



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

**PUBLIC DISCLOSURE**

January 02, 2013

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Simmons First National Bank  
Charter Number 6680

501 Main Street  
Pine Bluff, AR 71611

Office of the Comptroller of the Currency

Victory Building  
1401 West Capitol Avenue  
Suite 350  
Little Rock, AR 72201

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

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## Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- SFNB’s lending level reflects adequate responsiveness to its deposit market share and assessment area credit needs.
- The distribution of home mortgage loans by income level of geography is adequate.
- The distribution of loans to borrowers of different income levels and to businesses of different sizes is adequate.
- In the assessment area where SFNB maintains an ongoing presence, the level of community development loans is a neutral factor.
- There is an adequate level of qualified investments based on the investment opportunities and dollar volume of investments made in the assessment areas.
- Branch locations are accessible in the assessment areas where SFNB maintains an ongoing presence.
- In the assessment areas where SFNB maintains an ongoing presence, the bank provides a good level of community development services.

## 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):** Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Median Family Income (MFI):** The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

SFNB, headquartered in Pine Bluff, Arkansas is a wholly owned subsidiary of Simmons First National Corporation, a \$3.4 billion multi-bank holding company, and is the lead bank in the company. The holding company provides a full range of consumer and commercial financial products and services, and operates eight affiliate banks from 96 offices, in 55 communities in Arkansas, Missouri, and Kansas.

SFNB is an interstate bank with branches in Arkansas, Kansas, and Missouri. SFNB entered the Kansas and Missouri markets in 2010 and 2012. It is the sixth largest commercial bank headquartered in Arkansas with total assets of \$1.98 billion as of September 30, 2012. The bank's deposit market share in Arkansas is 2.48% as of June 30, 2012. As of September 30, 2012, net loans are reported at \$998 million, loan-to-deposit ratio at 59.3%, and Tier 1 Capital at \$174 million.

During the evaluation period, SFNB's strategic plan has been to proactively pursue and effectively manage growth through acquisitions and de novo branching while providing a wide array of financial services and excellent customer service to consumers and small businesses in the market area. The bank offers a variety of loan products, including the following types of loans: commercial and commercial real estate, consumer, credit card, and single-family real estate. SFNB operates 53 branch offices and 55 automated teller machines (ATM) throughout Arkansas, Missouri, and Kansas. The 35 Arkansas banking offices are located in the MAs of Fort Smith, Little Rock/North Little Rock, and Pine Bluff; and in non-MA counties of Fulton, Searcy, Sharp, Stone, and Van Buren. The 9 banking centers in Kansas are located in the MAs of Kansas City and Wichita; and the non-MA Saline County. The 9 banking centers located in Missouri are located in the MAs of Kansas City, Springfield, St. Louis, and Pettis County.

Net loans represent 50.4% of total assets as of September 20, 2012. The loan portfolio is comprised of 59.4% loans secured by real estate, 6.2% commercial and industrial loans, 4.4% agricultural loans, and 29.8% loans to individuals (including credit cards). SFNB has a large credit card operation with accounts throughout the United States. Credit card loans represent 19% of gross loans.

No significant financial barriers limit SFNB's ability to meet the identified credit needs within its AA.

The prior CRA examination is dated September 29, 2008, and the assigned rating was **"Satisfactory."**



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We analyzed home purchase, home improvement, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses and farms the bank reported under the Community Reinvestment Act. The evaluation periods covered by this review include 2009 through 2011. The 2009 through 2011 evaluation period was analyzed using 2000 U.S. Census Data. Loan data from 2012 was also evaluated using 2010 U.S. Census Data. The evaluation period for community development loans, investments, services, and retail services is September 30, 2008 through January 2, 2013. While SFNB originates some multifamily property loans, in most assessment areas, these loan types represent a very small percentage of the bank's lending activity and had volumes too small for meaningful analyses. As described in Appendix A, we reviewed all of the bank's assessment areas. Please refer to Appendix A for a detailed listing of products and entities included in our review, and evaluation periods by state or multistate metropolitan area.

### Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's HMDA and CRA lending data by reviewing audit reports conducted in 2012. Based on audit findings, we determined that SFNB is accurately reporting HMDA and CRA data. We also tested community development loans, investments, and services for accuracy and determined if they qualify as community development as defined in the CRA regulation. We determined that the data reported publicly and the additional data provided for this evaluation are accurate.

### Selection of Areas for Full-Scope Review

The following assessment areas were selected for a full-scope review:

- State of Arkansas: Fort Smith, AR-OK MA #2290; Little Rock-North Little Rock MA #30780; Pine Bluff, AR MA #38220; and non-MA counties Searcy, Stone, Van Buren.
- State of Kansas: Kansas City, KS-MO MA #28140; Wichita, KS MA #48620
- State of Missouri: Springfield, MO MA #44180.

### Ratings

The bank's overall rating is a blend of the multistate metropolitan area rating(s) and state ratings. The state of Arkansas is weighted most heavily in arriving at the overall conclusion. SFNB has more loan volume in the Pine Bluff, AR MA #38220.

### Factors Considered in our Analysis under Each Performance Test

We based the ratings primarily on those areas that received full-scope reviews, but we considered the bank's performance in areas receiving limited-scope reviews proportionally.

### Lending Test

For the various loan products considered under the Lending Test, we gave more weight to home purchase, refinance, and small loans to businesses in developing our conclusions. The weightings applied were reflective of the proportion of loans originated or purchased during the evaluation period.

In evaluating the bank's lending performance, we gave equal weighting to the geographic and borrower distribution components of the Lending Test. The volume and responsiveness of community development loans had a neutral impact on the Lending Test rating overall.

In our analysis of the distribution of loans to geographies with different income levels, we weighted the bank's performance in moderate-income census tracts heavier if there were a limited number of owner-occupied housing units or businesses in the low-income census tracts.

In our analysis of borrower distribution, we considered the impact that poverty levels have on the demand for mortgages from low- and moderate-income individuals. We considered the high cost and overall affordability of housing in some markets, and the difficulty that low- or moderate-income applicants have in qualifying for home loans in those markets.

### Investment Test

The volume of investments and grants made during the current evaluation period received primary consideration. We also evaluated the responsiveness of the bank's investments to identified community development needs. Investments made in prior evaluation periods that remain outstanding received secondary consideration. We also considered investments made in a broader regional area that include the bank's assessment areas.

### Service Test

In the Service Test evaluation, SFNB's performance in delivering retail products and services to its assessment areas received primary consideration. We placed the greatest weight on the delivery of financial services and products to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in low- and moderate-income geographies, but also considered branches in middle- and upper-income areas that are nearby low- and moderate-income areas.

We analyzed the distribution of deposit-taking ATMs by income level of census tract and gave positive consideration where the ATMs enhanced the access to banking services for low- and moderate-income individuals or geographies.

We evaluated the impact of branch openings and closings on accessibility for low- and moderate-income individuals and areas. We also considered the range of products and services and the convenience of business hours in low- and moderate-income areas compared to those in middle- and upper-income areas to determine if there were significant differences.

We evaluated the bank's record of providing community development services in assessment areas that received full-scope reviews. Our primary consideration in these

reviews was the responsiveness to the needs of the community. Services that reflected ongoing relationships with organizations involved in community development received the most consideration in our analysis.

## **Community Contacts**

We considered information from contacts made during the evaluation period with a variety of groups and organizations to identify financial and credit needs and opportunities within SFNBs assessment areas. We included relevant comments as appropriate in our performance context considerations. For the full-scope rating areas, we summarized information from community contacts in the Community Profiles found in Appendix C.

## **Lending Gap Analysis**

In order to identify any unexplained conspicuous gaps in the geographic distribution of loans, we reviewed summary reports, and analyzed SFNB's home mortgage and small business lending activity over the evaluation period. We did not identify any unexplained conspicuous gaps. We determined that all the bank's assessment areas consist of whole geographies, meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income areas.

## **Inside/Outside Ratio**

A substantial majority of originated and purchased loans reported by SFNB during the evaluation period are within the bank's AAs. Seventy-three percent of the number of loans and 68 percent of the dollar volume are located within the bank's AAs. A significant majority of small business/farm (82 percent) lending originated within the AAs, while 67 percent of home purchase, 85 percent of home improvement, and 66 percent of home refinancing lending occurred within those areas. SFNB originated a majority of its CD loans within the AAs. The inside/outside ratio was calculated on a bank-wide basis, and affiliate lending is not included. This record of lending within the AAs had no significant impact on the geographic distribution conclusions.

## **Flexible and Innovative Loan Programs and Services**

### Lending

SFNB does not offer any flexible or innovative loan programs specifically targeted to low- and moderate-income individuals.

### Services

Service delivery systems are accessible bank-wide. In addition to traditional banking branches and ATMs, customers may access bank services through a toll-free telephone banking customer service line and via online/Internet banking. We did not place significant weight on these alternative delivery systems when drawing conclusions for the Service Test as no data was available describing how low- and moderate-income individuals and geographies use these services.

SFNB demonstrates its commitment to community development through its participation in various programs sponsored by community development organizations in its communities. There is a discussion of examples of flexible and or innovative services throughout the narrative portions of the Service Tests in each rating area, where appropriate, and particularly when they resulted in a positive impact to an overall rating area.

## **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 Arkansas

<b>CRA Rating for Arkansas<sup>1</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	Low Satisfactory
<b>The investment test is rated:</b>	Low Satisfactory
<b>The service test is rated:</b>	High Satisfactory

The major factors that support this rating include:

- Geographic distribution of home mortgage loans is adequate.
- Geographic distribution of small loans to businesses and farms is good.
- Borrower distribution of home mortgage loans is good.
- SFNB has an excellent record of making loans to businesses and farms that report revenues of \$1 million or less.
- The bank has a low volume of CD loans.
- The level of qualified investments/grants is adequate.
- Retail branch distribution is good and SFNB has a good level of CD services.

### Description of Institution's Operations in Arkansas

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

### Scope of Evaluation in Arkansas

The following assessment areas in the state of Arkansas received a full-scope review: Fort-Smith, AR-OK MA #22900; Little Rock/North Little Rock MA #30780; Pine Bluff, AR MA #38220; and non-MA counties of Searcy, Stone, and Van Buren. The ratings are based primarily on results of those areas that received full-scope reviews. Refer to the table in Appendix A for more information.

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

The Pine Bluff, AR MA received the most weight in arriving at the rating for Arkansas. Approximately 40 percent of the loans in the state are located in the Pine Bluff, AR MA.

Community contacts are contained in the Market Profile in Appendix A.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Arkansas for the years 2009 through 2011 is rated "**High Satisfactory.**" Based on the bank's performance context and the full-scope reviews, the bank's performance in the Fort Smith MA, Little Rock/North Little Rock MA, and Pine Bluff MA is good and performance in the Searcy-Stone-Van Buren Counties AA is good.

The bank's performance under the lending test in Arkansas for 2012 is rated "**Low Satisfactory.**" Based on the bank's performance context and the full-scope reviews, the bank's performance in the Little Rock/North Little Rock MA and Pine Bluff MA is adequate and performance in the Fort Smith MA and Searcy-Stone-Van Buren Counties AA is good.

### Lending Activity

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

Lending activity in the state of Arkansas for the years 2009 through 2011 is adequate. SFNB is the dominant lender in the Pine Bluff MA. Approximately 39% of the bank's loans evaluated for CRA between January 1, 2009 and December 31, 2011 are in this market. During this evaluation period, the bank originated a good volume of loans to small businesses and residential real estate mortgages, which impacted CRA lending performance assessments. Due to the low volume of multi-family loans, these loans were not considered for geographical and borrower income distribution. During this period, the loan-to-deposit ratio has declined steadily, decreasing from 83.78% as of December 31, 2008 to 59.96% as of December 31, 2011. The decline in loan-to-deposit ratio is primarily attributable to an industry-wide decline in loan demand over the time period.

Lending activity in the state of Arkansas for 2012 is adequate. SFNB is the dominant lender in the Pine Bluff MA. Approximately 36% of the bank's loans evaluated for CRA between January 1, 2012 and December 31, 2012 are in this market. During this evaluation period, the bank originated a good volume of loans to small businesses and residential real estate mortgages, which impacted CRA lending performance assessments. Due to the low volume of multi-family loans, these loans were not considered for geographical and borrower income distribution.

### Fort Smith MA

Loan volume in this AA for 2009 through 2011 is adequate. Overall, the Fort Smith MA accounts for approximately 16% of the bank's loans. The bank had 5.61% of the deposit share in the Fort Smith MA and ranked 7<sup>th</sup> in this market as of June 30, 2011. SFNB ranked 11<sup>th</sup> in the AA for home purchase loans and had a 2.12% market share. For home improvement loans, SFNB ranked 7<sup>th</sup> with a 4.47% market share. The bank ranked 15<sup>th</sup> for refinance loans and had a 1.49% market share. SFNB was ranked 11<sup>th</sup> with a 3.34% market share for small loans to businesses and was ranked 1<sup>st</sup> with a 40.82% market share for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders compete for market share of loans in this market.

Loan volume in this AA for 2012 is adequate. Overall, the Fort Smith MA accounts for approximately 16% of the bank's loans. The bank had 4.33% of the deposit share in the Fort Smith MA and ranked 7<sup>th</sup> in this market as of June 30, 2012. No market share or ranking data for lending volume is available at the time of this evaluation.

### Little Rock/North Little Rock MA

Loan volume in this AA for 2009 through 2011 is adequate. Overall, the Little Rock/North Little Rock MA accounts for approximately 19% of the bank's loans. The bank had 1.80% of the deposit share in the Little Rock/North Little Rock MA and ranked 13<sup>th</sup> in this market as of June 30, 2011. SFNB ranked 25<sup>th</sup> in the AA for home purchase loans and had a 0.87% market share. For home improvement loans, SFNB ranked 17<sup>th</sup> with a 2.02% market share. The bank ranked 24<sup>th</sup> in the AA for refinance loans and had a 1.15% market share. SFNB was ranked 16<sup>th</sup> with a 1.66% market share for small loans to businesses, and was ranked 4<sup>th</sup> with a market share of 15.25% for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders compete for market share of loans in this market.

Loan volume in this AA for 2012 is adequate. Overall, the Little Rock/North Little Rock MA accounts for approximately 23% of the bank's loans. The bank had 1.53% of the deposit share in the Little Rock/North Little Rock MA and ranked 13<sup>th</sup> in this market as of June 30, 2012. No market share or ranking data for lending volume is available at the time of this evaluation.

### Pine Bluff MA

Loan volume in this AA for 2009 through 2011 is good. Overall, the Pine Bluff MA accounts for approximately 39% of the bank's loans. The bank had 60.86% of the deposit share in the Pine Bluff MA and ranked 1<sup>st</sup> in this market as of June 30, 2011. SFNB ranked 1<sup>st</sup> in the AA for home purchase loans and had an 18.52% market share. For home improvement loans, SFNB ranked 1<sup>st</sup> with a 35.05% market share. The bank ranked 2<sup>nd</sup> for refinance loans and had a 10.41% market share. SFNB was ranked 1<sup>st</sup> with a 35.95% market share for small loans to businesses, and was ranked 1<sup>st</sup> with a market share of 96.41% for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders compete for market share of loans in this market.



Loan volume in this AA for 2012 is good. Overall, the Pine Bluff MA accounts for approximately 36% of the bank's loans. The bank had 57.53% of the deposit share in the Pine Bluff MA and ranked 1<sup>st</sup> in this market as of June 30, 2012. No market share or ranking data for lending volume is available at the time of this evaluation.

### Searcy-Stone-Van Buren AR Counties AA

Loan volume in this AA for 2009 through 2011 is adequate. Overall, the Searcy-Stone-Van Buren Counties AA accounts for approximately 21% of the bank's loans. The bank had 17.59% of the deposit share in this AA and ranked 1<sup>st</sup> in this market as of June 30, 2011. SFNB ranked 2<sup>nd</sup> in the AA for home purchase loans and had a 10.88% market share. For home improvement loans, SFNB ranked 3<sup>rd</sup> with a 12.70% market share. The bank ranked 2<sup>nd</sup> for refinance loans and had a 9.64% market share. SFNB was ranked 1<sup>st</sup> with a 25.57% market share for small loans to businesses, and was ranked 1<sup>st</sup> with a market share of 74.39% for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders compete for market share of loans in this market.

Loan volume in this AA for 2012 is adequate. Overall, the Searcy-Stone-Van Buren Counties AA accounts for approximately 22% of the bank's loans. The bank had 18.3% of the deposit share in this AA and ranked 1<sup>st</sup> in this market as of June 30, 2012. No market share or ranking data for lending volume is available at the time of this evaluation.

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

The geographic distribution of SFNB's loans in the state of Arkansas for 2009 through 2011 is adequate. The overall geographic distribution of home mortgage loans is poor, the overall distribution of small loans to businesses is good, and the overall distribution of small loans to farms is adequate.

The geographic distribution of loans in the Fort Smith MA is poor. This is due to poor distribution of home mortgage loans, small loans to businesses, and small loans to farms. The performance in the Fort Smith MA is mitigated by limited opportunities to lend, which include a low percentage of owner-occupied housing units in moderate-income geographies at 5.17% and a low percentage of farms in moderate-income geographies at 2.42%. The geographic distribution of loans in the Little Rock/North Little Rock MA is adequate. This is due to poor distribution of home mortgage loans, good distribution of small loans to businesses and adequate distribution of small loans to farms. The bank's performance in home mortgage lending is mitigated due to the very low percentage of owner-occupied housing units in low-income geographies at 1.49%, suggesting limited opportunities to lend. The geographic distribution of loans in the Pine Bluff MA is adequate. While distribution of home mortgage lending is poor, distribution of small loans to farms and small loans to businesses is excellent. The geographic distribution of loans in the Searcy-Stone-Van Buren Counties AA is good. This is due to good geographic distribution for home mortgage loans, good distribution of small loans to businesses, and excellent distribution of small loans to farms.

The geographic distribution of SFNB's loans in the state of Arkansas for 2012 is good. The overall geographic distribution of home mortgage loans is adequate, the overall distribution of small loans to businesses is good, and the overall distribution of small loans to farms is excellent.

The geographic distribution of loans in the Fort Smith MA is good. This is due to good distribution of home mortgage loans and excellent distribution of small loans to businesses and small loans to farms. The geographic distribution of loans in the Little Rock/North Little Rock MA is adequate. This is due to adequate distribution of home mortgage loans, adequate distribution of small loans to businesses and excellent distribution of small loans to farms. The bank's performance in home mortgage lending is mitigated due to the low percentage of owner-occupied housing units in low-income geographies at 4.05%, suggesting limited opportunities to lend. The geographic distribution of loans in the Pine Bluff MA is adequate. While distribution of home mortgage lending is poor, distribution of small loans to farms and small loans to businesses is excellent. The geographic distribution of loans in the Searcy-Stone-Van Buren Counties AA is good. This is due to adequate geographic distribution for home mortgage loans and excellent distribution of small loans to businesses and small loans to farms.

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

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

Overall geographic distribution for home mortgage loans from 2009 through 2011 is poor. This is due to overall poor geographic distribution for home purchase loans, adequate distribution for home improvement loans, and poor distribution for home refinance loans. Geographic distribution for home mortgage loans is poor in the Fort Smith MA, Little Rock/North Little Rock MA, and Pine Bluff MA and good in the Searcy-Stone-Van Buren Counties AA. The Little Rock/North Little Rock MA is the only full-scope AA with low-income census tracts. The percentage of owner-occupied housing units in the low-income census tracts is small at 1.49%, indicating fewer opportunities for banks to lend in low-income geographies.

Overall geographic distribution for home mortgage loans in 2012 is adequate. This is due to overall poor geographic distribution for home purchase loans, good distribution for home improvement loans, and adequate distribution for home refinance loans. Geographic distribution for home mortgage loans is good in the Fort Smith MA, adequate in the Searcy-Stone-Van Buren Counties AA and Little Rock/North Little Rock MA, and poor in the Pine Bluff MA. The Little Rock/North Little Rock MA and Pine Bluff MA are the only full-scope AAs with low-income census tracts. The percentage of owner-occupied housing units in the low-income census tracts is small at 4.05% and 2.27% respectively, indicating fewer opportunities for banks to lend in low-income geographies. The percentage of owner-occupied housing units in moderate-income census tracts in the Searcy-Stone-Van Buren Counties AA is also low at 5.22%, indicating fewer opportunities to lend in moderate-income geographies in this AA.

Fort Smith MA2009 – 2011

Home purchase lending in the Fort Smith MA is poor. The AA does not have any low-income census tracts. The percentage of bank loans in moderate-income geographies is lower than the percentage of owner-occupied housing units in moderate-income geographies. The bank's performance is mitigated due to a low percentage of owner-occupied units in moderate-income geographies at 5.17%. As a result, there are fewer opportunities to make loans in moderate-income geographies. SFNB does not have any market share for home purchase loans in moderate-income geographies.

The bank's record of originating home improvement loans in moderate-income census tracts is adequate. The AA does not have any low-income census tracts. The percentage of home improvement loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income geographies. The bank does not have any market share in moderate-income census tracts for home improvement loans.

SFNB's record of originating home refinance loans in moderate-income census tracts in the Fort Smith MA is poor. The bank's loan penetration in moderate-income census tracts is lower than the percentage of owner-occupied housing units. As stated in the above paragraph, the bank's opportunities to make loans in moderate-income geographies are limited by a low percentage of owner-occupied houses in moderate-income census tracts. The bank does not have any market share in moderate-income census tracts for home refinance loans.

2012

Home purchase lending in the Fort Smith MA is adequate. The AA does not have any low-income census tracts. The percentage of bank loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income geographies.

The bank's record of originating home improvement loans in moderate-income census tracts is excellent. The AA does not have any low-income census tracts. The percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income geographies.

SFNB's record of originating home refinance loans in moderate-income census tracts in the Fort Smith MA is excellent. The bank's loan penetration in moderate-income census tracts exceeds the percentage of owner-occupied housing units in moderate-income geographies.

Little Rock/North Little Rock MA2009 – 2011

Home purchase lending in the Little Rock/North Little Rock MA is poor. The percentage of bank loans in low- and moderate-income geographies is lower than the percentage of owner-occupied housing units in low- and moderate-income geographies. The bank's performance in

low-income census tracts is mitigated due to the low percentage of owner-occupied housing units at 1.49%. As a result, there are fewer opportunities to make loans in low-income geographies. There are more owner-occupied housing units in moderate-income geographies but the housing stock is older and many homes in moderate-income census tracts do not meet the collateral criteria for in-house loans or loans sold on the secondary market. SFNB's market share in low-income geographies exceeds the overall market share for home purchase loans. SFNB's market share in moderate-income geographies is somewhat lower than the overall market share for home purchase loans.

The bank's record of originating home improvement loans in low-income census tracts is very poor. SFNB did not originate any loans in low-income census tracts during the evaluation period. As noted in the previous paragraph, the percentage of owner-occupied housing units is very low for low-income geographies which suggest less opportunity to make loans in these geographies. The bank's record of originating home improvement loans in moderate-income census tracts is excellent. The percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income geographies. The bank does not have any market share in low-income census tracts for home improvement loans. The bank's market share in moderate-income geographies is near to the overall market share for home improvement loans.

SFNB's record of originating home refinance loans is poor in low- and moderate-income geographies in the Little Rock/North Little Rock AA. The bank's loan penetration in low- and moderate-income geographies is lower than the percentage of owner-occupied housing units. The low percentage of owner-occupied housing units in low-income geographies mitigates the bank's performance for these census tracts. The bank has no market share in low-income census tracts. SFNB's market share for home refinance loans in moderate-income census tracts exceeds the overall market share for home refinance loans.

## 2012

Home purchase lending in the Little Rock/North Little Rock MA is poor. The percentage of bank loans in low- and moderate-income geographies is lower than the percentage of owner-occupied housing units in low- and moderate-income geographies. The bank's performance in low-income census tracts is mitigated due to the low percentage of owner-occupied housing units at 4.05%. As a result, there are fewer opportunities to make loans in low-income geographies.

