



## Community Reinvestment Act Policy

Revised: January 2024

- I. **Purpose:** The Community Reinvestment Act of 1977 (“CRA”) and the federal banking regulators’ CRA Regulations were enacted to help ensure that banks meet the credit needs of their communities. The Regulations provide guidance with regard to the methods regulators will use in assessing the Bank’s CRA performance. Each bank must delineate one or more “assessment areas” within which the regulators will evaluate the Bank’s record of helping to meet the credit needs of its community. Each bank must also make available to the public certain CRA related information. CRA encourages lenders to establish dialogues with local community members regarding their credit needs and to make efforts, within sound credit practices, to help meet those needs. The Board of Directors recognizes its responsibility to establish and implement policies and procedures to achieve compliance with the requirements of the CRA and to serve the community’s credit needs, including the needs of low and moderate income areas.
- II. **Statement:** The Board of Directors and senior management of FirstOak Bank will take an active role in assuring overall compliance with the CRA. The Board of Directors of the Bank will review and approve the Bank’s CRA policy, including the reasonableness of the delineated assessment area, at least annually and after each material change. All CRA-related discussions are to be documented in minutes of the Board of Director’s meetings. Further, the Board of Directors will review periodic self-assessments of the Bank’s CRA compliance efforts. The Bank will make reasonable efforts to ascertain the credit needs of the community and to develop and market products and services to meet those needs. All of the Bank’s directors, officers and employees are encouraged to be familiar with the Bank’s CRA goals and responsibilities. It is the Bank’s policy to comply with the standards imposed by CRA and related regulations by making safe and sound loans and investments and providing safe and sound services on which the Bank expects to make a profit. The Bank will develop and apply flexible underwriting standards for loans that benefit low or moderate income geographies or individuals which are consistent with safe and sound banking practices. The implementing regulations to the Community Reinvestment Act of 1977 (“CRA”) were revised for small banks effective January 1, 2016 to include banks with assets under \$304 million. Small banks operating under this definition are to be evaluated under the small bank lending test. Under the small bank lending test, small banks are to be assessed by their loan-to-deposit ratio (including community development loans and qualified investments), their percentage of loans in their assessment area, their record of lending to

different income levels and businesses and farms of different sizes, the geographic distribution of their loans, and their record of taking action in response to written complaints about their performance in helping to meet credit needs in their assessment area. This bank will be prepared to be evaluated under the small bank lending test and does not elect to be assessed under the lending, investment, and services tests, does not elect to be assessed under the community development test, and has not adopted an approved CRA strategic plan.

- III. **CRA Compliance Officer:** Christi Kuehn-Culver is designated as CRA Compliance Officer, the person responsible for coordinating, documenting, and monitoring the Bank's CRA program. Shanda Chambers will serve as the backup CRA Officer. The Bank's Board of Directors recognizes that CRA regulations are subject to change and that certain CRA regulations may or may not be effective to the Bank, or may become effective to the Bank on different dates, depending on certain factors and alternative forms of CRA compliance which are available to the Bank under applicable regulations. The Board of Directors, with the guidance and assistance of the Compliance Officer, intends to ensure that the Bank complies with such regulations in a proper and timely manner. The CRA Compliance Officer's responsibilities will include reporting periodically, but not less than annually, to the Board of Directors concerning the Bank's CRA efforts, performance, and, if appropriate, areas for improvement.
- IV. **Assessment Areas:** The Bank's designated assessment areas is available in the attached Exhibit "A".
- V. **CRA Notice:** The Bank will provide in the lobby of its main office and each of its branches a public CRA Notice which conforms in form and substance with the applicable regulatory requirements as set forth in the attached Exhibit "B".
- VI. **CRA Public File:** The Bank will maintain a public file, in which it will assemble all information and documents required by then effective regulations applicable to the Bank. Upon request, the Bank will provide copies of the information in its public file to any persons requesting such information in its public file to any persons requesting such information. Such information will be provided in paper or other form acceptable to the person making the request. If the Bank charges fees for such service, the fees will be reasonable and will not exceed copying and mailing costs (if applicable). The information contained in the Bank's public file will be made available at the Bank's main office. The Bank will make available at each of its branches:
  - a. A copy of the public section of its most recent CRA performance evaluation and a list of services provided by the branch; and
  - b. Within five calendar days of a request, all the information in the public file relating to the assessment area in which the branch is located.

The Bank will update its public file in order to ensure that the information contained therein will be current as of April 1 of each year.

VII. **Data Collection, Reporting, and Disclosure:** The Bank will assemble, collect and maintain such CRA related information as may be required by applicable regulations in form and substance which are fully compliant with such regulations.

Exhibit “A”

**Southeast Kansas Assessment Areas**

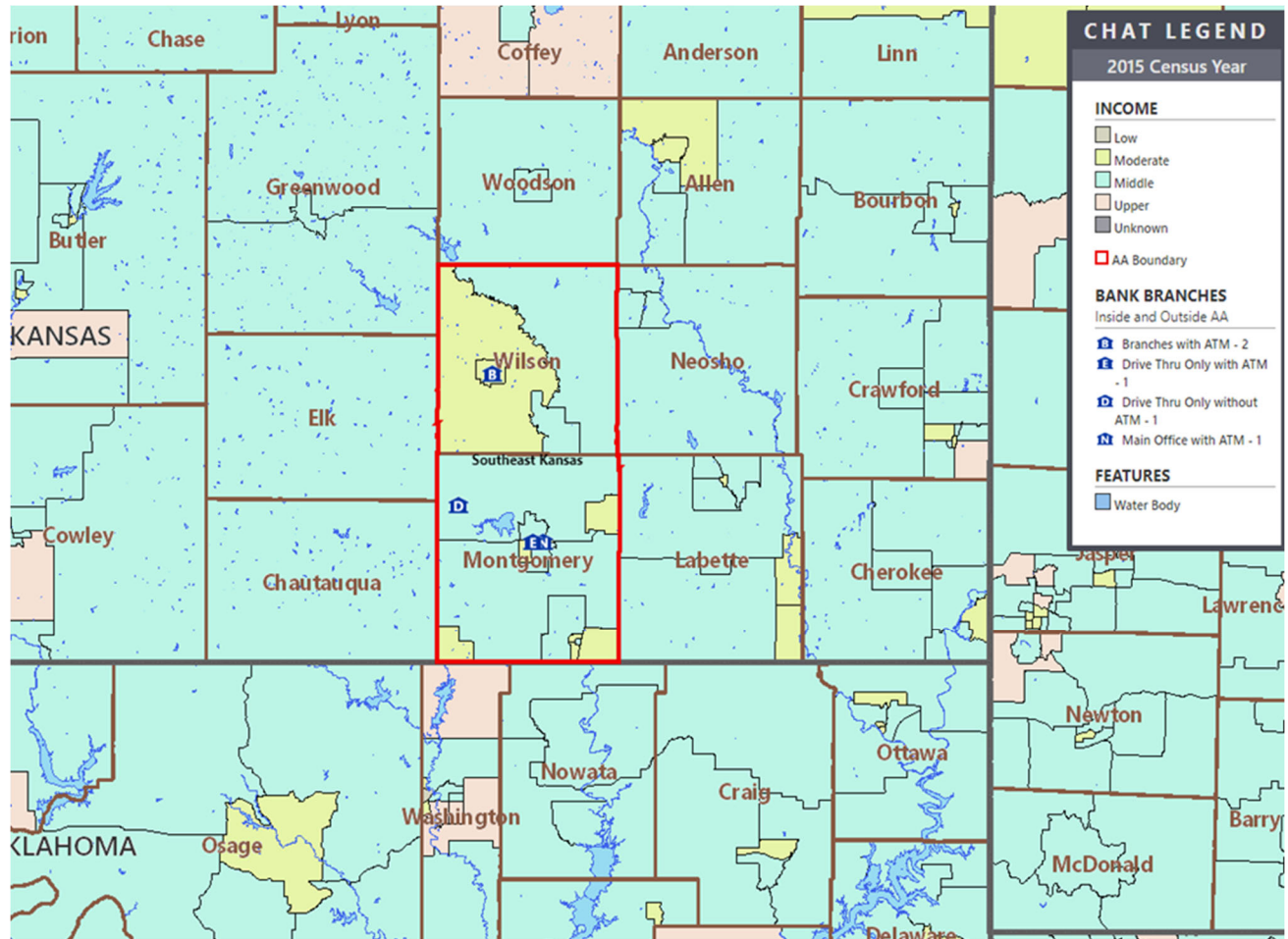
The Southeast Kansas Assessment Areas includes Montgomery and Wilson Counties in their entirety. **Following is a listing of 2023 census tracts within each county:**

**Montgomery County**

9501.00	9502.00	9503.00	9504.00	9505.00	9506.00
9507.00	9508.00	9510.00	9511.00	9511.00	9513.00
9514.00					

**Wilson County**

0971.00	0972.00	0973.00	0974.00		
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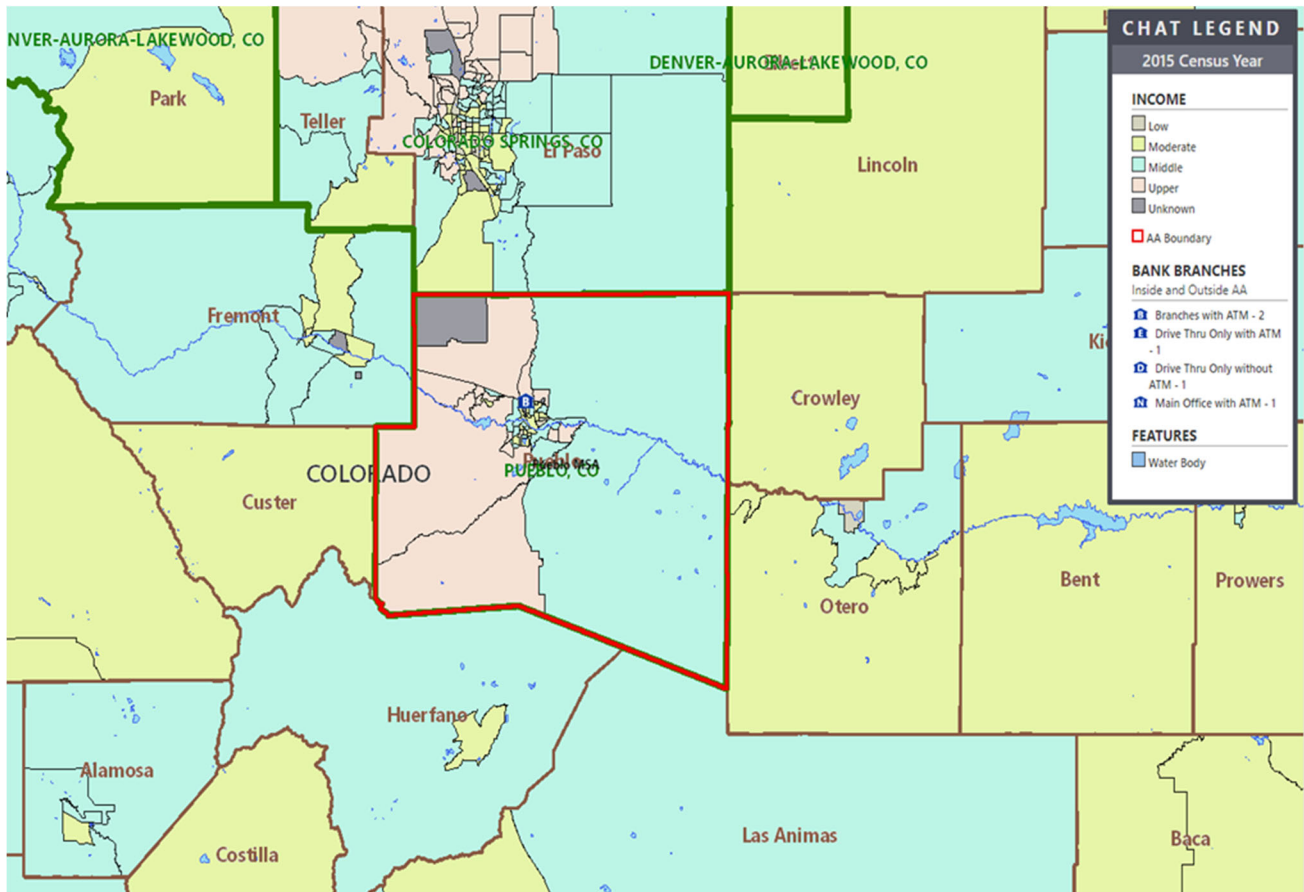


