, Sunflower originated or purchased 86 percent of the number and dollar volume of its home mortgage loans in Kansas and 14 percent by number and dollar in Colorado. Seventy-eight percent by number and dollar volume of small loans to businesses were originated or purchased in Kansas, while 22 percent were made in Colorado. Sunflower originated or purchased 93 percent by number and 84 percent by dollar of its small loans to farms in Kansas, while 7 percent by number and 16 percent by dollar were made in Colorado.

Based on loan volumes outstanding as of December 31, 2009, net loans as a percentage of total assets were 53 percent. Of the total dollar amount of loans outstanding, real estate (commercial and residential); commercial, consumer, and agriculture loans represented 40 percent, 9 percent, 2 percent, and 2 percent, respectively. Tier 1 capital was \$120 million, which equaled 7 percent of total assets.

Sunflower has no legal, financial, or other factors that impede its ability to help meet the credit needs of its AAs. Sunflower's performance was rated "Outstanding" at its last CRA evaluation dated August 26, 2006.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test (except CD loans) is January 1, 2007 through December 31, 2009. For the Lending Test, we evaluated home mortgage loans, small loans to businesses, and small loans to farms originated and purchased during the evaluation period. The evaluation period for CD loans, the Investment Test, and the Service Test is August 26, 2006 to March 1, 2011.

We used deposit information reported to the Federal Deposit Insurance Corporation (FDIC) annually to determine Sunflower's deposit market share and market presence within its AAs. The most recent deposit information available is as of June 30, 2010.

Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. Sunflower originated or purchased 80 percent by number and 77 percent by dollar of its home mortgage loans, small loans to businesses, and small loans to farms inside its AAs.

Data Integrity

To assess the accuracy of the data, we conducted an independent test of reported data for home mortgage, small loans to businesses, and small loans to farms. We did not find any material reporting errors in our sample.

We reviewed 100 percent of Sunflower's CD loans, investments, and services during this examination. Only those activities with a CD purpose are presented and included in this evaluation.

Selection of Areas for Full-Scope Review

Sunflower has eight AAs in two states - six in Kansas and two in Colorado. In 2009, two of the non-MA counties in Kansas became a separate AA when Manhattan, Kansas was designated as a MA. Based deposit volume and/or lending activity, we selected the two non-MA AAs in Kansas and the Pueblo Colorado MA for full scope reviews. See Appendix A for a full listing of counties included in each AA. The two non-metropolitan AAs in Kansas represent 63 percent of Sunflower's deposits. The Pueblo Colorado MA was selected due to the lending activity.

Ratings

The ratings in the state of Kansas carried the most weight in determining Sunflower's ratings due to the fact that 79 percent of Sunflower's deposits and 84 percent of its loans are in the state of Kansas.

Due to numbers and dollar volumes, higher weight was given to home mortgage loans and then small business loans in the state of Kansas. In Colorado, small loans to businesses received more weight than home mortgage loans or small loans to farms as the volume of small loans to businesses was almost exactly equal to the volume of all HMDA and small loans to farms together.

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.

State Rating

State of Kansas

CRA Rating for Kansas:

Satisfactory

The lending test is rated: **High Satisfactory**
 The investment test is rated: **Outstanding**
 The service test is rated: **High Satisfactory**

The major factors that support this rating include:

- Good geographic distribution of small loans to businesses.
- Reasonable distribution of home mortgage and small loans to businesses by income level of the borrower.
- Positive impact from the level of multi-family lending in MI CTs.
- Excellent level of community development investments.
- A majority of the loans (80 percent by number and 77 percent by dollar volume) originated or purchased during the evaluation period were made inside the AAs.

Description of Sunflower’s Operations in Kansas

The Kansas AAs account for 79 percent of Sunflower’s deposits and 84 percent by number and dollar amount of loan originations/purchases. Sunflower has 6 designated AAs within the state of Kansas. Sunflower operates 26 branches and 38 ATMs in the central and southwest areas of the state of Kansas. This represents 77 percent of Sunflower’s branches and 78 percent of the ATMs. Sunflower’s headquarters and main banking center are located in Salina, Kansas in Kansas Non-MA AA #1. Sunflower’s business focus varies depending on the primary credit needs of the specific communities it serves.

Refer to the Market Profiles for the State of Kansas in appendix C for detailed demographics and other performance context information for the Kansas AAs.

Scope of Evaluation in Kansas

We evaluated Sunflower’s performance in the state of Kansas by examining deposit and lending data from each of the six AAs. Overall, HMDA lending represents 52 percent, small loans to businesses represent 33 percent, and small loans to farms represent 15 percent of the total loans of these types originated/purchased during the evaluation period in the state of Kansas. Therefore, HMDA lending received the most weight in determining the rating for the state of Kansas, followed by small loans to businesses. In addition, more weight was given to lending performance in the Non-MA areas in Kansas as they represent the largest volume of deposits and loans originated/purchased – exceeding 60 percent.

We performed one community contact with a city official representative and reviewed several other contacts made recently within the Kansas AAs. The primary credit needs identified were small business loans and affordable housing. Community contacts expressed that banks in the areas are all active in meeting community credit needs.

Refer to the Market Profiles located in Appendix D for more information.

LENDING TEST

Sunflower's performance under the Lending Test in Kansas is rated "High Satisfactory".

The geographic distribution of home purchase loans and small loans to businesses is good to excellent in the Kansas Non-MA AA #1 and Kansas Non-MA AA #2. Although geographic lending distribution is generally not as strong in the MA AAs in Kansas, Sunflower's total deposits in the four MA AAs combined total 17 percent of deposits, compared to a combined total of 63 percent of deposits in the two Kansas Non-MA AAs. In the Lawrence and Topeka MA AAs, lending volume in some products was too low to allow for a meaningful analysis. Deposits from those two AAs equaled less than 3 percent of Sunflower's deposits.

Distribution of small loans to farms is reasonable. Performance was below the demographic, but there are only five MI CTs.

Distribution by income level of the borrowers represents primarily reasonable dispersion in Kansas. Performance of small loans to businesses in the Non-MA AAs was stronger as measured by the volume of loans of \$100 thousand or less, somewhat mitigating the lower distribution of Sunflower's loans to businesses with revenues of \$1 million or less compared to the number of businesses in the AAs reporting revenues of \$1 million or less.

Distribution of home refinance loans was generally much lower than for other products. This may be partly a function of the level of poverty in the various AAs.

Community development lending in Kansas consisted of three multi-family loans made in a MI CT in the Lawrence Kansas MA and one multi-family loan made in a MI CT in the Manhattan Kansas MA. These loans totaled \$2.6 million and had a positive impact on the lending test.

INVESTMENT TEST

Sunflower's performance under the investment test in Kansas is rated "Outstanding".

Community development investments and donations in the Kansas Non-MA AAs equaled \$11 million, representing 9 percent of Tier One Capital, which was considered excellent.

SERVICE TEST

Sunflower's performance under the service test in Kansas is rated "High Satisfactory".