The bank's record of originating home improvement loans in low-income census tracts is excellent. The percentage of bank loans in low-income geographies exceeds the percentage of owner-occupied housing units in low-income geographies. The bank's record of originating home improvement loans in moderate-income census tracts is good. The percentage of home improvement loans in moderate-income geographies is near to the percentage of owner-occupied housing units in moderate-income geographies.

SFNB's record of originating home refinance loans is poor in low- and moderate-income geographies in the Little Rock/North Little Rock AA. The bank's loan penetration in low- and moderate-income geographies is lower than the percentage of owner-occupied housing units.

The low percentage of owner-occupied housing units in low-income geographies mitigates the bank's performance for these census tracts.

### Pine Bluff MA

#### 2009 – 2011

Home purchase lending in the Pine Bluff MA is poor. The AA does not have any low-income census tracts. The percentage of bank loans in moderate-income geographies is lower than the percentage of owner-occupied housing units in moderate-income geographies. SFNB's market share in moderate-income geographies is near to the overall market share for home purchase loans.

The bank's record of originating home improvement loans in moderate-income census tracts is adequate. The AA does not have any low-income census tracts.

The percentage of home improvement loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in moderate-income geographies. The bank's market share for home improvement loans in moderate-income census tracts is near to the overall market share for home improvement loans.

SFNB's record of originating home refinance loans in moderate-income census tracts in the Pine Bluff MA is poor. The AA does not have any low-income census tracts. The bank's loan penetration in moderate-income census tracts is lower than the percentage of owner-occupied housing units. The bank's market share for home refinance loans in moderate-income census tracts is somewhat lower than the overall market share for home refinance loans.

#### 2012

Home purchase lending in low-income census tracts in the Pine Bluff MA is adequate. The percentage of bank loans is somewhat lower than the percentage of owner-occupied housing units in low-income census tracts. The bank's record of originating home purchase loans in moderate-income census tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the percentage of owner-occupied housing units in moderate-income geographies.

The bank's record of originating home improvement loans in low-income census tracts is excellent. The percentage of bank loans in low-income geographies exceeds the percentage of owner-occupied housing in these geographies. The bank's record of originating home improvement loans in moderate-income census tracts is poor. The percentage of loans made in moderate-income geographies is lower than the percentage of owner-occupied housing units in moderate-income census tracts.

SFNB's record of originating home refinance loans in low-income census tracts in the Pine Bluff MA is poor. The bank did not make any home refinance loans in low-income geographies. The bank's performance in low-income census tracts is mitigated due to the low percentage of owner-occupied housing units at 2.27%. As a result, there are fewer opportunities to make loans in low-income geographies. Home refinance lending in moderate-income census tracts is poor. The percentage of home refinance loans in moderate-income

census tracts is lower than the percentage of owner-occupied housing units in moderate-income census tracts.

### Searcy-Stone-Van Buren AR Counties AA

#### 2009 – 2011

Home purchase lending in the Searcy-Stone-Van Buren Arkansas Counties AA is excellent. The AA does not have any low-income census tracts. The percentage of bank loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income geographies. SFNB's market share in moderate-income geographies exceeds the overall market share for home purchase loans.

The bank's record of originating home improvement loans in moderate-income census tracts is excellent. The AA does not have any low-income census tracts. The percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income geographies. The bank does not have any market share in moderate-income census tracts for home improvement loans.

SFNB's record of originating home refinance loans in moderate-income census tracts in the Searcy-Stone-Van Buren Counties AA is adequate. The bank's loan penetration in moderate-income census tracts is somewhat lower than the percentage of owner-occupied housing units. The bank's market share for home refinance loans in moderate-income census tracts is somewhat lower than the overall market share for home refinance loans.

#### 2012

Home purchase lending in the Searcy-Stone-Van Buren Arkansas Counties AA is poor. The AA does not have any low-income census tracts. The bank did not make any home purchase loans in moderate-income geographies. However, this is mitigated by the low percentage of owner-occupied housing units in moderate-income census tracts at 5.22%, limiting the bank's opportunities to lend in these areas.

The bank's record of originating home improvement loans in moderate-income census tracts is excellent. The AA does not have any low-income census tracts. The percentage of home improvement loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in moderate-income geographies.

SFNB's record of originating home refinance loans in moderate-income census tracts in the Searcy-Stone-Van Buren Counties AA is excellent. The bank's loan penetration in moderate-income census tracts exceeds the percentage of owner-occupied housing units.

## **Multifamily Loans**

Refer to Table 5 in the state of Arkansas section of Appendix D for facts and data used to evaluate the geographic distribution of the bank's origination/purchase of multifamily loans.

SFNB originated six multifamily loans in the full scope review MAs and AAs during 2009 through 2011. SFNB originated three multifamily loans in the full scope review MAs and AAs during 2012. SFNB elected not to have multifamily loans evaluated due to the low volume.

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

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

Overall geographic distribution of small loans to businesses from 2009 through 2011 is good. The distribution of small loans to businesses is poor in the Fort Smith MA, good in the Little Rock/North Little Rock MA and Searcy-Stone-Van Buren Counties AA and excellent in the Pine Bluff MA.

Overall geographic distribution of small loans to businesses in 2012 is good. The distribution of small loans to businesses is excellent in the Fort Smith MA, Pine Bluff MA and Searcy-Stone-Van Buren Counties AA and adequate in the Little Rock/North Little Rock MA.

### *Fort Smith MA*

#### 2009 – 2011

SFNB has poor penetration of small loans to businesses in moderate-income census tracts. The percentage of small loans in moderate-income geographies is lower than the percentage of businesses located in moderate-income geographies. The bank's market share in moderate-income census tracts is lower than the overall market share for small loans to businesses. There are no low-income census tracts in this AA.

#### 2012

SFNB has excellent penetration of small loans to businesses in moderate-income census tracts. The percentage of small loans in moderate-income geographies exceeds the percentage of businesses located in moderate-income geographies.

### *Little Rock/North Little Rock MA*

#### 2009 – 2011

SFNB has adequate penetration of small loans to businesses in low-income census tracts. The percentage of small loans in low-income geographies is somewhat lower than the percentage of businesses located in low-income geographies. The bank has excellent

penetration of small loans to businesses in moderate-income census tracts. The percentage of small loans in moderate-income geographies exceeds the percentage of businesses in moderate-income geographies. The bank's market share of loans in low-income census tracts is somewhat lower than the overall market share for small loans to businesses. The bank's market share in moderate-income census tracts exceeds the overall market share for small loans to businesses.

## 2012

SFNB has adequate penetration of small loans to businesses in low-income census tracts. The percentage of small loans in low-income geographies is somewhat lower than the percentage of businesses located in low-income geographies. The bank's performance in low-income census tracts is mitigated by a low percentage of businesses in low-income geographies at 5.60%, limiting the bank's lending opportunities. The bank has good penetration of small loans to businesses in moderate-income census tracts. The percentage of small loans in moderate-income geographies is near to the percentage of businesses in moderate-income geographies.

### *Pine Bluff MA*

## 2009 – 2011

SFNB has excellent penetration of small loans to businesses in moderate-income census tracts. There are no low-income census tracts in the AA. The percentage of small bank loans in moderate-income geographies exceeds the percentage of businesses in moderate-income geographies. The bank's market share in moderate-income census tracts exceeds the overall market share for small loans to businesses.

## 2012

SFNB has excellent penetration of small loans to businesses in low- and moderate-income census tracts. The percentage of small bank loans in low- and moderate-income geographies exceeds the percentage of businesses in low- and moderate-income geographies.

### *Searcy-Stone-Van Buren AR Counties AA*

## 2009 – 2011

SFNB has good penetration of small loans to businesses in moderate-income census tracts. There are no low-income census tracts in the AA. The percentage of small loans in moderate-income geographies is near to the percentage of businesses in moderate-income geographies. The bank's market share in moderate-income census tracts exceeds the overall market share for small loans to businesses.

## 2012

SFNB has excellent penetration of small loans to businesses in moderate-income census tracts. There are no low-income census tracts in the AA. The percentage of small loans in



moderate-income geographies exceeds the percentage of businesses in moderate-income geographies.

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

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

Overall geographic distribution of small loans to farms from 2009 through 2011 is adequate. The distribution of small loans to farms is poor in the Fort Smith MA, adequate in the Little Rock/North Little Rock MA, and excellent in the Pine Bluff MA and Searcy-Stone-Van Buren Counties AA. Poor performance in the Fort Smith MA is mitigated due to low opportunity to lend, with only 2.42% of farms located in moderate-income census tracts.

Overall geographic distribution of small loans to farms in 2012 is excellent. The distribution of small loans to farms is excellent in the Fort Smith MA, Little Rock/North Little Rock MA, Pine Bluff MA, and Searcy-Stone-Van Buren Counties AA.

#### *Fort Smith MA*

##### 2009 – 2011

The bank's origination of small loans to farms in moderate-income census tracts is poor. The bank did not make any small loans to farms in moderate-income geographies. The bank's performance is mitigated due to the low percentage of farms located in moderate-income census tracts at 2.42%. This percentage indicates there are few opportunities to originate small loans to farms in moderate-income census tracts. There are no low-income census tracts in the AA. The bank does not have any market share in small loans to farms in moderate-income census tracts.

##### 2012

The bank's origination of small loans to farms in moderate-income census tracts is excellent. There are no low-income census tracts in the AA. The percentage of small loans in moderate-income geographies exceeds the percentage of farms in moderate-income geographies.

#### *Little Rock/North Little Rock MA*

##### 2009 – 2011

The bank's origination of small loans to farms in low-income census tracts is adequate. The percentage of small loans in low-income geographies is somewhat lower than the percentage of farms located in low-income geographies. The percentage of farms located in low-income census tracts is low at 2.84%. This percentage indicates there are few opportunities to originate small loans to farms in low-income census tracts. SFNB's loan origination of small loans to farms in moderate-income census tracts is poor. The percentage of bank loans in moderate-income census tracts is lower than the percentage of farms located in moderate-income census tracts. The bank's performance in moderate-income geographies is mitigated

by the fact that SFNB focuses primarily on commercial and commercial real estate lending in the AA. The bank does not have any market share in small loans to farms in low- or moderate-income census tracts.

#### 2012

The bank's origination of small loans to farms in low- and moderate-income census tracts is excellent. The percentage of small loans in low- and moderate-income geographies exceeds the percentage of farms in low- and moderate-income geographies.

#### *Pine Bluff MA*

#### 2009 – 2011

The bank has excellent penetration of small farm loans in moderate-income census tracts. There are no low-income census tracts in the AA. The percentage of small bank loans to farms in moderate-income geographies exceeds the percentage of farms in moderate-income geographies. The bank has a high market share of 97.03% for loans to small farms in moderate-income geographies which exceeds the overall market share of 96.41%.

#### 2012

The bank has excellent penetration of small farm loans in low- and moderate-income census tracts. The percentage of small bank loans to farms in low- and moderate-income geographies exceeds the percentage of farms in low- and moderate-income geographies.

#### *Searcy-Sharp-Van Buren AR Counties AA*

#### 2009 – 2011

The bank has excellent penetration of small farm loans in moderate-income census tracts. There are no low-income census tracts in the AA. The percentage of small loans to farms in moderate-income geographies exceeds the percentage of farms in moderate-income geographies. The bank's market share in moderate-income census tracts exceeds the overall market share for small loans to farms.

#### 2012

The bank has excellent penetration of small farm loans in moderate-income census tracts. There are no low-income census tracts in the AA. The percentage of small loans to farms in moderate-income geographies exceeds the percentage of farms in moderate-income geographies.

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

There are no unexplained conspicuous gaps identified in the SFNB's lending for the state of Arkansas.

***Inside/Outside Ratio***

The inside/outside ratio analysis was performed at the bank level as opposed to the AA level.

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

SFNB's overall distribution of loans by income level of the borrower for the state of Arkansas for the years 2009 through 2011 is good. Overall distribution for home mortgage loans is adequate, overall distribution for small loans to businesses is excellent, and overall distribution for small loans to farms is good.

The borrower distribution in the Fort Smith MA is good. This is due to adequate borrower distribution of home mortgage loans and excellent distribution of business and farm loans. The borrower distribution of SFNB's loans in the Little Rock/North Little Rock MA is good. This is due to adequate borrower distribution of home mortgage loans, excellent distribution of business loans, and good distribution of farm loans. The borrower distribution in the Pine Bluff MA is good. This is due to adequate borrower distribution of home mortgage loans, excellent distribution of business loans, and good distribution of farm loans. The borrower distribution for SFNB's loans in the Searcy-Stone-Van Buren Counties AA is good. This is due to adequate distribution of home mortgage loans, excellent distribution of business loans, and good distribution of farm loans.

SFNB's overall distribution of loans by income level of the borrower for the state of Arkansas for the year 2012 is good. Overall distribution for home mortgage loans is adequate, overall distribution for small loans to businesses is excellent, and overall distribution for small loans to farms is good.

The borrower distribution in the Fort Smith MA is good. This is due to adequate borrower distribution of home mortgage loans and excellent distribution of business and farm loans. The borrower distribution of SFNB's loans in the Little Rock/North Little Rock MA is good. This is due to adequate borrower distribution of home mortgage loans and excellent distribution of business and farm loans. The borrower distribution in the Pine Bluff MA is adequate. This is due to adequate borrower distribution of home mortgage loan and good distribution of business and farm loans. The borrower distribution for SFNB's loans in the Searcy-Stone-Van Buren Counties AA is good. This is due to adequate distribution of home mortgage loans, excellent distribution of business loans, and good distribution of farm loans.

***Home Mortgage Loans***

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

Overall borrower distribution for home mortgage loans from 2009 through 2011 is adequate. This is due to adequate borrower distribution for home purchase, home improvement, and home refinance loans. The distribution of loans by income level of the borrower is adequate in

the Fort Smith MA, the Little Rock/North Little Rock MA, the Pine Bluff MA, and the Searcy-Stone-Van Buren Counties AA.

Overall borrower distribution for home mortgage loans in 2012 is adequate. This is due to poor borrower distribution of home mortgage loans, good distribution of home improvement loans, and adequate borrower distribution on home refinance loans. The distribution of loans by income level of the borrower is adequate in the Fort Smith MA, the Little Rock/North Little Rock MA, the Pine Bluff MA, and the Searcy-Stone-Van Buren Counties AA.

### Fort Smith MA

#### 2009 – 2011

Borrower distribution of home purchase loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families. The 14% poverty level in the Fort Smith MA limits the bank's opportunity to make home purchase loans to low-income borrowers. The bank's penetration of home purchase loans to moderate-income borrowers is excellent. The bank's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families. SFNB's market share to low-income borrowers exceeds the overall market share of home purchase loans in the AA. Market share to moderate-income borrowers is equal to the overall market share of home purchase loans in the AA.

Borrower distribution of home improvement loans to low-income borrowers is adequate. The percentage of home improvement loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is excellent. The bank's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA. The bank's market share to low-income borrowers exceeds the overall market share for home improvement loans. The bank's market share to moderate-income borrowers is somewhat lower than the overall market share for home improvement loans.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 14% poverty level in the Fort Smith MA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is good. The percentage of bank loans to moderate-income borrowers is near to the percentage of moderate-income families. The bank does not have any market share to low-income borrowers for home refinance loans in the Fort Smith MA. Market share to moderate-income borrowers exceeds overall market share for home refinance loans.

#### 2012

Borrower distribution of home purchase loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families. The 17% poverty level in the Fort Smith MA limits the bank's opportunity

to make home purchase loans to low-income borrowers. The bank's penetration of home purchase loans to moderate-income borrowers is good. The bank's percentage of home purchase loans to moderate-income borrowers is near to the percentage of moderate-income families.

Borrower distribution of home improvement loans to low-income borrowers is good. The percentage of home improvement loans to low-income borrowers is near to the percentage of low-income families in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is excellent. The bank's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 17% poverty level in the Fort Smith MA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is good. The percentage of bank loans to moderate-income borrowers is near to the percentage of moderate-income families.

#### Little Rock/North Little Rock MA

##### 2009 – 2011

Borrower distribution of home purchase loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families. The 12% poverty level in the Little Rock/North Little Rock MA limits the bank's opportunity to make home purchase loans to low-income borrowers. The bank's penetration of home purchase loans to moderate-income borrowers is good. The bank's percentage of home purchase loans to moderate-income borrowers is near to the percentage of moderate-income families. SFNB's market share to low-income borrowers is near to the overall market share of home purchase loans in the AA. Market share to moderate-income borrowers is somewhat lower than the overall market share of home purchase loans in the AA.

Borrower distribution of home improvement loans to low-income borrowers is poor. The percentage of home improvement loans to low-income borrowers is lower than the percentage of low-income families in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is excellent. The bank's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA. The bank has no market share to low-income borrowers for home improvement loans in this AA. The bank's market share to moderate-income borrowers exceeds the overall market share for home improvement loans.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 12% poverty level in the Little Rock/North Little Rock MA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is good. The percentage of bank loans to moderate-income borrowers is near to the percentage of

moderate-income families. Market share to low-income borrowers is lower than the overall market share for home refinance loans. Market share to moderate-income borrowers exceeds overall market share for home refinance loans.

## 2012

Borrower distribution of home purchase loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families. The 15% poverty level in the Little Rock/North Little Rock MA limits the bank's opportunity to make home purchase loans to low-income borrowers. The bank's penetration of home purchase loans to moderate-income borrowers is excellent. The bank's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families.

Borrower distribution of home improvement loans to low-income borrowers is adequate. The percentage of home improvement loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is good. The bank's percentage of home improvement loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 15% poverty level in the Little Rock/North Little Rock MA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is adequate. The percentage of bank loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families.

## *Pine Bluff MA*

### 2009 – 2011

Borrower distribution of home purchase loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families. The 19% poverty level in the Pine Bluff MSA limits the bank's opportunity to make home purchase loans to low-income borrowers. The bank's penetration of home purchase loans to moderate-income borrowers is excellent. The bank's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families. SFNB's market share to low- and moderate-income borrowers exceeds the overall market share of home purchase loans in the AA.

Borrower distribution of home improvement loans to low-income borrowers is poor. The percentage of home improvement loans to low-income borrowers is lower than the percentage of low-income families in the AA. As stated above, the bank's lending opportunities for home improvement loans to low-income families is impacted by the high poverty level in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is excellent. The bank's percentage of home improvement loans to moderate-income borrowers

exceeds the percentage of moderate-income borrowers in the AA. The bank's market share to low- and moderate-income borrowers exceeds the overall market share of home purchase loans in the AA.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 19% poverty level in the Pine Bluff MA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is adequate. The percentage of bank loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families. SFNB's market share to low- and moderate-income borrowers exceeds the overall market share of home refinance loans in the AA.

## 2012

Borrower distribution of home purchase loans to low-income borrowers is adequate. The percentage of home purchase loans to low-income borrowers is somewhat lower than the percentage of low-income families. The 22% poverty level in the Pine Bluff MSA limits the bank's opportunity to make home purchase loans to low-income borrowers. The bank's penetration of home purchase loans to moderate-income borrowers is excellent. The bank's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families.

Borrower distribution of home improvement loans to low-income borrowers is adequate. The percentage of home improvement loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA. As stated above, the bank's lending opportunities for home improvement loans to low-income families is impacted by the high poverty level in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is excellent. The bank's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 22% poverty level in the Pine Bluff MA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is adequate. The percentage of bank loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families.

## *Searcy, Stone, and Van Buren AR Counties AA*

### 2009 – 2011

Borrower distribution of home purchase loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families. The 19% poverty level in the Searcy-Stone-Van Buren Counties AA limits the bank's opportunity to make home purchase loans to low-income borrowers. The bank's

penetration of home purchase loans to moderate-income borrowers is excellent. The bank's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families. SFNB's market share to low- and moderate-income borrowers is near to the overall market share of home purchase loans in the AA.

Borrower distribution of home improvement loans to low-income borrowers is good. The percentage of home improvement loans to low-income borrowers is near to the percentage of low-income families in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is excellent. The bank's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income borrowers in the AA. The bank's market share to low-income borrowers for home improvement loans is near to the overall market share for home improvement loans. The bank's market share to moderate-income borrowers exceeds the overall market share for home improvement loans.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 19% poverty level in the Searcy-Stone-Van Buren Counties AA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is adequate. The percentage of bank loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families. Market share to low-income borrowers is somewhat lower than the overall market share for home refinance loans. Market share to moderate-income borrowers is lower than the overall market share for refinance loans in the AA.

## 2012

Borrower distribution of home purchase loans to low-income borrowers is poor. The bank did not make any home purchase loans to low-income borrowers. The 23% poverty level in the Searcy-Stone-Van Buren Counties AA limits the bank's opportunity to make home purchase loans to low-income borrowers. The bank's penetration of home purchase loans to moderate-income borrowers is good. The bank's percentage of home purchase loans to moderate-income borrowers is near to the percentage of moderate-income families.

Borrower distribution of home improvement loans to low-income borrowers is excellent. The percentage of home improvement loans to low-income borrowers exceeds the percentage of low-income families in the AA. The bank's borrower distribution of home improvement loans to moderate-income borrowers is good. The bank's percentage of home improvement loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA. The 23% poverty level in the Searcy-Stone-Van Buren Counties AA limits the bank's opportunity to make home refinance loans to low-income borrowers. Borrower distribution of home refinance loans to moderate-income borrowers is good. The percentage of bank loans to moderate-income borrowers is near to the percentage of moderate-income families.



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

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

Overall distribution of loans by size of business for 2009 through 2011 is excellent. The distribution of loans by size of business is excellent in the Fort Smith MA, Little Rock/North Little Rock MA, Pine Bluff MA, and the Searcy-Stone-Van Buren Counties AA.

Overall distribution of loans by size of business in 2012 is excellent. The distribution of loans by size of business is excellent in the Fort Smith MA, Little Rock/North Little Rock MA, and the Searcy-Stone-Van Buren Counties AA and good in the Pine Bluff MA.

#### *Fort Smith MA; Little Rock/North Little Rock MA; Pine Bluff MA; Searcy, Stone, and Van Buren AR Counties AA*

##### 2009 – 2011

SFNB has an excellent record of originating loans to businesses with gross annual revenues of \$1 million or less between 2009 and 2011. In all four full-scope AAs, the percentage of bank loans to businesses with gross annual revenues of \$1 million or less exceeds the percentage of businesses in the AA that reported gross annual revenues of \$1 million or less. The highest concentration of these loans is for loan amounts of \$100,000 or less, which further demonstrates the bank's willingness to make credit available to small businesses. The 2011 Dun & Bradstreet business data shows SFNB's market share of businesses with gross annual revenues of \$1 million or less exceeding the overall market share for loans to small businesses. Small Business Administration (SBA) loans originated since the previous CRA examination in 2008 through December 31, 2011 total \$3.3 million with a dollar volume of approximately \$3.3 million.

##### 2012

SFNB has an excellent record of originating loans to businesses with gross annual revenues of \$1 million or less in the Fort Smith MA, Little Rock/North Little Rock MA and Searcy-Stone-Van Buren Counties AA. In the Fort Smith MA, the Little Rock/North Little Rock MA, and Searcy-Stone-Van Buren Counties AA, the percentage of bank loans to businesses with gross annual revenues of \$1 million or less exceeds the percentage of businesses in the AA that reported gross annual revenues of \$1 million or less. The highest concentration of these loans is for loan amounts of \$100,000 or less, which further demonstrates the bank's willingness to make credit available to small businesses. Small Business Administration (SBA) loans originated in 2012 total one (1) with a dollar volume of \$193 thousand.

SFNB has a good record of originating loans to businesses with gross annual revenues of \$1 million or less in the Pine Bluff MA. The percentage of bank loans to businesses with gross annual revenues of \$1 million or less is near to the percentage of businesses in the MA that reported gross annual revenue of \$1 million or less. The highest concentration of these loans

is for loan amounts of \$100,000 or less, which further demonstrates the bank's willingness to make credit available to small businesses.

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

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

Overall distribution of loans by the size of farm from 2009 through 2011 is good. The distribution of loans by size of farm is excellent in the Fort Smith MA and good in the Little Rock/North Little Rock MA, the Pine Bluff MA, and the Searcy-Stone-Van Buren Counties AA.