## Pueblo MSA Assessment Area

The Pueblo MSA Assessment Area includes the entire Pueblo County. **Following is a listing of 2023 census tracts within Pueblo County:**

### Pueblo County

0001.00	0002.00	0003.00	0004.00	0005.00	0006.00
0008.00	0009.02	0009.03	0009.04	0009.05	0010.00
0011.00	0012.00	0014.00	0015.00	0016.00	0017.00
0018.00	0019.00	0020.00	0021.00	0022.00	0023.00
0024.00	0025.00	0026.00	0027.00	0028.01	0028.02
0028.04	0028.06	0028.07	0028.08	0029.01	0029.06
0029.11	0029.12	0029.13	0029.14	0029.15	0029.16
0029.17	0029.18	0029.20	0029.21	0029.22	0029.23
0030.01	0030.04	0031.03	0031.04	0031.05	0031.06
0032.00	0035.00	0036.00	9801.00		



## Exhibit “B”

### COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Federal Reserve Board (Board) evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Board also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA performance evaluation, prepared by the Federal Reserve Bank of Kansas City (Reserve Bank); and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Federal Reserve System publishes a list of the banks that are scheduled for CRA examination by the Reserve Bank in that quarter. This list is available from Consumer Affairs Officer, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198. You may send written comments about our performance in helping to meet community credit needs to President Brad Oakes, 113 North Penn, PO Box 868, Independence, KS 67301 and Consumer Affairs Officer, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198. Your letter, together with any response by us, will be considered by the Federal Reserve System in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Reserve Bank. You may also request from the Reserve Bank an announcement of our applications covered by the CRA filed with the Reserve Bank. We are an affiliate of FNB Bancshares, Inc., a bank holding company. You may request from Consumer Affairs Officer, Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, MO 64198 an announcement of applications covered by the CRA filed by bank holding companies.





## COMMUNITY REINVESTMENT ACT NOTICE

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Beginning March 31, 1998, any person may obtain an annual disclosure statement from this bank. The annual disclosure statement consists of financial data for the previous two year-ends and other information as required by the Federal Reserve System and otherwise offered by this bank.

The first copy of the annual disclosure statement will be provided free of charge to each person requesting such a statement. There will be a fee for each additional copy.

Requests for the annual disclosure statement may be made by calling Shanda Chambers, SVP Operations/Cashier, at 620-331-2265 or by writing to the following address:

FirstOak Bank  
Attn: Shanda Chambers  
PO Box 868  
Independence, KS 67301

This notice given pursuant to 12 C.F.R. Part 18





## **FUNDS AVAILABILITY POLICY**

Our general policy is to allow you to withdraw funds deposited in your account on the first business day after the day we receive your deposit. Funds from electronic direct deposits will be available on the day we receive the deposit. In some cases, we may delay your ability to withdraw funds beyond the first business day. Then, the funds will generally be available by the fourth (4<sup>th</sup>) business day after the day of deposit.



## Consumer Comments

March 31, 2024

FirstOak Bank has received no written public comments regarding this institution's performance in helping meet the community credit needs during the prior two (2) years.

Respectfully submitted,

Christi Kuehn-Culver  
Compliance Officer

**FirstOak Bank**  
CRA Rating Matrix

Characteristic	Outstanding	Satisfactory	Needs to Improve	Substantial Noncompliance
Loan-to-Deposit Ratio	The loan-to-deposit ratio is more than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is less than reasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.	The loan-to-deposit ratio is unreasonable (considering seasonal variations and taking into account lending related activities) given the institution's size, financial condition, and assessment area credit needs.
Assessment area concentration	A substantial majority of loans and other lending related activities are in the institution's assessment area(s).	A majority of loans and other lending related activities are in the institution's assessment area(s).	A majority of loans and other lending related activities are outside the institution's assessment area(s).	A substantial majority of loans and other lending related activities are outside the institution's assessment area(s).
Geographic distribution of loans	The geographic distribution of loans reflects excellent dispersion throughout the assessment area(s).	The geographic distribution of loans reflects reasonable dispersion throughout the assessment area(s).	The geographic distribution of loans reflects poor dispersion throughout the assessment area(s).	The geographic distribution of loans reflects very poor dispersion throughout the assessment area(s).
Borrower's profile	The distribution of borrowers reflects, given the demographics of the assessment area(s), excellent penetration among individuals of different income levels (including low- and moderate- income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), reasonable penetration among individuals of different income levels (including low- and moderate- income) and businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), poor penetration among individuals of different income levels (including low- and moderate- income) businesses of different sizes.	The distribution of borrowers reflects, given the demographics of the assessment area(s), very poor penetration among individuals of different income levels (including low- and moderate- income) and businesses of different sizes.

**FirstOak Bank**  
CRA Rating Matrix

Characteristic	Outstanding	Satisfactory	Needs to Improve	Substantial Noncompliance
Response to substantiated complaints	The institution has taken noteworthy, creative action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution has taken appropriate action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution has taken inadequate action in response to substantiated complaints about its performance in meeting assessment area credit needs.	The institution is unresponsive to substantiated complaints about its performance in meeting the assessment area credit needs.
Investments	The institution's investment record enhances credit availability in its assessment area.	N/A	N/A	N/A
Services	The institution's record of providing branches, ATMs, loan production offices, and/or other services and delivery systems enhances credit availability in its assessments area(s).	N/A	N/A	N/A

<b>OVERALL RISK ASSESSMENT RATING</b>
CRA Risk for FirstOak Bank is Satisfactory
<b>CONCLUSION</b>
Overall the bank should be classified as Satisfactory.



## **PUBLIC DISCLOSURE**

January 9, 2023

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

FirstOak Bank  
RSSD# 916857

113 North Penn Street  
Independence, Kansas 67301

Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Missouri 64198

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

FirstOak Bank (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is more than reasonable given the bank's size, financial condition, and assessment areas' (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Additionally, for home mortgage lending, emphasis was placed on the bank's performance in comparison to aggregate lending data (aggregate lending) rather than in comparison to respective demographic figures, as aggregate lending is considered representative of credit demand. Further, for commercial lending, available aggregate data for the most recent three years (2018, 2019, and 2020) was referenced for additional perspective on credit demand within the bank's AAs. Lending performance was assessed within the bank's two AAs, which include the Southeast Kansas AA in the state of Kansas and the Pueblo Metropolitan Statistical Area (MSA) AA in Colorado. Both AAs were assessed using a full scope review. Examiners reviewed the following data:

- The bank's 20-quarter average NLTD ratio;
- A statistical sample of 46 small business loans selected from a universe of 59 loans originated between January 1, 2021 and December 31, 2021; and,
- The universe of 179 home mortgage loans reported on the bank's Home Mortgage Disclosure Act (HMDA) Loan/Application Registers originated between January 1, 2020 and December 31, 2021.

In determining the overall institution rating, the bank's lending performance in the state of Kansas carried the greatest weight given the higher volume of reported loans and deposits, greater market share, and number of branch locations in the state. Specific to

the lending analysis, more emphasis was placed on small business lending given the bank is primarily a commercial lender.

**DESCRIPTION OF INSTITUTION**

FirstOak Bank is a community bank headquartered in Independence, Kansas. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of FNB Bancshares, Inc., also located in Independence, Kansas.
- The bank has total assets of \$232.0 million as of September 30, 2022.
- The bank acquired The State Bank of Kansas effective May 4, 2018, which added the branch located in Fredonia, Kansas, and approximately \$63 million in assets.
- In addition to the main office in Independence, Kansas, the bank operates one full-service branch in Pueblo, Colorado and one full-service branch in Fredonia, Kansas. The bank also operates a drive-up facility in Independence, Kansas and a limited-service branch in Elk City, Kansas, in addition to a loan production office (LPO) in Nashville, Tennessee.
- The bank operates four cash-only automated teller machines, one at each location except in Elk City, Kansas.
- As shown in Table 1, the bank’s primary business focus is commercial lending followed by residential real estate lending.

**Table 1**

<b>Composition of Loan Portfolio as of September 30, 2022</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	20,908	11.3
Farmland	21,141	11.4
1-to 4-Family Residential Real Estate	64,265	34.8
Multifamily Residential Real Estate	912	0.5
Non-Farm Non-Residential Real Estate	49,108	26.6
Agricultural	5,532	3.0
Commercial and Industrial	19,482	10.5
Consumer	3,081	1.7
Other	274	0.1
<b>Gross Loans</b>	<b>184,703</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		



The bank was rated Satisfactory under the CRA at its May 7, 2018 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA<sup>1</sup>**

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of the bank's performance in the states of Kansas and Colorado, including the one AA located in each of the states.

The bank's overall lending test performance is Satisfactory. This is based on a reasonable NLTD ratio, a majority of loans originated within the bank's AAs, a reasonable geographic distribution, and a reasonable borrower distribution of loans within both bank AAs. As noted, the state of Kansas was given more weight in the analysis, as was small business lending.

**Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison, to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, location, and loan portfolio composition. The bank's NLTD ratio of 82.9 percent is above the range of the four similarly situated banks and is considered more than reasonable.

**Table 2**

<b>Comparative NLTD Ratios December 31, 2017 – September 30, 2022</b>			
<b>Institution</b>	<b>Location</b>	<b>Asset Size \$(000)</b>	<b>NLTD Ratio (%)</b>
			<b>20 Quarter Average</b>
<b>FirstOak Bank</b>	Independence, Kansas	232,025	82.9
<b>Similarly Situated Institutions</b>			
<b>Kansas State Bank</b>	Ottawa, Kansas	172,114	45.4
<b>Kanza Bank</b>	Kingman, Kansas	278,627	74.1
<b>ESB Financial</b>	Emporia, Kansas	351,331	69.6
<b>First National Bank, Cortez</b>	Cortez, Colorado	139,953	61.9

<sup>1</sup> The NLTD and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to states, multistate metropolitan areas, and AAs.

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a majority of loans inside the AAs by number, but outside the AAs by dollar. An additional review of the bank’s total home mortgage and small business loans showed that 22 of the 225 loans, totaling \$9.7 million, were loans originated at the bank’s LPO located in Nashville, Tennessee, and outside of the bank’s designated AAs. The \$9.7 million represents 29.9 percent of the bank’s total loan amount originated outside of the bank’s designated AAs, and 18.5 percent of the bank’s total loan amount originated over the 2020-2021 review period.