Retail Banking Services

Sunflower's distribution of branches in the Kansas AAs is reasonable. The two large Non-MA AAs do not have any LI CTs and only five MI CTs. The MA AAs have more LMI CTs, but there are fewer branches due to smaller presence in those communities. The branches in MDI and UI areas are within reasonable proximity to the LMI CTs.

Community Development Services

Sunflower's performance in providing CD services in its Kansas AAs is good. Sunflower's involvement in the local communities it serves is responsive to the needs of the communities. Bank employees and Board members provide financial expertise and services to various community organizations that provide services to LMI people.

KANSAS NON-MA Ratings

KANSAS NON-MA AA#1 AND #2 PERFORMANCE

CRA Rating for Kansas Non-MA AA#1: Satisfactory

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

The investment test is rated: **Outstanding**

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

CRA Rating for Kansas Non-MA AA#2: Satisfactory

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

The investment test is rated: **Outstanding**

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

The major factors that support these ratings include:

- Reasonable geographic dispersion of home purchase and home improvement loans.
- More than reasonable dispersion of small loans to businesses in Kansas Non-MA AA #1 and reasonable distribution in Kansas Non-MA AA #2 by income levels of the borrowers.
- Reasonable accessibility of branches and ATMs.

LENDING TEST

Sunflower’s overall lending activity reflects a good level of responsiveness to area credit needs and is rated “High Satisfactory”.

More weight is given to the Kansas Non-MA AA #1 based on the higher volume of loans by both dollar and number for home mortgage loans and small loans to businesses. The primary home mortgage product for the Kansas Non-MA AA #1 is home refinance loans, followed by home purchase, and then home improvement loans. In Kansas Non-MA AA #2 the primary home mortgage product is home purchase, followed by home refinance, and then home improvement loans. Due to volumes, more weight is given to small loans to businesses in Kansas Non-MA AA #1 and to small farm loans in the Kansas Non-MA AA #2.

Refer to Table 1 Lending Volume and Other Products in the state of Kansas section of appendix D for the facts and data used to evaluate Sunflower’s lending activity. The table shows loan data for years 2007, 2008, and 2009 combined since the 2000 Census data was the source of demographic information.

Distribution of Loans by Income Level of the Geography

There are no LI CTs and only five MI CTs out of 48 total CTs in these AAs. In addition, the percentages of owner-occupied units in these MI CTs were very low at two percent in Kansas-

Non-MA AA #1 and 11 percent in Kansas Non-MA AA #2. As a result, geographic distribution of lending activity did not carry as much weight in these AAs as distribution by the income level of the borrower.

Home Mortgage Loans

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

Geographic distribution of Home Purchase and Home Improvement loans was good in both AAs. The distribution of Home Refinance loans was reasonable given the low level of owner-occupied housing and that a higher level of equity might be required.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent in Kansas-Non-MA AA #1 and good in Kansas-Non-MA AA #2 and is close to or exceeded the demographics (the percentage of businesses in the CTs that are part of the AA) in all three years of the evaluation period.

Small Loans to Farms

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

Although Sunflower's distribution of small loans to farms was low, we considered the performance reasonable because only one percent of the farms in Kansas-Non-MA AA #1 were in MI CTs and only nine percent were in MI CTs in Kansas-Non-MA AA #2.

Lending Gap Analysis

Maps and reports were reviewed to identify any gaps in the geographic distribution of home mortgage loans, small loans to businesses, and small loans to farms. We did not identify any unexplained or conspicuous gaps.

Inside/Outside Ratio

We calculated this ratio at the bank level. The majority of Sunflower's primary loan products were originated and purchased in its AAs. Refer to the Scope of the Evaluation section of this Performance Evaluation for additional details.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

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

Sunflower's overall dispersion of home purchase loans by income level of the borrower is reasonable. In the Kansas Non-MA AA #1, Sunflower demonstrates reasonable performance to LMI borrowers for home purchase loans when considering 8 percent of the families in the AA have incomes below the poverty level. In the Kansas-Non-MA AA #2, Sunflower's home purchase lending to LI individuals is reasonable, considering 9 percent of the families in the AA have incomes below the poverty level. Sunflower's performance for home purchase lending to MI individuals in Kansas-Non-MA AA #2 is excellent and exceeded area demographics.

Sunflower's overall dispersion of home improvement loans by income level of the borrower is good. In the Kansas Non-MA AAs #1 and #2, Sunflower demonstrates good performance to LMI individuals for home improvement loans, considering the percentage of families below the poverty level. Sunflower's performance for lending to MI borrowers in the Kansas Non-MA AAs #1 and #2 was good.

Sunflower's overall dispersion of refinanced loans by income level of the borrower is reasonable. In the Kansas Non-MA AAs #1 and #2, Sunflower's performance for lending to LMI individuals is below area demographics, but is considered reasonable, in view of the percentage of families in the AAs living below the poverty level.

Small Loans to Businesses

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

The overall dispersion of small loans to businesses of different sizes is good. Sunflower's performance in Kansas in both AAs was good. In both AAs, Sunflower made more than one-half of its loans to small businesses to ones with annual gross revenues of less than \$1 million. Originating small loans to businesses in amounts less than \$100 thousand was strong in both AAs.

Small Loans to Farms

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

The overall distribution of small loans to farms of different sizes is good. Sunflower's volume of loan originations/purchases in both AAs is good. Both the percentage of loans to farms with

revenues of \$1 million or less and the percentage of loans for amounts less than \$100 thousand are good.

Community Development Lending

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

During the evaluation period, Sunflower did not originate any CD loans in these AAs during the evaluation period. This had a neutral impact on the Lending Test conclusions.

Product Innovation and Flexibility

Sunflower offers various flexible loan products to customers. They offer small business, fair deal credit cards and a pro-business line of credit to small business owners.

INVESTMENT TEST

Refer to Table 14 in Appendix D for data used to evaluate Sunflower's level of qualified investments.

Sunflower's performance under the investment test is rated "excellent".

There are five CD investments in Kansas Non-MA AA #1 and twelve in Kansas Non-MA AA #2. The investments totaled \$11 million, representing 9 percent of Tier One Capital, which was considered excellent.

SERVICE TEST

Sunflower's performance under the Service Test in the Kansas Non-MA AA #1 and Kansas Non-MA AA #2 is rated "High Satisfactory".

Retail Banking Services

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

Sunflower's distribution of branches in the Kansas Non-MA AA #1 is reasonable since there are no LI CTs and only one MI CT. There is one non-deposit-taking ATM in the MI CT. The branches in MDI and UI areas are within reasonable proximity to the MI CT. In the Kansas Non-MA AA#2, there are no LI CTs and 4 MI CTs. Sunflower has two branches and two ATMs in these MI CTs. Sunflower has no deposit-taking ATMs not co-located with a branch. There were no branch openings or closings in these AAs during the evaluation period.

Community Development Services

Sunflower's performance in providing CD services in its Kansas AAs is good. Sunflower's involvement in the local communities it serves is responsive to the needs of the communities. Bank employees and Board members provide financial expertise and services to various community organizations that provide services to LMI people.