Overall distribution of loans by the size of farm for 2012 is good. The distribution of loans by size of farm is excellent in the Fort Smith MA and the Little Rock/North Little Rock MA and good in the Pine Bluff MA and Searcy-Stone-Van Buren Counties AA.

#### *Fort Smith MA*

##### 2009 – 2011

SFNB has an excellent record of originating loans to farms with gross annual revenues of \$1 million or less. In the Fort Smith MA, the percentage of bank loans to farms with gross annual revenues of \$1 million or less exceeds the percentage of farms in the AA that reported gross annual revenues of \$1 million or less. The 2011 Dun & Bradstreet farm data shows SFNB's market share of farms with gross annual revenues of \$1 million or less exceeding the overall market share for small loans to farms.

##### 2012

SFNB has an excellent record of originating loans to farms with gross annual revenues of \$1 million or less. In the Fort Smith MA, the percentage of bank loans to farms with gross annual revenues of \$1 million or less exceeds the percentage of farms in the AA that reported gross annual revenues of \$1 million or less.

#### *Little Rock/North Little Rock MA*

##### 2009 – 2011

SFNB has a good record of originating loans to farms with gross annual revenues of \$1 million or less. In the Little Rock/North Little Rock MA, the percentage of bank loans to farms with gross annual revenues of \$1 million or less is near to the percentage of farms in the AA that reported gross annual revenues of \$1 million or less. The 2011 Dun & Bradstreet farm data shows SFNB's market share of farms with gross annual revenues of \$1 million or less exceeding the overall market share for small loans to farms.

2012

SFNB has an excellent record of originating loans to farms with gross annual revenues of \$1 million or less. In the Little Rock/North Little Rock MA, the percentage of bank loans to farms with gross annual revenues of \$1 million or less exceeds the percentage of farms in the AA that reported gross annual revenues of \$1 million or less.

Pine Bluff MA2009 – 2011

SFNB has a good record of originating loans to farms with gross annual revenues of \$1 million or less. In the Pine Bluff MA, the percentage of bank loans to farms with gross annual revenues of \$1 million or less is near to the percentage of farms in the AA that reported gross annual revenues of \$1 million or less. The 2011 Dun & Bradstreet farm data shows SFNB's market share of farms with gross annual revenues of \$1 million or less exceeding the overall market share for small loans to farms.

2012

SFNB has a good record of originating loans to farms with gross annual revenues of \$1 million or less. In the Pine Bluff MA the percentage of bank loans to farms with gross annual revenues of \$1 million or less is near to the percentage of farms in the AA that reported gross annual revenues of \$1 million or less.

Searcy, Stone, and Van Buren AR Counties AA2009 – 2011

SFNB has a good record of originating loans to farms with gross annual revenues of \$1 million or less. In the Searcy-Stone-Van Buren Counties AA, the percentage of bank loans to farms with gross annual revenues of \$1 million or less is near to the percentage of farms in the AA that reported gross annual revenues of \$1 million or less. The 2011 Dun & Bradstreet farm data shows SFNB's market share of farms with gross annual revenues of \$1 million or less exceeding the overall market share for small loans to farms.

2012

SFNB has a good record of originating loans to farms with gross annual revenues of \$1 million or less. In the Searcy-Stone-Van Buren MSA the percentage of bank loans to farms with gross annual revenues of \$1 million or less is near to the percentage of farms in the AA that reported gross annual revenues of \$1 million or less.

**Community Development Lending**

Refer to Table 1 Lending Volume in the state of Arkansas section of Appendix D for the facts and data used to evaluate the bank's level of community development lending. This table

includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

SFNB has a low level of community development loans during the evaluation period. One qualified community development loan was made during this evaluation period. This loan was to the Argenta Community Development Corporation, a CDC, and originated April 1, 2011 for \$560 thousand. The loan was used for revitalizing the Argenta Historic District in downtown North Little Rock, Arkansas.

## **Product Innovation and Flexibility**

SFNB did not offer innovative loan programs during 2009 through 2011. However, the bank did offer flexible loan programs for home mortgage loans (Federal Housing Administration (FHA), Veterans' Administration (VA), and Farm Service Agency/Rural Housing Service (FSA/RHS loans)). Between January 1, 2009 and December 31, 2011, SFNB originated 574 FHA loans totaling \$63 million. The bank originated 92 VA loans totaling \$12.8 million. SFNB originated 16 FSA/RHS loans totaling \$1.6 million. These flexible loan programs offer borrowers an opportunity to obtain financing when they would otherwise be denied under conventional loan programs.

SFNB did not offer innovative loan products in 2012. However the bank did offer flexible loan programs for home mortgage loans (FHA, VA, and FSA/RHS). Between January 1, 2012 and December 31, 2012, SFNB originated 111 FHA loans totaling \$12.7 million. The bank originated 27 VA loans totaling \$4.7 million. SFNB originated 13 FSA/RHS loans totaling \$1.1 million. These flexible loan programs offer borrowers an opportunity to obtain financing when they would otherwise be denied under conventional loan programs.

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

Based on limited-scope reviews for the evaluation period of January 1, 2009 through December 31, 2011, the bank's performance under the Lending Test in the Fulton-Sharp Counties AA is stronger than the bank's overall low satisfactory performance under the Lending Test. This is due to an overall excellent geographic distribution for home mortgage loans, small loans to farms, and small loans to businesses and a good overall borrower distribution due to adequate home mortgage distribution, excellent distribution for small loans to businesses, and good distribution for small loans to farms. Based on low lending volume in this area, these counties are considered part of a limited review and do not have a significant impact on the overall conclusion. Refer to Tables 1 through 15 in the state of Arkansas section of Appendix D for the facts and data that support these conclusions.

Based on limited-scope reviews for the evaluation period of January 1, 2012 through December 31, 2012, the bank's performance under the Lending Test in the Fulton-Sharp Counties AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Lending Test. Refer to Tables 1 through 13 in Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "**Low Satisfactory**". Based on full-scope reviews, the bank's performance in the Fort Smith MA, the Pine Bluff MSA, and Searcy-Stone-Van Buren AR Counties is adequate. SFNB's performance in the Little Rock/North Little Rock MA is poor.

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

SFNB's qualifying investments are centered in investments, grants, and donations with the primary purpose of community development and community services targeted to low- and moderate-income individuals. Investment activity in the Pine Bluff MA was considered the most in weighting the investment activities in the different AAs. Unless specifically noted, the majority of the Investments mentioned below are in the form of recurring, usually annual donations. Therefore no comparison is made between those investments made from January 1, 2009 through December 31, 2012 and January 1, 2012 through December 31, 2012.

#### Fort Smith AR MA

SFNB has an adequate level of investments in the Fort Smith MA. During the evaluation period, SFNB had three qualified investments, grants/donations totaling \$327 thousand. One of these investments, made in 2010 was in the form of a land and building donation to the city of Altus, Arkansas, totaling \$300 thousand dollars to be used as administrative offices for the city government. The other two investments, totaling \$27 thousand were cash contributions to the Fort Smith Regional Chamber of Commerce and Economic Arkansas to support their economic development campaigns in the Fort Smith AR MA.

#### Little Rock-North Little Rock AR MA

SFNB has a poor level of qualified investments in the Little Rock-North Little Rock AR MA. During the evaluation period, SFNB had 21 qualified investments, grants/donations totaling \$35 thousand. These investments benefit organizations in the Little Rock MSA that provide a variety of services to low- and moderate-income individuals including access to affordable housing and other qualified social services and to non-profit organizations that promote economic development/revitalization within the MA.

#### Pine Bluff MA

SFNB has an adequate level of qualified investments in the Pine Bluff MA. During the evaluation period, SFNB had 31 qualified grants/donations totaling approximately \$1.3 million.

The majority of the dollar volume of qualified investments during this evaluation period was in the six separate purchases of shares in an SBIC, Diamond State Ventures, totaling \$996

thousand, from January 1, 2009 through December 31, 2011. This SBIC benefits a regional area, mostly counties in southeast Arkansas.

SFNB made three donations to Partners in Progress from January 1, 2009 through December 31, 2011, totaling \$166 thousand. Partners in Progress is an entity that provides funding for the Jefferson County Economic Alliance, a non-profit organization that promotes economic development/revitalization in the Pine Bluff MSA.

SFNB made one donation of \$70 thousand in 2009 to CASA, a non-profit organization that used the funds to construct a women's shelter in this MSA.

The remaining 21 donations made during this evaluation period totaled \$66 thousand. These donations were to non-profit organizations that provided other qualified social services and affordable housing to low- and moderate-income individuals, and to non-profit organizations that promote economic development in this MSA

### Searcy, Stone, and Van Buren AR Counties

SFNB has an adequate level of qualified investments in the Searcy, Stone, and Van Buren AR Counties AA. SFNB made four donations totaling \$12 thousand to Ozark Health Foundation, Inc., a 501(c)(3) organization dedicated to improving healthcare in Searcy and Van Buren County.

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

Based on a limited-scope review, the bank's performance under the Investment Test in the Fulton-Sharp Counties AR AA was comparable to the bank's overall "Low Satisfactory" performance under the Investment Test. However, there are fewer investment opportunities in these counties.

## **SERVICE TEST**

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

SFNB's level of community development services during the evaluation period is good. Generally, the services SFNB provided were in the form of technical assistance provided to nonprofit organizations that assisted low- and moderate-income individuals and families obtain affordable housing; small businesses and farms gain access to financing and technical expertise; funding for economic development / revitalization of low- and moderate-income geographies within SFNB's AAs, and providing technical expertise in providing other qualifying community developments services. The level of community development services in the Little Rock/North Little Rock MA and Pine Bluff AR MA is excellent; CD services in the Fort Smith MA is good; and in the Searcy, Stone, and Van Buren AR Counties, is satisfactory. Since the majority of the services mentioned below are provided on a continuing basis, no comparison is made between those services provided from January 1, 2009 through December 31, 2012 and January 1, 2012 through December 31, 2012.

## **Retail Banking Services**

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

### Fort Smith MA

The distribution of the bank's branch delivery system is excellent. The bank's service delivery systems were readily accessible to geographies and individuals of different income levels in this MSA.

#### 2009 – 2011

Per the 2000 U.S. Census, the MA did not have any low-income census tracts (CTs). One of the bank's seven branches and one of its seven ATMs are located in a moderate-income CT of the MA. The percentage of branches and the percentage ATMs located in moderate-income CTs exceed the percentage of the population located in the moderate-income CTs of the MA. No branches or ATMs were opened or closed in this MA, and one branch located in a middle-income CT in the city of Altus, Franklin County, Arkansas, was closed in this MA during the evaluation period. Banking hours and services are reasonable and convenient to the entire assessment area.

#### 2012

There are no low-income census tracts in the MA for this evaluation period. As a result of the 2010 U.S. Census, the income status of one of the CTs in which the bank has one branch and one ATM changed from middle- to moderate-income. This change increased both the number of branches and the number of ATMs located in moderate-income CTs from one to two. Both the percentage of branches and percentage of ATMs located in moderate-income CTs exceed the percentage of the population located in the moderate-income CTs. No branches or ATMs were opened or closed in this MA during this portion of this evaluation period. Banking hours and services are reasonable and convenient to the entire assessment area.

### Little Rock/North Little Rock MA

The distribution of the bank's branch delivery system is adequate. The bank's service delivery systems were reasonably accessible to geographies and individuals of different income levels in this MSA.

#### 2009 – 2011

One of the bank's twelve branches and one of its 13 ATMs are located in low-income CTs of the MA. Both the percentage of branches and the percentage ATMs located in low-income CTs exceed the percentage of the population located in the moderate-income CTs. Also, one of its branches and one of its ATMs is located in a moderate-income CT of this MA. Both the percentage of branches and the percentage of ATMs located in moderate-income CTs is less

than the percentage of the population located in the moderate-income CTs. No branches or ATMs were opened and one branch located in a moderate-income CT in the city of Little Rock, Arkansas, was closed in this MA during this portion of this evaluation period. The branch was located in Southwest Little Rock and was no longer profitable for the bank to operate. There are several competing banks located in Southwest Little Rock. Banking hours and services are reasonable and convenient to the entire assessment area.

## 2012

None of the bank's twelve branches and 13 ATMs is located in low-income CTs. As a result of the 2010 U.S. Census, the income status of one low-income CT in which the bank has one branch and one ATM changed from low- to moderate-income. Also, as a result of the 2010 U.S. Census, the income status of one middle-income CT in which the bank has one branch and one ATM changed from middle- to moderate-income. The combined change in status of these two CTs decreased both the number of branches and the number of ATMs located in low-income CTs from one to zero while increasing both the number of branches and the number of ATMs located in moderate-income CTs increased from one to three. Both the percentage of branches and the percentage of ATMs located in low-income CTs is less than the percentage of the population located in the moderate-income CTs. Both the percentage of branches and the percentage of ATMs located in moderate-income CTs exceed the percentage of the population located in the moderate-income CTs. No branches or ATMs were opened or closed in this MA during this portion of this evaluation period. Banking hours and services are reasonable and convenient to the entire assessment area.

## *Pine Bluff AR MA*

The distribution of the bank's branch delivery system was is excellent. The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in this MSA.

## 2009 - 2011

Per the 2000 U.S. Census, the MA did not have any low-income CTs. Four of the bank's nine branches and four of its ten ATMs are located in moderate-income CTs. Both the percentage of branches and the percentage of ATMs located in moderate-income CTs exceed the percentage of the population located in moderate-income CTs. No branches or ATMs were opened or closed in this MA during this portion of this evaluation period. Banking hours and services are reasonable and convenient to the entire assessment area.

## 2012

None of the bank's nine branches and ten ATMs is located in low-income CTs. Less than three percent of the population of this MA is located in low-income CT(s). Five of the bank's branches and five of its ATMs are located in moderate-income CTs. The income status of one middle-income CT in which the bank has both a branch and an ATM changed from middle- to moderate-income, per the 2010 U.S. Census. The change in status of this CT increased both the number of branches and the number of ATMs located in moderate-income CTs from four to



five. Both the percentage of branches and the percentage of ATMs located in moderate-income CTs exceed the percentage of the population located in moderate-income CTs. No branches or ATMs were opened or closed in this MA during the evaluation period. Banking hours and services are reasonable and convenient to the entire assessment area.

### Searcy, Stone, and Van Buren AR Counties

The distribution of the bank's branch delivery system is adequate. The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in this AA.

### 2009 - 2011

The AA does not have any low-income CTs. No branches or ATMs are located in moderate-income CTs; all of the bank's five branches and six ATMs are located in middle-income CTs. Less than five percent of the population of the AA is located in moderate-income CTs. No branches or ATMs were opened during the evaluation period. One branch located in a moderate-income CT located in the city of Leslie, Arkansas, was closed during this portion of this evaluation period. Banking hours and services are reasonable and convenient to the entire assessment area.

### 2012

There are no low-income CTs in the AA. No branches or ATMs are located in moderate-income CTs; all of the bank's five branches and six ATMs are located in middle-income CTs. The percent of the population located in moderate-income CTs has decreased from 17 percent to 4 percent between the 2000 and 2010 U.S. Census periods. No branches or ATMs were opened or closed in the AA during the evaluation period. Banking hours and services are reasonable and convenient to the entire assessment area.

## **Community Development Services**

### Fort Smith MA

SFNB and its employees have served as executive officers, provided technical assistance to, and participated in fund raising activities for several non-profit organizations that provide qualified community development services to low- and moderate- income families in this MSA during this evaluation period. A summary of these activities is as follows:

*Crawford Sebastian Community Development Council's (CSCDC)* home ownership program which provides assistance to approximately 250 low- and moderate- income families a year purchase their own home through counseling and direct assistance toward down payment and closing costs.

*Fort Smith Chamber of Commerce (FSCC)* An SFNB employee served as secretary and treasurer of the FSCC, an organization that promotes economic development / revitalization in this MA.

*United Way of Fort Smith (UWFS)* - SFNB employees have or are serving as chairman of the Board and members of the Allocation Committee for the Fort Smith United Way fund which provides financial support for organizations that perform qualified community development services including health care, education / job training, childcare, and financial assistance to low- and moderate-income individuals in the Fort Smith MSA and surrounding counties. The organizations and programs supported by the FSUW include the Family Wise Prescription Program, local area Boys and Girls Clubs, Community Services Clearing House, Salvation Army, the Single Parent Scholarship Fund, and the Lion's Club of Van Buren, Arkansas.

*Various CD Services* - SFNB employees provided personal finance educational services to low- and moderate- income families as either sponsors or as partners with the following programs - Family Economics Night at Sutton Elementary School, Cavanaugh Elementary School / Simmons First Scholar Awards, Future Business Leaders of America, and the Sutton Elementary School.

#### *Little Rock/North Little Rock MA*

SFNB and its employees have served as executive officers, provided technical assistance, and participated in fund raising activities for several non-profit organizations that provide qualified community development services to low- and moderate- income families during this evaluation period. A summary of these activities is as follows:

*Conway, Arkansas* – SFNB provided technical assistance to this municipality in the issue of an industrial revenue bond for economic development-revitalization. The issue of this bond attracted an employer that brought over one thousand jobs to the MA.

*Gaines House (GH)* - SFNB sponsored the annual fund raising dinner for GH, a residential facility for women with mental or physical disabilities who are or about to become homeless.

*Good Shepherd Ecumenical Retirement Center - (GSERC)* SFNB sponsored the annual Bishop's fund raising luncheon for the GSERC which provides financial assistance and affordable housing to low- and moderate-income individuals.

*Habitat For Humanity (HFH)* – SFNB employees donated labor and assisted in fund raising activities for HFH, which assists low- and moderate-income individuals with affordable housing. SFNB also provided technical assistance to HFH in applying for a grant that was approved by the Federal Home Loan Bank.

*Our House (OH)* - SFNB sponsored the annual fund raising dinner for OH, a shelter for the homeless.

*First Time Home Buyers Program* - SFNB provided educational services to low- and moderate-income families covering personal finance, home purchase, home mortgage application processes and products, and applicable tax credits for first time home buyers. SFNB served as sponsor and delivered these services to the Conway, Arkansas Chamber of Commerce, the Black Community Developers Homebuyers Education Program, the Homebuyer Education program -Wrightsville Unit of the Dept. of Correction, ACORN of Little Rock, AR, the Re-entry

Program - Arkansas Department of Corrections, Malvern, Pine Bluff, and Wrightsville Units, the Better Community Developers of Little Rock, and held seminar to educate first time homebuyers about available tax credits in Conway, Arkansas.

SFNB has also participated in providing basic financial education services with local elementary schools, colleges, and other non-profit organizations serving low- and moderate-income families. These services were a partnership with the FDIC's series of presentations on "Teaching Children To Save" Program, University of Little Rock "Financial Planning 101" for Freshmen program, the University of Central Arkansas' "UCA Foundation for Minority Services", and the city of Vilonia Elementary School's "Teach the Children to Save" program.

*United Way of Little Rock (UWLR)* – an SFNB employee serves as Chairman of the Board for UWLR which provides financial support for organizations that perform qualified community development services including health care, education/job training, childcare, and credit or financial services to low- and moderate-income individuals in the Little Rock–North Little Rock MSA and surrounding counties.

#### *Pine Bluff MA*

SFNB and its employees have served as executive officers, provided technical assistance, and participated in fund raising activities for several non-profit organizations that provide qualified community development services to low- and moderate- income families during this evaluation period. A summary of these activities is as follows:

*CASA* – An SFNB officer serves as Chairman for CASA's fundraising project for construction of a new housing facility for women who are victims of spousal abuse.

*Jefferson Comprehensive Care Systems (JCCS)* – A SFNB Officer Serves as treasurer for this non-profit community health care provider that serves low- and moderate- income families in the Pine Bluff MA.

*Neighbor to Neighbor (NTN)* – SFNB employees volunteer in the operation of NTN's food pantry which provides food to low- and moderate- income families in the Pine Bluff MA.

*Small Business Economic Development* - SFNB provided educational services to small businesses covering start up, financing, and planning. SFNB served as sponsor and delivered these educational services through its "How to start a small business in Arkansas" program and was in partnership with the Southern Good Faith Fund's program on obtaining small business loans.

SFNB has also participated in providing basic financial education services with local elementary schools, colleges, and other non-profit organizations serving low- and moderate-income families. These services were a partnership with the ACORN First Time Homebuyers Fair & Workshop, the University of Arkansas Pine Bluff personal finance seminar, the Southern Good Faith Fund's first time homebuyers program, Arkansas Department of Health and Human Services banking seminar "at risk" students, the Family Community Development and Topps personal finance program, and the Pine Bluff Elementary Schools National Teach Children to Save Day program.

*United Way of Southeastern Arkansas (UWSA)* – an SFNB employee serves as Campaign Chairperson for UWSA fund drive which provides financial support for organizations that perform qualified community development services including health care, education/job training, childcare, and financial assistance to low- and moderate-income individuals in the Pine Bluff MSA and surrounding counties.

*University of Arkansas Pine Bluff* – An SFNB officer serves on the loan committee for the UAPB Incubator Small Business Loan Program which provides financing for small businesses.

*Youth Partners Events* - An SFNB officer serves as chairman of the fund raising committee for this organization that provides social services to low- and moderate-income individuals in the Pine Bluff MSA.

### *Searcy, Stone, and Van Buren AR Counties*

SFNB provided technical assistance and financial education to the following groups during this evaluation period:

*Earnest Horton Charitable Trust Fund* – A SFNB officer serves as Secretary-Treasurer of this charitable trust that provides financial assistance and scholarships to low- and moderate-income students of Searcy County.

*Financial Educational Services* - SFNB provided financial educational services by participating in Searcy County elementary schools “Career Day” program.

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

Performance in Fulton-Sharp Counties AR AA is not inconsistent with the bank’s “High Satisfactory” performance under the Service Test.

## State Rating

### State of Kansas

<b>CRA Rating for Kansas<sup>2</sup>:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	High Satisfactory
<b>The investment test is rated:</b>	Low Satisfactory
<b>The service test is rated:</b>	Low Satisfactory

The major factors that support this rating include:

- SFNB's geographic distribution of home mortgage loans and small loans to businesses is good.
- Borrower distribution of home mortgage loans is good.
- SFNB has an adequate record of making loans to businesses that report revenues of \$1 million or less.
- SFNB did not originate any CD loans during the evaluation periods.
- SFNB has an adequate level of qualified community development investments and grants.
- The bank's delivery systems are accessible to geographies and individuals of different income levels.
- SFNB provides an adequate level of community development services.

### Description of Institution's Operations in Kansas

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

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

## Scope of Evaluation in Kansas

For the state of Kansas, there are two full-scope assessment areas: Kansas City, KS-MO MA #28140 and the Wichita, KS MA #48620. More weight is given to the Kansas City, KS-MO MA due to the volume of loans being greater. When SFNB acquired banks in the Kansas City MA, Saline County, and Wichita, KS MA, the former institution originated few, if any, home improvement loans and small loans to farms. The bank's performance for the state of Kansas is based on home purchase loans, refinance loans, and small loans to businesses. During the 2009 through 2011 evaluation period, Johnson County, KS located in the Kansas, KS-MO MA received a full-scope review. SFNB only had branches located in Johnson County. During the 2012 evaluation period, SFNB acquired a branch in Jackson County, Missouri located in the Kansas City, KS-MO MA. We did not evaluate the SFNB's CRA performance in Jackson County, MO since the bank had just entered that market.

A community contact for Johnson County was conducted. Refer to Market Profiles in Appendix A for the Kansas City, KS-MO MA. We did not conduct a community contact for Saline County or Wichita during our examination.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Kansas for the years 2009 through 2011 is rated "High Satisfactory". Based on the bank's performance context and the full-scope reviews, the bank's performance in the Kansas City, KS-MO MO and Wichita MA is good.

The bank's performance under the lending test in Kansas for 2012 is rated "Low Satisfactory." Based on the bank's performance context and the full-scope review, the bank's performance in the Kansas City, KS-MO MA, and the Wichita MA is adequate.