**Table 3**

<b>Lending Inside and Outside the Assessment Areas</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>
Home Purchase - Conventional	23	46.0	2,202	16.2	27	54.0	11,428	83.8
Home Improvement	4	57.1	604	43.7	3	42.9	779	56.3
Other Purpose Closed-End	1	33.3	407	44.6	2	66.7	505	55.4
Refinancing	83	69.7	13,148	43.8	36	30.3	16,876	56.2
<b>Total HMDA related</b>	<b>111</b>	<b>62.0</b>	<b>16,361</b>	<b>35.6</b>	<b>68</b>	<b>38.0</b>	<b>29,588</b>	<b>64.4</b>
<b>Small Business</b>	<b>39</b>	<b>84.8</b>	<b>3,820</b>	<b>56.3</b>	<b>7</b>	<b>15.2</b>	<b>2,965</b>	<b>43.7</b>
<b>Total Loans</b>	<b>150</b>	<b>66.7</b>	<b>20,181</b>	<b>38.3</b>	<b>75</b>	<b>33.3</b>	<b>32,553</b>	<b>61.7</b>

*Note: Percentages may not total 100.0 percent due to rounding.*

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. The state ratings for Kansas and Colorado are consistent with the overall rating, and there were no material differences between the conclusions of each AA.

**Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending has an overall reasonable distribution among individuals of different income levels and businesses of different sizes. The state ratings for Kansas and Colorado are consistent with the overall rating, and there were no material differences between the conclusions of each AA.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**STATE OF KANSAS  
SOUTHEAST KANSAS ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Full Scope Review)**

**COMMUNITY INVESTMENT ACT RATING FOR KANSAS: Satisfactory**

This rating is based on the following conclusions with respect to the performance criteria:

- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.

**SCOPE OF EXAMINATION**

The scope of review for the state of Kansas was consistent with the overall scope for the institution. A full-scope review was conducted for the Southeast Kansas AA, which is the bank's only AA in the state and was evaluated concurrently with its overall state performance. The State of Kansas analysis included an evaluation of 31 small business loans and 82 home mortgage loans originated inside the Southeast Kansas AA.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KANSAS/SOUTHEAST KANSAS AA**

The bank's Southeast Kansas AA consists of Montgomery and Wilson counties in their entirety (see Appendix B for an AA map and Appendix C for additional demographic data).

- The bank's AA has changed since the previous examination. The previous AA in Kansas, which included Montgomery County only, was expanded to include Wilson County and renamed the Southeast Kansas AA with the acquisition of The State Bank of Kansas, Fredonia, Kansas, effective May 4, 2018.
- In addition to its main office in Independence, Kansas, the bank operates one full-service branch in Fredonia, Kansas, one drive-up facility in Independence, Kansas, and a limited-service location in Elk City, Kansas.
- The AA is comprised of nine moderate- and eight middle-income census tracts. At the previous evaluation on May 7, 2018, the AA had one low-, one moderate-, ten middle-, and one upper-income census tracts.
- According to the June 30, 2022 FDIC Market Share Report, the bank's deposit market share was 12.6 percent for the Southeast Kansas AA, which ranked 3rd out of the 9 FDIC-insured institutions operating in the AA.

- To further augment the CRA evaluation, an interview with a member of the community within the bank’s AA was conducted to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The community member represented an organization focused on economic development.

**Table 4**

<b>Population Change</b>			
<b>Assessment Area: Southeast Kansas</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Southeast Kansas	44,880	43,245	(3.6)
Montgomery County, Kansas	35,471	34,184	(3.6)
Wilson County, Kansas	9,409	9,061	(3.7)
NonMSA Kansas	929,981	922,403	(0.8)
Kansas	2,853,118	2,892,987	1.4

*Source: 2010 U.S. Census Bureau Decennial Census  
2011 – 2015 U.S. Census Bureau: American Community Survey*

- At 18.4 percent, the proportion of the AA population age 65 and older is greater than the statewide figure of 14.0 percent and other non-metropolitan areas (NonMSAs) in Kansas at 17.1 percent. Further, a community member acknowledged the AA’s aging population and decline in population overall as it pertains to Montgomery County, Kansas.

**Table 5**

<b>Median Family Income Change</b>			
<b>Assessment Area: Southeast Kansas</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Southeast Kansas	54,910	49,803	(9.3)
Montgomery County, Kansas	55,824	50,042	(10.4)
Wilson County, Kansas	52,495	49,007	(6.6)
NonMSA Kansas	57,322	57,229	(0.2)
Kansas	67,977	66,389	(2.3)

*Source: 2006 - 2010 U.S. Census Bureau: American Community Survey  
2011 - 2015 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- The AA contains a concentration of families below the poverty level at 13.1 percent, which is above both the statewide figure of 9.1 percent and the non-metropolitan figure of 10.2 percent.

**Table 6**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Southeast Kansas</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Southeast Kansas	66.2	31.3	36.1	57.4	24.5	15.7
Montgomery County, Kansas	66.5	28.0	35.4	56.8	26.5	16.2
Wilson County, Kansas	64.8	43.6	38.9	59.6	18.2	14.0
NonMSA Kansas	67.5	29.3	34.1	56.8	24.9	15.6
Kansas	74.7	35.9	38.8	61.9	29.8	16.3

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy*

- The median housing value in the AA, at \$68,580, is below the statewide figure of \$132,000 and the nonmetropolitan figure of \$88,625.
- The AA median gross rent of \$618 is below the statewide figure of \$757 and the nonmetropolitan figure of \$623.

**Table 7**

<b>Unemployment Rates</b>					
<b>Assessment Area: Southeast Kansas</b>					
<b>Region</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Southeast Kansas	5.1	4.2	4.0	7.2	3.9
Montgomery County, Kansas	5.2	4.2	4.0	7.1	3.9
Wilson County, Kansas	4.7	4.2	3.9	7.6	4.0
NonMSA Kansas	3.5	3.1	3.0	4.4	2.7
Kansas	3.6	3.3	3.1	5.7	3.2

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- The major industries operating in the AA include manufacturing, health care and social assistance, retail trade, and educational services.
- A community member indicated the largest employers in the AA include Coffeyville Resources, Bartlett’s Soybean Crushing Plant, FedEx, Precision Railway Equipment Company, and the Loren Cook Manufacturing Company.

**Table 8**

<b>Small Business Loan Trends</b>					
<b>Assessment Area: Southeast Kansas</b>					
<b>Area</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Southeast Kansas	285	291	271	305	257
Montgomery County, Kansas	221	228	208	220	208
Wilson County, Kansas	64	63	63	85	49
NonMSA Kansas	8,330	8,291	8,875	9,619	9,303
Kansas	37,560	38,677	40,252	43,504	49,225

*Source: FFIEC CRA Aggregate Data*

- As indicated in Table 8, lending to small businesses within the Southeast Kansas AA decreased 9.8 percent between 2016 and 2020. This figure is in contrast to the increasing statewide and nonmetropolitan figures of 31.1 percent and 11.7 percent, respectively, over the same period.

**Table 9**

<b>Home Mortgage Loan Trends</b>			
<b>Assessment Area: Southeast Kansas</b>			
<b>Area</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Southeast Kansas	483	458	588
Montgomery County, Kansas	419	382	490
Wilson County, Kansas	64	76	98
NonMSA Kansas	9,653	10,605	14,401
Kansas	53,329	62,378	99,184

*Source: FFIEC Home Mortgage Disclosure Act Aggregate Data*

- Table 9 reflects an increase in home mortgage lending demand at 21.7 percent for the Southeast Kansas AA between 2018 and 2020. This figure is below the statewide and nonmetropolitan figures of 86.0 percent and 49.2 percent, respectively, over the same period.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN  
KANSAS/SOUTHEAST KANSAS AA**

The bank's performance under the lending test in the Southeast Kansas AA is reasonable, and the state of Kansas is rated Satisfactory. This is based on reasonable small business and home mortgage loan penetration among geographies of different income levels, reasonable levels of lending to borrowers of different income levels, and reasonable levels of lending to businesses of different revenue sizes.

**Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA given relevant performance context. As referenced, there are no low-income census tracts in the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of 2021 home mortgage lending in the moderate-income census tracts was comparable to aggregate lending by number and dollar volume, and comparable to the demographic figure.

The bank's lending performance for 2020 was below 2021 performance levels. However, greater weight was placed on the bank's 2021 performance based on higher lending volume in 2021, which contributed to the overall reasonable rating. Consideration was also given to the early and dramatic impacts resulting from the initial onset of the Corona Virus Disease Pandemic (pandemic) in 2020.

An evaluation of the bank's dispersion of home mortgage lending revealed no material gaps or lapses throughout the AA.

**Table 10**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Southeast Kansas													
Geographic Income Level	Bank And Aggregate Loans By Year												
	2020						2021						Owner Occupied Units %
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Moderate	5	13.9	30.8	320	7.4	24.2	13	28.3	35.7	1,280	21.8	28.8	38.7
Middle	31	86.1	69.2	3,992	92.6	75.8	33	71.7	64.3	4,583	78.2	71.2	61.3
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>4,312</b>	<b>100.0</b>	<b>100.0</b>	<b>46</b>	<b>100.0</b>	<b>100.0</b>	<b>5,863</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of 2021 small business lending in the moderate-income census tracts was below the



demographic figure. According to the June 30, 2022 Deposit Market Share Report, there are 8 additional FDIC-insured institutions operating out of 18 offices located within the AA, one of which is a large institution with a regional branch network that operates 7 of those 18 offices. An additional analysis also determined there are five National Credit Union Administration-regulated credit unions also operating within the bank’s AA.

Furthermore, information obtained from a community member indicated that the general economic conditions of Montgomery County has declined since the start of the pandemic, noting that business closings have increased, especially in the retail and restaurant sector, which is further supported by the decrease in small business loan demand illustrated in Table 8.

When factoring in the level of competition along with performance context provided by a community member, the bank’s level of penetration in moderate-income census tracts is reasonable.

Lastly, an evaluation of the bank’s dispersion of small business lending revealed some gaps; however, this did not impact the overall conclusion.

**Table 11**

<b>Distribution of 2021 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Southeast Kansas</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Low</b>	0	0.0	0	0.0	0.0
<b>Moderate</b>	11	35.5	1,197	42.9	54.2
<b>Middle</b>	20	64.5	1,594	57.1	45.8
<b>Upper</b>	0	0.0	0	0.0	0.0
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	0.0
<b>Total</b>	31	100.0	2,790	100.0	100.0

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. In 2021, the bank's home mortgage lending to both low- and moderate-income borrowers was below aggregate and demographic figures. The bank's total home mortgage lending in 2020 was above the performance in 2021.

Approximately 66.2 percent of low-income renters in the Southeast Kansas AA are cost burdened, which indicates an income constraint for those individuals trying to accumulate a down payment for a mortgage loan. Additionally, information obtained from a community member acknowledged that inventories of affordable housing in Montgomery County are low, especially for LMI families, which would represent a barrier for LMI borrowers to successfully obtain housing in the AA.

Further supporting the reasonable rating is the bank's participation in a loan referral program with Mortgage Investment Services Corporation (MISC) that resulted in nine home mortgage originations to LMI borrowers located in the bank's Southeast Kansas AA during the 2020 and 2021 review periods. This unique referral-based lending program helps borrowers that would not typically qualify for the bank's more conservative home mortgage lending products to potentially obtain a loan from MISC. Based on this additional supporting information, the borrower distribution of home mortgage lending is considered reasonable.