MA Rating

LAWRENCE KANSAS MA

CRA Rating for Lawrence Kansas MA: Satisfactory

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

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

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

Description of Sunflower’s Operations in the Lawrence Kansas MA

Sunflower operates one branch and one ATM in the Lawrence Kansas MA. This represents one percent of Sunflower’s branches and ATMs. This AA encompasses all of Douglas County and contains two percent of Sunflower’s deposits. There is one LI CT and five MI CTS in the Lawrence Kansas MA.

The Lawrence Kansas MA accounts for two percent of Sunflower’s deposits and five percent by number and three percent by dollar amount of loan originations and purchases. Sunflower’s primary lending focus in the Lawrence Kansas MA is small loans to businesses. We did not analyze other lending products in this AA due to extremely low volumes,

LENDING TEST

Sunflower’s Lending Test Performance in the Lawrence MA is rated “High Satisfactory”.

The lending performance in the Lawrence Kansas MA was not as strong as in the full-scope AAs in Kansas. However, Sunflower made three multi-family loans in MI CTs in the Lawrence Kansas MA. This lending had a positive impact on the lending test.

INVESTMENT TEST

Sunflower’s Investment Test Performance in the Lawrence MA is rated “Low Satisfactory”.

Sunflower did not make any CD investments in the Lawrence Kansas MA. We considered this to be reasonable because Sunflower’s presence is so small in this AA.

SERVICE TEST

Sunflower’s service test performance is rated “Low Satisfactory”.

Sunflower has one branch in the Lawrence Kansas MA. It is located in an UI CT. This may limit access to LMI individuals. This is mitigated by the small percentage of activity in this AA. Sunflower did not have any community development services in this AA.

MA Rating

MANHATTAN KANSAS MA

CRA Rating for Manhattan Kansas MA:

Satisfactory

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

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

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

Description of Sunflower's Operations in the Manhattan Kansas MA

Sunflower operates three branches and six ATMs in the Manhattan Kansas MA. This represents nine percent of Sunflower's branches and 12.5 percent of the ATMs. This AA encompasses Riley and Geary Counties. There are no LI CTs in the AA. There are nine MI CTs in the Manhattan Kansas MA.

The Manhattan Kansas MA accounts for seven percent of Sunflower's deposits and seven percent by number and eight percent by dollar amount of loan originations and purchases.

LENDING TEST

Sunflower's performance under the lending test in the Manhattan Kansas MA is rated "Low Satisfactory".

The lending performance in the Manhattan Kansas MA is not as strong as in the full-scope AAs. Sunflower made one multi-family loan in a MI CT in the Manhattan Kansas MA, which had a positive impact on the lending test rating.

INVESTMENT TEST

Sunflower's Investment Test Performance in the Manhattan MA is rated "Low Satisfactory".

Sunflower did not make any CD investments in the Manhattan Kansas MA. We considered this to be reasonable because Sunflower's presence is so small in this AA

SERVICE TEST

Sunflower's service test performance is rated "Low Satisfactory".

Sunflower has three branches in the Manhattan Kansas MA. One of the three is in a MI CT, making retail banking services reasonably accessible. Sunflower did not have any community development services in this AA.

MA Rating

TOPEKA KANSAS MA

CRA Rating for Topeka Kansas MA:

Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

Although performance in all categories is weaker than in the full-scope areas, only 0.62 percent of Sunflower's deposits are in the Topeka Kansas MA. Due to such a limited presence, performance is considered reasonable.

MA Rating

WICHITA KANSAS MA

CRA Rating for the Wichita Kansas MA:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Low Satisfactory
The service test is rated:	High Satisfactory

Description of Sunflower’s Operations in the Wichita Kansas MA

Sunflower operates four branches each with an ATM in the Wichita Kansas MA. This represents twelve percent of Sunflower’s branches and ATMs. This AA encompasses all of Sedgwick County and contains seven percent of Sunflower’s deposits. There are five LI CTs and 39 MI CTs in the Wichita Kansas MA AA.

LENDING TEST

Sunflower’s performance under the lending test in the Wichita Kansas MA is rated “Low Satisfactory”.

We focused our review in the Wichita Kansas MA on small loans to businesses due to the much greater volume of lending activity. The geographic distribution of small loans to businesses is excellent in both LI and MI CTs, exceeding the number of businesses in the LMI CTs that reported revenues of \$1 million or less. Distribution based on the size of revenues and the volume of small loans to businesses made for amounts of \$100 thousand or less was not as strong as in the full-scope AAs.

INVESTMENT TEST

Sunflower’s Investment Test Performance in the Wichita MA is rated “Low Satisfactory”.

Sunflower did not make any CD investments in the Wichita Kansas MA. This was considered reasonable because of the limited presence in this AA.

SERVICE TEST

Sunflower’s service test performance is reasonable.

Sunflower has four branches with ATMs in the Wichita Kansas MA. Two of the branches are located in MI CTs, one is in a MDI CT and one is in an UI CT, representing excellent distribution. Sunflower did not have any community development services in this AA.

State of Colorado

CRA Rating for Colorado:

Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent geographic distribution of small loans to businesses;
- Reasonable borrower distribution of home mortgage lending in MI CTs, but less than reasonable in LI CTs; and,
- Reasonable accessibility of office locations.

Description of Sunflower's Operations in Colorado

The Colorado AAs account for 20 percent of Sunflower's deposits and 16 percent by number and 18 percent by dollar amount of loan originations/purchases. Sunflower has 2 designated AAs within the state of Colorado. Sunflower operates 7 branches and 9 ATMs in the southern area of the state of Colorado. This represents 20 percent of Sunflower's branches and 19 percent of the ATMs.

Refer to the Market Profiles for the State of Colorado in appendix C for detailed demographics and other performance context information for the Colorado AAs.

Scope of Evaluation in Colorado

We evaluated Sunflower's performance in the state of Colorado by performing a full-scope review of the Pueblo MA AA and a limited-scope review of the Colorado Non-MA AA. We selected the full-scope AA based on loan volume originated and purchased during the evaluation period.

We performed one community contact with a city official and reviewed several other area contacts made in the last 12 months. The contacts felt all banks in the area are helping meet community credit needs. They identified small business loans as the primary credit need.

Refer to the Market Profiles for the State of Colorado in appendix D for deposit and lending market shares.

LENDING TEST

Sunflower's performance under the Lending Test in Colorado is rated "Low Satisfactory".

The lending performance in the state of Colorado overall is satisfactory.

Lending Activity

Sunflower's lending activity reflects reasonable responsiveness to the credit needs of its AAs, considering its size, resources, and deposit and lending market shares in the AAs.

Refer to Tables 1 Lending Volume and Other products in the state of Colorado section of appendix D for the facts and data used to evaluate Sunflower's Lending activity.

Geographic Distribution

Due to limited or no volume, geographic analysis of small loans to farms was not performed.

Home Mortgage Loans

The geographic distribution of home purchase, home improvement, and home refinance loans originated or purchased by Sunflower in all three loan types was near to or exceeded the percentage of owner-occupied housing within the AA for MI CTs. There are no LI CTs in these AAs.

Due to limited or no volume, geographic analysis of multi-family loans was not performed.

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

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in the Colorado AAs is excellent. The percentage of loans originated or purchased by Sunflower exceeded the percentage of small businesses within the AAs.

