



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

**Public Disclosure**

**August 22, 2005**

**Community Reinvestment Act  
Performance Evaluation**

**Central National Bank  
Charter Number: 4284**

**802 N. Washington  
Junction City, Kansas 66441**

**Office of the Comptroller of the Currency**

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6700 Antioch Road, Suite 450  
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**NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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## Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- Central National Bank’s (CNB) lending levels are responsive in relation to meeting area credit needs. A substantial majority of the bank’s primary loan products are inside its assessment areas (AAs).
- The bank’s level of community development lending in Kansas is good and positively impacted the Lending Test rating.
- CNB’s service delivery systems are adequate and accessible to different geographies and individuals of different income levels throughout the AAs. Bank personnel provided their financial expertise to organizations that promote community development initiatives in the AAs.
- CNB provided an adequate level of qualified investments in the state of Kansas and a poor level in the state of Nebraska.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total

number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

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

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

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

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

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

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

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

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area

comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

CNB is a \$609 million interstate financial institution operating in the states of Kansas and Nebraska. CNB is a wholly owned subsidiary of Central of Kansas, Inc. (Central), a \$517 million one-bank holding company. Both CNB and Central are headquartered in Junction City, Kansas. Central's operating subsidiaries include a Loan Processing Office (LPO) in Omaha, Nebraska, a loan-servicing center in Superior, Nebraska, and Central Charities, a philanthropic wing of the holding company located in Junction City, Kansas. Loans originated and donations made by these affiliates are included in our analysis of the bank's CRA performance. Subsidiary activity does not adversely impact CNB's ability to meet the community reinvestment needs of its AAs.

CNB is a full-service financial institution offering a wide variety of loan and deposit products. Its lending focus is primarily in agricultural and commercial real estate loans. The LPO originates the majority of the residential mortgage transactions. The bank also offers insurance, trust, and investment products. During the lending evaluation period, CNB operated 31 banking offices throughout five AAs in the state of Kansas and one banking office in the state of Nebraska. The bank opened six additional offices in 2005. Our evaluation did not include a review of the bank's new AAs since these offices have been open for less than 12 months.

As of June 30, 2005, gross loans totaled \$389 million and represented 63 percent of total assets and 73 percent of total deposits. Tier 1 Capital totaled \$58 million. The loan portfolio, by dollar amount, consisted of the following: (49%) commercial including related real estate, (29%) agricultural related, (17%) residential real estate, and (5%) consumer.

There are no financial, legal, or other factors that impede the bank's ability to help meet the credit needs in its AAs. CNB received a "Satisfactory" rating on its last CRA evaluation dated May 13, 2002.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending Test is January 1, 2002 to December 31, 2004. We focused our primary attention on the bank's small business and small farm lending performance for the full-scope AAs since home mortgage lending activity only represents a small percentage of loan originations. Our analysis also included a review of community development loans.

The Standardized Tables are shown in Appendix D for the 2004 time period. Market share information was not available. Significant data for 2002 and 2003 is discussed in the narrative of this Report. We used 1990 census data to evaluate performance in 2002. For 2003 and 2004, we used 2000 census data. In addition for 2004, we used the revised Metropolitan Statistical Area (MSA) boundaries and definitions established by the Office of Management and Budget.

The evaluation period for the Investment and Service Tests is May 13, 2002 to August 22, 2005. At the bank's request, we included a review of qualified donations made by Central Charities in this evaluation.

### Data Integrity

We performed data integrity reviews prior to this examination to test the accuracy of the 2002-2004 Home Mortgage Disclosure Act (HMDA) and CRA data. We compared reported information to credit file documentation for an independent sample of each category of loans. We identified a material reporting error of revenue codes used for the CRA data during the initial review. The bank corrected the errors. We validated the data's accuracy during a follow-up review. The revised data are presented and considered in this evaluation.

We reviewed the information provided for the bank's investment and service activity. Only qualified activities with a community development purpose were considered in this evaluation.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, a sample of AAs within that state were selected for full-scope reviews. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected.

### Ratings

The bank's overall rating is a blend of a rating for the states of Kansas and Nebraska. The state of Kansas received the most weight. The state of Kansas represents 93 percent of the total deposit base by dollar. The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

## **Inside/Outside Ratio**

For the geographic distribution analysis under the Lending Test, we performed an inside/outside ratio analysis at the bank level. Both by number and dollar, the majority of the bank's loans are extended to businesses and agricultural customers. By number, combining mortgage loans with small business and small farm loans, the bank's inside/outside ratio is 47 percent. This is, however, due to the inclusion of mortgage loans originated by the LPO, of which 80 percent are located outside of the bank's AAs. Reviewing this ratio without mortgage loans significantly increases the bank's inside AA ratio to 82 percent by number and 90 percent by dollar. We viewed this factor positively in our assessment of the bank's lending performance since business and agricultural loan originations are essential to the local economy.