**Table 12**

<b>Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Southeast Kansas</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2020</b>						<b>2021</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	2	5.6	12.6	59	1.4	7.0	2	4.3	9.8	81	1.4	5.2	22.7
<b>Moderate</b>	6	16.7	19.2	428	9.9	15.4	5	10.9	17.7	365	6.2	14.0	21.9
<b>Middle</b>	5	13.9	18.1	434	10.1	18.3	14	30.4	20.7	1,220	20.8	19.5	22.6
<b>Upper</b>	22	61.1	26.7	3,292	76.3	36.4	25	54.3	29.1	4,197	71.6	39.6	32.8
<b>Unknown</b>	1	2.8	23.4	99	2.3	22.8	0	0.0	22.7	0	0.0	21.6	0.0
<b>Total</b>	36	100.0	100.0	4,312	100.0	100.0	46	100.0	100.0	5,863	100.0	100.0	100.0

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.  
Multifamily loans are not included in the borrower distribution analysis.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with revenues of \$1 million or less is comparable to the demographic figure, which represents the percentage of small businesses in the AA.

A review of the 3-year average aggregate lending reported by all CRA reporters in the bank's AA revealed that 39.2 percent of loans by number and 30.9 percent by dollar were made to small businesses with revenues of \$1 million or less. This aggregate lending was considered as additional context in understanding credit demand by size of businesses in the AA, which further supports the bank's reasonable small business lending performance.

**Table 13**

<b>Distribution of 2021 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Southeast Kansas</b>					
	<b>Bank Loans</b>				<b>Total Businesses</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	23	74.2	2,055	73.7	89.8
<b>Over \$1 Million</b>	3	9.7	623	22.3	8.7
<b>Revenue Unknown</b>	5	16.1	113	4.1	1.5
<b>Total</b>	31	100.0	2,790	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	24	77.4	874	31.3	
<b>\$100,001 - \$250,000</b>	2	6.5	379	13.6	
<b>\$250,001 - \$1 Million</b>	5	16.1	1,538	55.1	
<b>Total</b>	31	100.0	2,790	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	17	73.9	561	27.3	
<b>\$100,001 - \$250,000</b>	2	8.7	379	18.4	
<b>\$250,001 - \$1 Million</b>	4	17.4	1,115	54.3	
<b>Total</b>	23	100.0	2,055	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**STATE OF COLORADO  
PUEBLO MSA ASSESSMENT AREA  
METROPOLITAN AREA  
(Full Scope Review)**

**COMMUNITY INVESTMENT ACT RATING FOR COLORADO: Satisfactory**

This rating is based on the following conclusions with respect to the performance criteria:

- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.

**SCOPE OF EXAMINATION**

The scope of review for the state of Colorado was consistent with the overall scope for the institution. A full-scope review was conducted for the Pueblo MSA AA, which is the bank's only AA in the state and was evaluated concurrently with its overall state performance. The State of Colorado analysis included an evaluation of 8 small business loans and 29 home mortgage loans originated inside the Pueblo MSA AA.

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO/PUEBLO MSA AA**

The bank's Pueblo MSA AA consists of the entire Pueblo, Colorado MSA, which is comprised of Pueblo County in its entirety (see Appendix B for an AA map and Appendix C for additional demographic data).

- The bank's AA has not changed since the previous examination.
- The bank operates one full-service branch in Pueblo, Colorado.
- The AA is comprised of 3 low-, 16 moderate-, 18 middle-, 15 upper-, and 3 unknown-income census tracts. At the previous evaluation on May 7, 2018, the AA was comprised of 4 low-, 16 moderate-, 17 middle-, 15 upper-, and 3 unknown-income census tracts.
- According to the June 30, 2022 FDIC Market Share Report, the bank's deposit market share was 3.5 percent for the Pueblo, Colorado MSA AA, which ranked 9<sup>th</sup> out of the 14 FDIC-insured institutions operating in the county.
- An interview with a community member within the bank's AA was conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an area economic development organization.

**Table 14**

<b>Population Change</b>			
<b>Assessment Area: Pueblo MSA</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Pueblo MSA	159,063	161,519	1.5
Colorado	5,029,196	5,278,906	5.0

*Source: 2010 U.S. Census Bureau Decennial Census  
2011 – 2015 U.S. Census Bureau: American Community Survey*

- At 16.5 percent, the proportion of the AA population age 65 and older is greater than the statewide figure of 12.2 percent. This figure was further supported when a community member acknowledged that Pueblo County’s residents consist of a significantly older population.

**Table 15**

<b>Median Family Income Change</b>			
<b>Assessment Area: Pueblo MSA</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Pueblo MSA	54,995	51,986	(5.5)
Colorado	76,277	74,826	(1.9)

*Source: 2006 – 2010 U.S. Census Bureau: American Community Survey  
2011 – 2015 U.S. Census Bureau: American Community Survey*  
*Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- The AA contains a concentration of families below the poverty level at 15.1 percent, which is above the statewide figure of 8.5 percent.

**Table 16**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Pueblo MSA</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Pueblo MSA	74.4	46.2	49.2	61.9	42.0	22.2
Colorado	80.3	56.4	46.4	65.8	43.6	21.5

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy*

- The median housing value in the AA at \$138,626 is below the statewide figure of \$247,800.
- The AA median gross rent of \$774 is below the statewide figure of \$1,002.

**Table 17**

<b>Unemployment Rates</b>					
<b>Assessment Area: Pueblo MSA</b>					
<b>Region</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Pueblo MSA	4.0	4.5	3.9	7.8	7.9
Colorado	2.6	3.0	2.6	6.9	5.4

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- The major industries operating in the AA include health care & social assistance, retail trade, and educational services.
- A community member indicated the largest employers in the AA include CS Wind, the Convergys Corporation, Target Distribution Center, EVRAZ steel mill, and Atlas Pacific Engineering.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN COLORADO/PUEBLO MSA AA**

The bank’s performance under the lending test in the Pueblo MSA AA is reasonable and the state of Colorado is rated Satisfactory. This is based on reasonable small business and home mortgage loan penetrations among geographies of different income levels, reasonable levels of lending to borrowers of different income levels, and reasonable levels of lending to businesses of different revenue sizes.

**Geographic Distribution of Loans**

The bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of 2021 home mortgage lending in low-income census tracts was comparable to aggregate lending by number and dollar volume, and to the demographic figure. The distribution of 2021 home mortgage lending in moderate-income census tracts was comparable to aggregate lending by number, below by dollar volume, and comparable to the demographic figure.

The bank’s lending performance for 2020 was below 2021 performance levels. However, greater weight was placed on the bank’s 2021 performance based on higher lending volume in 2021, which contributed to the overall reasonable rating. Consideration was also given to the early and dramatic impacts resulting from the initial onset of the pandemic in 2020.

An evaluation of the bank’s dispersion of home mortgage lending revealed significant gaps, including in LMI tracts. However, when considering the relatively low numbers of bank loans originated in an AA comprised of 55 census tracts in total, including 19 LMI census tracts, the lending dispersion did not impact the overall conclusion.

**Table 18**

<b>Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Pueblo MSA</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>											<b>Owner Occupied Units %</b>	
	<b>2020</b>						<b>2021</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>		<b>\$%</b>
<b>Low</b>	0	0.0	2.0	0	0.0	1.5	0	0.0	2.6	0	0.0	1.7	3.5
<b>Moderate</b>	1	8.3	17.8	124	4.9	13.0	4	23.5	21.3	300	8.2	16.0	23.6
<b>Middle</b>	2	16.7	24.6	153	6.1	20.5	6	35.3	24.5	1,974	53.8	21.4	30.7
<b>Upper</b>	9	75.0	55.6	2,240	89.0	65.1	7	41.2	51.7	1,395	38.0	60.9	42.2
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	12	100.0	100.0	2,517	100.0	100.0	17	100.0	100.0	3,669	100.0	100.0	100.0

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Small Business Lending**

The geographic distribution of small business lending is reasonable. The distribution of 2021 small business lending in low-income census tracts was above the demographic figure. Comparatively, lending in the moderate-income census tracts was below the demographic figure.

While the bank does not report CRA data, a review of the 3-year average aggregate lending (2018 - 2020) reported by all CRA-reporters in the AA revealed that 2.6 percent of loans by number and 3.2 percent by dollar were made in low-income census tracts, while loans at 22.4 percent by number and 20.9 percent by dollar were made in moderate-income census tracts to small businesses. Aggregate CRA data is not used as a direct comparator for performance; however, it reflects small business loan demand in the area, which further supports the bank’s reasonable small business lending performance. As such, when evaluating the bank’s combined lending performance within LMI census tracts, the bank’s performance is considered reasonable.

Lastly, an evaluation of the bank’s dispersion of small business lending revealed significant gaps. However, when considering the low number of bank loans originated in

an AA comprised of 55 census tracts in total, including 19 LMI census tracts, this did not impact the overall conclusion.

**Table 19**

<b>Distribution of 2021 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Pueblo MSA</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
Low	1	12.5	80	7.8	3.2
Moderate	1	12.5	250	24.3	28.4
Middle	4	50.0	481	46.7	30.0
Upper	2	25.0	218	21.2	38.0
Unknown	0	0.0	0	0.0	0.4
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>1,029</b>	<b>100.0</b>	<b>100.0</b>

*Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey*

*Note: Percentages may not total 100.0 percent due to rounding.*

**Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. In 2021, the bank’s home mortgage lending to low-income borrowers was comparable to aggregate lending but below the demographic figure. Lending to moderate-income borrowers was comparable to both aggregate lending and the demographic figure. The bank’s total home mortgage lending in 2020 was comparable to the overall performance in 2021.

Information obtained from a community member acknowledged there is a significant shortage of homes and rental properties affordable for LMI individuals in the area. The community member referenced a recent housing study conducted in 2021 by the City of Pueblo’s Housing and Citizen Services which indicated that the “for-sale” housing market in Pueblo County is operating on less than one month’s supply, with an average loan price exceeding \$300,000.



**Table 20**

<b>Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Pueblo MSA</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2020</b>						<b>2021</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	0	0.0	5.2	0	0.0	2.9	1	5.9	5.0	199	5.4	2.6	22.6
<b>Moderate</b>	2	16.7	14.7	252	10.0	11.0	3	17.6	16.3	311	8.5	12.0	17.6
<b>Middle</b>	0	0.0	23.8	0	0.0	22.6	2	11.8	23.5	235	6.4	22.6	18.7
<b>Upper</b>	8	66.7	36.2	1,941	77.1	41.2	7	41.2	38.0	2,654	72.3	43.9	41.1
<b>Unknown</b>	2	16.7	20.2	324	12.9	22.3	4	23.5	17.2	270	7.4	19.0	0.0
<b>Total</b>	12	100.0	100.0	2,517	100.0	100.0	17	100.0	100.0	3,669	100.0	100.0	100.0

*Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey*

*Note: Percentages may not total 100.0 percent due to rounding.  
Multifamily loans are not included in the borrower distribution analysis.*

**Small Business Lending**

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with revenues of \$1 million or less is comparable to the demographic figure, which represents the percentage of small businesses in the AA.

A review of the 3-year aggregate lending reported by CRA reporters in the bank’s AA revealed that 45.7 percent of loans by number and 36.1 percent by dollar were made to small businesses with revenues of \$1 million or less. This aggregate lending was considered as additional context in understanding credit demand by size of businesses in the AA, which further supports the bank’s reasonable small business lending performance.