### Lending Activity

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

Lending activity in the state of Kansas for the years 2009 through 2011 is adequate. SFNB is not a dominant lender in any of the Kansas assessment areas. Approximately 11.5% of the bank's loans evaluated for CRA between January 1, 2009 and December 31, 2011, are in this market. During the evaluation period, the bank originated a good volume of loans to small businesses and residential real estate loans, which impacted CRA lending performance assessments. Due to the low volume of home improvement, multi-family loans, small loans to farms, these loans were not considered for geographical and borrower income distribution. During the evaluation period, SFNB's overall loan to deposit ratio declined steadily, decreasing from 83.78% as of December 31, 2008, to 59.96% as of December 31, 2011. The decline in

loan-to-deposit ratio is primarily attributable to an industry-wide decline in loan demand over the time period.

Lending activity in the state of Kansas for 2012 is adequate. SFNB is not a dominant lender in any of the Kansas assessment areas. Approximately 13% of the bank's loans evaluated for CRA between January 1, 2012 and December 31, 2012, are in this market. During the evaluation period, the bank originated a good volume of loans to small businesses and residential real estate mortgages, which impacted CRA lending performance assessments. Due to the low volume of home improvement loans, multi-family loans, and small loans to farms these loans were not considered for geographical and borrower income distribution.

#### Kansas City, KS-MO MA

Lending activity in the Kansas City, KS-MO MA for the years 2009 through 2011 is adequate. SFNB is not a dominant lender in the Kansas City MA. During the evaluation period, the bank originated an adequate volume of home mortgage loans and a low volume loans to small businesses. SFNB did not originate any small loans to farms as agricultural loans are not typically made in this AA. SFNB did not originate any multi-family loans in the MA; therefore no analyses was conducted for geographical and borrower income distribution. During the evaluation period, SFNB's overall loan to deposit ratio declined steadily, decreasing from 83.78% as of December 31, 2008, to 59.96% as of December 31, 2011. The decline in loan-to-deposit ratio is primarily attributable to an industry-wide decline in loan demand over the time period.

Lending activity in the Kansas City, KS-MO MA for 2012 is adequate. During the evaluation period, the bank originated an adequate volume of home mortgage loans and a low volume of loans to small businesses. As stated previously, SFNB did not originate any small loans to farms as agricultural loans are not typically made in this AA.

Overall, the Kansas City MA accounts for approximately 6% of the bank's loans. The bank had 0.33% of the deposit share in the Kansas City MA and ranked 45<sup>th</sup> in this market as of June 30, 2011. SFNB was ranked 32<sup>nd</sup> in the AA for home purchase loans with a 0.47% market share. For home improvement loans, SFNB was not ranked with a notable market share. The bank was ranked 41<sup>st</sup> for refinance loans with a 0.51% market share. SFNB was ranked 32<sup>nd</sup> for small loans to businesses with 0.21% market share. No small loans to farms were originated. Numerous non-deposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders competed for market share of loans in this market. Lending activity in the market is concentrated with larger financial institutions such as Wells Fargo Bank, NA having the top market shares.

#### Wichita, KS MA

Loan volume in this AA for 2009 through 2011 is adequate. Overall, the Wichita MA accounted for 4% of the bank's loans. The bank had 0.44% of the deposit share in the Wichita MA and was ranked 24<sup>th</sup> in this market as of June 30, 2011. SFNB was ranked 38<sup>th</sup> for home purchase loans with a 0.50% market share. For home improvement loans, SFNB was not ranked without a notable market share. The bank was ranked 94<sup>th</sup> for refinance loans with a 0.08% market share. SFNB was ranked 27<sup>th</sup> and had a 0.22% market share for small loans to

businesses. No small loans to farms were originated. Market share is 0%. Numerous non-deposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders competed for market share of loans in this market. Lending activity in the market is concentrated with larger financial institutions such as American Express Bank, FSB and Wells Fargo Bank, NA having the top market shares.

Loan volume in this AA for 2012 is adequate. Overall, the Wichita MA accounted for 1.5% of the bank's loans. The bank had 0.28% of the deposit share in the Wichita MA and ranked 27<sup>th</sup> in this market as of June 30, 2012. No market share or ranking data for lending volume is available at the time of evaluation.

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

The geographic distribution of SFNB's loans in the state of Kansas for 2009 through 2011 is good. The overall geographic distribution of home mortgage loans is good and the overall distribution of small loans to businesses is good.

The geographic distribution of SFNB's loans in the state of Kansas for 2012 is adequate. The overall geographic distribution of home mortgage loans is adequate and the overall distribution of small loans to businesses is good.

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

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

Overall geographic distribution for home mortgage loans from 2009 through 2011 is good. This is due to overall good geographic distribution for home purchase and refinance loans. Geographic distribution for home mortgage loans is adequate in the Wichita MA. The Wichita MA is the only AA with low-income census tracts. The percentage of owner-occupied housing units in the low-income census tracts is small at 1.40%, indicating fewer opportunities for banks to lend in low-income geographies.

Overall geographic distribution for home mortgage loans in 2012 is adequate. This is due to adequate geographic distribution of home purchase loans and home refinance loans. Geographic distribution is adequate in the Kansas City, KS-MO MA, poor in Saline County, and poor the Wichita MA. The Wichita MA is the only AA with low-income census tracts. The percentage of owner-occupied housing units in the low-income census tracts is low at 6.08 percent in the Kansas City, KS-MO MA and at 4.01 percent in the Wichita, KS MA, indicating fewer opportunities for banks to lend in low-income geographies.

Overall geographic distribution for home mortgage loans from 2009 through 2011 is good. This is due to overall good geographic distribution for home purchase loans, very poor distribution for home improvement loans, and good distribution for home refinance loans. Lending opportunities are limited in the moderate-income census tracts of the Kansas City MA



due to the low percentage of owner-occupied housing units in moderate-income geographies at 0.97%.

Overall geographic distribution for home mortgage loans in 2012 is adequate. Geographic distribution for home purchase loans is adequate; very poor for home improvement loans (only one loan); and adequate for refinance loans. The percentage of owner-occupied housing units in the low-income census tracts is low at 4.01%, indicating fewer opportunities for banks to lend in low-income geographies.

### Kansas City, KS-MO MA

#### 2009 - 2011

Home purchase lending in the Kansas City MA is excellent. The AA does not include any low-income census tracts. The percentage of bank loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies even in light of the limited opportunities to make loans in geographies with a low volume of owner-occupied housing units. At 1.54 percent, the bank's market share of home purchase loans in moderate income census tracts exceeded the bank's overall market share of home purchase loans at 0.47 percent.

SFNB's record of originating home refinance loans in moderate-income census tracts in the Kansas City, KS-MO MA is excellent. The percentage of home mortgage refinance loans in moderate-income geographies exceeds the percentage of owner occupied housing units located in those geographies. At 1.64 percent, the bank's market share of home refinance loans in moderate-income geographies exceeds its overall market share of home refinance loans of 0.52 percent.

#### 2012

Home purchase lending in the Kansas City MA is adequate. Geographic distribution in low-income CTs is very poor. SFNB did not originate any loans in low-income CTs. The percentage of owner-occupied housing units in low-income geographies is low at 6.08 percent, which indicates there are fewer opportunities to originate home mortgage products in these CTs. The percentage of bank loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in those geographies.

SFNB's record of originating home refinance loans in low-income CTs is very poor. The bank did not originate any home refinance loans in low-income CTs. However, the opportunities to originate home mortgage loans in low-income geographies are few as the percentage of owner-occupied housing units is low at 6.08 percent. The percentage of bank loans in moderate-income CTs is somewhat lower than the percentage of owner-occupied housing units.

Wichita, KS MA2009 - 2011

Home purchase lending in the low-income geographies of the Wichita MA is very poor. The percentage of bank loans in low-income geographies is significantly lower than the percentage of owner-occupied housing units in those geographies. SFNB did not originate any home purchase loans in the low-income geographies during the evaluation period. The bank's very poor performance in low-income census tracts is mitigated due to the low percentage of owner-occupied housing units at 1.40 percent. As a result, there are fewer opportunities to make loans in low-income geographies. Home purchase lending in the moderate-income geographies is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in those geographies. SFNB's market share of home purchase loans in moderate-income geographies is near to its overall home purchase loans market share.

SFNB's record of originating refinance loans in low-income geographies is very poor. SFNB did not originate any home refinance loans in low-income geographies where lending opportunities are limited due to less than 2 percent of owner occupied housing units being located in those geographies. The bank's record of originating refinance loans in moderate-income geographies is poor. The percentage of SFNB's home refinance loans in moderate-income geographies is lower than the percentage of owner occupied housing units located in those geographies. SFNB's market share for home mortgage refinance loans exceeds the overall market share for this product.

2012

Home purchase lending in the low-income geographies of the Wichita MA is very poor. The percentage of bank loans in low-income geographies is significantly lower than the percentage of owner-occupied housing units in those geographies. SFNB did not originate any home purchase loans in the low-income geographies during the evaluation period. The bank's very poor performance in low-income census tracts is mitigated due to the low percentage of owner-occupied housing units at 4.01 percent. As a result, there are fewer opportunities to make loans in low-income geographies. Home purchase lending in the moderate-income geographies is poor. The percentage of bank loans in moderate-income geographies is lower than the percentage of owner-occupied housing units in those geographies.

SFNB's record of originating refinance loans in the Wichita MA is very poor. The bank's loan penetration in low- and moderate-income geographies is significantly lower than the percentage of owner-occupied housing units in those geographies. The low percentage of owner-occupied housing units in the low-income geographies mitigates the bank's performance for those census tracts.

### ***Multifamily Loans***

Refer to Table 5 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of multifamily loans.

SFNB did not originate any multifamily loans in the full-scope assessment areas during the 2009 – 2011 evaluation period and the 2012 evaluation period. In addition, SFNB elected not to have an evaluation of multifamily loans for this Performance Evaluation.

### ***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 the bank's origination/purchase of small loans to businesses.

Overall geographic distribution of small loans to businesses from 2009 to 2011 is adequate. The distribution of small loans to businesses is good in the Wichita MA.

Overall geographic distribution of small loans to businesses during 2012 is good. The distribution of small loans to businesses is good in the Wichita MA and the Saline County AA.

#### **Kansas City, KS-MO MA**

In the Kansas City MA overall geographic distribution of small loans to businesses from 2009 to 2011 is poor; and good for 2012.

Refer to Table 6 in the "Multistate Metropolitan Area(s)" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

#### **2009 – 2011**

SFNB has very poor penetration of small loans to businesses in moderate-income census tracts. The Kansas City MA does not include any low-income census tracts. The bank's performance is mitigated by the limited opportunities to lend in moderate-income geographies. The bank did not originate any business loans in moderate-income geographies in which less than 2 percent of businesses are located.

#### **2012**

Overall geographic distribution is good. No loans were originated in low-income census tracts. The percentage of loans originated in moderate-income census tracts exceeds the percentage of businesses in located in moderate-income census tracts.

Wichita MA2009 – 2011

SFNB has excellent penetration of small loans to businesses in low-income census tracts. The percentage of bank loans to businesses in low-income geographies exceeds the percentage of businesses located in those geographies. The bank has very poor penetration of small loans to businesses in moderate-income census tracts. The bank did not originate any loans in the moderate-income census tracts during the examination period. As such, the percentage of loans in moderate-income geographies is significantly lower than the percentage of businesses located in those geographies. At 3.33%, the bank's market share of business loans in low income geographies exceeds its overall market share of 0.22% for small loans to businesses.

2012

SFNB has excellent penetration of small loans to businesses in the low-income census tracts of the Wichita MA during 2012. The percentage of bank loans to businesses in low-income geographies exceeds the percentage of businesses located in low-income geographies. SFNB has adequate penetration of small loans to businesses in the moderate-income census tracts of the Wichita MA during 2012. The percentage of small loans to businesses in moderate-income geographies is somewhat lower than the percentage of businesses in moderate-income geographies.

***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 the bank's origination/purchase of small loans to farms.

Small loans to farms were not evaluated. SFNB entered the full-scope assessment areas in the third quarter of 2010. The previous institution did not originate small loans to farms as the demand for this product was low and the bank did not have an experienced agriculture lender.

***Lending Gap Analysis***

There are no unexplained conspicuous gaps identified in the Kansas City, KS-MO MA, Saline County or the Wichita, KS MA.

***Inside/Outside Ratio***

The inside/outside ratio was performed at the bank level as opposed to the assessment level.

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

SFNB's overall distribution of loans by income level of the borrower for the state of Kansas for the years of 2009 through 2011 is good. Overall distribution for home mortgage loans is good and overall distribution for small loans to businesses is adequate.

SFNB's overall distribution of loans by income level of the borrower for the state of Kansas during 2012 is good. Distribution for home mortgage loans is good and distribution for small loans to businesses is adequate.

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

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

Overall borrower distribution for home mortgage loans from 2009 through 2011 is good. This is due to excellent borrower distribution for home purchase loans and good distribution for home refinance loans. The distribution of loans by income level of the borrower is good for the Kansas City, KS-MO MA and the Wichita, KS MA.

Overall borrower distribution for home mortgage loans during 2012 is good. This is due to excellent borrower distribution for home purchase loans and adequate distribution for home refinance loans. The distribution of loans by income level of the borrower is good in the Kansas City, KS-MO MA and the Wichita, KS MA.

### **Kansas City, KS-MO MA**

#### **2009 - 2011**

Borrower distribution of home purchase loans to low-income borrowers in the Kansas City MA is good. The percentage of bank loans to low-income borrowers is near to the percentage of low-income families in the MA. Borrower distribution of home purchase loans to moderate-income borrowers is excellent. The percentage of bank loans to moderate-income borrowers exceeds the percentage of moderate-income families in the MA. The 2011 Peer Mortgage Data shows the bank's market shares of home purchase loans to low-income borrowers and moderate-income borrowers exceeded the overall market share for home purchase loans.

Borrower distribution of home refinance loans to low-income borrowers is poor. The percentage of bank loans to low-income borrowers is lower than the percentage of low-income families in the MA. Borrower distribution of refinance loans to moderate-income borrowers is excellent. The percentage of bank loans to moderate-income borrowers exceeds the percentage of moderate-income families in the MA. Based on 2011 Peer Mortgage Data, the bank's market share of refinance loans to low-income borrowers is adequate and is somewhat lower than the overall market share for refinance loans. The market share to moderate-income borrowers is excellent and exceeds the overall market share for refinance loans.

## 2012

Borrower distribution of home purchase loans is excellent. The percentage of bank loans to low- and moderate-income borrowers exceeds the percentage of low- and moderate-income families. Borrower distribution of refinance loans is adequate. The percentage of bank loans to low-income borrowers is lower than the percentage of low-income families. The percentage of bank loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families.

### Wichita MA

#### 2009 - 2011

Borrower distribution of home purchase loans to low- and moderate-income borrowers in the Wichita MA is excellent. The percentages of home purchase loans to low-income borrowers and moderate-income borrowers exceed the percentages of low-income and moderate-income families in the MA. The 2011 Peer Mortgage Data shows SFNB's market share to low-income borrowers is greater than the overall market share for home purchase loans in the MA. The data also shows the bank's market share for moderate-income borrowers is near to the overall market share for home purchase loans in the MA.

Borrower distribution of home refinance loans is adequate for low-income borrowers and good for moderate-income borrowers. The percentage of bank loans to low-income borrowers is somewhat lower than the percentage of low-income families in the MA. The percentage of bank loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. According to 2011 Peer Mortgage Data, the bank has a 0.10% share of the home refinance market. The bank's market share of low-income borrowers is somewhat greater at 0.17%.

## 2012

Borrower distribution of home purchase loans to low-income borrowers is poor. The percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the MA. Penetration of home purchase loans to moderate-income borrowers is excellent. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the MA.

Borrower distribution of home refinance loans to both low- and moderate-income borrowers is very poor. The percentage of home mortgage refinance loans to low-income borrowers is significantly lower than the percentage of low-income families in the MSA. The bank did not originate any home mortgage refinance loans to low-income or moderate-income borrowers in 2012. As such, the percentage of home mortgage refinance loans to moderate-income borrowers is significantly lower than the percentage of moderate-income families in the AA. The 13% poverty level in the Wichita MA limits the bank's opportunities to make home refinance loans to low- and moderate-income borrowers in the MA. The bank originated 9 home mortgage refinance loans in 2012, all of which were to moderate- and upper- income borrowers.

### ***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 the bank's origination and purchase of small loans to businesses.

Overall distribution of loans by size of business for 2009 through 2011 is adequate. The distribution of loans by size of business is adequate in the Kansas City, KS-MO MA and poor in the Wichita, KS MA.

Overall distribution of loans by size of business for 2012 is good. The distribution of loans by size of business is adequate in the Kansas City, KS-MO MA and good in the Wichita MA.

#### *Kansas City, KS-MO MA*

##### 2009 - 2011

SFNB has a poor record of originating small loans to businesses with gross annual revenues of \$1 million or less in the Kansas City MA. The percentage of loans to businesses with gross annual revenues of \$1 million or less is lower than the percentage of small businesses in the MA. Per the 2011 Peer Small Business Data, the bank's market share of businesses with gross annual revenues of \$1 million or less is lower than the overall market share for small loans to businesses. During the examination period, the bank originated 22 small loans to businesses in the MA with 54.55% of these for loan amounts of \$100,000 or less.

##### 2012

SFNB's has a poor record of originating small loans to businesses with gross annual revenues of \$1 million or less in the Kansas City MA. The percentage of bank loans is lower than the percentage of businesses in the MA. SFNB originated 10 small loans to businesses with revenues of \$1 million or less.

#### *Wichita MA*

##### 2009 – 2011

SFNB has an adequate record of originating loans to businesses with gross annual revenues of \$1 million or less in the Wichita MA. The percentage of loans to businesses with gross annual revenues of \$1 million or less is somewhat lower than the percentage of small businesses in the MA. Per the 2011 Peer Small Business Data, the bank's market share of businesses with gross annual revenues of \$1 million or less is near to the overall market share for small loans to businesses. During the examination period, the bank originated 14 small loans to businesses in the AA with 29% of them \$100,000 or less.

##### 2012

SFNB has a good record of originating loans to businesses with gross annual revenues of \$1 million or less. The percentage of loans to businesses with gross annual revenues of \$1 million or less is near to the percentage of small businesses in the AA. During 2012, the bank originated 8 small loans to businesses in the AA with 12.5% of these loans having original amounts of \$100,000 or less.

### ***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 the bank's origination/purchase of small loans to businesses.

Small loans to farms were not evaluated. SFNB had no or few loan originations for this product. Small loans to farms were not a major product for the previous institution and the bank did not have loan officers experienced in agricultural lending. SFNB has not had sufficient time to grow this product for the state of Kansas.

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

SFNB did not originate any CD loans in the Kansas City, KS-MO MA or the Wichita, KS MA.



## **Product Innovation and Flexibility**

### 2009 – 2011

SFNB did not offer innovative loan programs during the evaluation period. However, the bank did offer flexible loan programs for home mortgage loans (Federal Housing Administration (FHA), Veterans' Administration (VA), and Farm Service Agency/Rural Housing Service (FSA/RHS loans)). During the evaluation period, SFNB originated 43 FHA loans totaling \$5.47 million. The bank originated 7 VA loans totaling \$1 million. SFNB originated 3 FSA/RHS loans totaling \$553 thousand. These flexible loan programs offer borrowers an opportunity to obtain financing when they would otherwise be denied under conventional loan programs.

### 2012

SFNB did not offer innovative loan programs during the evaluation period. However, the bank did offer flexible loan programs for home mortgage loans (Federal Housing Administration (FHA), Veterans' Administration (VA), and Farm Service Agency/Rural Housing Service (FSA/RHS loans)). During the evaluation period, SFNB originated 11 FHA loans totaling \$1.16 million in the state of Kansas. The bank originated 4 VA loans totaling \$523 thousand and no FSA/RHS loans in the state of Kansas. These flexible loan programs offer borrowers an opportunity to obtain financing when they would otherwise be denied under conventional loan programs.

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

Based on a limited-scope review, the bank's performance under the Lending Test in the Saline County, KS assessment area is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in the State of Kansas. Refer to Tables 1 through 13 in the State of Kansas of Appendix D for facts and data that supports this conclusion.

## **INVESTMENT TEST**

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

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

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

Based on full-scope reviews, the bank's performance in the Kansas City, KS-MO MA and the Wichita, KS MA is adequate.

### Kansas City, KS-MO MA

SFNB has an adequate level of qualified investments in the Kansas City, KS-MO MA. SFNB donated \$10 thousand to Habitat for Humanity in during the 2009 – 2011 evaluation period. No investments, grants or donations were made in the 2012 evaluation period. SFNB entered the Kansas City, KS-MO MA in October 2010.

Wichita KS MSA

SFNB has an adequate level of qualified investments in the Wichita KS MA. SFNB donated \$10 thousand in 2012 to United Methodist Open Door foundation to purchase furniture for the women's shelter it operates in this MSA.

**Conclusions for Area Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Investment Test in the Saline County, KS assessment area is weaker than the bank's overall "Low Satisfactory" performance under the Investment Test in the State of Kansas. Refer to Table 14 in the State of Kansas section of Appendix D for facts and data that supports this conclusion.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kansas is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Kansas City, KS-MO MA and the Wichita MA is adequate.

### Retail Banking Services

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

The bank's branch delivery system is reasonably accessible to essentially all portions of the assessment area for the 2009 – 2011 evaluation period. SFNB's branch delivery system is adequate for the 2009 – 2011 evaluation period. The bank's branch delivery system for 2012 is accessible to essentially all portions of the assessment area. SFNB's branch delivery system is good for the 2012 evaluation period.

#### Kansas City, KS-MO MA

##### 2009 – 2011

During this evaluation period, SFNB only had branches located in the state of Kansas in this multistate MA. There were no low-income CTs located in the assessment area, per the 2000 U.S. Census. The bank did not have any branches or ATMs located in moderate-income CTs. However, less than two percent of the population is located in moderate-income CT(s) in this MA. There have been four branches and four ATMs opened and none closed in the MA since during the evaluation period. Banking hours and services offered are reasonable.

##### 2012

The bank does not have any branches located in low-income CTs. Per the 2010 Census, the income status of one middle-income CT in which the bank has both a branch and an ATM, changed from middle- to moderate-income. The change in status of this census tract increased both the number of branches and the number of ATMs located in moderate-income CTs from zero to one. The percentage of branches located in the moderate-income CT exceeds the percentage of the population located in the moderate-income CT of the MA. Banking hours and services offered are reasonable.

#### Wichita KS MA

##### 2009 – 2011

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment area. SFNB has no branches or ATMs located in low- or moderate-income CTs. The AA has two branches and one is located in a middle-income CT and one is located in an

upper-income CT. During the evaluation period, there have been two branches and two ATMs acquired, while no branches or ATMs opened or closed in the MA. Banking hours and services do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.

## 2012

Delivery systems are reasonably accessible to essentially all portions of the bank's assessment area. During the 2010 Census, the income designation of a middle-income CT in which the bank has both a branch and an ATM changed from middle- to moderate-income. SFNB does not have any banking offices located in low-income geographies. The percentage of families that reside in low-income CTs is 7.93. The percentage of bank branches located in moderate-income geographies exceeds the percentage of moderate-income families located in moderate-income CTs. There have been no branches and no ATMs opened, and no branches or ATMs closed in the MA during the evaluation period. Banking hours and services do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies and/or individuals.

## **Community Development Services**

SFNB provides an adequate level of community development services.

### Kansas City, KS-MO MA

SFNB provided a limited level of community development services. The level of community development services is poor. SFNB provided technical assistance to one organization during this evaluation period.

### Wichita MA

SFNB provided technical assistance and financial education to the following groups during the 2009 – 2011 and 2012 evaluation periods:

*Downtown Lenders Development Consortium* – SFNB is a member of this economic development consortium that manages a pool of loan funds available to support the economic development and revitalization of the Wichita corridor.

*Grace Med (GM)* – A SFNB employee participated in fundraising efforts to support GM's operations. This entity is a Wichita based health clinic that serves the uninsured and in our area low- and moderate-income individuals.