## **Fair Lending Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## State Rating

### State of Kansas

#### **CRA Rating for Kansas: Satisfactory**

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

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

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

The major factors that support this rating include:

- CNB's geographic distribution for all loan products is adequate. In the full scope AAs, the geographic distribution of small loans to farms and businesses is adequate.
- The overall distribution of loans by income level is good. A significant percentage of loan originations are at amounts of \$100 thousand or less for each rating year.
- Community Development lending had a positive impact on the Lending Test conclusions. During this evaluation period, CNB originated or refinanced 9 community development (CD) loans totaling \$10.3 million, which represents 18 percent of total Tier 1 capital.
- CNB's delivery systems are accessible to all geographies and individuals of different income levels throughout the AAs. Bank personnel provide an adequate level of community development services.

## **Description of Institution's Operations in Kansas**

CNB operates 30 branches in the State of Kansas. This represents 97 percent of the bank's branches and 98 percent of the ATMs. CNB designated five AAs within the state of Kansas. The Kansas AAs account for 94 percent of the bank's deposits and 91 percent of loan originations by dollar amount. CNB's primary focus in the State of Kansas is commercial and agriculture lending.

Refer to the market profiles for the State of Kansas in Appendix B where detailed demographics and other performance context information for AAs that received full-scope reviews are provided.

## **Scope of Evaluation in Kansas**

We evaluated the bank's performance in the state of Kansas by performing full-scope reviews in the Rural Non-MA#1 and Rural Non-MA #2 AAs, and limited scope reviews in the Lawrence, Topeka, and Wichita AAs. We selected the Rural Non-MAs for full-scope review because these AAs represented the largest volume of loans in the AAs. We focused on the bank's small loans to farms and businesses for the Lending Test due to the volume of lending activity in these products.

We performed one community contact with a city official representative. The primary credit need identified was small business loans. A number of these communities have a limited and/or inadequate supply of affordable housing. However, banks are meeting the need for mortgage loans when housing stock is available.

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

## **LENDING TEST**

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

The bank's performance under the Lending Test in Kansas is rated "High Satisfactory." We focused on the bank's small business and small farm lending activity due to volume, lending focus and area credit needs. Small loans to farms and businesses comprise 92% of the loans analyzed. We evaluated home purchase and refinance loans, but did not give them much weight in determining the rating because they represent such a small percentage of the bank's lending. We did not give any weight to home improvement loans due to limited volume. Based on full-scope reviews, the bank's performance in the Rural Non-MA#1 and #2 AAs is good. The bank's level of community development lending is good had a positive impact on this rating. Refer to the tables in Appendix C, which reflects the bank's 2004 data. Refer to the narrative comments in this section regarding the bank's overall performance during the rating period.

### **Lending Activity**

Lending activity reflects an adequate level of responsiveness in relation to area credit needs and the bank's deposit market share in each of its AAs. Agricultural and business loans are essential to the local economy. Both by number and dollar, the majority of the bank's loans are extended to businesses and agricultural customers. CNB ranks fifth in deposit market in Rural Non-MA#1 and second in deposit market share in Rural Non-MA#2. Lending market share information is presented in this analysis for informational purposes only. The majority of institutions in the full-scope AAs are not subject to data collection requirements.

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

CNB's geographic distribution of lending is adequate. There are no low-income areas in either of the full-scope AAs. Rural Non-MA#1 has 8 moderate-income CTs while Rural Non-MA#2 has one moderate-income CT.

### **Small Loans to Farms**

The bank's geographic distribution of small loans to farms is adequate in Rural Non-MA#1 AA. The bank's performance in Rural Non-MA#2 is excellent. CNB continues to have the leading market share of small loans to farms in Rural Non-AA#2 and has a 50 percent market share of Rural Non-MA#1 in moderate-income areas.

### **Small Loans to Businesses**

The geographic distribution of small loans to businesses is excellent in Rural Non-MA#1 and #2. The bank's small business loan originations significantly exceed demographic data in both AAs for all three

rating years (2002, 2003, and 2004). This is strong performance given the fact lending opportunities are limited since only 5 percent of the businesses are located in moderate-income tracts. Approximately 11 percent in 2004, 20 percent in 2003, and 24 percent in 2002 of the bank's loan originations were to small businesses in moderate-income tracts. In addition, although the bank has less than 17 percent of deposits in this area, the bank's market share of loans is approximately 52 percent.