Lending Gap Analysis

Maps and reports were reviewed to identify any gaps in the geographic distribution of home mortgage and small loans to businesses. We did not identify any unexplained or conspicuous gaps.

Inside/Outside Ratio

We calculated this ratio at the bank level. The majority of Sunflower's primary loan products were originated and purchased in its AAs. Refer to the Scope of the Evaluation section of this Performance Evaluation for additional details.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is rated "Low Satisfactory".

Home Mortgage Loans

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

The distribution of home purchase, home improvement, and home refinance loans by the income level of the borrowers in the Colorado AAs is very poor to LI borrowers and reasonable to MI borrowers. The percentage of loans originated or purchased by Sunflower to LI borrowers fell significantly below the percentage of LI families in the AA. The percentage of loans originated or purchased by Sunflower to MI borrowers was below the percentage of MI families in the AA.

Small Loans to Businesses

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

The distribution of small loans to businesses by the level of businesses' annual revenues and by the size of loans is reasonable. The loans to businesses with revenues less than \$1 million were moderately below the number of businesses in the AA reporting revenues less than \$1 million. The volume of small loans to businesses in amounts less than \$100 thousand was below the number of small loans to businesses reported in the AA that were less than \$100 thousand.

Community Development Lending

Refer to Table 1 Lending Volume in the state of Colorado section of appendix D for the facts and data used to evaluate Sunflower's lever of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

Sunflower did not make any community development loans in the Colorado AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Sunflower's performance under the Lending Test in the Colorado Non-MA AA is low satisfactory. Small loans to businesses are the primary product in this AA. Geographic and borrower distribution of home mortgage lending in this AA is primarily poor. However, geographic distribution of small loans to businesses and farms is excellent, while the distribution of loans by income level of the borrower is reasonable. Sunflower did not make any multifamily or community development loans in the Colorado Non-MA AA.

Product Innovation and Flexibility

Sunflower offers various flexible loan products to customers. They offer small business, fair deal credit cards and a pro-business line of credit to small business owners.

INVESTMENT TEST

Sunflower's performance under the investment test in Colorado is rated "Low Satisfactory".

Refer to Table 14 in Appendix D for data used to evaluate Sunflower's level of qualified investments. There were no CD investments in the state of Colorado. The opportunities in the Pueblo MA AA are limited.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, Sunflower's performance in providing CD services is the same as Sunflower's overall performance in the full-scope AA.

SERVICE TEST

Sunflower's performance under the Service Test is rated "Low Satisfactory" for the state of Colorado.

Retail Banking Services

Based on full-scope reviews, Sunflower's performance in the Pueblo MA AA is reasonable. The branches were established prior to the bank's purchase of the locations.

Community Development Services

Sunflower has limited CD services in the Pueblo MA AA. They provide services to community development companies such as schools and health care alliances.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, Sunflower's performance in providing CD services is better than Sunflower's overall performance in the full-scope AA.

Refer to Table 15 in appendix D for the facts and data that support these conclusions.

MA Rating

Pueblo Colorado MA

CRA Rating for the Pueblo Colorado MA:

Satisfactory

The lending test is rated: Low Satisfactory

The investment test is rated: Low Satisfactory

The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent geographic distribution of home mortgage loans and small loans to businesses;
- Reasonable borrower distribution of home mortgage lending in MI CTs, but less than satisfactory in LI CTs;
- Reasonable accessibility of office locations

Description of Sunflower's Operations in the Pueblo Colorado MA

Sunflower Bank operates 3 branches and 3 ATMs in the Pueblo Colorado MA. This represents 17 percent of Sunflower's branches and ATMs. There are no LI CTs in the MA.

The Pueblo Colorado MA accounts for 7 percent of Sunflower's deposits and eight percent by number and nine percent by dollar amount of loan originations and purchases. Sunflower's primary lending focus in Colorado is the origination of small business loans, as they represent 50 percent of the number and 52 percent of the dollar volume of Sunflower's HMDA/CRA lending in Colorado.

Refer to the Market Profiles for the State of Colorado in appendix C for detailed demographics and other performance context information for the Colorado AAs.

Scope of Evaluation in the Pueblo Colorado MA

Sunflower's primary lending product in the Pueblo Colorado MA is small loans to businesses. It received the most weight in determining the rating for the lending test.

Refer to the Market Profile for the Pueblo Colorado MA located in Appendix D for more information

LENDING TEST

Sunflower's performance under the Lending Test in the Pueblo Colorado MA is rated "High Satisfactory".

Lending Activity

Refer to Tables 1 Lending Volume and Other Products in the Pueblo Colorado MA section of appendix D for the facts and data used to evaluate lending activity.

Sunflower's lending activity reflects good responsiveness to the credit needs of this AA, considering its size, resources, and deposit and lending market shares in the AA.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

The geographic distribution of home purchase, home improvement, and home refinance loans in MI CTs in the Pueblo Colorado MA AA is excellent.

The percentage of loans originated or purchased by Sunflower in all three loan types was near to or exceeded the percentage of owner-occupied housing within the AA. There are no LI CTs in this AA.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in MI CTs in the Pueblo Colorado MA AA is excellent. The percentage of loans originated or purchased by Sunflower exceeded the percentage of small businesses within the AA.

Small Loans to Farms

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

We did not evaluate lending distribution of small loans to farms in the Pueblo Colorado MA due to extremely low volume.

Lending Gap Analysis

Maps and reports were reviewed to identify any gaps in the geographic distribution of home mortgage and small loans to businesses. We did not identify any unexplained or conspicuous gaps.

Inside/Outside Ratio

We calculated this ratio at the bank level. The majority of Sunflower's primary loan products were originated and purchased in its AAs. Refer to the Scope of the Evaluation section for additional details.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is reasonable.

Home Mortgage Loans

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

The distribution of home purchase, home improvement, and home refinance loans by the income level of the borrowers in the Pueblo Colorado MA AA is very poor to LI borrowers and reasonable to MI borrowers. The percentage of loans originated or purchased by Sunflower to LI borrowers fell significantly below the percentage of LI families in the AA. The percentage of loans originated or purchased by Sunflower to MI borrowers was below the percentage of MI families in the AA. However, distribution of home mortgage lending was considered reasonable, taking into account that 13 percent of the families in the Pueblo Colorado MA AA are living below the poverty level.

Small Loans to Businesses

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

The distribution of small loans to businesses by the level of businesses' annual revenues and by the size of the loans is good. The loans to businesses with revenues less than \$1 million were below the number of businesses in the AA reporting revenues less than \$1 million. The distribution was still considered good. The volume of small loans to businesses in amounts \$100 thousand or less was below the number of small loans to businesses reported in the AA that were less than \$100 thousand and considered reasonable.

Community Development Lending

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

Sunflower did not make any community development loans in the Pueblo Colorado MA AA. This had a neutral impact on the lending test rating.

Product Innovation and Flexibility

Sunflower offers various loan products to their customers. They offer small business, fair deal credit cards and a pro-business line of credit to small business owners.

INVESTMENT TEST

Refer to Table 14 in Appendix D for data used to evaluate Sunflower's level of qualified investments.