*Wichita North High School* - A SFNB employee presented a personal finance educational program to students at Wichita North High School. At least 50 percent of the students are from low- and moderate-income families or households.

*United Methodist Open Door Ministries (UMODM)* – A SFNB officer provides technical assistance to UMODM, non-profit organization that provides financial assistance and other social services to low- and moderate-income individuals and the homeless in this MSA.

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

Performance in the limited-scope assessment area is not inconsistent with the full-scope assessment areas.

## State Rating

### State of Missouri

<b>CRA Rating for Missouri<sup>3</sup>:</b>	<b>Needs to Improve</b>
<b>The lending test is rated:</b>	Low Satisfactory
<b>The investment test is rated:</b>	Needs to Improve
<b>The service test is rated:</b>	Low Satisfactory

The major factors that support this rating include:

- SFNB's geographic distribution of home mortgage products is adequate.
- The geographic distribution of small loans to businesses is excellent.
- Borrower distribution of home mortgage loans is poor.
- SFNB's record to lending to businesses with revenues of \$1 million or less is excellent.
- SFNB did not originate any CD loans in the AA during the evaluation periods, which had a neutral impact on the bank's lending performance.
- There are no qualified investments/grants made in the AA during the evaluation periods.
- The bank's one branch is reasonably accessible to geographies and individuals of different income levels in its assessment area.

### Description of Institution's Operations in Missouri

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

### Scope of Evaluation in Missouri

The Springfield, MO MA is the full-scope AA. During the 2009 – 2011 evaluation period, the Springfield, MO MA was the only assessment area SFNB had for the state of Missouri. In October 2012, SFNB acquired banking offices in the St. Louis MA. The St. Louis MA was not included in this Performance Evaluation due to the brief time SFNB had acquired these branches. A community contact was not conducted for the Springfield, MO MA.

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

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Missouri for the years 2009 through 2011 is rated "Low Satisfactory". Based on the bank's performance context and the full-scope review, the bank's performance in the Springfield MA is adequate.

The bank's performance under the lending test in Missouri for 2012 is rated "Low Satisfactory". Based on the bank's performance context and the full-scope review, the bank's performance in the Springfield MA is adequate. Bank performance in the St. Louis MA could not be assessed due to the timing of the acquisition. See below for more details.

### Lending Activity

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

Lending activity in the state of Missouri for the years 2009 through 2011 is adequate. SFNB is not a dominant lender in the Missouri AAs. Bank loans evaluated for CRA between January 1, 2009 and December 31, 2011 in this market comprise 1.20 percent. During the evaluation period, the bank originated an adequate volume of loans to small businesses and residential real estate loans, which impacted CRA lending performance assessments. Due to the low volume of home improvement, multi-family, and small loans to farms, these loans were not considered for geographical and borrower income distribution.

Lending activity in the state of Missouri for 2012 is adequate. SFNB is not a dominant lender in the Missouri AAs. Bank loans evaluated for CRA between January 1, 2012 and December 31, 2012, in this market comprise 1.40 percent. During the evaluation period, the bank originated an adequate volume of loans to small businesses and residential real estate loans, which impacted CRA lending performance assessments. Due to the low volume of multi-family loans, these loans were not considered for geographical and borrower income distribution.

### Springfield MA

Loan volume in this MA for 2009 through 2011 is adequate. Overall, the Springfield MA accounts for approximately 1.20% of loans originated by the bank during the evaluation period. The bank had 0.28% of the deposit share in the Springfield MA and ranked 27<sup>th</sup> as of June 30, 2011. SFNB was ranked 45<sup>th</sup> for home purchase loans with a 0.23% market share. For home improvement loans, SFNB does not rank and doesn't have a notable market share. The bank is ranked 37<sup>th</sup> for home refinance loans with a 0.48% market share. SFNB is ranked 29<sup>th</sup> with a 0.10% market share for small loans to businesses. No small loans to farms were originated, and the bank does not have a market share of small loans to farms. Numerous non-deposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders competed for market share of loans in this market. Lending activity in

the market is concentrated with larger financial institutions such as American Express Bank, FSB, Bank of America, NA, and US Bank, NA having the top market shares.

Loan volume in this MA for 2012 is adequate. Overall, the Springfield MA accounted for approximately 1.40% of loans originated by the bank during the evaluation period. The bank is not a dominant lender in the Springfield MA. As of June 30, 2012, the bank had a 0.11% market share of deposits and ranked 32<sup>nd</sup> out of 32 institutions in the market. No market share or ranking data for lending volume is available at the time of evaluation.

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

The geographic distribution of SFNB's loans in the state of Missouri for 2009 through 2011 is good. The overall geographic distribution of home mortgage loans is good, the overall distribution of small loans to businesses is good.

The geographic distribution of SFNB's loans in the state of Missouri for 2012 is good. The overall geographic distribution of home mortgage loans is good, the overall distribution of small loans to businesses is good.

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

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

Overall geographic distribution for home mortgage loans from 2009 through 2011 is good. This is due to adequate geographic distribution for home purchase loans, and excellent geographic distribution for home refinance loans. The percentage of owner-occupied housing units in the Springfield MA is nominal at 0.06%, indicating few, if any, opportunities for banks to lend in low-income geographies.

Overall geographic distribution for home mortgage loans for 2012 is good. This is attributed to adequate geographic distribution for home purchase loans, and excellent geographic distribution for home refinance loans. The percentage of owner-occupied housing units in the Springfield MA is small at 0.81%, indicating few, if any, opportunities for banks to lend in low-income geographies.

#### **Springfield MA**

##### **2009 – 2011**

Home purchase lending in the low-income geographies of the Springfield MA from 2009 to 2011 is very poor. The bank did not originate any home purchase loans in the low-income census tracts of the MA. However, this is mitigated by the very low percentage of owner-occupied housing units in low-income census tracts. With only 0.06% of owner-occupied housing units located in low-income census, opportunity for banks to make home purchase loans in those census tracts is minimal. Home purchase lending in the moderate-income



geographies is adequate. The percentage of SFNB's loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in those geographies. The bank's market share of home purchase loans in moderate-income geographies exceeds its overall home purchase market share of the AA.

SFNB's record of originating home refinance loans in low-income geographies is very poor. However, this is mitigated by the low percentage of owner-occupied housing units in the low-income census tracts indicating little opportunity to originate loans in those census tracts. SFNB's record of originating home refinance loans in moderate-income geographies is excellent. The percentage of home refinance loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies. At 2.82%, the bank's market share of home refinance loans in moderate-income geographies exceeds its overall market share at 0.48%.

## 2012

Home purchase lending in the low-income geographies of the Springfield MA during 2012 is very poor. The bank did not originate any home purchase loans in the low-income census tracts of the MA. However, this is mitigated by the very low percentage of owner-occupied housing units in low-income census tracts. With only 0.81% of owner-occupied housing units located in low-income census tracts, opportunity for banks to make home purchase loans in those census tracts is minimal. Home purchase lending in the moderate-income geographies is adequate. The percentage of SFNB's loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units in those geographies.

SFNB's record of originating home refinance loans in low-income geographies is very poor. The percentage of home refinance loans in low-income geographies is significantly lower than the percentage of owner-occupied housing units in those geographies. However, the bank's performance is mitigated by the low percentage of owner-occupied housing units in the low-income census tracts indicating little opportunity to originate loans in those census tracts. SFNB's record of originating home refinance loans in moderate-income geographies is excellent. The percentage of home refinance loans in moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies.

### ***Multifamily Loans***

Refer to Table 5 in the state of Missouri section Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of multifamily loans.

SFNB management elected not to have multifamily loans evaluated as the bank does not have a significant volume of multifamily loans.

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

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

Overall geographic distribution of small loans to businesses in Missouri from 2009 through 2011 is excellent. The distribution of small loans to businesses in the Springfield MA is excellent.

Overall geographic distribution of small loans to businesses in Missouri during 2012 is good. The distribution of small loans to businesses in the Springfield MA is good.

### **Springfield MA**

#### **2009-2011**

SFNB has very poor penetration of small loans to businesses in low-income census tracts. The percentage of bank loans to businesses in low-income geographies is significantly lower than the percentage of businesses in low-income geographies. The bank's performance in low-income geographies is mitigated by the small percentage of businesses in low-income geographies which limits the bank's opportunity to make loans in those geographies. Only 3.20% of businesses in the MA are located in low-income geographies. SFNB has excellent penetration of small loans to businesses in moderate-income census tracts. The percentage of banks loans to businesses in moderate-income geographies exceeds the percentage of businesses in those geographies.

#### **2012**

SFNB has very poor penetration of small loans to businesses in low-income census tracts. The percentage of bank loans to businesses in low-income geographies is significantly lower than the percentage of businesses in low-income geographies. The bank's performance in low-income geographies is mitigated by the small percentage of businesses in low-income geographies, which limits the bank's opportunity to make loans in those geographies. Only 1.19% of businesses in the MA are located in low-income geographies. SFNB has excellent penetration of small loans to businesses in moderate-income census tracts. The percentage of banks loans to businesses in moderate-income geographies exceeds the percentage of businesses in those geographies.

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

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

Small loans to farms were not evaluated, as the volume was not significant.

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

There are no unexplained conspicuous lending gaps were identified.

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

The inside/outside ratio analysis was performed at the bank level as opposed to the AA level.

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

SFNB's overall distribution of loans by income level of the borrower for the state of Missouri for the years of 2009 through 2011 is poor. Overall distribution for home mortgage loans is very poor, overall distribution for small loans to businesses is excellent.

SFNB's overall distribution of loans by income level of the borrower for the state of Missouri during 2012 is adequate. Overall distribution for home mortgage loans is adequate, overall distribution for small loans to businesses is poor.

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

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

Overall borrower distribution for home mortgage loans from 2009 through 2011 is poor. This is attributed to poor distribution for home purchase loans and very poor distribution for home refinance loans. The distribution of loans by income level of the borrower is poor for the Springfield MA.

Overall borrower distribution for home mortgage loans during 2012 is adequate. This is attributed to adequate distribution of home purchase and home refinance loans. The distribution of loans by income level of the borrower is adequate for the Springfield MA.

### **Springfield MA**

#### **2009 - 2011**

Borrower distribution of home purchase loans to low- and moderate-income borrowers is very poor. The percentage of bank loans to low-income borrowers is significantly lower than the percentage of low-income families. The percentage of bank loans to moderate-income borrowers is significantly lower than the percentage of moderate-income families in the MA. The bank's performance is mitigated by the 13% poverty level in the Springfield MA. Per 2011 Peer Mortgage Data, the bank's overall market share of home purchase loans is small at 0.12%. The bank's market share of low-income and moderate-income borrowers is significantly lower at 0% than its overall market share of home purchase loans.

Borrower distribution of home refinance loans to low-income borrowers is very poor. The percentage of home mortgage refinance loans to low-income borrowers is significantly lower than the percentage of low-income families in the MA. Borrower distribution of home refinance loans to moderate-income borrowers is poor. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families in the MA. The bank's performance is mitigated by the 13% poverty level in the Springfield MA which limits the bank's opportunity to make home refinance loans to low-income and moderate-income borrowers. The bank's overall market share of home refinance loans is small at 0.65%. The bank's market share of low-income borrowers is 0% and 0.11% for moderate-income borrowers.

## 2012

Borrower distribution of home purchase loans to low-income borrowers is very poor. The percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the MA. No home purchase loans were originated to low-income borrowers during the examination period. The bank's performance is mitigated by high unemployment in the MA and an increased percentage of families below the poverty level at 16%. Borrower distribution of home purchase loans to moderate-income borrowers is excellent. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the MA.

Borrower distribution of home refinance loans to low-income borrowers is excellent. The percentage of home mortgage refinance loans originated to low-income borrowers exceeds the percentage of low-income families in the AA. Borrower distribution of home refinance loans to moderate-income borrowers is very poor. The percentage of home refinance loans originated to moderate-income borrowers is significantly lower than the percentage of moderate-income families in the Springfield MA. The bank's performance is mitigated by high unemployment in the MA and an increased percentage of families below the poverty level at 16%.

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

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

Overall distribution of loans by size of business in the state of Missouri for 2009 through 2011 is excellent. The distribution of loans by size of business is excellent in the Springfield MA.

Overall distribution of loans by size of business in the state of Missouri during 2012 is poor. The distribution of loans by size of business is poor in the Springfield MA.

### Springfield MA

#### 2009 – 2011

SFNB has an excellent record of originating loans to businesses with gross annual revenues of \$1 million or less in the Springfield MA. The percentage of bank loans to businesses with gross annual revenues of \$1 million or less exceeds the percentage of businesses in the MA with gross annual revenues of \$1 million or less. Per the 2011 Peer Small Business Data, the bank's market share of businesses with gross annual revenue of \$1 million or less is greater than the overall market share for small loans to businesses.

#### 2012

SFNB has a poor record of originating loans to businesses with gross annual revenues of \$1 million or less. The percentage of banks loans to businesses with gross annual revenues of \$1 million or less is lower than the percentage of businesses in the AA with gross annual revenues of \$1 million or less.

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

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

Small loans to farms were not evaluated, as the volume was not significant.

### **Community Development Lending**

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

SFNB did not originate any CD loans in the AA during the evaluation periods.

### **Product Innovation and Flexibility**

#### 2009 – 2011

SFNB did not offer innovative loan programs during the evaluation period. However, the bank did offer flexible loan programs for home mortgage loans (Federal Housing Administration (FHA), Veterans' Administration (VA), and Farm Service Agency/Rural Housing Service

(FSA/RHS loans)). During the evaluation period, SFNB originated one FHA loan totaling \$74 thousand. The bank did not originate any VA or FSA/RHS loans though they were offered. These flexible loan programs offer borrowers an opportunity to obtain financing when they would otherwise be denied under conventional loan programs.

## 2012

SFNB did not offer innovative loan programs during the evaluation period. However, the bank did offer flexible loan programs for home mortgage loans (Federal Housing Administration (FHA), Veterans' Administration (VA), and Farm Service Agency/ Rural Housing Service (FSA/RHS) loans). During the examination period, the bank originated one FHA loan totaling \$103 thousand and no VA or FSA/RHS loans in the state of Missouri. These flexible loan programs offer borrowers an opportunity to obtain financing when they would otherwise be denied under conventional loan programs.

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

There are no limited-scope areas for the state of Missouri for this evaluation.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Missouri is rated "Needs to Improve". Based on full-scope reviews, the bank's performance in the Springfield, MO MA is very poor.

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

SFNB had no qualified investments, grants or donations during the evaluation periods.

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

There is no limited-scope AA for the state of Missouri.

## **SERVICE TEST**

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

The bank's performance under the service test in Missouri is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Springfield, MO MA is adequate.

### **Retail Banking Services**

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

The distribution of the bank's branch delivery system is adequate. The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the MSA.

#### 2009 – 2011

SFNB has one branch and one ATM located in an upper-income CT in the MA. Distribution of banking offices in low- and moderate-income geographies is very poor. However, the branch and ATM are reasonably accessible to the low- and moderate-income CTs located in this MA. SFNB acquired a branch and ATM in the MA during the evaluation period. No branches or ATMs opened or closed in the MA.

#### 2012

There have been no changes in the bank's retail distribution during the evaluation period. The bank has one branch and one ATM in the assessment area located in an upper-income geography. However, the branch and ATM are reasonably accessible to low- and moderate-

income CTs located in the MA. There have been no branches or ATMs opened or closed in the MA during the evaluation period.

## **Community Development Services**

### Springfield MO MA

SFNB provided technical assistance to the following groups during the 2009 – 2011 and 2012 evaluation periods:

*Springfield Chamber of Commerce (SCC)* - An SFNB officer provides technical assistance to SCC in its projects and initiatives to promote economic development / revitalization in this MSA.

*The Great Circle (TGC)* - An SFNB officer provides technical assistance to TGC, a non-profit organization that provides financial assistance and other social services, specifically low- and moderate-income children who are in the residential care program at the Springfield campus

*United Way of Springfield (USS)* - a SFNB employee serves on the UWS Allocation Panel which provides financial support for organizations that perform qualified community development services including health care, education / job training, childcare, and financial assistance to low- and moderate-income individuals in this MSA and surrounding counties.

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

There is no limited-scope assessment area for the state of Missouri.



## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2009 to 12/31/2011 01/01/2012 to 12/31/2012 Investment and Service Tests and CD Loans: 09/29/2008 to 01/02/2013	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Simmons First National Bank (SFNB) Pine Bluff, Arkansas	Home purchase, home improvement, refinance, small business and small farm loans.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
No affiliate products were reviewed.		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
States: <i>Arkansas</i> Fort Smith, AR MA #22900 Little Rock-North Little Rock, AR MA #30780 Pine Bluff, AR MA #38220 Searcy, Stone, Van Buren Counties, AR Fulton, Sharp Counties, AR  <i>Kansas</i> Kansas City, KS-MO MA Saline County, KS Wichita, KS MA #48620  <i>Missouri</i> Springfield, MO MA #44180	Full-Scope Full-Scope  Full-Scope Full-Scope  Limited-Scope   Full-Scope Limited-Scope Full-Scope  Full-Scope	           The Kansas City, KS-MO MA became a multi-state MA in 2012 when SFNB acquired banking offices in Jackson County, MO.   In October 2012, SFNB acquired banking offices in the St. Louis, MO MA and in Pettus County, MO.

## Appendix B: Summary of State Ratings

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RATINGS		SIMMONS FIRST NATIONAL BANK		
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Simmons First National Bank	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
ARKANSAS	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
KANSAS	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
MISSOURI	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve

(\*) 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 Arkansas

### Fort Smith AR-OK MA #22900

Demographic Information for Full Scope Area: Fort Smith AR-OK MSA 22900						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	0.00	11.11	66.67	22.22	0.00
Population by Geography	186,089	0.00	7.37	74.38	18.25	0.00
Owner-Occupied Housing by Geography	49,108	0.00	5.17	76.06	18.77	0.00
Business by Geography	18,060	0.00	8.93	67.54	23.53	0.00
Farms by Geography	619	0.00	2.42	82.71	14.86	0.00
Family Distribution by Income Level	51,130	17.38	17.14	23.33	42.15	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	17,651	0.00	10.55	78.79	10.66	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		37,051 47,800 14%	Median Housing Value Unemployment Rate (2000 US Census)	69,657 2.47%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI.

The Fort Smith, AR MA is located in northwest Arkansas. The MA is comprised of 36 census tracts of which 25 are in Sebastian County; 8 are in Crawford County, and 3 are in Franklin County. The census tract income designations are as follows: 4 moderate-income, 24 middle-income, and 8 upper-income. Fort Smith is the largest city in Sebastian County and is the county seat. The 2000 population of this geographical area is 186,089. There are 51,130 families in the Fort Smith MA. The U.S. Census 2000 median family income for the MSA is \$37,051. The updated 2011 HUD MFI used to determine individual income classifications is \$47,800. Of the total population in 2000, 17 percent of families are considered low-income and 17 percent are considered moderate-income families. Fourteen percent of the households live below the poverty level.

The economy is distressed. The US Bureau of Labor Statistics reported the unemployment rate at 8.0 percent as of October 2012. This is higher than the state unemployment rate of 6.6 percent. The trend in the Fort Smith MA has not improved to the extent that the state unemployment trends have. A major refrigeration manufacture that employed 700+ people closed its doors in 2011. Retail trade and services comprise the majority of the industries within the Fort Smith MA. Finance, manufacturing construction, and agriculture represent a minor percentage of the industries. The most significant employers include Fort Smith Public

Schools, Gerber Foods, Rheem Air Conditioning Products, St. Edward Mercy Medical Center, Sparks Health System, and Weyerhaeuser.

According to 2000 U.S. Census Bureau Data, there are 78,299 housing units in the Fort Smith MA of which 63 percent are owner-occupied, 29 percent are renter-occupied, and 8 percent are vacant. Based on the American Fact Finders 2009-2011 survey, the median value of owner-occupied housing units in the Fort Smith MA is \$98,600. According to the 2000 Census, 5 percent of all owner-occupied units and 11 percent of renter-occupied units were located in moderate-income CTs.

Competition for financial services in the AA is strong. SFNB operates 7 full service branches and 7 ATMs in the Fort Smith MA. SFNB has 4.33 percent of the deposit market share for the Fort Smith MA. Some of the larger deposit competitors include The First National Bank of Fort Smith, Arvest Bank, BancorpSouth Bank, and Citizens Bank & Trust Co. The top three banks hold 42 percent of the AA deposits.

### 2010 Census:

#### **Fort Smith AR MSA 22900**

Demographic Information for Full Scope Area: Fort Smith AR MSA 22900						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	40	0.00	27.50	47.50	25.00	0.00
Population by Geography	205,817	0.00	25.39	49.90	24.71	0.00
Owner-Occupied Housing by Geography	52,826	0.00	19.35	52.75	27.90	0.00
Business by Geography	16,827	0.00	27.01	46.82	26.17	0.00
Farms by Geography	613	0.00	15.99	62.48	21.53	0.00
Family Distribution by Income Level	54,545	20.13	18.21	19.24	42.41	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	20,914	0.00	35.19	48.38	16.43	0.00
Median Family Income		46,201	Median Housing Value		103,627	
HUD Adjusted Median Family Income for 2012		48,400	Unemployment Rate		28.14%	
Households Below Poverty Level		17%	(2010 US Census)			

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

Source: 2010 US Census and 2012 HUD updated MFI

The overall number of census tracts increased for the 2010 Census. The number of CTs increased from 36 in the 2000 Census to 40 in the 2010 Census. There are still no low-income census tracts, but the number of moderate-income census tracts increased from 4 to 11. And the number of middle-income census tracts decreased from 24 to 19. The number of families grew from 51,130 in 2000 to 54,545 in 2010. The percentage of low-income families grew slightly from 17 percent to 20 percent. Similarly the number of moderate-income families grew

slightly from 17 percent to 18 percent. The number of households living below the poverty level has also increased from 14 percent to 17 percent.

## State of Arkansas

### Little Rock-North Little Rock, AR MA #30780

#### Little Rock-North Little Rock MA 30780 (LR-NLR MA)

Demographic Information for Full Scope Area: LR-NLR MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	83	7.23	26.51	43.37	22.89	0.00
Population by Geography	354,542	2.66	21.06	46.91	29.37	0.00
Owner-Occupied Housing by Geography	90,892	1.49	15.75	47.92	34.85	0.00
Business by Geography	45,451	7.37	18.36	43.01	31.25	0.00
Farms by Geography	950	2.84	10.11	51.89	35.16	0.00
Family Distribution by Income Level	93,823	19.97	17.16	20.86	42.02	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,830	4.35	31.87	48.12	15.66	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		46,412 61,500 12%	Median Housing Value Unemployment Rate (2000 US Census)	91,397 2.98%		

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

Source: 2000 US Census and 2011 HUD updated MFI

The Little Rock-North Little Rock MA is located in the central Arkansas region. The MA is comprised of 83 census tracts in Faulkner and Pulaski Counties, of which 6 are low-income, 22 are moderate-income, 36 are middle-income, and 19 are upper-income. The defined AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income census tracts. Little Rock is the capital of Arkansas. The 2000 population of this geographical area is 354,542. There are 93,823 families in the Little Rock-North Little Rock MA. The US Census 2000 median family income (MFI) for the MSA is 46,412. The updated 2011 HUD updated MFI used to determine the individual- income classification is \$61,500. Of the total population in 2000, 20 percent of the families are considered low-income families and 17 percent are considered moderate-income families. Twelve percent of the households in the Little Rock-North Little Rock MA live below the poverty level.