### **Home Mortgage Loans**

The geographic distribution of home purchase loans is good. The distribution of home purchase loans in Rural Non-MA #1 is excellent. The bank made 25 home purchase loans in Rural Non-MA #2 over the evaluation period. The geographic distribution of refinance loans is adequate in both the full-scope AAs. We did not evaluate home improvement loans due to the limited volume.

A geographic analysis of multi-family loans is not meaningful due to the limited number of originations.

### **Lending Gap Analysis**

Our geographic distribution analysis included a review for any unexplained lending gaps in the AAs, particularly in the moderate-income tracts. Our analysis found CNB originated loans in all moderate-income tracts in both AAs, and we did not identify any conspicuous underserved geographies in the AAs.

### **Inside/Outside Ratio**

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

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

CNB's overall distribution of loans by income level is adequate. The distribution of small loans to farms is adequate in both full-scope AAs. The distribution of small loans to businesses is adequate in Rural Non-MA#1 and good in Rural Non-MA#2. The level of home mortgage lending is a small percentage of total reportable loans. The distribution of these loans is not given much weight because of that low volume. Refer to Tables 7-12 in Appendix C for data used to evaluate the borrower income level of the bank's loan originations.

### **Small Loans to Farms**

The distribution of loans to farms of different sizes is also adequate in both full-scope AAs. Again, the vast majority of the small loans to farms were originated in amounts of less than \$100 thousand for each rating year 2002, 2003, and 2004.

### **Small Loans to Business**

The distribution of loans to businesses of different sizes is adequate Rural Non-MA#1 and good in Rural Non-MA#2. The large majority of small loans to businesses, more than 90% in both AAs, were originated in amounts less than \$100 thousand for each rating year 2002, 2003, and 2004.

### **Home Mortgage Loans**

The bank’s borrower distribution of home purchase loans is excellent in both full-scope AAs, while the distribution of refinance loans is good. Home improvement is not material and was not considered.

### **Community Development Lending**

Community Development lending had a positive impact on the Lending Test conclusions. During this evaluation period, CNB originated or refinanced 9 community development (CD) loans totaling \$10.3 million, which represents 18 percent of total Tier 1 capital. The loans were originated in Rural Non-MA#1 and in the limited-scope AAs of Lawrence and Topeka. The CD lending included one loan totaling \$1.3 million for an affordable housing development project; four loans totaling \$5.3 million for the revitalization of two downtown areas in low-and moderate-income tracts, two loans totaling \$4.1 million to help promote economic development by providing jobs to low-and moderate-income (LMI) individuals or in LMI areas; and two loans totaling \$105 thousand to organizations that provide community services targeted to LMI individuals.

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank’s level of CD lending. This table includes all CD loans.

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

Based on limited-scope reviews, the bank’s overall performance under the Lending Test in the Lawrence and Topeka AAs is consistent with the bank’s overall “High Satisfactory” performance under the Lending Test for the state of Kansas. The performance in the Wichita AA is slightly below the overall performance in the state of Kansas. Distribution of small loans to farms is below the performance in the full-scope AAs. Distribution of small loans to businesses was consistent with the performance in the full-scope AAs. The volume of home mortgage loans was low and of limited weight as in the full-scope AAs. Both Lawrence and Topeka had some community development lending.

Refer to the Tables in Appendix D for the facts and data that support these conclusions.

## Investment Test

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test in Kansas is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Rural Non-MA#1 and #2 AAs is adequate.

During the evaluation period, CNB had one outstanding FHLMC mortgage-backed security for low-and moderate-income housing totaling \$120 thousand. The bank has one small investment totaling \$2 thousand to support the revitalization of a downtown area that primarily benefits low-and moderate-income residents. For the State of Kansas, the bank invested \$226 thousand in the Kansas Equity Fund, LLC. The Fund supports low-income housing tax credit projects throughout the State of Kansas. The bank also invested \$553 thousand in a CRA Qualified Investment Fund. Investments in this Fund include the entire US in the service area. The combined total is shown with investments for Rural Non-MA#1 in Table 14 because a portion of this funding has been used in that AA.

Due to limited projects in the full-scope AAs, qualified investment opportunities primarily consist of contributions/donations to organizations with a community development purpose that offer services to low-and moderate-income individuals. For Rural Non-MA#1, CNB made donations totaling \$32 thousand to 20 organizations. This total includes a \$5 thousand contribution from the bank's affiliate Central Charities. For Rural Non-MA#2, CNB made donations totaling \$102 thousand to 2 organizations.