Investment performance in the Pueblo Colorado MA is rated "Low Satisfactory."

Sunflower did not make any community development investments in Colorado. However, donations to groups providing community development services to LMI people within the AA totaled approximately \$28 thousand, resulting in reasonable performance.

SERVICE TEST

Sunflower's performance under the Service Test is rated "Low Satisfactory" for the Pueblo Colorado MA.

Retail Banking Services

Refer to Table 15 in the Pueblo Colorado MA section of appendix D for the facts and data used to evaluate the distribution of Sunflower's branch delivery system and branch openings and closings.

Sunflower has a reasonable distribution of branches in the Pueblo Colorado MA. Although none of the current branch locations in Colorado are in LMI CTs, branches are still accessible. All the branches in Colorado were already established through the acquisition, by Sunflower, of other financial institutions. The distribution is considered reasonable.

No branches were closed in the Pueblo Colorado MA during the evaluation period. One branch in the Pueblo Colorado MA was sold as projected when the financial institution was first acquired. The branch was in a rural area in a small town well outside of Pueblo.

Community Development Services

Sunflower's performance in providing CD services in the Pueblo Colorado MA is limited and considered poor.

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”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/2007 to 12/31/2009) Investment and Service Tests and CD Loans: (08/26/2006 to 03/01/2011)	
Financial Institution	Products Reviewed	
Sunflower Bank, N.A. Salina, Kansas	Home Mortgage Small Loans to Businesses and Farms	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Counties in Each AA
KANSAS		
Kansas Non-MA #1	Full Scope	Saline and McPherson Barton, Ford, Seward, Ellis, Osborne, Russell, and Thomas
Kansas Non-MA #2	Full Scope	
Lawrence KS MA 29940	Limited Scope	Douglas Geary, Riley Shawnee Sedgwick
Manhattan KS MA 31740	Limited Scope	
Topeka KS MA 45820	Limited Scope	
Wichita KS MA 48620	Limited Scope	
COLORADO		
Pueblo CO MA 39380	Full Scope	Pueblo
Colorado Non-MA	Limited Scope	Fremont, Rio Grande

Appendix B: Summary of State Ratings

RATINGS		BANK NAME		
	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
Sunflower Bank, N.A.:	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State:				
Kansas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Colorado	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Market Profiles for Full-Scope Areas

State of Kansas Full-Scope Areas

KS Non-MA AA #1

Demographic Information for Full Scope Area: Sunflower KS Non-MSA 1						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0.00	5.26	63.16	31.58	0.00
Population by Geography	83,151	0.00	2.99	65.81	31.20	0.00
Owner-Occupied Housing by Geography	23,082	0.00	2.32	62.37	35.31	0.00
Business by Geography	7,426	0.00	4.70	68.10	27.20	0.00
Farms by Geography	630	0.00	0.95	60.63	38.41	0.00
Family Distribution by Income Level	22,359	13.60	16.26	26.53	43.61	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,676	0.00	6.80	72.63	20.57	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level		41,490 52,100 9%	Median Housing Value Unemployment Rate (2000 US Census)	83,166 1.94%		

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2009 HUD updated MFI

KS Non-MA#1 AA consists of two counties: McPherson and Saline. Of the 19 CTs in the AA, none are LI CTs, and one is a MI CTs. The AA complies with the regulation and does not arbitrarily exclude any low- or MI areas.

Sunflower has 6 branches and operates 12 ATMs within this AA. Five branches are in Salina and one in McPherson.

The AA is rural with an agricultural and health care basis. Salina has a large percentage of doctors for the size of the town. Individuals are sent from miles around to receive care for a family member. Grain and cattle are the primary agricultural products. Two of the larger cities in the AA, Salina and McPherson are centers for retail trade. Economic conditions are growing in the area. Growth and development plans vary across the AA. For March, the unemployment rate for the overall area was 5.1 percent for McPherson County and 6.7 percent for Saline County while the state is 6.8 percent.

KS Non-MA AA #2

Demographic Information for Full Scope Area: Sunflower KS Non-MSA 2						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	29	0.00	13.79	72.41	13.79	0.00
Population by Geography	130,682	0.00	14.21	69.68	16.11	0.00
Owner-Occupied Housing by Geography	33,243	0.00	11.39	71.85	16.76	0.00
Business by Geography	12,859	0.00	13.04	73.18	13.78	0.00
Farms by Geography	1,421	0.00	4.43	84.87	10.70	0.00
Family Distribution by Income Level	33,352	19.08	19.66	24.42	36.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,922	0.00	18.50	70.48	11.03	0.00
Median Family Income		41,490	Median Housing Value	64,794		
HUD Adjusted Median Family Income for 2009		52,100	Unemployment Rate (2000	2.42%		
Households Below Poverty Level		13%	US Census)			

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

Source: 2000 US Census and 2009 HUD updated MFI

Rural Non-MA#2 MA consists of seven counties: Barton, Ellis, Ford, Osborne, Russell, Seward and Thomas. Of the 29 CTs in the AA, none are LI CTs, and four are MI CTs. The AA complies with the regulation and does not arbitrarily exclude any low- or MI areas.

Sunflower has 12 branches and operates 16 ATMs within this AA. Two branches each are located in Hays and Dodge City, and one in each of the cities of Colby, Ellinwood, Great Bend, Liberal, Osborne, Russell and Victoria.

The AA is rural with an agricultural base. Grain and cattle are the primary agricultural products. Economic conditions are declining in the area. Growth and development plans vary across the AA. The unemployment rate for the overall area was 4.56 percent while Kansas is 6.8 percent during the month of March 2011.

State of Colorado Full-Scope Areas

Pueblo MA

Demographic Information for Full Scope Area: Sunflower Pueblo MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	0.00	37.25	37.25	21.57	3.92
Population by Geography	141,472	0.00	30.02	43.31	25.47	1.21
Owner-Occupied Housing by Geography	38,434	0.00	24.22	46.83	28.95	0.00
Business by Geography	11,341	0.00	31.43	37.96	30.58	0.03
Farms by Geography	339	0.00	15.93	42.77	41.30	0.00
Family Distribution by Income Level	37,624	20.21	18.34	21.79	39.67	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,502	0.00	43.46	41.84	14.69	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level		40,123 51,300 14%	Median Housing Value Unemployment Rate (2000 US Census)	94,716 2.85%		

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

Source: 2000 US Census and 2009 HUD updated MFI

Pueblo MA consists of one county Pueblo. Of the 51 CTs in the AA, none are LI CTs, and nineteen are MI CTs. The AA complies with the regulation and does not arbitrarily exclude any low- or MI areas.

Sunflower has 3 branches and operates 3 ATMs within this AA. No branches are located in LMI CTs.

The AA is metropolitan with health care and hospitals, manufacturing and education as the primary jobs in the area. The largest city in the AA is Pueblo. Economic conditions are growing in the area. Growth and development plans vary across the AA. The unemployment rate for the overall area was 11.22 percent while the state of Colorado is 9.2 percent.

Appendix D: 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. [Note: Do not renumber the tables.]