The economy is stable. The US Bureau of Labor Statistics reported the unemployment rate at 6.0 as of October 2012. This is lower than the state unemployment rate of 6.6 percent. Dun and Bradstreet reported in 2011 there were 45,451 businesses and 950 farms in the MA. Approximately 97 percent of the businesses and 3 percent of the farms reported gross annual revenues less than \$1 million. Services, education, retail trade, finance, insurance and real estate comprise the majority of industries within the MA. There are 35 industrial parks located in the Little Rock-North Little Rock MA and surrounding areas. The leading employers in the area include: Federal, State and local agencies; the Little Rock Air Force Base; Acxiom; Little Rock School District; Pulaski County School District; Entergy Arkansas; AT&T; Dillard's;

Verizon Wireless; Verizon; Windstream, and Union Pacific Railroad. The AA has three 7-year universities: University of Arkansas at Little Rock (UALR); Philander Smith College, Baptist College, University of Central Arkansas UCA, Hendrix College, and Central Baptist College. Pulaski Technical College provides associate degrees. The Little Rock-North Little Rock MA is home to several major hospitals for the state of Arkansas: University of Arkansas Medical Sciences (UAMS) Baptist Health Systems; Central Arkansas Veteran's Healthcare System; St Vincent's Health System; and Arkansas Children's Hospital. The area has several advanced manufacturing firms, including Caterpillar; LM Wind Power; Sage V Foods; Saint Gobain; Unilever North America (Skippy peanut butter manufacturer); and Welsun Tubular, LLC. The MA has the Bill and Hillary Clinton National Airport and is home to the Little Rock Port. The William Jefferson Clinton Presidential Library is located in east of downtown Little Rock overlooking the Arkansas River.

The Little Rock-North Little Rock MA is part of the Pulaski Empowerment Zone (PEZ) designation for federal tax incentives. This zone began in January of 2002. Companies locating in this zone can receive wage credits, work opportunity tax credits, increased section 179 deduction, environmental cleanup cost deductions, new market tax credits and low-income housing tax credits.

According to 2000 U.S. Census Bureau Data, there are 157,021 housing units in the Little Rock-North Little Rock MA, of which 58 percent are owner-occupied, 34 percent are renter-occupied, and 8 percent are vacant. The median housing value for the MA is \$91,397, with the median age of housing stock at 25 years. Based on the American Fact Finders 2009-2011 survey median value of owner-occupied housing units in Little Rock-North Little Rock MA is \$133,300. According to the 2000 Census, 17 percent of all owner-occupied units and 30 percent of renter-occupied units were located in LMI CTs in the MA.

Competition for financial services in the AA is strong. SFNB operates 12 full service branches and 13 ATMs in the Little Rock-North Little Rock MA. SFNB has 1.53 percent of the deposit market share for the MA. Some of the larger deposit competitors include Bank of America, N.A; Regions Bank; Centennial Bank; First Security Bank, Bank of the Ozarks; and Arvest Bank. The top three banks hold 42 percent of the AA deposits.

Based on information from community contacts, the primary credit need in the AA is affordable housing. The community also has a need for rehabilitation of vacant, abandoned, or foreclosed properties. The community contact identified multiple opportunities for banks to participate in community development. These include participating in a community engagement program, the Neighborhood Stabilization Program (NSP), and the Individual Development Account (IDA) Program.

**Little Rock-North Little Rock (LR-NLR) MSA 30780**

Demographic Information for Full Scope Area: LR-NLR MSA 30780						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	120	9.17	27.50	38.33	24.17	0.83
Population by Geography	495,985	7.03	24.79	36.73	31.45	0.00
Owner-Occupied Housing by Geography	120,830	4.05	21.43	39.67	34.86	0.00
Business by Geography	53,904	5.60	27.82	34.16	32.40	0.02
Farms by Geography	1,201	3.41	17.24	42.63	36.72	0.00
Family Distribution by Income Level	125,191	22.61	17.80	19.30	40.29	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	50,584	11.42	35.71	36.63	16.24	0.00
Median Family Income		58,911	Median Housing Value	140,679		
HUD Adjusted Median Family Income for 2012		62,300	Unemployment Rate	31.02%		
Households Below Poverty Level		15%	(2010 US Census)			

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

Source: 2010 US Census and 2012 HUD updated MFI

According to the 2010 Census data the number of low- and moderate-income CTs and low- and moderate-income households have increased since the 2000 Census. The number of CTs in the AA increased from 83 in the 2000 Census to 120 in the 2010 Census. The number of low-income tracts increased from 6 to 11, and the number of moderate-income tracts increased from 22 to 33 CTs. The number of middle-income increased from 36 to 46 and the number of upper-income CTs increased from 19 to 29. The number of families grew from 98,823 in 2000 to 125,191 in 2010. The percentage of low-income families increased from 19.6 percent to 23 percent. The number of moderate-income families remained unchanged at 17 percent. Additionally, the number of households living below the poverty level has increased from 12 percent to 15 percent.



## State of Arkansas

### Pine Bluff, AR MA #38220

#### Pine Bluff AR MSA 38220

Demographic Information for Full Scope Area: Pine Bluff MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0.00	35.48	45.16	19.35	0.00
Population by Geography	98,770	0.00	37.62	38.54	23.84	0.00
Owner-Occupied Housing by Geography	23,457	0.00	31.14	39.82	29.04	0.00
Business by Geography	6,774	0.00	31.19	40.98	27.83	0.00
Farms by Geography	286	0.00	41.61	43.71	14.69	0.00
Family Distribution by Income Level	24,764	23.62	16.20	20.21	39.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	9,862	0.00	50.28	35.28	14.44	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		37,881 47,800 19%	Median Housing Value Unemployment Rate (2000 US Census)	51,801 3.41%		

#### Description of the Assessment Area

The Pine Bluff MA is located in the Arkansas River Basin farming region. Pine Bluff is the county seat of Jefferson County. The MA is comprised of 31 census tracts in Jefferson and Lincoln Counties, of which there are no low-income tracts, 11 are moderate-income, 14 are middle-income, and 6 are upper-income. The defined AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income census tracts. Pine Bluff is the county seat of Jefferson County. The 2000 population of this geographical area is 354,542. There are 24,764 families in the Pine Bluff MA. The US Census 2000 median family income (MFI) for the MSA is 38,728. The updated 2011 HUD updated MFI used to determine the individual- income classification is \$47,800. Of the total population in 2000, 24 percent of the families are considered low-income families and 16 percent are considered moderate-income families. Nineteen (19) percent of the households in the Pine Bluff MA live below the poverty level.

The economy is distressed. The US Bureau of Labor Statistics reported the unemployment rate at 8.4 percent as of October 2012. This is higher than the state unemployment rate of 6.6 percent. Dun and Bradstreet reported in 2011 there were 6,774 businesses and 286 farms in the MA. Approximately 71 percent of the businesses and 98 percent of the farms reported gross annual revenues less than \$1 million. Services, retail trade, finance, insurance and real estate comprise the majority of industries within the MA. The Pine Bluff MA has many regional health care facilities. These include the Jefferson Regional Medical Center (JRMC) Arkansas Cancer Institute, Jefferson Professional Centers, and JRMC Heart Center. The Pine Bluff MA has four public school districts, eight parochial schools, an adult education center, a special training center for the mentally and physically challenged, a state community college, on-the-job and pre-employment training programs and the University of Arkansas at Pine Bluff. The

leading employers in the area include: Tyson Foods; Jefferson Regional Medical Center; US Army – Pine Bluff Arsenal (army depot); Arkansas Department of Correction; Evergreen Packaging (paperboard mill); Pine Bluff School District; URS/Washington Group Division (chemical weapons disposal); University of Arkansas at Pine Bluff; Union Pacific Railroad; Central Moloney, Inc. (electric transformers) and NCTR (federal research laboratory).

According to 2000 U.S. Census Bureau Data, there are 39,305 housing units in the Pine Bluff MA, of which 60 percent are owner-occupied, 29 percent are renter-occupied, and 11 percent are vacant. The median housing value for the MA is \$54,733, with the median age of housing stock at 28 years. Based on the American Fact Finders 2009-2011 survey, the median value of owner-occupied housing units in the Pine Bluff MA is \$77,200. According to the 2000 Census, 48 percent of all owner-occupied units and 35 percent of renter-occupied units were located in moderate-income CTs in the MA. The Pine Bluff MA does not have any low-income CTs.

Competition for financial services in the AA is moderate. There are eight financial institutions in the AA. SFNB operates 9 full service branches and 10 ATMs in the Pine Bluff MA. SFNB is ranked first in deposit market share in the Pine Bluff MA according to the FDIC Deposit Market Share reports as of June 30, 2011. SFNB has 58 percent of the deposit market share for the Pine Bluff MA. The top competitors in the area include Pine Bluff National Bank with 25 percent of deposit market share, Bank of America, N.A, with 6 percent, Bank of Star City with 6 percent and The Bank of Rison with 2 percent.

Based on information from community contacts, the primary credit need in the community is affordable housing. The community contact identified a need for more owner-occupied housing units. The Low Income Housing Tax Credit (LIHTC) program has increased the supply of affordable rental housing in the Pine Bluff market, but more affordable owner-occupied housing remains a need. A major opportunity for banks in this area is promoting financial education. The community contact identified SFNB as being an active participant in the community by participating in the Federal Home Loan Bank's SNAP program to develop housing units and providing mortgages for borrowers approved for the city's Housing Reconstruction Program which provides funds to aid with major new construction.

2010 Census:**Pine Bluff MSA 38220**

Demographic Information for Full Scope Area: Pine Bluff MSA 38220						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	3.57	35.71	35.71	25.00	0.00
Population by Geography	91,569	2.80	33.48	31.05	32.67	0.00
Owner-Occupied Housing by Geography	20,878	2.27	26.90	32.16	38.67	0.00
Business by Geography	6,343	4.48	31.12	34.02	30.38	0.00
Farms by Geography	293	0.34	42.32	38.23	19.11	0.00
Family Distribution by Income Level	21,404	22.56	17.07	18.52	41.85	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	8,482	4.49	42.47	31.11	21.93	0.00
Median Family Income		45,357	Median Housing Value		73,992	
HUD Adjusted Median Family Income for 2012		48,500	Unemployment Rate		31.48%	
Households Below Poverty Level		22%	(2010 US Census)			

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

Source: 2010 US Census and 2012 HUD updated MFI

The 2010 Census data shows the number of CTs declined from the 2000 Census. There were 31 CTs at the 2000 Census and 28 CTs at the 2010 Census. The number of CTs in the AA decreased from 31 in the 2000 Census to 28 in the 2010 Census. The AA gained a low-income CTs at the 2010 Census, while the number of moderate-income tracts decreased from 11 to 10. The number of middle-income CTs decreased from 14 to 10. The number of upper-income tracts increased from 6 to 7. The number of families decreased from 24,764 in 2000 to 21,404 in 2010. The percentage of low-income families decreased from 24 percent to 22 percent. The number of moderate-income families showed a modest increase from 16 percent to 17 percent. The number of households living below the poverty level has increased from 19 percent to 22 percent.

## State of Arkansas

### Searcy-Stone-Van Buren, AR Counties (non-MA)

Demographic Information for Full Scope Area: Searcy-Stone-Van Buren AR Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0.00	22.22	77.78	0.00	0.00
Population by Geography	35,952	0.00	16.77	83.23	0.00	0.00
Owner-Occupied Housing by Geography	11,986	0.00	16.29	83.71	0.00	0.00
Business by Geography	4,168	0.00	19.82	80.18	0.00	0.00
Farms by Geography	155	0.00	15.48	84.52	0.00	0.00
Family Distribution by Income Level	10,699	23.45	21.93	22.92	31.70	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,855	0.00	18.25	81.75	0.00	0.00
Median Family Income		34,263	Median Housing Value	56,655		
HUD Adjusted Median Family Income for 2011		43,300	Unemployment Rate	2.19%		
Households Below Poverty Level		19%	(2000 US Census)			

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

Source: 2000 US Census and 2011 HUD updated MFI

The Searcy-Stone-Van Buren Counties AA consists of three contiguous non-MSA counties located in the northern central part Arkansas. The western portion of the AA contains parts of the Ozark National Forest. The AA is comprised of 9 census tracts, of which 2 are moderate-income, and 7 are middle-income. The Searcy-Stone-Van Buren AA has a population of 35,952. There are 10,669 families in the AA. The U.S. Census 2000 median family income for the AA is \$34,263. The updated 2011 HUD MFI used to determine individual income classifications is \$43,300. Of the total population in 2000, 22 percent of the families are considered moderate-income families and 19 percent of the households live below the poverty level.

The economy is distressed. The US Bureau of Labor Statistics reported the unemployment rates of 7 percent, 8.4 percent and 7.9 percent respectively as of October 2012. This is higher than statewide unemployment of 6.6 percent. Retail trade and services comprise the majority of the industries within the Searcy-Stone-Van Buren AA. Finance, manufacturing construction, and agriculture represent a minor percentage of the industries. The most significant employers include the Searcy County School District, Stone County School District, Van Buren School District, the Ozark Medical Center, Superior Forestry Services, and Mallard Ready-Mix.

According to 2000 U.S. Census Bureau Data, there are 19,171 housing units in the Searcy-Stone-Van Buren AA of which 63 percent are owner-occupied, 16 percent are renter-occupied, and 21 percent are vacant. Based on the American Fact Finders 2009-2011 survey, the median value of owner-occupied housing units in the Searcy-Stone-Van Buren AA is \$179,500. According to the 2000 Census, 17 percent of all owner-occupied units and 18 percent of renter-occupied units were located in low- and moderate-income CTs.

Competition for financial services in the AA is moderate. SFNB operates 5 full service branches and 5 ATMs in the Searcy-Stone-Van Buren AA. SFNB has 18.30 percent of the deposit market share for the AA. The bank has the largest deposit market share in the Searcy-Stone-Van Buren AA. The next largest deposit shareholders include Centennial Bank, and First Service Bank who maintain 17 percent and 15 percent market shares respectively.

No community contact was conducted for this AA.

2010 Census:

**Searcy-Stone-Van Buren Counties AR 2010**

Demographic Information for Full Scope Area: Searcy-Stone-Van Buren Counties AR 2010						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	11	0.00	9.09	90.91	0.00	0.00
Population by Geography	37,884	0.00	4.37	95.63	0.00	0.00
Owner-Occupied Housing by Geography	12,136	0.00	5.22	94.78	0.00	0.00
Business by Geography	3,533	0.00	1.84	98.16	0.00	0.00
Farms by Geography	155	0.00	3.23	96.77	0.00	0.00
Family Distribution by Income Level	10,312	22.00	21.66	21.32	35.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,503	0.00	5.77	94.23	0.00	0.00
Median Family Income		42,249	Median Housing Value		79,091	
HUD Adjusted Median Family Income for 2012		43,900	Unemployment Rate		27.96%	
Households Below Poverty Level		23%	(2010 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2010 US Census and 2012 HUD updated MFI

The number of CTs in the AA increased from 9 in the 2000 Census to 11 in the 2010 Census. Moderate-income CTs declined from 2 to 1, and middle-income CTs increased from 7 to 10. The number of families decreased from 10,669 in 2000 to 10,312 in 2010. The percentage of low-income families decreased slightly from 23 percent to 22 percent. The number of moderate-income families remained unchanged at 22 percent. The number of households living below the poverty level increased from 19 percent to 23 percent.

## State of Kansas Kansas City, KS-MO

### Kansas City MO-KS MSA 28140 Metropolitan Area

Demographic Information for Full Scope Area: Kansas City MO-KS MSA 28140						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	107	0.00	1.87	38.32	59.81	0.00
Population by Geography	451,086	0.00	1.64	37.21	61.15	0.00
Owner-Occupied Housing by Geography	126,231	0.00	0.97	33.40	65.63	0.00
Business by Geography	64,677	0.00	1.80	27.87	70.33	0.00
Farms by Geography	1,286	0.00	1.56	33.98	64.46	0.00
Family Distribution by Income Level	122,280	8.46	12.92	21.87	56.75	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	26,143	0.00	3.56	56.46	39.98	0.00
Median Family Income		55,031	Median Housing Value	157,354		
HUD Adjusted Median Family Income for 2011		72,300	Unemployment Rate	1.29%		
Households Below Poverty Level		4%	(2000 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Kansas City, KS-MO MA is multi-state AA. As of October 2012 the SFNB operated branches in both Kansas and Missouri. However, during the evaluation period the AA was an intrastate AA. The bank operated only in Johnson County Kansas. The demographic information for the 2000 Census reflects the Kansas data only. The MA is located along the Kansas/Missouri border and contains numerous lakes and rivers. The AA is comprised of 107 CTs, of which 2 are moderate-income, 41 are middle-income, and 64 are upper-income. Kansas City is the largest city in the MA. There were no low-income census tracts. The 2000 population of this geographical area was 451,806. There were 122,280 families in the Kansas City MA. The U.S. Census 2000 median family income for the MA was \$55,031. The updated 2011 HUD MFI used to determine individual income classifications was \$72,300. Of the total population in 2000, 8 percent of families were considered low income and 13 percent were considered moderate-income. Four percent of the households live below the poverty level. The Kansas City, KS-MO MA is one of the more affluent areas in the United States.

The economy is stabilizing. The U.S. Bureau of Labor Statistics reported the unemployment rate at 6.2 percent as of October, 2012. This was slightly higher than the state unemployment rate of 5.2 percent but has decreased from its high point of 9.6 percent in January of 2010. The MA has a wide variety of industries. Some of the more significant private sector employers in the area include HCA Midwest, Sprint Nextel, Saint Luke's Health System, Cerner, and Children's Mercy Hospital.

The State of Kansas passed the Promoting Employment Across Kansas (PEAK) Act, in 2009. PEAK is intended to encourage economic development in Kansas by incenting companies to

relocate, locate or expand business operations and jobs in Kansas. The 2010 and 2011 Legislative Sessions passed subsequent changes to the Act to broaden the eligibility criteria to increase the volume of companies that can apply. During the benefit period, participating PEAK companies may retain 95 percent of the payroll withholding tax of PEAK-Eligible employees/jobs. The state of Missouri has enacted tax credits for companies that will create sustainable jobs within designated Enhanced Enterprise Zones which includes areas in the MA.

According to 2000 U.S. Census Bureau Data, there were 181,612 housing units in the Kansas City MA of which 70 percent were owner-occupied, 27 percent were renter-occupied, and 4 percent were vacant. Based on the American Fact Finders 2009-2011 survey, the median value of owner-occupied housing units in the Kansas City MA was \$158,500. According to the 2000 Census, 1 percent of all owner-occupied units and 4 percent of renter-occupied units were located in moderate-income CTs.

Competition for financial services in the AA is strong. SFNB operates 5 full service branches and 5 ATMs in the Kansas City MA. SFNB has 0.10 percent of the deposit market share for the MA. Some of the larger deposit competitors include UMB Bank, N.A., Commerce Bank, and Bank of America, N.A. The top three banks hold 35 percent of the AA deposits.

A community contact was conducted with the director of a housing services agency in Johnson County. The contact stated that Johnson County is an affluent county consisting of many of the southwestern suburbs of the Kansas City MO-KS MSA. A majority of the population in Johnson County is middle- and upper-income. As of the 2010 census, 67,566 low- to moderate-income individuals lived in Johnson County representing 16.37% of the population. In addition to the 16.37%, there is a larger population of low- and moderate-income individuals working in Johnson County providing services to the affluent majority population and living in less affluent adjacent counties. The affluent cultural and economic perspective of the majority population in Johnson County results in the significant but non-majority low- and moderate-income population being largely invisible. Low- and moderate-income individuals working in Johnson County are likely to live in less affluent adjacent counties and patronize retail businesses including check cashing facilities and payday lenders located in less affluent counties in Kansas and Missouri. The contact stated the low- and moderate-income population may not be adequately served by retail businesses including financial institutions. There are unmet credit needs in the county, specific to the low- and moderate-income population and affordable housing programs. None of the sixty-five banks in Johnson County have contacted the county housing services or the county housing authority to obtain information about their housing programs or discuss how their banks can support the programs. The contact stated that of the sixty-five banks with branches in Johnson County, only a "handful" have participated in the First Time Home Buyer Program administered by county housing services. The contact also stated that the availability of multi-family and single family rental properties participating in the Section 8 Voucher program in Johnson County has been limited and contributed to the shortage of affordable housing. Bank assistance in encouraging rental property owner borrowers to participate in the Section 8 program would be beneficial.

2010 Census:**Kansas City KS-MO MA 28140**

Demographic Information for Full Scope Area: Kansas City KS-MO MA 28140						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	130	0.77	11.54	30.00	55.38	2.31
Population by Geography	544,179	0.68	10.13	29.28	59.90	0.01
Owner-Occupied Housing by Geography	151,234	0.28	7.54	28.75	63.43	0.00
Business by Geography	61,807	0.56	8.98	24.51	63.32	2.62
Farms by Geography	1,281	0.16	7.96	29.51	61.67	0.70
Family Distribution by Income Level	143,509	10.86	13.18	20.26	55.70	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,508	1.70	21.75	39.36	37.19	0.00
Median Family Income		69,313	Median Housing Value		224,105	
HUD Adjusted Median Family Income for 2012		73,300	Unemployment Rate (2010		31.20%	
Households Below Poverty Level		5%	US Census)			

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

Source: 2010 US Census and 2012 HUD updated MFI

On October 1, 2012 SFNB acquired a bank in Lee's Summit, Missouri in Jackson County, which is part of the Kansas City, KS-MO MA. The CTs in the state of MO are not included in the demographic data for the Kansas City, KS-MO MA due to the short amount of time SFNB entered this market. The number of CTs in the AA increased from 107 in the 2000 Census to 130 in the 2010 Census, of which one (1) CT is low-income, 15 are in moderate-income CTs, 39 are middle-income CTs, 72 are upper-income CTs. No data is available for 3 CTs. The number of low-income tracts increased from zero (0) to one (1). The number of moderate-income tracts increased from two (2) to 15. The number of middle-income CTs decreased from 41 to 39. Upper-income tracts increased from 64 to 72. The total population of the AA is 544,179. The number of families grew from 122,280 in 2000 to 143,509 in 2010. Low-income families increased from 8.5 percent to 10.9 percent. Moderate-income families also saw an increase from 12.9 percent to 13.2 percent. The number of households below the poverty level saw a slight increase from 4 percent to 5 percent.



**Wichita KS MA #48620**

Demographic Information for Full Scope Area: Wichita KS MSA 48620						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	118	4.24	33.05	37.29	25.42	0.00
Population by Geography	452,869	2.65	29.09	42.15	26.11	0.00
Owner-Occupied Housing by Geography	116,738	1.40	22.67	46.10	29.83	0.00
Business by Geography	45,569	1.98	24.75	41.13	32.14	0.00
Farms by Geography	1,258	0.95	11.76	51.75	35.53	0.00
Family Distribution by Income Level	118,663	17.98	18.92	24.26	38.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	43,797	4.50	43.39	41.12	10.98	0.00
Median Family Income		51,478	Median Housing Value		79,321	
HUD Adjusted Median Family Income for 2011		64,100	Unemployment Rate (2000 US Census)		2.46%	
Households Below Poverty Level		9%				

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

Source: 2000 US Census and 2011 HUD updated MFI

The Wichita KS MA is situated in the southern central portion of Kansas and lies within the Arkansas River Lowlands. The AA consists of Sedgwick County in the Wichita KS MA. The MA is comprised of 118 CTs, of which 5 are low-income, 39 are moderate-income, 44 are middle-income, and 30 are upper-income. Wichita is the largest city in the MA and is the county seat of Sedgwick County. The 2000 population of this geographical area is 452,869. There are 118,663 families in the Wichita MA. The U.S. Census 2000 median family income for the MA is \$51,478. The updated 2011 HUD MFI used to determine individual income classifications is \$64,100. Of the total population in 2000, 18 percent of families are considered low income and 19 percent are considered moderate-income. Nine (9) percent of the households live below the poverty level.

The economy is stabilizing. The US Bureau of Labor Statistics reported the unemployment rate at 6.1 percent as of October, 2012. This is slightly higher than the state unemployment rate of 5.2 percent, but has decreased from its high point of 10.6 percent in July of 2009. Boeing will be closing their Wichita operations in 2013 which will impact the MA. Manufacturing, education and retail trade comprise the majority of the industries within the Wichita MA. The most significant employers include Spirit Aerosystems, Inc., Cessna Aircraft Company, and the Via Christ Medical Center.