Refer to Table 12 in the State of Kansas section of Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lawrence, Topeka, and Wichita AAs is similar to the bank's overall Investment rating of "Low Satisfactory" for the state of Kansas.

Allocations for investments in the limited-scope AAs were limited to qualified contributions and donations to organizations with a community development purpose to assist in servicing the needs of low-and moderate-income individuals. In the Lawrence AA, qualified donations totaled \$61 thousand to 17 organizations, in Topeka \$3 thousand to 10 organizations, and Wichita \$9 thousand to 16 organizations. Note: the qualified investments included in the full-scope AAs are statewide investments that may benefit the limited-scope AAs.

Refer to Table 12 in the State of Kansas section of Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Kansas is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Rural Non-MA #1 and #2 AAs are adequate. Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

### Retail Banking Services

CNB's delivery systems are accessible to all geographies and individuals of different income levels throughout the AAs. CNB operates 15 banks in Rural Non-MA#1. Three branches are in moderate-income areas, eleven in middle-income areas, and one in an upper-income area. The bank opened one new branch in a moderate-income tract in this AA during the evaluation period. The 2000 census changed the income designation for many tracts in this AA. There were 3 low-income tracts in this AA as of the 1990 census. The 2000 census reduced this number to zero. The number of moderate-income tracts also changed, from 26 in 1990 to 8 in 2000. The bank opened a new branch in a moderate-income area during this evaluation period. The percentage of branches in moderate-income areas exceeds the percentage of population. There are no low-income tracts in this AA.

CNB has five banks in Rural Non-MA#2. Of these branches, one is in a moderate-income tract and four are in middle-income tracts. There are no low-income tracts in this AA.

Business hours and services offered are reasonable and do not vary in ways that inconveniences the AAs. In the Rural Non-MA#1, all offices are open five days a week, and all, except the Durham branch, offer extended hours to include Saturdays. The Durham office is open half days due to staffing and limited needs within the small community. The majority of the banks are full service facilities. Those limited to teller operations are in close proximity to a branch that offers full service. Drive up service is also offered at all branches except the Durham branch, the Junction City Washington Street branch, and the two branches located in retail stores.

Offices in Rural Non-MA#2 are open five days a week with extended lobby hours except at the Formosa branch. Three branches also have drive-up facilities. Internal analysis at the other branches indicated there was no demand for this service and the bank has not received any adverse reaction to this decision.

Deposit services and loan products can be obtained at each branch or through the bank's Internet site. Product and service availability does not vary widely among the bank's AAs. CNB offers two types of free, no minimum balance checking account products. One is available to all customers and one is targeted toward customers over fifty. The bank also offers other types of free checking account products with varying minimum balance requirements. CNB offers brochures both in English and Spanish in all of their offices and have multilingual personnel. Each branch is allowed to set certain ancillary fees to remain competitive in local markets. In some instances, fees charged by CNB are somewhat lower than fees charged in other locations in Kansas.

CNB has 30 ATMs in Rural Non-MA#1; 6 in moderate-income areas, 22 in middle-income areas, and 2 in upper-income areas. Eight of the branches have 24 hour ATMs and five of the ATMs accept deposits. The location of other ATMs provides wide coverage for CNB's customers. In addition to these ATMs, the bank has an agreement with the Credit Union 1 of Kansas to allow CNB's customers free access to six Credit Union 1 of Kansas ATMs conveniently located on the Fort Riley military installation. There are two ATMs located in Rural Non-MA#2, both located in middle-income tracts. One ATM is located at the branch office in Mankato and is available 24 hours, with deposit-taking capability. The other is in a local convenience store. CNB customers can also access their accounts with the STAR ATM network.

### **Community Development Services**

CNB provided a limited level of community development services in the Rural Non-MA#1 and Rural Non-MA#2 AAs. These services were to organizations that primarily benefit low- and moderate-income individuals or promote economic development. Officers provided financial expertise to three organizations in Rural Non-MA#1 and to three organizations in Rural Non-MA#2. These activities included economic development corporations, housing authorities, and a fund raising drive for schools consisting primarily of low- and moderate-income students. Bank personnel also provided financial education for low- and moderate-income people.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Lawrence MA and Topeka MA is not inconsistent with the bank's overall "Low Satisfactory" performance under the service test in Kansas. In the Wichita AA, the bank's performance is weaker than the bank's overall performance in the state.