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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Tables of Performance Data

Table 1. Lending Volume

LENDING VOLUME		Geography: SUNFLOWER						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009				
Assessment Area (2009):	% 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)	
State of Kansas:												
KS Non-MA AA #1	28.78	1,303	118,705	409	59,161	89	7,413	0	0	1,801	185,279	24.61
KS Non-MA AA #2	35.63	756	63,907	766	69,703	708	40,450	0	0	2,230	174,060	38.88
Lawrence MA	2.56	45	10,503	110	24,116	2	208	3	2,097	160	36,924	2.11
Manhattan MA	6.50	282	36,910	121	17,713	4	496	1	150	407	54,969	7.02
Topeka MA	1.57	58	7,937	39	10,327	1	75	0	0	98	18,339	0.62
Wichita MA	9.11	306	53,208	260	51,425	4	197	0	0	570	104,830	6.60
State of Colorado:												
Pueblo MA	8.42	207	18,992	310	40,527	10	595	0	0	527	60,114	6.83
CO Non-MA AA	7.43	232	30,121	182	23,546	51	8,577	0	0	465	62,244	13.34

* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2007 to December 31, 2009.

*** Deposit Data as of May 13, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: SUNFLOWER						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009						
Assessment Area (2009):	% 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)	
State of Kansas:														
KS Non-MA AA #1	0.00	0	0	0	0	0	0	0	0	0	0	0	0	24.61
KS Non-MA AA #2	0.00	0	0	0	0	0	0	0	0	0	0	0	0	38.88
Lawrence MA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.11
Manhattan MA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	7.02
Topeka MA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.62
Wichita MA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	6.60
State of Colorado:														
Pueblo MA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	6.83
CO Non-MA AA	0.00	0	0	0	0	0	0	0	0	0	0	0	0	13.34

* Loan Data as of December 31, 2009. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2007 to December 31, 2009.

*** Deposit Data as of May 13, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME		Geography: SUNFLOWER		Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009	
Assessment Area (2009):	Other Unsecured Consumer Loans		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
State of Kansas:					
KS Non-MA AA #1	0	0	0	0	
KS Non-MA AA #2	0	0	0	0	
Lawrence MA	0	0	0	0	
Manhattan MA	0	0	0	0	
Topeka MA	0	0	0	0	
Wichita MA	0	0	0	0	
State of Colorado:					
Pueblo MA	0	0	0	0	
CO Non-MA AA	0	0	0	0	

* The evaluation period for Optional Product Line(s) is from January 01, 2007 to December 31, 2009.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share (%) by Geography				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ***	% BANK Loans****	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans						
State of Kansas:																
KS Non-MA AA #1	367	29.84	0.00	0.00	2.32	1.63	62.37	48.23	35.31	50.14	9.56	0.00	0.00	5.95	16.33	
KS Non-MA AA #2	385	31.30	0.00	0.00	11.39	7.79	71.85	75.06	16.76	17.14	10.34	0.00	8.82	11.14	8.68	
Lawrence MA	12	0.98	0.11	0.00	19.97	16.67	49.84	33.33	30.08	50.00	0.22	0.00	0.28	0.24	0.15	
Manhattan MA	130	10.57	0.00	0.00	20.08	28.46	46.25	35.38	33.67	36.15	1.07	0.00	0.51	1.34	1.21	
Topeka MA	32	2.60	0.65	3.13	21.77	12.50	41.36	25.00	36.23	59.38	0.39	6.67	0.25	0.00	0.79	
Wichita MA	142	11.54	1.40	7.04	22.67	9.86	46.10	36.62	29.83	46.48	0.26	5.77	0.21	0.12	0.36	
State of Colorado:																
Pueblo MA	88	7.15	0.00	0.00	24.22	37.50	46.83	34.09	28.95	28.41	1.13	0.00	3.28	0.81	0.74	
CO Non-MA AA	74	6.02	0.00	0.00	13.36	1.35	85.10	94.59	1.54	4.05	2.50	0.00	1.96	2.41	4.44	

* Based on 2009 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: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share (%) by Geography				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
State of Kansas:																
KS Non-MA AA #1	275	40.74	0.00	0.00	2.32	1.82	62.37	58.18	35.31	40.00	51.74	0.00	25.00	53.13	51.39	
KS Non-MA AA #2	153	22.67	0.00	0.00	11.39	7.19	71.85	73.86	16.76	18.95	26.44	0.00	13.64	28.21	28.57	
Lawrence MA	13	1.93	0.11	0.00	19.97	7.69	49.84	23.08	30.08	69.23	2.56	0.00	0.00	1.32	5.77	
Manhattan MA	42	6.22	0.00	0.00	20.08	21.43	46.25	40.48	33.67	38.10	5.14	0.00	4.26	5.49	5.26	
Topeka MA	11	1.63	0.65	0.00	21.77	9.09	41.36	54.55	36.23	36.36	1.54	0.00	1.69	0.76	2.27	
Wichita MA	70	10.37	1.40	0.00	22.67	22.86	46.10	38.57	29.83	38.57	1.71	0.00	2.93	1.56	1.45	
State of Colorado:																
Pueblo MA	40	5.93	0.00	0.00	24.22	22.50	46.83	42.50	28.95	35.00	6.12	0.00	11.36	4.63	5.38	
CO Non-MA AA	71	10.52	0.00	0.00	13.36	8.45	85.10	88.73	1.54	2.82	23.96	0.00	60.00	20.69	50.00	

* Based on 2009 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: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
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	Overa ll	Low	Mod	Mid	Upp	
State of Kansas:																
KS Non-MA AA #1	660	51.76	0.00	0.00	2.32	1.06	62.37	48.33	35.31	50.61	16.21	0.00	9.52	14.35	18.56	
KS Non-MA AA #2	218	17.10	0.00	0.00	11.39	3.67	71.85	72.94	16.76	23.39	6.98	0.00	1.18	7.54	6.90	
Lawrence MA	16	1.25	0.11	0.00	19.97	0.00	49.84	25.00	30.08	75.00	0.29	0.00	0.00	0.06	0.60	
Manhattan MA	110	8.63	0.00	0.00	20.08	13.64	46.25	41.82	33.67	44.55	2.73	0.00	2.49	2.66	2.88	
Topeka MA	15	1.18	0.65	0.00	21.77	6.67	41.36	20.00	36.23	73.33	0.24	0.00	0.00	0.06	0.42	
Wichita MA	94	7.37	1.40	1.06	22.67	11.70	46.10	43.62	29.83	43.62	0.47	2.08	0.50	0.40	0.51	
State of Colorado:																
Pueblo MA	76	5.96	0.00	0.00	24.22	23.68	46.83	40.79	28.95	35.53	0.61	0.00	0.44	0.67	0.59	
CO Non-MA AA	86	6.75	0.00	0.00	13.36	1.16	85.10	90.70	1.54	8.14	2.52	0.00	1.18	2.70	1.47	