**Table 21**

<b>Distribution of 2021 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Pueblo MSA</b>					
	<b>Bank Loans</b>				<b>Total Businesses</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	6	75.0	653	63.5	93.9
<b>Over \$1 Million</b>	2	25.0	376	36.5	5.5
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.6
<b>Total</b>	8	100.0	1,029	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	5	62.5	295	28.7	
<b>\$100,001 - \$250,000</b>	2	25.0	418	40.6	
<b>\$250,001 - \$1 Million</b>	1	12.5	316	30.7	
<b>Total</b>	8	100.0	1,029	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	4	66.7	235	36.0	
<b>\$100,001 - \$250,000</b>	2	33.3	418	64.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	6	100.0	653	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

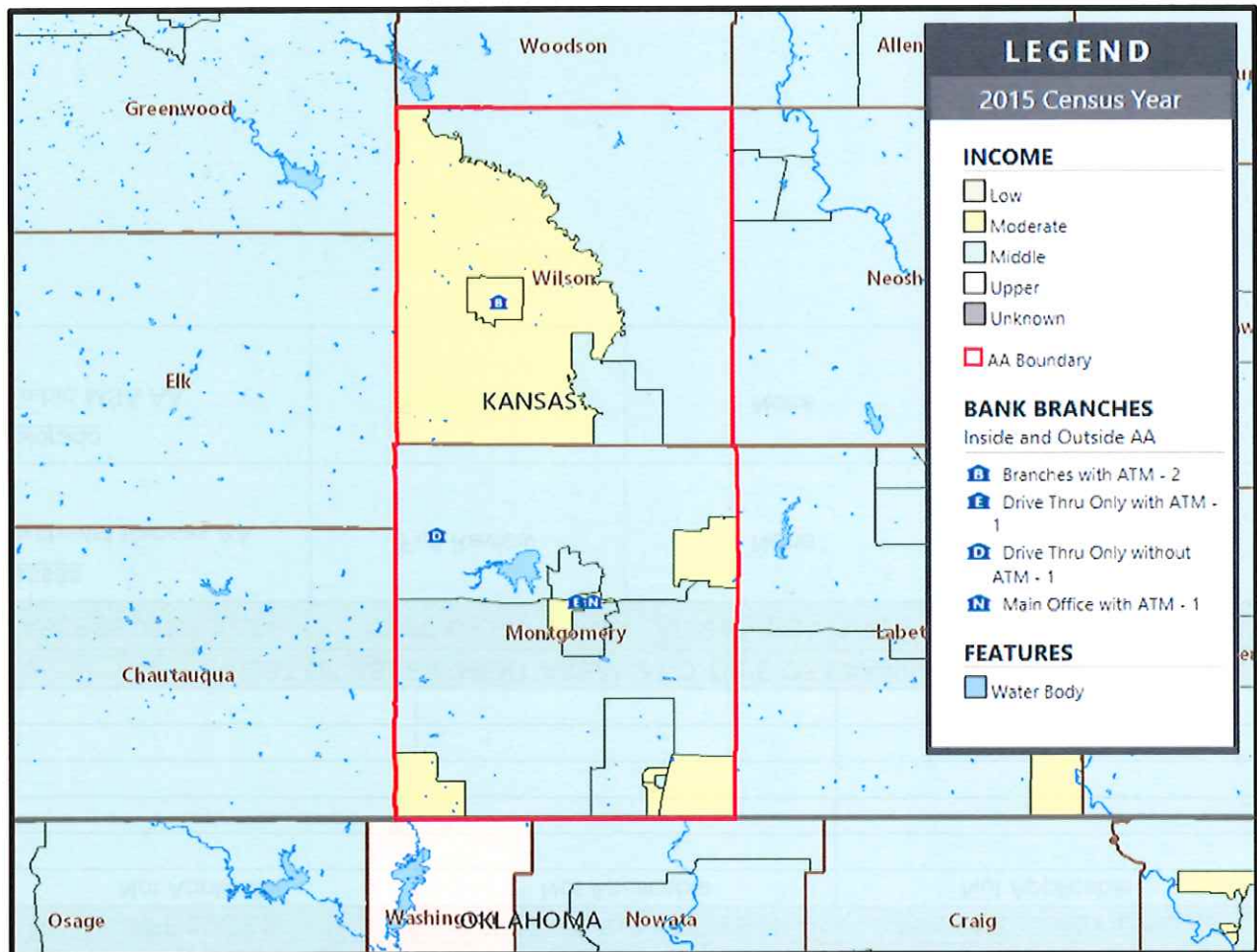
**APPENDIX A – SCOPE OF EXAMINATION TABLE**

**Table A-1**

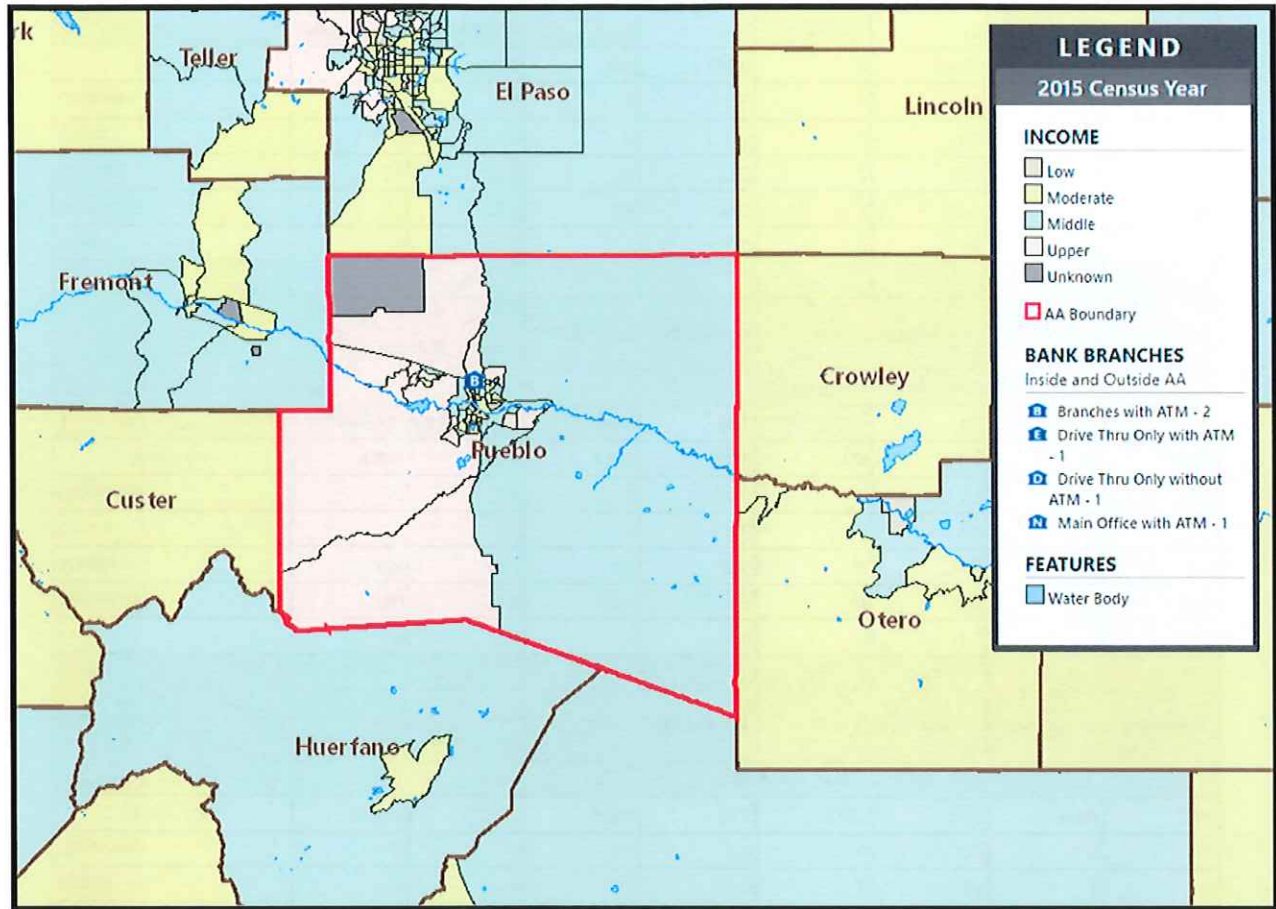
<b>SCOPE OF EXAMINATION</b>			
<b>FINANCIAL INSTITUTION</b>		<b>PRODUCTS/SERVICES REVIEWED</b>	
FirstOak Bank Independence, Kansas		<ul style="list-style-type: none"> <li>• Small Business</li> <li>• HMDA Loans</li> </ul>	
<b>TIME PERIODS REVIEWED</b>			
<u>Small Business:</u>		January 1, 2021 – December 31, 2021	
<u>HMDA Loans:</u>		January 1, 2020 – December 31, 2021	
<b>LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION</b>			
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
Not Applicable	Not Applicable	Not Applicable	
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
ASSESSMENT AREA	TYPE OF EXAM	BRANCHES VISITED	OTHER INFORMATION
<u>Kansas</u> Southeast Kansas AA	Full Review	None	1 community contact
<u>Colorado</u> Pueblo MSA AA	Full Review	None	1 community contact

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

B-1: Southeast Kansas AA



B-2: Pueblo MSA AA



APPENDIX C – DEMOGRAPHIC INFORMATION

Table C-1

2021 Southeast Kansas AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,528	22.7
Moderate	9	52.9	4,319	38.8	844	19.5	2,439	21.9
Middle	8	47.1	6,819	61.2	614	9.0	2,517	22.6
Upper	0	0.0	0	0.0	0	0.0	3,654	32.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>17</b>	<b>100.0</b>	<b>11,138</b>	<b>100.0</b>	<b>1,458</b>	<b>13.1</b>	<b>11,138</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	9,071	4,701	38.7	51.8	2,291	25.3	2,079	22.9
Middle	12,066	7,446	61.3	61.7	2,766	22.9	1,854	15.4
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21,137</b>	<b>12,147</b>	<b>100.0</b>	<b>57.5</b>	<b>5,057</b>	<b>23.9</b>	<b>3,933</b>	<b>18.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	780	54.2	704	54.5	64	51.2	12	54.5
Middle	658	45.8	587	45.5	61	48.8	10	45.5
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,438</b>	<b>100.0</b>	<b>1,291</b>	<b>100.0</b>	<b>125</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.8</b>		<b>8.7</b>		<b>1.5</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	31	29.5	29	29.0	2	50.0	0	0.0
Middle	74	70.5	71	71.0	2	50.0	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>105</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>95.2</b>		<b>3.8</b>		<b>1.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table C-2**

2020 Southeast Kansas AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,528	22.7
Moderate	9	52.9	4,319	38.8	844	19.5	2,439	21.9
Middle	8	47.1	6,819	61.2	614	9.0	2,517	22.6
Upper	0	0.0	0	0.0	0	0.0	3,654	32.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>17</b>	<b>100.0</b>	<b>11,138</b>	<b>100.0</b>	<b>1,458</b>	<b>13.1</b>	<b>11,138</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	9,071	4,701	38.7	51.8	2,291	25.3	2,079	22.9
Middle	12,066	7,446	61.3	61.7	2,766	22.9	1,854	15.4
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21,137</b>	<b>12,147</b>	<b>100.0</b>	<b>57.5</b>	<b>5,057</b>	<b>23.9</b>	<b>3,933</b>	<b>18.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	799	54.0	715	54.0	73	54.5	11	52.4
Middle	681	46.0	610	46.0	61	45.5	10	47.6
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,480</b>	<b>100.0</b>	<b>1,325</b>	<b>100.0</b>	<b>134</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.5</b>		<b>9.1</b>		<b>1.4</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	33	29.7	31	29.0	2	66.7	0	0.0
Middle	78	70.3	76	71.0	1	33.3	1	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>111</b>	<b>100.0</b>	<b>107</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>96.4</b>		<b>2.7</b>		<b>0.9</b>

Source: 2020 FFIEC Census Data  
 2020 Dun & Bradstreet Data  
 2011-2015 U.S. Census Bureau: American Community Survey  
 Note: Percentages may not total 100.0 percent due to rounding.