The State of Kansas passed the Promoting Employment Across Kansas (PEAK) Act in 2009. The 2010 and 2011 Legislative Sessions passed subsequent changes to the Act to broaden the eligibility criteria to increase the volume of companies that can apply. PEAK is intended to encourage economic development in Kansas by incenting companies to relocate, locate or expand business operations and jobs in Kansas. During the benefit period, participating PEAK companies may retain 95 percent of the payroll withholding tax of PEAK-Eligible employees/jobs.

According to 2000 U.S. Census Bureau Data, there are 191,133 housing units in the Wichita MA of which 61 percent are owner-occupied, 31 percent are renter-occupied, and 8 percent are vacant. Based on the American Fact Finders 2009-2011 survey, the median value of owner-occupied housing units in the Wichita MA is \$121,200. According to the 2000 Census, 24 percent of all owner-occupied units and 51 percent of renter-occupied units were located in low- and moderate-income CTs.

Competition for financial services in the AA is strong. SFNB operates 2 full service branches and 2 ATMs in the Wichita MA. SFNB has 0.24 percent of the deposit market share for the MA. Some of the larger deposit competitors include Bank of America, N.A., Intrust Bank, N.A., and Fidelity. The top three banks hold 52 percent of the AA deposits.

### 2010 Census:

#### **Wichita KS MSA 48620-SedgwickCounty**

Demographic Information for Limited Scope Area: Wichita KS MSA 48620-SedgwickCounty						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	124	10.48	33.06	27.42	29.03	0.00
Population by Geography	498,365	7.93	29.95	29.65	32.47	0.00
Owner-Occupied Housing by Geography	127,710	4.01	25.63	31.80	38.56	0.00
Business by Geography	42,429	11.36	23.10	29.89	35.64	0.00
Farms by Geography	1,235	2.91	13.52	33.28	50.28	0.00
Family Distribution by Income Level	125,002	21.44	18.27	20.93	39.36	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	49,638	12.41	44.40	26.52	16.68	0.00
Median Family Income		61,850	Median Housing Value	116,537		
HUD Adjusted Median Family Income for 2012		65,000	Unemployment Rate (2010 US Census)	30.26%		
Households Below Poverty Level		13%				

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

Source: 2010 US Census and 2012 HUD updated MFI

According to the 2010 Census data the number CTs increased since the 2000 Census. The number of CTs in the AA increased from 118 in the 2000 Census to 124 in the 2010 Census. The number of low- and moderate-income CTs increased from the 2000 levels. The number of low-income tracts increased from 5 to 13. The number of moderate-income tracts increased from 39 to 41. The number of middle-income CTs decreased from 44 to 34 CTs, and upper-income tracts increased from 29 to 34. In contrast the percent of low-income and moderate-income families has remained fairly stable. The number of families grew from 118,663 in 2000 to 125,002 in 2010. The percentage of low-income families increased from 18 percent to 21 percent. The number of moderate-income families remained steady at 19 percent. The number of households living below the poverty level has increased from 9 percent to 14 percent.

## State of Missouri

### Springfield MO MA #44180

Demographic Information for Full Scope Area: Springfield MO MSA 44180						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	61	3.28	24.59	42.62	29.51	0.00
Population by Geography	240,391	2.52	23.63	44.47	29.38	0.00
Owner-Occupied Housing by Geography	62,284	0.06	18.28	45.93	35.74	0.00
Business by Geography	27,369	3.20	16.95	45.23	34.61	0.00
Farms by Geography	886	0.23	9.37	54.18	36.23	0.00
Family Distribution by Income Level	62,147	16.58	18.76	23.86	40.79	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	21,967	0.91	34.81	46.58	17.70	0.00
Median Family Income		41,591	Median Housing Value	90,240		
HUD Adjusted Median Family Income for 2011		54,700	Unemployment Rate	2.91%		
Households Below Poverty Level		13%	(2000 US Census)			

(\* ) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2011 HUD updated MFI

The Springfield MO MA is located in the southwestern portion of Missouri. The AA consists of Greene County. Springfield is the largest city in the MA, and is the third largest city in the state. It is located on the Springfield Plateau of the Ozarks. The topography varies from flat to rolling hills, cliffs, and forest. The MA is comprised of 61 CTs, of which 2 are low-income, 15 are moderate-income, 26 are middle-income, and 18 are upper-income. The 2000 population of the assessment area is 240,391. There are 62,147 families in the Springfield MA. The U.S. Census 2000 median family income for the MA is \$41,591. The updated 2011 HUD MFI used to determine individual income classifications is \$54,700. Of the total population in 2000, three percent of families are considered low-income and 25 percent are considered moderate-income. Thirteen percent of the households live below the poverty level.

The economy is stable. The US Bureau of Labor Statistics reported the unemployment rate at 5.7 percent as of October 2012. This is lower than the state unemployment rate of 6.6 percent. Healthcare, manufacturing and retail trade are the largest industries in the MA. Some of the more significant employers in the area include the Saint John's Health System, Cox Health, Springfield Public Schools, and Tracker Marine.

The state of Missouri's Department of Economic Development has enacted tax credits for companies that will create sustainable jobs within designated Enhanced Enterprise Zones which includes areas in the MA.

According to the 2000 U.S. Census Bureau Data, there are 104,517 housing units in the Springfield MA of which 60 percent are owner-occupied, 34 percent are renter-occupied, and 6 percent are vacant. Based on the American Fact Finders 2009-2011 survey, the median value of owner-occupied housing units in the Springfield MA is \$129,300. According to the 2000

Census, 18 percent of all owner-occupied units and 38 percent of renter-occupied units were located in low- and moderate-income CTs.

Competition for financial services in the AA is strong. SFNB operates one full service branch and one ATM in the Springfield MA. SFNB has 0.09 percent of the deposit market share for the MA. Some of the larger deposit competitors include Great Southern Bank, Commerce Bank, Empire Bank, and Liberty Bank. The top three banks hold 40 percent of the AA deposits.

### 2010 Census:

#### **Springfield MO MSA 44180-Greene County**

Demographic Information for Full Scope Area: Springfield MO MSA 44180-Greene County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	62	4.84	30.65	41.94	22.58	0.00
Population by Geography	275,174	3.66	23.41	45.26	27.67	0.00
Owner-Occupied Housing by Geography	69,828	0.81	19.98	46.32	32.89	0.00
Business by Geography	26,432	1.19	30.29	41.25	27.27	0.00
Farms by Geography	885	0.68	11.53	61.13	26.67	0.00
Family Distribution by Income Level	68,592	19.69	17.97	21.74	40.60	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	25,829	3.28	35.35	45.42	15.95	0.00
Median Family Income		52,463	Median Housing Value		124,189	
HUD Adjusted Median Family Income for 2012		55,400	Unemployment Rate		31.76%	
Households Below Poverty Level		16%	(2010 US Census)			

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

Source: 2010 US Census and 2012 HUD updated MFI

According to the 2010 Census data the number of low- and moderate-income CTs and low- and moderate-income households have increased. Upper-income CTs and households decreased. The number of CTs in the AA increased from 61 in the 2000 Census to 62 in the 2010 Census. The number of low-income tracts increased from two to three, and the number of moderate-income tracts increased from 15 to 19. The number of middle-income CTs remains unchanged at 26, and the number of upper-income CTs decreased from 18 to 14. The number of families grew from 62,147 in 2000 to 68,592 in 2010. The percentage of low-income families increased from 17 percent to nearly 20 percent. The number of moderate-income families declined slightly from almost 19 percent to 18 percent. The number of households living below the poverty level has increased from 13 percent to 16 percent.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/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, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

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

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.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.

Table 1. Lending Volume

LENDING VOLUME												
Geography: ARKANSAS												
Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011												
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Fort Smith AR-OK MSA 22900	16.16	502	49,333	303	22,941	218	4,127	0	0	1,023	76,401	14.52
Little Rock-North Little Rock MSA 30780	19.44	762	110,716	423	52,869	45	4,404	1	560	1,231	168,549	15.83
Pine Bluff AR MSA 38220	39.11	953	85,265	965	62,089	558	54,710	0	0	2,476	202,064	57.54
Searcy-Stone-Van Buren AR Counties	21.18	331	27,811	401	18,934	609	25,288	0	0	1,341	72,033	8.58
<b>Limited Review:</b>												
Fulton-Sharp AR Counties	4.11	99	6,492	88	4,251	73	1,839	0	0	260	12,582	3.54

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

\*\* The evaluation period for Community Development Loans is from September 30, 2008 to January 2, 2013.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



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

Geographic Distribution: HOME PURCHASE		Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR-OK MSA 22900	193	17.47	0.00	0.00	5.17	1.04	76.06	70.98	18.77	27.98	2.09	0.00	0.00	2.38	1.35
Little Rock-North Little Rock MSA 30780	272	24.62	1.49	0.37	15.75	5.88	47.92	53.31	34.85	40.44	0.87	2.33	0.63	0.70	1.12
Pine Bluff AR MSA 38220	508	45.97	0.00	0.00	31.14	8.66	39.82	42.72	29.04	48.62	18.46	0.00	14.89	17.00	20.69
Searcy-Stone-Van Buren AR Counties	105	9.50	0.00	0.00	16.29	21.90	83.71	78.10	0.00	0.00	10.88	0.00	14.29	10.18	0.00
<b>Limited Review:</b>															
Fulton-Sharp AR Counties	27	2.44	0.00	0.00	6.99	7.41	93.01	92.59	0.00	0.00	3.14	0.00	7.69	2.81	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2011		Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31,							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total* *	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR-OK MSA 22900	92	28.84	0.00	0.00	5.17	3.26	76.06	85.87	18.77	10.87	4.47	0.00	0.00	4.83	3.75
Little Rock-North Little Rock MSA 30780	42	13.17	1.49	0.00	15.75	23.81	47.92	45.24	34.85	30.95	2.03	0.00	1.96	2.59	1.19
Pine Bluff AR MSA 38220	119	37.30	0.00	0.00	31.14	16.81	39.82	36.13	29.04	47.06	35.05	0.00	29.41	37.21	35.1 4
Searcy-Stone-Van Buren AR Counties	52	16.30	0.00	0.00	16.29	26.92	83.71	73.08	0.00	0.00	12.90	0.00	0.00	15.09	0.00
<b>Limited Review:</b>															
Fulton-Sharp AR Counties	14	4.39	0.00	0.00	6.99	21.43	93.01	78.57	0.00	0.00	3.33	0.00	0.00	3.70	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					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	
<b>Full Review:</b>																
Fort Smith AR-OK MSA 22900	213	17.50	0.00	0.00	5.17	0.94	76.06	71.36	18.77	27.70	1.47	0.00	0.00	1.58	1.29	
Little Rock-North Little Rock MSA 30780	447	36.73	1.49	0.22	15.75	3.36	47.92	48.55	34.85	47.87	1.14	0.00	1.27	1.15	1.13	
Pine Bluff AR MSA 38220	325	26.71	0.00	0.00	31.14	4.92	39.82	29.54	29.04	65.54	10.49	0.00	7.02	10.68	10.93	
Searcy-Stone-Van Buren AR Counties	174	14.30	0.00	0.00	16.29	10.34	83.71	89.66	0.00	0.00	9.64	0.00	7.37	10.11	0.00	
<b>Limited Review:</b>																
Fulton-Sharp AR Counties	58	4.77	0.00	0.00	6.99	10.34	93.01	89.66	0.00	0.00	5.20	0.00	5.56	5.18	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: ARKANSAS					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Fort Smith AR-OK MSA 22900	4	66.67	0.00	0.00	11.88	0.00	56.55	75.00	31.56	25.00	6.25	0.00	0.00	5.88	16.67	
Little Rock-North Little Rock MSA 30780	1	16.67	6.09	0.00	15.76	100.00	44.64	0.00	33.50	0.00	1.89	0.00	10.00	0.00	0.00	
Pine Bluff AR MSA 38220	1	16.67	0.00	0.00	37.74	100.00	46.34	0.00	15.91	0.00	12.50	0.00	50.00	0.00	0.00	
Searcy-Stone-Van Buren AR Counties	0	0.00	0.00	0.00	18.10	0.00	81.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Fulton-Sharp AR Counties	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: ARKANSAS								Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	% of Busines ses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR-OK MSA 22900	303	13.90	0.00	0.00	8.93	3.63	67.54	80.86	23.53	15.51	3.34	0.00	0.95	4.32	2.32
Little Rock-North Little Rock MSA 30780	423	19.40	7.37	5.20	18.36	18.44	43.01	43.97	31.25	32.39	1.66	0.96	2.11	1.67	1.61
Pine Bluff AR MSA 38220	965	44.27	0.00	0.00	31.19	37.93	40.98	27.36	27.83	34.72	35.95	0.00	38.65	32.11	41.20
Searcy-Stone-Van Buren AR Counties	401	18.39	0.00	0.00	19.82	19.45	80.18	80.55	0.00	0.00	25.57	0.00	36.99	27.58	0.00
<b>Limited Review:</b>															
Fulton-Sharp AR Counties	88	4.04	0.00	0.00	4.14	11.36	95.86	88.64	0.00	0.00	12.30	0.00	50.00	11.71	0.00

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: ARKANSAS								Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR-OK MSA 22900	218	14.50	0.00	0.00	2.42	0.00	82.71	95.87	14.86	4.13	40.82	0.00	0.00	42.42	26.67
Little Rock-North Little Rock MSA 30780	45	2.99	2.84	2.22	10.11	2.22	51.89	51.11	35.16	44.44	15.25	0.00	0.00	14.94	17.86
Pine Bluff AR MSA 38220	558	37.13	0.00	0.00	41.61	59.50	43.71	35.30	14.69	5.20	96.41	0.00	97.03	96.43	100.00
Searcy-Stone-Van Buren AR Counties	609	40.52	0.00	0.00	15.48	22.99	84.52	77.01	0.00	0.00	74.39	0.00	87.72	71.43	0.00
<b>Limited Review:</b>															
Fulton-Sharp AR Counties	73	4.86	0.00	0.00	7.34	21.92	92.66	78.08	0.00	0.00	62.22	0.00	100.00	58.97	0.00

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR-OK MSA 22900	193	17.47	17.38	7.98	17.14	23.94	23.33	26.60	42.15	41.49	2.43	3.35	2.43	2.70	2.05
Little Rock-North Little Rock MSA 30780	272	24.62	19.97	7.54	17.16	16.27	20.86	31.35	42.02	44.84	1.04	0.96	0.52	1.42	1.15
Pine Bluff AR MSA 38220	508	45.97	23.62	10.43	16.20	29.24	20.21	31.49	39.97	28.83	21.55	21.57	28.08	26.54	14.04
Searcy-Stone-Van Buren AR Counties	105	9.50	23.45	3.81	21.93	24.76	22.92	22.86	31.70	48.57	12.08	11.11	10.91	12.28	12.50
<b>Limited Review:</b>															
Fulton-Sharp AR Counties	27	2.44	21.49	8.00	23.58	36.00	23.71	28.00	31.22	28.00	3.57	0.00	5.00	6.98	2.27

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.2% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: ARKANSAS								Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR-OK MSA 22900	92	28.84	17.38	10.99	17.14	21.98	23.33	19.78	42.15	47.25	4.66	7.14	3.66	4.08	4.84
Little Rock-North Little Rock MSA 30780	42	13.17	19.97	7.50	17.16	22.50	20.86	17.50	42.02	52.50	1.91	0.00	2.33	2.44	1.84
Pine Bluff AR MSA 38220	119	37.30	23.62	10.78	16.20	19.61	20.21	23.53	39.97	46.08	31.40	50.00	33.33	36.84	26.00
Searcy-Stone-Van Buren AR Counties	52	16.30	23.45	19.23	21.93	23.08	22.92	17.31	31.70	40.38	12.90	12.50	14.29	0.00	15.63
<b>Limited Review:</b>															
Fulton-Sharp AR Counties	14	4.39	21.49	14.29	23.58	42.86	23.71	28.57	31.22	14.29	3.57	0.00	11.11	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.3% of loans originated and purchased by bank.



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

Borrower Distribution: HOME MORTGAGE REFINANCE 2011			Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31,						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR-OK MSA 22900	213	17.50	17.38	3.55	17.14	13.71	23.33	23.35	42.15	59.39	1.54	0.00	2.27	0.76	1.78
Little Rock-North Little Rock MSA 30780	447	36.73	19.97	3.59	17.16	13.88	20.86	20.10	42.02	62.44	1.34	0.65	1.54	1.24	1.39
Pine Bluff AR MSA 38220	325	26.71	23.62	4.14	16.20	11.03	20.21	24.14	39.97	60.69	11.81	15.00	13.11	12.12	11.25
Searcy-Stone-Van Buren AR Counties	174	14.30	23.45	3.66	21.93	16.46	22.92	25.61	31.70	54.27	10.25	6.45	4.60	11.11	12.21
<b>Limited Review:</b>															
Fulton-Sharp AR Counties	58	4.77	21.49	10.42	23.58	25.00	23.71	20.83	31.22	43.75	4.66	8.70	6.82	5.08	2.73

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.2% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: ARKANSAS			Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Fort Smith AR-OK MSA 22900	303	13.90	69.15	78.88	80.86	10.23	8.91	3.34	5.24	
Little Rock-North Little Rock MSA 30780	423	19.40	67.90	74.70	73.52	11.82	14.66	1.66	2.76	
Pine Bluff AR MSA 38220	965	44.27	71.42	88.08	85.28	9.74	4.97	35.95	59.07	
Searcy-Stone-Van Buren AR Counties	401	18.39	70.42	86.78	89.03	6.73	4.24	25.57	36.56	
<b>Limited Review:</b>										
Fulton-Sharp AR Counties	88	4.04	69.55	92.05	89.77	5.68	4.55	12.30	25.00	

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.97% 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: ARKANSAS			Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fort Smith AR-OK MSA 22900	218	14.50	97.58	98.62	99.08	0.92	0.00	40.82	43.48
Little Rock-North Little Rock MSA 30780	45	2.99	97.37	95.56	66.67	22.22	11.11	15.25	17.65
Pine Bluff AR MSA 38220	558	37.13	97.90	92.47	71.86	14.70	13.44	96.41	97.99
Searcy-Stone-Van Buren AR Counties	609	40.52	98.71	96.22	90.48	7.88	1.64	74.39	75.55
<b>Limited Review:</b>									
Fulton-Sharp AR Counties	73	4.86	99.08	97.26	95.89	4.11	0.00	62.22	65.12

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.33% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Fort Smith AR-OK MSA 22900	0	0	3	327	3	327	18.27	0	0
Little Rock-North Little Rock MSA 30780	0	0	20	32	20	32	1.79	0	0
Pine Bluff AR MSA 38220	3	130	26	1,291	29	1,421	79.39	0	0
Searcy-Stone-Van Buren AR Counties	0	0	3	10	3	10	0.56	0	0
<b>Limited Review:</b>									
Fulton-Sharp AR Counties	0	0	0	0	0	0	0.00	0	0

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\* '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: ARKANSAS Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Fort Smith AR-OK MSA 22900	14.52	7	20.00	0.00	14.29	42.86	42.86	0	1	0	0	- 1	0	0.00	7.37	74.38	18.25
Little Rock-North Little Rock MSA 30780	15.83	12	34.29	8.33	8.33	33.33	50.00	0	1	0	- 1	0	0	2.66	21.06	46.91	29.37
Pine Bluff AR MSA 38220	57.54	9	25.71	0.00	44.44	44.44	11.11	0	2	0	- 2	0	0	0.00	37.62	38.54	23.84
Searcy-Stone-Van Buren AR Counties	8.58	5	14.29	0.00	0.00	100.00	0.00	0	1	0	- 1	0	0	0.00	16.77	83.23	0.00
<b>Limited Review:</b>																	
Fulton-Sharp AR Counties	3.54	2	5.71	0.00	0.00	100.00	0.00	0	1	0	0	- 1	0	0.00	6.44	93.56	0.00

**Table 1. Lending Volume**

LENDING VOLUME		Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012						
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Fort Smith AR MSA 22900	16.16	145	14,575	88	5,420	72	1,710	0	0	305	21,705	14.14
LR-NLR MSA 30780	22.63	263	39,101	145	14,476	19	1,474	0	0	427	55,051	16.24
Pine Bluff MSA 38220	35.56	272	30,305	275	17,305	124	12,192	0	0	671	59,802	56.76
Searcy-Stone-Van Buren Counties AR 2010	21.89	73	5,309	124	4,729	216	9,939	0	0	413	19,977	9.20
<b>Limited Review:</b>												
Fulton-Sharp Counties AR 2010	3.76	19	848	28	1,750	24	474	0	0	71	3,072	3.67

\* Loan Data as of December 31, 2012. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

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

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

Geographic Distribution: HOME PURCHASE		Geography: ARKANSAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Fort Smith AR MSA 22900	46	16.43	0.00	0.00	19.35	15.22	52.75	45.65	27.90	39.13	0.00	0.00	0.00	0.00	0.00	
LR-NLR MSA 30780	75	26.79	4.05	1.33	21.43	4.00	39.67	29.33	34.86	65.33	0.00	0.00	0.00	0.00	0.00	
Pine Bluff MSA 38220	132	47.14	2.27	1.52	26.90	7.58	32.16	25.76	38.67	65.15	0.00	0.00	0.00	0.00	0.00	
Searcy-Stone-Van Buren Counties AR 2010	23	8.21	0.00	0.00	5.22	0.00	94.78	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Fulton-Sharp Counties AR 2010	4	1.43	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT 2012			Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement 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 II	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Fort Smith AR MSA 22900	29	28.16	0.00	0.00	19.35	31.03	52.75	55.17	27.90	13.79	0.00	0.00	0.00	0.00	0.00	
LR-NLR MSA 30780	24	23.30	4.05	4.17	21.43	20.83	39.67	41.67	34.86	33.33	0.00	0.00	0.00	0.00	0.00	
Pine Bluff MSA 38220	33	32.04	2.27	3.03	26.90	12.12	32.16	27.27	38.67	57.58	0.00	0.00	0.00	0.00	0.00	
Searcy-Stone-Van Buren Counties AR 2010	12	11.65	0.00	0.00	5.22	16.67	94.78	83.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Fulton-Sharp Counties AR 2010	5	4.85	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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



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

Geographic Distribution: HOME MORTGAGE REFINANCE 2012			Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,					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	
<b>Full Review:</b>																
Fort Smith AR MSA 22900	70	18.13	0.00	0.00	19.35	21.43	52.75	54.29	27.90	24.29	0.00	0.00	0.00	0.00	0.00	
LR-NLR MSA 30780	163	42.23	4.05	1.23	21.43	7.98	39.67	32.52	34.86	58.28	0.00	0.00	0.00	0.00	0.00	
Pine Bluff MSA 38220	105	27.20	2.27	0.00	26.90	8.57	32.16	32.38	38.67	59.05	0.00	0.00	0.00	0.00	0.00	
Searcy-Stone-Van Buren Counties AR 2010	38	9.84	0.00	0.00	5.22	5.26	94.78	94.74	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Fulton-Sharp Counties AR 2010	10	2.59	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012						Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total*	% of MF Units***	% BANK Loans***	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Fort Smith AR MSA 22900	0	0.00	0.00	0.00	36.82	0.00	28.78	0.00	34.40	0.00	0.00	0.00	0.00	0.00	0.00	
LR-NLR MSA 30780	1	33.33	10.18	100.00	23.20	0.00	34.95	0.00	31.66	0.00	0.00	0.00	0.00	0.00	0.00	
Pine Bluff MSA 38220	2	66.67	4.41	0.00	37.09	0.00	52.61	0.00	5.89	100.00	0.00	0.00	0.00	0.00	0.00	
Searcy-Stone-Van Buren Counties AR 2010	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Fulton-Sharp Counties AR 2010	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES 2012			Geography: ARKANSAS								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR MSA 22900	88	13.33	0.00	0.00	27.01	38.64	46.82	48.86	26.17	12.50	0.00	0.00	0.00	0.00	0.00
LR-NLR MSA 30780	145	21.97	5.60	4.14	27.82	24.83	34.16	33.10	32.40	37.93	0.00	0.00	0.00	0.00	0.00
Pine Bluff MSA 38220	275	41.67	4.48	6.18	31.12	32.00	34.02	36.36	30.38	25.45	0.00	0.00	0.00	0.00	0.00
Searcy-Stone-Van Buren Counties AR 2010	124	18.79	0.00	0.00	1.84	5.65	98.16	94.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Fulton-Sharp Counties AR 2010	28	4.24	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 (2012).