* Based on 2009 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: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
State of Kansas:																
KS Non-MA AA #1	1	16.67	0.00	0.00	0.96	0.00	58.02	0.00	41.02	100.00	0.00	0.00	0.00	0.00	0.00	
KS Non-MA AA #2	1	16.67	0.00	0.00	5.13	0.00	69.07	100.00	25.80	0.00	0.00	0.00	0.00	0.00	0.00	
Lawrence MA	4	33.33	10.24	0.00	34.66	75.00	37.90	25.00	17.20	0.00	5.00	0.00	9.09	0.00	0.00	
Manhattan MA	2	16.67	0.00	0.00	34.18	50.00	45.96	50.00	19.85	0.00	0.00	0.00	0.00	0.00	0.00	
Topeka MA	0	0.00	5.50	0.00	22.25	0.00	52.47	0.00	19.77	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita MA	0	0.00	4.30	0.00	32.79	0.00	42.30	0.00	20.62	0.00	0.00	0.00	0.00	0.00	0.00	
State of Colorado:																
Pueblo MA	3	25.00	0.00	0.00	46.91	0.00	48.33	100.00	4.76	0.00	33.33	0.00	0.00	75.00	0.00	
CO Non-MA AA	1	16.67	0.00	0.00	21.61	0.00	78.39	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2009 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: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share (%) by Geography				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total*	% of Busines ses**	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans						
State of Kansas:																
KS Non-MA AA #1	409	18.62	0.00	0.00	4.70	6.11	68.10	66.26	27.20	27.63	5.51	0.00	8.70	5.32	5.63	
KS Non-MA AA #2	766	34.87	0.00	0.00	13.04	10.84	73.18	70.37	13.78	18.80	8.53	0.00	9.87	7.92	12.61	
Lawrence MA	110	5.01	2.12	0.00	26.74	35.45	43.89	31.82	27.25	32.73	2.09	0.00	3.83	1.34	1.80	
Manhattan MA	121	5.51	0.00	0.00	38.73	21.49	38.68	30.58	22.59	47.93	1.84	0.00	1.60	1.07	3.92	
Topeka MA	39	1.78	12.43	5.13	19.05	12.82	39.79	46.15	28.73	35.90	0.30	0.00	0.15	0.33	0.44	
Wichita MA	260	11.83	2.57	5.00	28.53	30.77	39.99	32.31	28.92	31.92	0.70	2.00	0.66	0.72	0.59	
State of Colorado:																
Pueblo MA	310	14.11	0.00	0.00	31.43	32.58	37.96	36.13	30.58	31.29	2.70	0.00	3.19	2.70	2.42	
CO Non-MA AA	182	8.28	0.00	0.00	16.11	17.03	81.14	78.02	2.73	4.95	5.50	0.00	8.16	5.58	4.88	

* Based on 2009 Peer Small Business Data -- US

** 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 (2009).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
State of Kansas:																
KS Non-MA AA #1	89	10.24	0.00	0.00	0.95	0.00	60.63	65.17	38.41	34.83	14.94	0.00	0.00	16.83	12.86	
KS Non-MA AA #2	708	81.47	0.00	0.00	4.43	1.55	84.87	94.35	10.70	4.10	24.04	0.00	15.38	24.21	27.03	
Lawrence MA	2	0.23	0.31	0.00	13.84	0.00	52.83	50.00	33.02	50.00	0.00	0.00	0.00	0.00	0.00	
Manhattan MA	4	0.46	0.00	0.00	10.03	0.00	37.54	100.00	52.43	0.00	2.14	0.00	0.00	3.51	0.00	
Topeka MA	1	0.12	3.98	0.00	9.84	0.00	49.88	0.00	36.30	100.00	0.00	0.00	0.00	0.00	0.00	
Wichita MA	4	0.46	1.10	0.00	14.02	0.00	50.99	25.00	33.89	75.00	2.82	0.00	0.00	2.56	3.57	
State of Colorado:																
Pueblo MA	10	1.15	0.00	0.00	15.93	10.00	42.77	60.00	41.30	30.00	6.67	0.00	10.00	4.35	8.33	
CO Non-MA AA	51	5.87	0.00	0.00	9.18	13.73	88.61	86.27	2.22	0.00	11.11	0.00	16.67	11.25	0.00	

* Based on 2009 Peer Small Business Data -- US

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

*** Source Data - Dun and Bradstreet (2009).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: SUNFLOWER						Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009						
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 ¹	% BANK Loans**	% Families***	% BANK Loans****	% Families***	% BANK Loans***	Over all	Low	Mod	Mid	Upp
State of Kansas:															
KS Non-MA AA #1	367	29.84	13.60	3.38	16.26	12.00	26.53	25.54	43.61	59.08	11.62	3.26	5.74	11.16	20.00
KS Non-MA AA #2	385	31.30	19.08	6.49	19.66	21.35	24.42	27.30	36.84	44.86	12.74	13.04	10.48	11.64	15.09
Lawrence MA	12	0.98	18.17	0.00	18.89	0.00	24.70	41.67	38.24	58.33	0.25	0.00	0.00	0.51	0.39
Manhattan MA	130	10.57	20.02	2.36	19.59	12.60	21.56	22.05	38.83	62.99	1.50	0.00	1.26	1.36	1.78
Topeka MA	32	2.60	13.32	3.33	15.07	13.33	21.62	23.33	49.99	60.00	0.45	0.00	0.00	0.50	1.05
Wichita MA	142	11.54	17.98	3.85	18.92	10.00	24.26	6.92	38.84	79.23	0.30	0.08	0.25	0.10	0.65
State of Colorado:															
Pueblo MA	88	7.15	20.21	14.29	18.34	11.90	21.79	16.67	39.67	57.14	1.21	1.85	0.30	0.44	2.16
CO Non-MA AA	74	6.02	22.44	8.45	21.32	9.86	24.81	25.35	31.43	56.34	2.86	1.08	1.89	3.70	3.70

* Based on 2009 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.6% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009					Market Share				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
State of Kansas:																
KS Non-MA AA #1	275	40.74	13.60	6.75	16.26	13.89	26.53	22.62	43.61	56.75	53.42	55.56	41.67	41.86	62.35	
KS Non-MA AA #2	153	22.67	19.08	10.27	19.66	20.55	24.42	25.34	36.84	43.84	26.04	37.50	21.88	26.00	26.58	
Lawrence MA	13	1.93	18.17	0.00	18.89	0.00	24.70	18.18	38.24	81.82	2.05	0.00	0.00	2.86	3.13	
Manhattan MA	42	6.22	20.02	2.50	19.59	2.50	21.56	22.50	38.83	72.50	5.61	0.00	0.00	12.50	4.84	
Topeka MA	11	1.63	13.32	18.18	15.07	27.27	21.62	0.00	49.99	54.55	1.65	2.86	1.39	0.00	2.31	
Wichita MA	70	10.37	17.98	9.52	18.92	14.29	24.26	25.40	38.84	50.79	1.62	2.94	0.41	2.25	1.46	
State of Colorado:																
Pueblo MA	40	5.93	20.21	2.50	18.34	10.00	21.79	12.50	39.67	75.00	6.52	5.26	2.27	1.96	10.34	
CO Non-MA AA	71	10.52	22.44	7.58	21.32	18.18	24.81	28.79	31.43	45.45	23.60	27.27	13.04	28.00	26.67	

* Based on 2009 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 6.8% of loans originated and purchased by bank.