Table C-3

2021 Pueblo MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	5.5	1,876	4.6	858	45.7	9,187	22.6
Moderate	16	29.1	10,789	26.5	2,493	23.1	7,160	17.6
Middle	18	32.7	12,183	30.0	1,755	14.4	7,616	18.7
Upper	15	27.3	15,808	38.9	1,025	6.5	16,697	41.1
Unknown	3	5.5	4	0.0	4	100.0	0	0.0
<b>Total AA</b>	<b>55</b>	<b>100.0</b>	<b>40,660</b>	<b>100.0</b>	<b>6,135</b>	<b>15.1</b>	<b>40,660</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,961	1,418	3.5	35.8	2,084	52.6	459	11.6
Moderate	21,983	9,541	23.6	43.4	9,908	45.1	2,534	11.5
Middle	21,420	12,377	30.7	57.8	7,032	32.8	2,011	9.4
Upper	22,585	17,033	42.2	75.4	3,485	15.4	2,067	9.2
Unknown	10	0	0.0	0.0	10	100.0	0	0.0
<b>Total AA</b>	<b>69,959</b>	<b>40,369</b>	<b>100.0</b>	<b>57.7</b>	<b>22,519</b>	<b>32.2</b>	<b>7,071</b>	<b>10.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	207	3.2	198	3.2	9	2.5	0	0.0
Moderate	1,845	28.4	1,714	28.1	118	33.1	13	33.3
Middle	1,952	30.0	1,828	30.0	113	31.7	11	28.2
Upper	2,469	38.0	2,341	38.4	113	31.7	15	38.5
Unknown	26	0.4	22	0.4	4	1.1	0	0.0
<b>Total AA</b>	<b>6,499</b>	<b>100.0</b>	<b>6,103</b>	<b>100.0</b>	<b>357</b>	<b>100.0</b>	<b>39</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.9</b>	<b>5.5</b>			<b>0.6</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	12	6.2	12	6.3	0	0.0	0	0.0
Middle	87	45.1	84	44.4	3	75.0	0	0.0
Upper	92	47.7	91	48.1	1	25.0	0	0.0
Unknown	1	0.5	1	0.5	0	0.0	0	0.0
<b>Total AA</b>	<b>193</b>	<b>100.0</b>	<b>189</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.9</b>	<b>2.1</b>			<b>0.0</b>
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								



Table C-4

2020 Pueblo MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	5.5	1,876	4.6	858	45.7	9,187	22.6
Moderate	16	29.1	10,789	26.5	2,493	23.1	7,160	17.6
Middle	18	32.7	12,183	30.0	1,755	14.4	7,616	18.7
Upper	15	27.3	15,808	38.9	1,025	6.5	16,697	41.1
Unknown	3	5.5	4	0.0	4	100.0	0	0.0
<b>Total AA</b>	<b>55</b>	<b>100.0</b>	<b>40,660</b>	<b>100.0</b>	<b>6,135</b>	<b>15.1</b>	<b>40,660</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,961	1,418	3.5	35.8	2,084	52.6	459	11.6
Moderate	21,983	9,541	23.6	43.4	9,908	45.1	2,534	11.5
Middle	21,420	12,377	30.7	57.8	7,032	32.8	2,011	9.4
Upper	22,585	17,033	42.2	75.4	3,485	15.4	2,067	9.2
Unknown	10	0	0.0	0.0	10	100.0	0	0.0
<b>Total AA</b>	<b>69,959</b>	<b>40,369</b>	<b>100.0</b>	<b>57.7</b>	<b>22,519</b>	<b>32.2</b>	<b>7,071</b>	<b>10.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	217	3.3	206	3.4	11	2.9	0	0.0
Moderate	1,837	28.3	1,703	28.0	121	32.4	13	36.1
Middle	1,961	30.2	1,832	30.1	121	32.4	8	22.2
Upper	2,456	37.8	2,324	38.2	117	31.3	15	41.7
Unknown	28	0.4	24	0.4	4	1.1	0	0.0
<b>Total AA</b>	<b>6,499</b>	<b>100.0</b>	<b>6,089</b>	<b>100.0</b>	<b>374</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				93.7		5.8		0.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.5	1	0.5	0	0.0	0	0.0
Moderate	10	5.2	10	5.3	0	0.0	0	0.0
Middle	86	45.0	83	44.4	3	75.0	0	0.0
Upper	93	48.7	92	49.2	1	25.0	0	0.0
Unknown	1	0.5	1	0.5	0	0.0	0	0.0
<b>Total AA</b>	<b>191</b>	<b>100.0</b>	<b>187</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				97.9		2.1		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

## **APPENDIX D – GLOSSARY**

**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 metropolitan area/assessment area.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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, 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 nonrelatives 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-scope review:** Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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.

**Nonmetropolitan area (NonMSA):** Any area that is not located within an MSA.

**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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.

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

**FirstOak Bank**  
**Hours of Operation**  
**Effective January 1, 2023**

**Main Bank**

113 N. Penn  
PO Box 868  
Independence, KS 67301  
Phone: (620) 331-2265  
Fax: (620) 331-2290

Lobby Hours: (Central Time Zone)  
Monday – Thursday 9:00 a.m. – 3:00 p.m.  
Friday 9:00 a.m. – 4:00 p.m.

**Drive-Thru Facility**

1801 W. Main  
Independence, KS 67301  
Phone: (620) 331-7733  
Fax: (620) 331-0473

Lobby Hours: (Central Time Zone)  
Monday – Friday 8:30 a.m. – 11:00 p.m.

Drive-Thru Hours:  
Monday – Friday 8:30 a.m. – 5:30 p.m.  
Saturday 8:30 a.m. – 12:00 p.m.

**Elk City Facility**

106 E. Hickory  
Elk City, KS 67344  
Phone: (620) 627-2105

Drive-thru only: (no lobby access) (Central Time Zone)  
Tuesday and Friday 8:30 a.m. – 11:00 a.m.

**Fredonia Facility**

501 Madison  
Fredonia, KS 66736  
Phone: (620) 378-2114  
Fax: (620) 378-3575

Lobby Hours: (Central Time Zone)  
Monday – Friday 9:00 a.m. – 3:00 p.m.

Drive-Thru Hours:  
Monday – Friday 8:30 a.m. – 5:30 p.m.  
Saturday 8:30 a.m. – 12:00 p.m.

**FirstOak Bank  
Hours of Operation  
Effective January 1, 2023**

**Pueblo, Colorado Branch**

1419 Hwy 50 West

Pueblo, CO 81008

Phone: (719) 544-2265

Fax: (719) 544-1199

Lobby Hours: (Mountain Time Zone)

Monday – Friday 8:30 a.m. – 5:00 p.m.

Drive-Thru Hours:

Monday – Friday 8:30 a.m. – 5:30 p.m.

FirstOak Bank  
Main Bank  
113 N. Penn  
Independence, KS 67301

HOURS (Central Time Zone)

Monday – Thursday 9:00 a.m. thru 3:00 p.m.

Friday 9:00 a.m. thru 4:00 p.m.

This facility is a full service location. For a complete listing of all deposit accounts and loan products refer to the Product Information brochure, the fee schedule and the loan products list found in the Services section of this file. This facility offers safe deposit box service.

FirstOak Bank  
Drive-Thru Branch  
1801 W. Main  
Independence, KS 67301

LOBBY HOURS (Central Time Zone)  
Monday - Friday 8:30 a.m. - 11:00 p.m.

DRIVE-THRU HOURS (Central Time Zone)  
Monday – Friday 8:30 a.m. thru 5:30 p.m.  
Saturday 8:30 a.m. thru 12:00 p.m.

This facility is a full service location. For a complete listing of all deposit accounts and loan products refer to the Product Information brochure, the fee schedule and the Loan products list found in the Services section of this file. There is not a loan officer at this location. Loan applications can be accepted at this location but will be transported to the main bank to be reviewed by a loan officer.



FirstOak Bank  
Elk City Branch  
Drive-thru only - No lobby access.

HOURS (Central Time Zone)  
Tuesday and Friday 8:30 a.m. thru 11:00 a.m.

This facility accepts transaction account deposits and withdrawals, as well as loan payments. No other services are available.

SERVICES AND CHARGES:

Stop Payments	\$25.00
Special Statements/Additional Copies/Account Printout	\$ 3.00
Zipper Bags (one provided at no cost)	\$10.00

FirstOak Bank  
Fredonia Branch  
501 Madison  
Fredonia, KS 66736

LOBBY HOURS (Central Time Zone)

Monday - Friday 9:00 a.m. - 3:00 p.m.

DRIVE-THRU HOURS (Central Time Zone)

Monday – Friday 8:30 a.m. thru 5:30 p.m.

Saturday 8:30 a.m. thru 12:00 p.m.

This facility is a full service location. For a complete listing of all deposit accounts and loan products refer to the Product Information brochure, the fee schedule and the loan products list found in the Services section of this file. This facility offers safe deposit box service.

FirstOak Bank  
Pueblo Branch  
1419 Hwy 50 West  
Pueblo, CO 81008

LOBBY HOURS (Mountain Time Zone)  
Monday – Friday 8:30 a.m. thru 5:00 p.m.

DRIVE-THRU HOURS (Mountain Time Zone)  
Monday - Friday 8:30 a.m. thru 5:30 p.m.

This facility is a full service location. For a complete listing of all deposit accounts and loan products refer to the Product Information brochure, the fee schedule and the loan products list found in the Services section of this file. This facility offers safe deposit box service.

FirstOak Bank  
Pueblo, Colorado Branch

Metropolitan Statistical Area

39380  
39380

Pueblo, CO Metropolitan Statistical Area  
Pueblo County, CO

## FirstOak Bank

### Branches Opened/Closed

No branches have been opened or closed this year or in each of the prior two years.

## Loans

Mortgage - Residential & Commercial

Construction - Residential & Commercial

Business

Consumer

Agricultural

For more information visit

[www.firstoakbank.com](http://www.firstoakbank.com)



## Services

Bill Pay

Mobile banking/ Mobile Apps

Remote Mobile Deposit

Telephone Banking

Instant Issue Debit Cards

Safety Deposit Boxes

Visa Credit Card

Apple/Google/Samsung Pay

## Locations

### Main Bank

113 N Penn Ave

PO Box 868

Independence, KS 67301

Phone: 620-331-2265

### Drive-Thru

1801 W Main St

Independence, KS 67301

Phone: 620-331-7733

### Elk City

106 E Hickory

Elk City, KS 67344

Phone: 620-627-2105

### Pueblo

1419 Hwy 50 West

Pueblo, CO 81008

Phone: 719-544-2265

### Fredonia

501 Madison St

Fredonia, KS 66736

Phone: 620-378-2114



Member  
**FDIC**



Account  
Brochure



**FirstOak**  
**BANK**

*Real Hometown  
Banking*

## Checking Accounts

### FirstOak Rewards Plus (NOW)

- \$100 opening deposit
- Rewards! See rewards brochure
- Image provided with statement
- Free money orders & cashier's checks
- \$6 monthly service charge if average daily balance falls below \$2500
- 60 years old or older \$4 monthly service charge if average daily balance falls below \$2500
- Interest earned on average daily balance over \$2500

### FirstOak Rewards Checking

- \$100 opening deposit
- Rewards! See rewards brochure
- Image provided with statement
- \$5 monthly service charge if average daily balance falls below \$2500
- 60 years old or older \$3 monthly service charge if average daily balance falls below \$2500

### FirstOak Checking

- \$100 opening deposit
- No minimum balance required
- Monthly statement via online banking
- \$2 monthly service charge-waived with direct deposit