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

Geographic Distribution: SMALL LOANS TO FARMS 2012			Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
<b>Full Review:</b>																
Fort Smith AR MSA 22900	72	15.82	0.00	0.00	15.99	18.06	62.48	69.44	21.53	12.50	0.00	0.00	0.00	0.00	0.00	
LR-NLR MSA 30780	19	4.18	3.41	10.53	17.24	26.32	42.63	31.58	36.72	31.58	0.00	0.00	0.00	0.00	0.00	
Pine Bluff MSA 38220	124	27.25	0.34	2.42	42.32	51.61	38.23	38.71	19.11	7.26	0.00	0.00	0.00	0.00	0.00	
Searcy-Stone-Van Buren Counties AR 2010	216	47.47	0.00	0.00	3.23	3.70	96.77	96.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Fulton-Sharp Counties AR 2010	24	5.27	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 (2012).

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

Borrower Distribution: HOME PURCHASE		Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR MSA 22900	46	16.43	20.13	4.35	18.21	15.22	19.24	26.09	42.41	54.35	0.00	0.00	0.00	0.00	0.00
LR-NLR MSA 30780	75	26.79	22.61	4.17	17.80	19.44	19.30	23.61	40.29	52.78	0.00	0.00	0.00	0.00	0.00
Pine Bluff MSA 38220	132	47.14	22.56	10.94	17.07	25.78	18.52	33.59	41.85	29.69	0.00	0.00	0.00	0.00	0.00
Searcy-Stone-Van Buren Counties AR 2010	23	8.21	22.00	0.00	21.66	17.39	21.32	21.74	35.01	60.87	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Fulton-Sharp Counties AR 2010	4	1.43	21.33	0.00	21.33	25.00	21.58	25.00	35.77	50.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR MSA 22900	29	28.16	20.13	19.23	18.21	23.08	19.24	23.08	42.41	34.62	0.00	0.00	0.00	0.00	0.00
LR-NLR MSA 30780	24	23.30	22.61	14.29	17.80	14.29	19.30	28.57	40.29	42.86	0.00	0.00	0.00	0.00	0.00
Pine Bluff MSA 38220	33	32.04	22.56	15.38	17.07	34.62	18.52	19.23	41.85	30.77	0.00	0.00	0.00	0.00	0.00
Searcy-Stone-Van Buren Counties AR 2010	12	11.65	22.00	25.00	21.66	16.67	21.32	16.67	35.01	41.67	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Fulton-Sharp Counties AR 2010	5	4.85	21.33	40.00	21.33	20.00	21.58	40.00	35.77	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.6% of loans originated and purchased by bank.

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

Borrower Distribution: HOME MORTGAGE REFINANCE 2012			Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Smith AR MSA 22900	70	18.13	20.13	8.96	18.21	16.42	19.24	13.43	42.41	61.19	0.00	0.00	0.00	0.00	0.00
LR-NLR MSA 30780	163	42.23	22.61	2.63	17.80	10.53	19.30	17.11	40.29	69.74	0.00	0.00	0.00	0.00	0.00
Pine Bluff MSA 38220	105	27.20	22.56	3.23	17.07	8.60	18.52	23.66	41.85	64.52	0.00	0.00	0.00	0.00	0.00
Searcy-Stone-Van Buren Counties AR 2010	38	9.84	22.00	10.53	21.66	15.79	21.32	21.05	35.01	52.63	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Fulton-Sharp Counties AR 2010	10	2.59	21.33	20.00	21.33	10.00	21.58	10.00	35.77	60.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.7% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES 2012			Geography: ARKANSAS		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses ***	% BANK Loans*** *	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fort Smith AR MSA 22900	88	13.33	71.93	90.91	86.36	10.23	3.41	0.00	0.00
LR-NLR MSA 30780	145	21.97	70.68	75.86	75.17	15.86	8.97	0.00	0.00
Pine Bluff MSA 38220	275	41.67	74.10	73.45	88.36	6.55	5.09	0.00	0.00
Searcy-Stone-Van Buren Counties AR 2010	124	18.79	76.00	83.87	92.74	4.84	2.42	0.00	0.00
<b>Limited Review:</b>									
Fulton-Sharp Counties AR 2010	28	4.24	75.09	85.71	85.71	3.57	10.71	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 - 2012).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.03% 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 2012		Geography: ARKANSAS			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fort Smith AR MSA 22900	72	15.82	97.88	100.00	98.61	0.00	1.39	0.00	0.00
LR-NLR MSA 30780	19	4.18	97.25	100.00	68.42	31.58	0.00	0.00	0.00
Pine Bluff MSA 38220	124	27.25	97.95	90.32	70.16	18.55	11.29	0.00	0.00
Searcy-Stone-Van Buren Counties AR 2010	216	47.47	98.71	94.44	88.89	8.80	2.31	0.00	0.00
<b>Limited Review:</b>									
Fulton-Sharp Counties AR 2010	24	5.27	99.10	91.67	95.83	4.17	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 - 2012).

\*\*\*\* 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 1.98% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Fort Smith AR MSA 22900	0	0	0	0	0	0	0.00	0	0
LR-NLR MSA 30780	0	0	0	0	0	0	0.00	0	0
Pine Bluff MSA 38220	0	0	0	0	0	0	0.00	0	0
Searcy-Stone-Van Buren Counties AR 2010	0	0	0	0	0	0	0.00	0	0
<b>Limited Review:</b>									
Fulton-Sharp Counties AR 2010	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 TO DECEMBER 31, 2012								Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2012					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Fort Smith AR MSA 22900	14.14	6	17.65	0.00	33.33	50.00	16.67	0	0	0	0	0	0	0.00	25.39	49.90	24.71
LR-NLR MSA 30780	16.24	12	35.29	0.00	25.00	16.67	58.33	0	0	0	0	0	0	7.03	24.79	36.73	31.45
Pine Bluff MSA 38220	56.76	9	26.47	0.00	55.56	33.33	11.11	0	0	0	0	0	0	2.80	33.48	31.05	32.67
Searcy-Stone-Van Buren Counties AR 2010	9.20	5	14.71	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	4.37	95.63	0.00
<b>Limited Review:</b>																	
Fulton-Sharp Counties AR 2010	3.67	2	5.88	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

**Table 1. Lending Volume**

LENDING VOLUME		Geography: KANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Kansas City MO-KS MSA 28140	54.94	434	79,154	22	3,412	0	0	0	0	456	82,566	26.18
Wichita KS MSA 48620	35.78	283	37,515	14	3,176	0	0	0	0	297	40,691	22.47
<b>Limited Review:</b>												
Saline County KS	9.28	70	7,336	7	975	0	0	0	0	77	8,311	51.36

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

\*\* The evaluation period for Community Development Loans is from September 29, 2009 to January 02, 2013.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: KANSAS					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Kansas City MO-KS MSA 28140	135	41.16	0.00	0.00	0.97	1.48	33.40	37.78	65.63	60.74	0.47	0.00	1.54	0.69	0.37	
Wichita KS MSA 48620	182	55.49	1.40	0.00	22.67	17.03	46.10	40.66	29.83	42.31	0.50	0.00	0.42	0.59	0.43	
<b>Limited Review:</b>																
Saline County KS	11	3.35	0.00	0.00	3.62	0.00	59.27	63.64	37.10	36.36	0.19	0.00	0.00	0.35	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: KANSAS						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS MSA 28140	0	0.00	0.00	0.00	0.97	0.00	33.40	0.00	65.63	0.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620	0	0.00	1.40	0.00	22.67	0.00	46.10	0.00	29.83	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Saline County KS	1	100.00	0.00	0.00	3.62	0.00	59.27	0.00	37.10	100.00	1.35	0.00	0.00	0.00	3.45

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE 2011			Geography: KANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Kansas City MO-KS MSA 28140	299	65.28	0.00	0.00	0.97	1.67	33.40	23.08	65.63	75.25	0.52	0.00	1.64	0.58	0.49	
Wichita KS MSA 48620	101	22.05	1.40	0.00	22.67	9.90	46.10	40.59	29.83	49.50	0.08	0.00	0.12	0.08	0.07	
<b>Limited Review:</b>																
Saline County KS	58	12.66	0.00	0.00	3.62	0.00	59.27	44.83	37.10	55.17	2.64	0.00	0.00	1.67	3.64	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: KANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011									
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of MF Units***	% BANK Loans***	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS MSA 28140	0	0.00	0.00	0.00	3.84	0.00	53.21	0.00	42.95	0.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620	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
<b>Limited Review:</b>															
Saline County KS	0	0.00	0.00	0.00	1.27	0.00	59.23	0.00	39.50	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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



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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: KANSAS								Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS MSA 28140	22	51.16	0.00	0.00	1.80	0.00	27.87	9.09	70.33	90.91	0.21	0.00	0.00	0.08	0.27
Wichita KS MSA 48620	14	32.56	1.98	35.71	24.75	0.00	41.13	42.86	32.14	21.43	0.22	3.33	0.00	0.24	0.15
<b>Limited Review:</b>															
Saline County KS	7	16.28	0.00	0.00	5.82	0.00	60.20	28.57	33.98	71.43	1.17	0.00	0.00	0.63	2.23

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: KANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
<b>Full Review:</b>																
Kansas City MO-KS MSA 28140	0	0.00	0.00	0.00	1.56	0.00	33.98	0.00	64.46	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita KS MSA 48620	0	0.00	0.95	0.00	11.76	0.00	51.75	0.00	35.53	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Saline County KS	0	0.00	0.00	0.00	2.56	0.00	47.86	0.00	49.57	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: KANSAS						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS MSA 28140	135	41.16	8.46	7.46	12.92	30.60	21.87	28.36	56.75	33.58	0.56	0.74	0.92	0.78	0.22
Wichita KS MSA 48620	182	55.49	17.98	20.88	18.92	31.32	24.26	26.37	38.84	21.43	0.62	1.18	0.52	0.48	0.56
<b>Limited Review:</b>															
Saline County KS	11	3.35	14.65	27.27	16.83	27.27	25.67	9.09	42.86	36.36	0.22	0.00	0.00	0.00	0.55

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.3% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: KANSAS						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City MO-KS MSA 28140	0	0.00	8.46	0.00	12.92	0.00	21.87	0.00	56.75	0.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620	0	0.00	17.98	0.00	18.92	0.00	24.26	0.00	38.84	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Saline County KS	1	100.00	14.65	0.00	16.83	0.00	25.67	0.00	42.86	100.00	1.43	0.00	0.00	0.00	3.45

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: KANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Kansas City MO-KS MSA 28140	299	65.28	8.46	2.31	12.92	13.08	21.87	31.15	56.75	53.46	0.57	0.45	0.63	0.95	0.42	
Wichita KS MSA 48620	101	22.05	17.98	12.77	18.92	17.02	24.26	28.72	38.84	41.49	0.10	0.17	0.00	0.17	0.09	
<b>Limited Review:</b>																
Saline County KS	58	12.66	14.65	5.45	16.83	29.09	25.67	27.27	42.86	38.18	3.45	3.33	2.38	2.96	4.10	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 10.7% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES 2011			Geography: KANSAS		Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans*** *	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Kansas City MO-KS MSA 28140	22	51.16	65.07	27.27	54.55	31.82	13.64	0.21	0.14
Wichita KS MSA 48620	14	32.56	66.16	35.71	28.57	35.71	35.71	0.22	0.23
<b>Limited Review:</b>									
Saline County KS	7	16.28	68.12	71.43	57.14	28.57	14.29	1.17	2.78

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.65% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS			Geography: KANSAS		Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Kansas City MO-KS MSA 28140	0	0.00	95.96	0.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620	0	0.00	97.77	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Saline County KS	0	0.00	97.44	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: KANSAS				Evaluation Period: SEPTEMBER 29, 2009 TO JANUARY 2, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Kansas City MO-KS MSA 28140	0	0	1	10	1	10	71.43	0	0
Wichita KS MSA 48620	0	0	1	4	1	4	28.57	0	0
<b>Limited Review:</b>									
Saline County KS	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: KANSAS				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Kansas City MO-KS MSA 28140	26.18	4	44.44	0.00	0.00	25.00	75.00	0	0	0	0	0	0	0.00	1.64	37.21	61.15
Wichita KS MSA 48620	22.47	2	22.22	0.00	0.00	50.00	50.00	0	0	0	0	0	0	2.65	29.09	42.15	26.11
<b>Limited Review:</b>																	
Saline County KS	51.36	3	33.33	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	4.64	63.81	31.54

**Table 1. Lending Volume**

LENDING VOLUME		Geography: KANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Kansas City KS-MO MA 28140	77.99	199	35,519	9	1,271	1	125	0	0	209	36,915	26.93
Wichita KS MSA 48620-SedgwickCounty	12.31	25	3,486	8	2,559	0	0	0	0	33	6,045	19.34
<b>Limited Review:</b>												
Saline County KS 2010	9.70	22	3,497	4	224	0	0	0	0	26	3,721	53.73

\* Loan Data as of December 31, 2012. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

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

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

Geographic Distribution: HOME PURCHASE		Geography: KANSAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Kansas City KS-MO MA 28140	73	79.35	0.28	0.00	7.54	10.96	28.75	41.10	63.43	47.95	0.00	0.00	0.00	0.00	0.00	
Wichita KS MSA 48620-SedgwickCounty	13	14.13	4.01	0.00	25.63	7.69	31.80	46.15	38.56	46.15	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Saline County KS 2010	6	6.52	0.00	0.00	8.60	0.00	51.30	66.67	40.10	33.33	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: KANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City KS-MO MA 28140	1	50.00	0.28	0.00	7.54	0.00	28.75	0.00	63.43	100.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620-SedgwickCounty	0	0.00	4.01	0.00	25.63	0.00	31.80	0.00	38.56	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Saline County KS 2010	1	50.00	0.00	0.00	8.60	0.00	51.30	100.00	40.10	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE 2012			Geography: KANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					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	
<b>Full Review:</b>																
Kansas City KS-MO MA 28140	125	82.24	0.28	0.00	7.54	10.40	28.75	15.20	63.43	74.40	0.00	0.00	0.00	0.00	0.00	
Wichita KS MSA 48620-SedgwickCounty	12	7.89	4.01	0.00	25.63	0.00	31.80	41.67	38.56	58.33	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Saline County KS 2010	15	9.87	0.00	0.00	8.60	0.00	51.30	13.33	40.10	86.67	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: KANSAS					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa II	Low	Mod	Mid	Upp	
	#	% of Total*	% of MF Units***	% BANK Loans***	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Kansas City KS-MO MA 28140	0	0.00	0.70	0.00	19.50	0.00	36.25	0.00	43.55	0.00	0.00	0.00	0.00	0.00	0.00	
Wichita KS MSA 48620-SedgwickCounty	0	0.00	14.07	0.00	36.37	0.00	34.26	0.00	15.30	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Saline County KS 2010	0	0.00	0.00	0.00	36.75	0.00	23.05	0.00	40.20	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: KANSAS		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012											
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City KS-MO MA 28140	8	40.00	0.56	0.00	8.98	25.00	24.51	0.00	63.32	75.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620-SedgwickCounty	8	40.00	11.36	37.50	23.10	12.50	29.89	12.50	35.64	37.50	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Saline County KS 2010	4	20.00	0.00	0.00	28.00	25.00	38.05	50.00	33.96	25.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 (2012).

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: KANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
<b>Full Review:</b>																
Kansas City KS-MO MA 28140	1	100.00	0.16	0.00	7.96	0.00	29.51	0.00	61.67	100.00	0.00	0.00	0.00	0.00	0.00	
Wichita KS MSA 48620-SedgwickCounty	0	0.00	2.91	0.00	13.52	0.00	33.28	0.00	50.28	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Saline County KS 2010	0	0.00	0.00	0.00	8.36	0.00	40.92	0.00	50.72	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 (2012).



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

Borrower Distribution: HOME PURCHASE		Geography: KANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City KS-MO MA 28140	73	79.35	10.86	17.81	13.18	19.18	20.26	35.62	55.70	27.40	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620-SedgwickCounty	13	14.13	21.44	7.69	18.27	30.77	20.93	23.08	39.36	38.46	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Saline County KS 2010	6	6.52	16.61	0.00	17.14	66.67	21.23	0.00	45.02	33.33	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: KANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City KS-MO MA 28140	1	50.00	10.86	0.00	13.18	0.00	20.26	0.00	55.70	100.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620-SedgwickCounty	0	0.00	21.44	0.00	18.27	0.00	20.93	0.00	39.36	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Saline County KS 2010	1	50.00	16.61	0.00	17.14	0.00	21.23	0.00	45.02	100.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE 2012		Geography: KANSAS						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,								
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid
<b>Full Review:</b>																
Kansas City KS-MO MA 28140	125	82.24	10.86	5.22	13.18	12.17	20.26	19.13	55.70	63.48	0.00	0.00	0.00	0.00	0.00	0.00
Wichita KS MSA 48620-SedgwickCounty	12	7.89	21.44	10.00	18.27	0.00	20.93	20.00	39.36	70.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>																
Saline County KS 2010	15	9.87	16.61	9.09	17.14	0.00	21.23	18.18	45.02	72.73	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 10.5% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES 2012			Geography: KANSAS		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans*** *	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Kansas City KS-MO MA 28140	9	42.86	71.09	33.33	55.56	11.11	33.33	0.00	0.00
Wichita KS MSA 48620-SedgwickCounty	8	38.10	70.98	62.50	12.50	37.50	50.00	0.00	0.00
<b>Limited Review:</b>									
Saline County KS 2010	4	19.05	70.92	50.00	100.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 - 2012).

\*\*\*\* 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 4.76% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS			Geography: KANSAS		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Kansas City KS-MO MA 28140	1	100.00	96.17	0.00	0.00	100.00	0.00	0.00	0.00
Wichita KS MSA 48620-SedgwickCounty	0	0.00	98.14	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Saline County KS 2010	0	0.00	97.41	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 - 2012).

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: KANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Kansas City KS-MO MA 28140	0	0	0	0	0	0	0.00	0	0
Wichita KS MSA 48620- SedgwickCounty	0	0	0	0	0	0	0.00	0	0
<b>Limited Review:</b>									
Saline County KS 2010	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: KANSAS				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Kansas City KS-MO MA 28140	26.93	4	44.44	0.00	25.00	0.00	75.00	0	0	0	0	0	0	0.68	10.13	29.28	59.90
Wichita KS MSA 48620-SedgwickCounty	19.34	3	33.33	0.00	33.33	33.33	33.33	0	0	0	0	0	0	7.93	29.95	29.65	32.47
<b>Limited Review:</b>																	
Saline County KS 2010	53.73	2	22.22	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	14.82	50.68	34.50

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Springfield MO MSA 44180	100.00	83	8,211	4	1,922	0	0	0	0	87	10,133	100.00

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

\*\* The evaluation period for Community Development Loans is from September 29, 2008 to January 2, 2013.

\*\*\* Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



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

Geographic Distribution: HOME PURCHASE		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans*** *	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180	35	100.00	0.06	0.00	18.28	11.43	45.93	60.00	35.74	28.57	0.24	0.00	0.40	0.32	0.06

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total*	% Owner Occ Units***	% BANK Loans***	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Springfield MO MSA 44180	0	0.00	0.06	0.00	18.28	0.00	45.93	0.00	35.74	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE 2011			Geography: MISSOURI						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31,						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180	48	100.0 0	0.06	0.00	18.28	37.50	45.93	43.75	35.74	18.75	0.48	0.00	2.82	0.57	0.03

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					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	
<b>Full Review:</b>																
Springfield MO MSA 44180	0	0.00	8.67	0.00	21.84	0.00	52.60	0.00	16.89	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MISSOURI								Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180	4	100.00	3.20	0.00	16.95	25.00	45.23	50.00	34.61	25.00	0.10	0.00	0.12	0.12	0.07

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
<b>Full Review:</b>																
Springfield MO MSA 44180	0	0.00	0.23	0.00	9.37	0.00	54.18	0.00	36.23	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

Borrower Distribution: HOME PURCHASE		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families*	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180	35	100.00	16.58	0.00	18.76	0.00	23.86	0.00	40.79	100.00	0.12	0.00	0.00	0.00	0.35

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 88.6% of loans originated and purchased by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: MISSOURI								Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180	0	0.00	16.58	0.00	18.76	0.00	23.86	0.00	40.79	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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



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

Borrower Distribution: HOME MORTGAGE REFINANCE 2011		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31,							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180	48	100.00	16.58	0.00	18.76	2.94	23.86	0.00	40.79	97.06	0.65	0.00	0.11	0.00	1.22

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 29.2% of loans originated and purchased by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES 2011		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield MO MSA 44180	4	100.00	65.83	75.00	25.00	0.00	75.00	0.10	0.15

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield MO MSA 44180	0	0.00	98.87	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Small Business Data -- US and PR

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

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

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MISSOURI				Evaluation Period: SEPTEMBER 29, 2008 TO JANUARY 2, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Springfield MO MSA 44180	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 TO				Geography: MISSOURI				Evaluation Period: JANUARY 1, 2009 DECEMBER 31, 2011									
MA/Assessment Area:	Deposit s	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposit s in AA	# of BANK Branch es	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openin gs	# of Branch Closing s	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Springfield MO MSA 44180	100.00	1	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	2.52	23.63	44.47	29.38

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Springfield MO MSA 44180-Greene County	100.00	27	2,599	3	898	1	92	0	0	31	3,589	100.00

\* Loan Data as of December 31, 2012. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

\*\*\* Deposit Data as of June 10, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Springfield MO MSA 44180-Greene County	9	100.00	0.81	0.00	19.98	11.11	46.32	88.89	32.89	0.00	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Geographic Distribution: HOME IMPROVEMENT		Geography: MISSOURI								Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% Owner Occ Units***	% BANK Loans**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180-Greene County	0	0.00	0.81	0.00	19.98	0.00	46.32	0.00	32.89	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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



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

Geographic Distribution: HOME MORTGAGE REFINANCE 2012			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					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	
<b>Full Review:</b>																
Springfield MO MSA 44180-Greene County	17	100.00	0.81	0.00	19.98	58.82	46.32	23.53	32.89	17.65	0.00	0.00	0.00	0.00	0.00	

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Geographic Distribution: MULTIFAMILY		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp
	#	% of Total*	% of MF Units***	% BANK Loans***	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
<b>Full Review:</b>															
Springfield MO MSA 44180-Greene County	1	100.00	9.06	0.00	31.77	0.00	43.63	100.00	15.53	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MISSOURI		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012											
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total*	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180-Greene County	3	100.00	1.19	0.00	30.29	33.33	41.25	33.33	27.27	33.33	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 (2012).

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180-Greene County	1	100.00	0.68	0.00	11.53	100.00	61.13	0.00	26.67	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 (2012).

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

Borrower Distribution: HOME PURCHASE		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180-Greene County	9	100.00	19.69	0.00	17.97	50.00	21.74	0.00	40.60	50.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 55.6% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012							
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180- Greene County	0	0.00	19.69	0.00	17.97	0.00	21.74	0.00	40.60	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE 2012		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,							
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total*	% Families***	% BANK Loans***	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Springfield MO MSA 44180- Greene County	17	100.00	19.69	100.00	17.97	0.00	21.74	0.00	40.60	0.00	0.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

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

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

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 94.1% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES 2012			Geography: MISSOURI		Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans*** *	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield MO MSA 44180-Greene County	3	100.00	70.65	33.33	33.33	0.00	66.67	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 - 2012).

\*\*\*\* 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 33.33% of small loans to businesses originated and purchased by the bank.



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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Springfield MO MSA 44180-Greene County	1	100.00	98.87	100.00	100.00	0.00	0.00	0.00	0.00

\* The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2012.

\*\* 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 - 2012).

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

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2012			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Springfield MO MSA 44180-Greene County	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 TO DECEMBER 31, 2012								Geography: MISSOURI				Evaluation Period: JANUARY 1, 2012					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Springfield MO MSA 44180-Greene County	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.66	23.41	45.26	27.67