² 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: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009							
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 ³	% BANK Loans*** *	% Families* **	% BANK Loans*** *	% Families* **	% BANK Loans** **	Overall	Low	Mod	Mid	Upp
State of Kansas:															
KS Non-MA AA #1	660	51.76	13.60	2.69	16.26	9.34	26.53	18.67	43.61	69.30	19.13	7.41	11.16	13.57	25.60
KS Non-MA AA #2	218	17.10	19.08	7.18	19.66	13.33	24.42	17.95	36.84	61.54	7.85	7.79	4.79	5.21	9.94
Lawrence MA	16	1.25	18.17	0.00	18.89	0.00	24.70	13.33	38.24	86.67	0.35	0.00	0.00	0.24	0.59
Manhattan MA	110	8.63	20.02	3.03	19.59	14.14	21.56	14.14	38.83	68.69	3.55	0.00	3.70	2.99	3.93
Topeka MA	15	1.18	13.32	0.00	15.07	0.00	21.62	42.86	49.99	57.14	0.26	0.00	0.00	0.43	0.30
Wichita MA	94	7.37	17.98	1.25	18.92	5.00	24.26	17.50	38.84	76.25	0.52	0.12	0.11	0.30	0.86
State of Colorado:															
Pueblo MA	76	5.96	20.21	4.11	18.34	10.96	21.79	15.07	39.67	69.86	0.83	0.47	0.15	0.38	1.34
CO Non-MA AA	86	6.75	22.44	11.69	21.32	16.88	24.81	25.97	31.43	45.45	3.03	3.92	1.92	3.59	3.04

* Based on 2009 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 12.9% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: SUNFLOWER			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009		
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	
State of Kansas:										
KS Non-MA AA #1	409	18.62	75.33	39.61	69.19	13.20	17.60	5.51	16.49	
KS Non-MA AA #2	766	34.87	72.74	50.39	77.02	14.75	8.22	8.53	14.10	
Lawrence MA	110	5.01	76.38	37.27	45.45	20.91	33.64	2.09	2.42	
Manhattan MA	121	5.51	73.30	47.93	59.50	24.79	15.70	1.84	2.54	
Topeka MA	39	1.78	73.58	53.85	25.64	41.03	33.33	0.30	0.76	
Wichita MA	260	11.83	74.61	40.77	51.15	23.46	25.38	0.70	1.65	
State of Colorado:										
Pueblo MA	310	14.11	78.65	60.65	60.00	27.10	12.90	2.70	6.25	
CO Non-MA AA	182	8.28	80.16	44.51	65.38	21.98	12.64	5.50	7.77	

* Based on 2009 Peer Small Business Data -- US

** 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 - 2009).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 28.45% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: SUNFLOWER			Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009		
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less	
State of Kansas:										
KS Non-MA AA #1	89	10.24	97.94	78.65	78.65	17.98	3.37	14.94	17.54	
KS Non-MA AA #2	708	81.47	97.26	75.85	87.43	9.89	2.68	24.04	22.16	
Lawrence MA	2	0.23	99.06	50.00	50.00	50.00	0.00	0.00	0.00	
Manhattan MA	4	0.46	95.47	100.00	75.00	0.00	25.00	2.14	5.06	
Topeka MA	1	0.12	97.89	100.00	100.00	0.00	0.00	0.00	0.00	
Wichita MA	4	0.46	97.24	75.00	100.00	0.00	0.00	2.82	1.89	
State of Colorado:										
Pueblo MA	10	1.15	98.23	70.00	90.00	10.00	0.00	6.67	6.06	
CO Non-MA AA	51	5.87	94.94	49.02	45.10	35.29	19.61	11.11	6.25	

* Based on 2009 Peer Small Business Data -- US

** 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 - 2009).

**** 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 22.78% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009			
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
State of Kansas:									
KS Non-MA AA #1	1	143	4	4,639	5	4,782	42.81	0	0
KS Non-MA AA #2	8	4,286	4	130	12	4,416	39.53	0	0
Lawrence MA	0	0	0	0	0	0	0.00	0	0
Manhattan MA	0	0	0	0	0	0	0.00	0	0
Topeka MA	0	0	0	0	0	0	0.00	0	0
Wichita MA	0	0	2	1,973	2	1,973	17.66	0	0
State of Colorado:									
Pueblo MA	0	0	0	0	0	0	0.00	0	0
CO Non-MA AA	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: SUNFLOWER **Evaluation Period:** JANUARY 1, 2007 TO DECEMBER 31, 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
State of Kansas:																	
KS Non-MA AA #1	24.61	6	17.65	0.00	0.00	33.33	66.67	0	0	0	0	0	0	0.00	2.99	65.81	31.20
KS Non-MA AA #2	38.88	12	35.29	0.00	16.67	66.67	16.67	0	0	0	0	0	0	0.00	14.21	69.68	16.11
Lawrence MA	2.11	1	2.94	0.00	0.00	0.00	100.00	0	0	0	0	0	0	5.95	25.54	46.20	22.31
Manhattan MA	7.02	3	8.82	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	37.04	40.91	22.05
Topeka MA	0.62	1	2.94	0.00	0.00	0.00	100.00	1	0	0	0	0	1	1.72	26.54	40.50	31.24
Wichita MA	6.60	4	11.76	0.00	50.00	25.00	25.00	0	0	0	0	0	0	2.65	29.09	42.15	26.11
State of Colorado:																	
Pueblo MA	6.83	3	8.82	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	30.02	43.31	25.47
CO Non-MA AA	13.34	4	11.76	0.00	25.00	75.00	0.00	0	3	0	- 2	- 1	0	0.00	13.48	76.68	1.09

Distribution of Branch and ATM Delivery System

Distribution of Branch and ATM Delivery System				Geography: SUNFLOWER				Evaluation Period: JANUARY 1, 2007 TO DECEMBER 31, 2009									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
State of Kansas:																	
KS Non-MA AA #1	24.61	6	17.65	0	0	33	67	12	25.00	0	1	9	2	0.00	2.99	65.81	31.20
KS Non-MA AA #2	38.88	12	35.29	0	17	67	17	16	33.33	0	2	11	3	0.00	14.21	69.68	16.11
Lawrence MA	2.11	1	2.94	0	0	0	100	1	2.08	0	0	0	1	5.95	25.54	46.20	22.31
Manhattan MA	7.02	3	8.82	0	33	67	0	6	12.50	0	1	5	0	0.00	37.04	40.91	22.05
Topeka MA	0.62	1	2.94	0	0	0	100	1	2.08	0	0	0	1	1.72	26.54	40.50	31.24
Wichita MA	6.60	4	11.76	0	50	25	25	3	6.25	0	1	1	1	2.65	29.09	42.15	26.11
State of Colorado:																	
Pueblo MA	6.83	3	8.82	0	0	67	33	3	6.25	0	0	2	1	0.00	30.02	43.31	25.47
CO Non-MA AA	13.34	4	11.76	0	25	75	0	6	12.50	0	1	5	0	0.00	13.48	76.68	1.09