## Money Market Checking Accounts

### Commercial or Personal

- \$2,500 opening deposit
- Interest earned on average daily balance over \$2500
- \$8 monthly service charge if average daily balance falls below \$2500
- Tiered interest rate subject to change

## Commercial Checking Accounts

### Premium Commercial Checking

- \$200 opening deposit
- \$10 monthly service charge
- \$0.15 fee per debit posted
- \$0.05 fee per deposited item
- Earnings credit may apply

### Small Business Checking

- \$100 opening deposit
- \$6 monthly service charge if average daily balance falls below \$500

## Savings Accounts

### Commercial or Personal Savings

- \$100 opening deposit
- Quarterly statement
- \$2 monthly service charge if average daily balance falls below \$100

### Young Savers Account

- \$25 opening deposit
- Must be under 18 years of age
- Quarterly statement
- Gift with initial deposit
- \$2 monthly service charge if average daily balance falls below \$25

### Santa's Savings

- No minimum deposit
- Interest paid annually on balances over \$99
- Check distributed in November
- No early withdrawals permitted





**Independence**  
KANSAS  
113 N. Penn Ave  
Independence, KS 67301  
(800) 960-4639  
(620) 331-2265

**Independence**  
KANSAS  
Drive thru  
1801 W. Main St.  
Independence, KS 67301  
(620) 331-7733

**Fredonia**  
KANSAS  
501 Madison  
Fredonia, KS 66736  
(620) 378-2114

**Elk City**  
KANSAS  
106 E. Hickory  
Elk City, KS 67344  
(620) 627-2105

**Pueblo**  
COLORADO  
1419 Hwy 50 West  
Pueblo, CO 81008  
(719) 544-2265

[firstoakbank.com](http://firstoakbank.com)



02/23

## FirstOak Rewards Checking Accounts

**Savings and Security  
All in One Place.**



## Secure Your Peace of Mind

Peace of mind. It's one of  
the most important benefits  
a financial institution  
can provide.

With unrivaled security and  
smart savings – it's simple! With  
our FirstOak Rewards Checking  
Accounts it's easier to protect  
your finances and enjoy your life.

That's something you can bank on.





**FirstOak Rewards Financial Features include:**

- Free Online Mobile Banking
- Free Mobile Deposit
- Free Debit Card
- Free Paper Statement

## Value-Added Benefits

### Save When You Play

#### Travel and Leisure Discounts

Money-saving discounts from thousands of local and national businesses. Members can redeem and print coupons online or access discounts from a mobile device. Digital Access makes saving super easy and convenient, giving instant savings anywhere and anytime. (available via mobile or web only)

#### \$shopping Rewards™

Receiving \$shopping Rewards is simple! As a member, you have access to exclusive offers and discounts at thousands of leading online retailers. Simply shop online using our customized shopping portal and receive cash back. Your cash back can be held in your \$shopping Rewards account to use towards future purchases or conveniently sent to you as a check. Yes, it's that easy! (registration/activation required; available via mobile or web only)



### Feel Confident with IDProtect®

You can rest easy knowing that IDProtect, our identity theft monitoring and resolution service<sup>1</sup>, can help better protect your identity.

#### Identity Theft Expense Reimbursement Insurance<sup>2</sup>

Receive up to \$5,000 Identity Theft Expense Reimbursement Coverage for expenses associated with restoring your identity.

#### Comprehensive Identity Theft Resolution Services

Should you suffer identity theft, your very own dedicated fraud resolution specialist will help you every step of the way until your identity is restored.

#### Debit and Credit Card Registration

Register your credit, debit and ATM cards and have peace of mind knowing you can call one toll-free number to cancel and request replacement cards should your cards become lost or stolen. (registration/activation required)

#### Credit File Monitoring

Daily credit file monitoring and automated alerts of key changes to your credit report. (registration/activation required)

#### Credit Report and Score<sup>3</sup>

Access to credit report and credit scores. (registration/activation required)

#### Credit Score Tracker

Receive valuable insight into your credit score<sup>3,4</sup>. (registration/activation required)

#### Identity Monitoring

Monitoring of more than 1,000 databases and public records to identify suspicious activity, including credit header information, phone records, United States Postal Service records, and more. (registration/activation required)

#### Online Identity Theft News Center and Valuable Phone and Web Resources

(registration/activation required)

#### Financial Wellness 360°

Access your financial wellness platform with unlimited one-on-one coaching, interactive courses, videos, booklets, infographics, and more to help maximize financial wellness. (available via mobile or web only)

### Help Protect from Unexpected Losses

#### Accidental Death & Dismemberment Insurance<sup>2</sup>

Receive up to \$5,000 24-hour Accidental Death & Dismemberment Insurance. (Coverage divides equally on joint accounts and reduces by 50% at age 70.)

#### Cellular Telephone Protection<sup>2</sup>

Receive up to \$400 of replacement or repair costs if your cell phone is stolen or damaged, in the U.S. and abroad. \$50 deductible applies. Up to two claims per twelve month period. Covers up to four phones on a cellular telephone bill. (Cellular telephone bill must be paid through the FirstOak Rewards Checking Account.)

#### Debit Advantage®

Buyers Protection<sup>2</sup> covers items for 90 days from the date of purchase against accidental breakage, fire or theft. Extended Warranty<sup>2</sup> extends the U.S. manufacturer's original written warranty up to one full year on most new retail purchases if the warranty is less than five years. (Item(s) must be purchased entirely with this account for coverage.)

#### Roadside Assistance Service<sup>2</sup>

24-hour coverage for roadside assistance services including vehicle towing, fuel/oil/fluid/water delivery, and battery/lock-out/tire assistance up to \$100 per occurrence. Maximum of two occurrences per twelve month period.



### Save on Health Care

#### Health Discount Savings

Enjoy savings on vision, prescriptions and dental services. This is NOT insurance. (registration/activation required)

A \$5.00 monthly service fee will apply; just \$3.00 for those ages 60 years old or older. The monthly service fee will be waived when you have an average daily balance of \$2,500.

**FirstOak Rewards Plus Financial Features include:**

- Free Online Mobile Banking
- Free Mobile Deposit
- Free Debit Card
- Free Paper Statement
- Earns Interest\*

***FirstOak Rewards Plus Checking Includes all the benefits of FirstOak Rewards Checking with Additional Coverage***

#### Accidental Death & Dismemberment Insurance<sup>2</sup>

Receive up to \$10,000 24-hour Accidental Death & Dismemberment Insurance. (Coverage divides equally on joint accounts and reduces by 50% at age 70.)

#### Identity Theft Expense Reimbursement Insurance<sup>2</sup>

Receive up to \$10,000 Identity Theft Expense Reimbursement Coverage for expenses associated with restoring your identity.

#### Cellular Telephone Protection<sup>2</sup>

Receive up to \$600 of replacement or repair costs if your cell phone is stolen or damaged, in the U.S. and abroad. \$50 deductible applies. Up to two claims and maximum of \$1,000 per twelve month period. Covers up to four phones on a cellular telephone bill. (Cellular telephone bill must be paid through the FirstOak Rewards Plus Checking Account.)

A \$6.00 monthly service fee will apply; just \$4.00 for those ages 60 years old or older. The monthly service fee will be waived when you have an average daily balance of \$2,500.

\*The information above is accurate as of the effective date. Interest Rates may change after an account is opened and these rates will be posted as of their effective date. Maintenance and/or activity fees may reduce earnings. APY = Annual Percentage Yield. The Annual Percentage Yield (APY) assumes interest remains on deposit until maturity. A withdrawal of interest or any withdrawal may reduce earnings and a penalty may be applied on some accounts for early withdrawals. A minimum balance is required on all checking accounts (except FirstOak checking). Interest Rates subject to change daily.

1 Benefits are available to personal checking account owner(s), and their joint account owners subject to the terms and conditions for the applicable Benefits. Some Benefits require authentication, registration and/or activation. Benefits are not available to a "signer" on the account who is not an account owner or to businesses, clubs, trusts organizations and/or churches and their members, or schools and their employees/students.

2 Special Program Notes: The descriptions herein are summaries only and do not include all terms, conditions and exclusions of the Benefits described. Please refer to the actual Guide to Benefit and/or insurance documents for complete details of coverage and exclusions. Coverage is provided through the company named in the Guide to Benefit or on the certificate of insurance. Insurance Products are not insured by the FDIC or any Federal Government Agency; Not a deposit of or guaranteed by the bank or any bank affiliate.

3 Credit Score is a VanLageScore 3.0 based on single credit bureau data. Third parties may use a different type of credit score to assess your creditworthiness. Once you have activated credit file monitoring, you may request your credit score. Once you have done so, you will have access to your score on a monthly basis.

4 Credit Score Tracker: Once credit file monitoring has been activated and you have requested your first credit score, you may request a new credit score each month to be plotted on your Credit Score Tracker graph. Monthly email notifications will be sent to let you know when your new score is available.





## Loan Products

Available at the Main Bank, Drive-Thru, Fredonia and Pueblo Colorado locations.

### **Real Estate Loans**

Construction

Farmland (including residential and other improvements)

One-to-Four Family Residential/Conventional

Multi-Family Residential/Conventional

### **Installment Loans**

Secured

Unsecured

### **Single Payment Loans**

Secured

Unsecured

### **Commercial/Business Loans**

Small Business Loans

(including those guaranteed by the Small Business Administration)

Inventory Financing

Accounts Receivable Financing

Equipment Financing

Plant Expansion/Construction/Modernization Financing

Commercial Real Estate

Agriculture Loans

(both direct and indirect including FMHA guaranteed)

Letters of Credit



**FEE SCHEDULE  
COMMON FEATURES  
Effective November 1, 2022**

Bill Pay service	\$3.00	per month
Bank official checks (Money order)	\$3.00	
Cashier checks	\$5.00	
Non-customer transaction fee	10% OR \$10.00	Minimum
Collections In	\$15.00	
Collection Out (Including Canada)	\$15.00	
Foreign item collection (\$200.00 minimum account balance)	\$50.00	Plus costs
International and Domestic Incoming wire - Customer	\$10.00	
International and Domestic Incoming wire - Non-customer	\$75.00	
Outgoing Domestic wire	\$25.00	
International Outgoing wire	\$75.00	
Night deposit lock bag	\$15.00	
Zipper bag (1 <sup>ST</sup> is free) 2 <sup>ND</sup> and after	\$10.00	
Overdraft fee (per item)	\$36.00	
Returned check fee (per presentment)	\$36.00	
Continuous overdraft fee	\$6.00	per day
After 7 <sup>th</sup> business day		
Stop payment fee	\$25.00	
Early closure fee (within 90 days of opening)	\$15.00	
Special statement/additional copies/account printout (Per account)	\$3.00	
Account sweeps	\$3.00	
Research (Per hour)	\$50.00	
Account reconciliation assistance (Per hour)	\$20.00	
Garnishment or levy	\$25.00	
Copies - letter/legal	\$1.00	
Real estate appraisal duplicate copy fee	\$15.00	
Debit card replacements (after the first replacement card)	\$10.00	
Fax - first page	\$3.00	
Each additional page	\$1.00	
Dormant account fee (starts after 12 months of inactivity-balance less than \$500.00)	\$5.00	
Counter Checks	\$10.00	per 12
Safe Deposit Box Annual Rental Fee		
4 X 5 (Fredonia Branch Only)	\$15.00	
5 X 5 (Fredonia Branch Only)	\$20.00	
3 X 10 (Main Bank and Fredonia Branch Only)	\$35.00	
5 X 10 (Main Bank and Fredonia Branch Only)	\$40.00	
10X10 (Fredonia and Pueblo Only)	\$75.00	
Safety Deposit Box Drill Out Fee	\$75.00	plus mileage
Commercial Account Analysis	Monthly Service Charge	\$10.00
	Charge per foreign item on deposit	\$0.05
	Charge per debit transaction	\$0.15
Small Business Accounts	Monthly Service Charge	\$6.00
(Applies if average daily balance falls below \$500)		

November 2022

## Southeast Kansas Assessment Areas

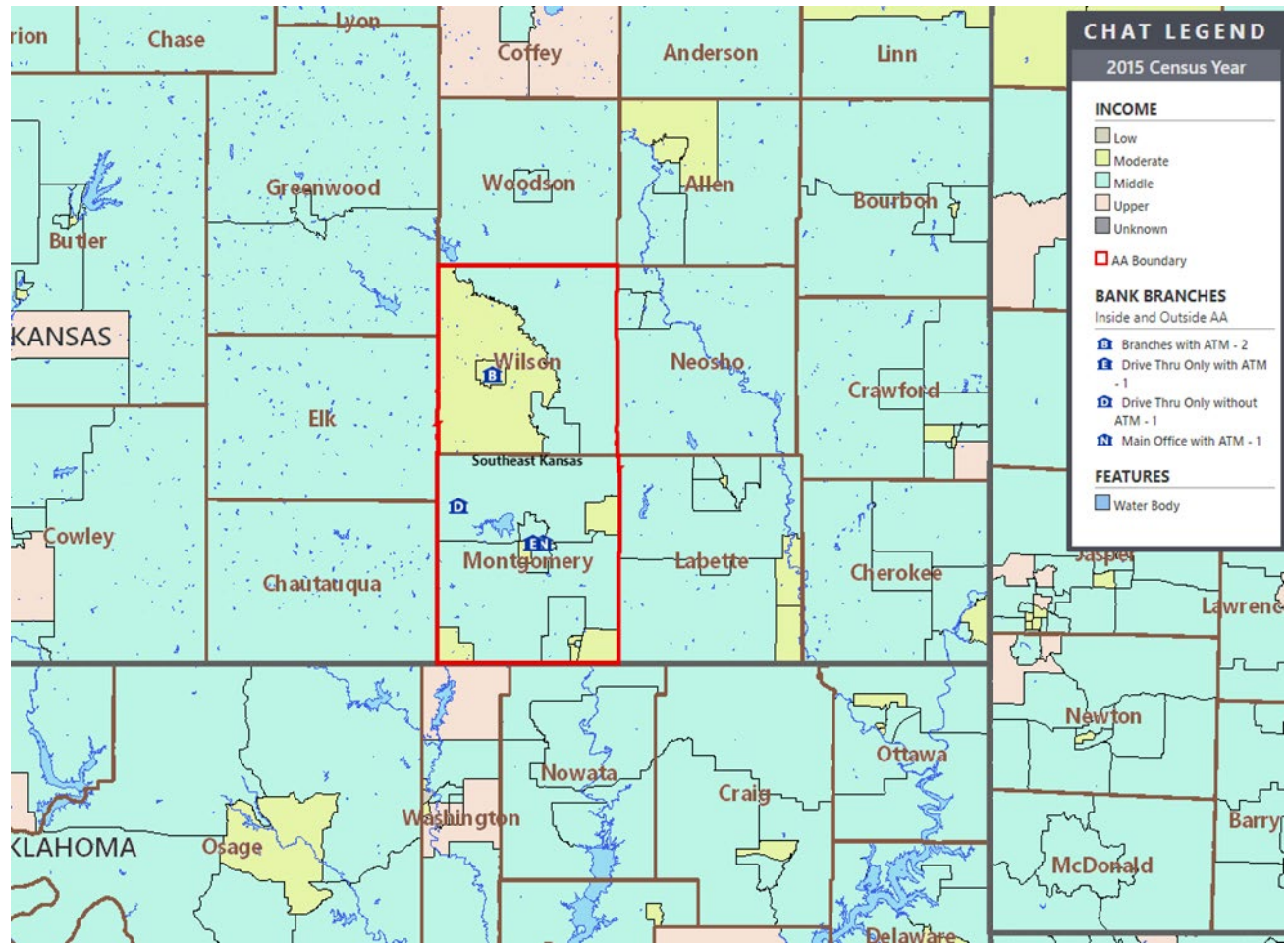
The Southeast Kansas Assessment Areas includes Montgomery and Wilson Counties in their entirety. Following is a listing of 2023 census tracts within each county:

### Montgomery County

9501.00	9502.00	9503.00	9504.00	9505.00	9506.00
9507.00	9508.00	9510.00	9511.00	9513.00	9514.00

### Wilson County

0971.00	0972.00	0973.00	0974.00		
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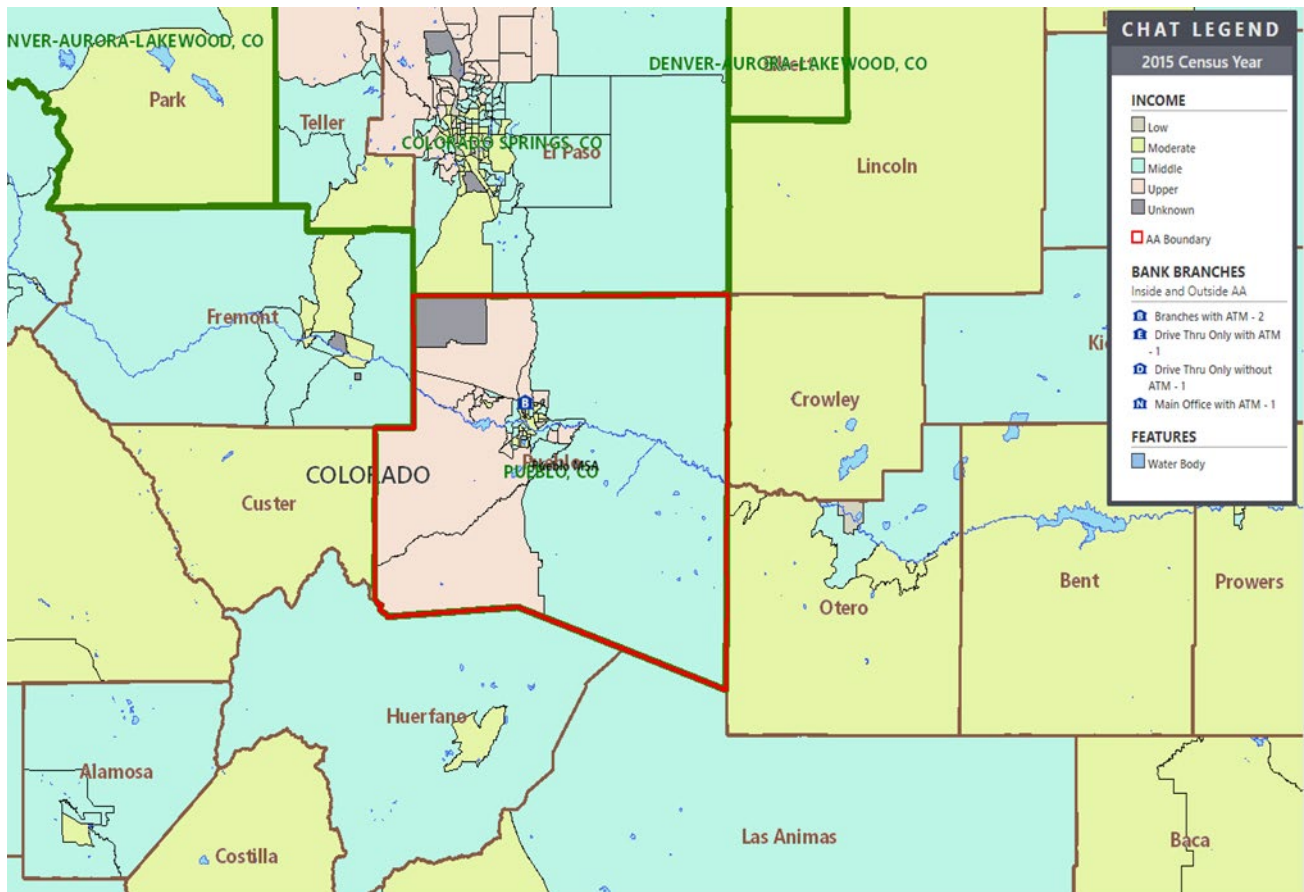


## Pueblo MSA Assessment Area

The Pueblo MSA Assessment Area includes the entire Pueblo County. Following is a listing of 2023 census tracts within Pueblo County:

### Pueblo County

0001.00	0002.00	0003.00	0004.00	0005.00	0006.00
0008.00	0009.02	0009.03	0009.04	0009.05	0010.00
0011.00	0012.00	0014.00	0015.00	0016.00	0017.00
0018.00	0019.00	0020.00	0021.00	0022.00	0023.00
0024.00	0025.00	0026.00	0027.00	0028.01	0028.02
0028.04	0028.06	0028.07	0028.08	0029.01	0029.06
0029.11	0029.12	0029.13	0029.14	0029.15	0029.16
0029.17	0029.18	0029.20	0029.21	0029.22	0029.23
0030.01	0030.04	0031.03	0031.04	0031.05	0031.06
0032.00	0035.00	0036.00	9801.00		





## **LOAN-TO-DEPOSIT RATIOS**

### **CALENDAR YEAR 2023**

#### QUARTER ENDING:

MARCH 31, 2023	90.00%
JUNE 30, 2023	91.90%
SEPTEMBER 30, 2023	90.30%
DECEMBER 31, 2023	89.50%

# **2023 ANNUAL DISCLOSURE STATEMENT NOTICE OF AVAILABILITY**

In accordance with Federal regulation, this bank will provide an Annual Disclosure Statement to our customers, shareholders, and the general public, upon request, containing the bank's financial information for the last two years. This information will be updated annually and made available on or before March 31, 2024.

## **To request a copy**

of the Annual Disclosure Statement, please contact:

Shanda S. Chambers, SVP  
620-331-2265  
FirstOak Bank  
113 N. Penn  
Independence, KS 67301



## **HMDA Disclosure Statement**

The 2023 HMDA Disclosure Statement may be obtained from the Consumer Financial Protection Bureau's Web site [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).





## **HMDA Disclosure Statement**

The 2022 HMDA Disclosure Statement may be obtained from the Consumer Financial Protection Bureau's Web site [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## **HMDA Disclosure Statement**

The 2021 HMDA Disclosure Statement may be obtained from the Consumer Financial Protection Bureau's Web site [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## **HMDA Disclosure Statement**

The 2020 HMDA Disclosure Statement may be obtained from the Consumer Financial Protection Bureau's Website at [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## **HMDA Disclosure Statement**

The 2019 HMDA Disclosure Statement may be obtained from the Consumer Financial Protection Bureau's Website at [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## **Modified Loan Application Register (LAR)**

The 2023 Modified Loan Application Register (LAR) may be obtained from the Consumer Financial Protection Bureau's Web site [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## **Modified Loan Application Register (LAR)**

The 2022 Modified Loan Application Register (LAR) may be obtained from the Consumer Financial Protection Bureau's Web site [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## **Modified Loan Application Register (LAR)**

The 2021 Modified Loan Application Register (LAR) may be obtained from the Consumer Financial Protection Bureau's Web site [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## Affiliate Mortgage Lending

March 31, 2024

FirstOak Bank has not had an affiliate mortgage lending during the prior two (2) years.

Respectfully submitted,

Christi Kuehn-Culver  
Compliance Officer