The weaker performance in Wichita is based on the distribution of branches in this AA. All of the branches are located in middle-income tracts. Almost 30 percent of the population in this AA lives in low- and moderate-income tracts. This performance does not adversely impact the overall conclusions reached for the service test in the state of Kansas.

## State Rating

### State of Nebraska

**CRA Rating for Nebraska: Satisfactory**

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

**The investment test is rated: Needs Improvement**

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

The major factors that support this rating include:

- CNB lending performance for Nuckolls County reflects a good level of responsiveness in relation to small loans to farms and businesses.
- The bank ranks first in deposit share among area institutions.
- The overall distribution of loans by income level is good. The bank's overall record of lending to low- and moderate-income individuals is good considering the percentage of households living below the poverty level. A significant percentage of loan originations are at amounts of \$100 thousand or less for each rating year.
- CNB's delivery systems are accessible to all geographies and individuals of different income levels throughout the AAs. Bank personnel provide an adequate level of community development services.

## **Description of Institution's Operations in Nebraska**

CNB operates one branch with one ATM in the state of Nebraska. This represents three percent of the bank's branches and two percent of the ATMs. The bank designated Nuckolls County as its only AA in Nebraska. This AA is primarily rural with an agricultural base. The Nebraska AA accounts for six percent of the bank's deposits and nine percent of loan originations by dollar amount. The primary lending focus in the state of Nebraska is agricultural related loans.

CNB ranks first among five financial institutions with 29 percent of the deposit market share. The bank also operates its LPO and loan-servicing center in Nebraska. The LPO is located in Omaha, Nebraska, outside of the bank's AA, and the servicing center operates in the branch office in Superior, Nebraska.

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

## **Scope of Evaluation in Nebraska**

We evaluated the bank's performance in the state of Nebraska by performing a full-scope review of the Nuckolls County AA. This is the bank's only AA in the State of Nebraska. In the Lending Test, we gave the most weight to farm loans, followed by business loans because of the level of lending activity in these products. We did not perform a geographic analysis as this AA does not contain any low- or moderate-income geographies. We did not perform an analysis of home mortgage lending. It represents only 7% of the bank's reportable lending activity in this AA.

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

## **LENDING TEST**

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

The bank's performance under the lending test in Nebraska is rated "High Satisfactory." We focused on the bank's small farm and small business lending activity, which represent 93% of the reported lending activity in this AA. The bank did not make any community development loans in the Nebraska AA. Refer to the tables in Appendix C for 2004 data. Refer to the narrative comments in this section regarding the bank's overall performance during the rating period.

### **Lending Activity**

CNB lending performance for Nuckolls County reflects a good level of responsiveness in relation to small loans to farms and businesses. The level of home mortgage lending is too low to allow for a meaningful analysis. CNB continues to rank first in deposit market share among the five institutions in the AA. Lending market share information is presented in this analysis for informational purposes only. Only one other lender in this market reports CRA data.

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

The AA in this state consists of one county with only two middle-income tracts. Therefore a geographic analysis would not be meaningful.

### **Inside/Outside Ratio**

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

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

CNB's overall distribution of loans by income level is good. Refer to Tables 8-12 in Appendix C for data used to evaluate the borrower income level of the bank's loan originations.

### **Small Loans to Farms**

The distribution of loans by farm revenue level is good. A review by loan size shows that 66 percent in 2002, 65 percent in 2003, and 69 percent in 2004 of the loans originated were in amounts less than \$100 thousand. Refer to Table 12 in Appendix C.

### **Small Loans to Businesses**

The distribution of loans by business revenue level is good. A review by loan size shows that more than 97 percent of the loans were originated in amounts less than \$100 thousand consistently for each rating year. Refer to Table 11 in Appendix D.

### **Home Mortgage Loans**

Mortgage lending was so limited, we did not analyze the distribution.

## **Investment Test**

The bank's performance under the Investment Test in Nebraska is rated "Needs Improvement."

Based on a full-scope review, the bank's performance in Nuckolls County AA is poor. CNB made a small number of qualified investments in this AA. Qualified investments consisted of donations totaling \$11 thousand to 10 organizations providing targeted social services to low-and moderate-income individuals. According to our analysis, there are four qualified investment funds that have service areas including Nuckolls County.

Refer to Table 12 in the state of Nebraska section of Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

### **Service Test**

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

The bank's performance under the service test in Nebraska is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Nuckolls County AA is adequate. Refer to Table 13 of Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The Nuckolls County, Nebraska, AA has one bank, located in a middle-income area. There are no low- or moderate-income tracts in this AA. This full-service bank offers extended hours and drive-up facilities at this branch. Business hours are reasonable and do not vary in a way that inconveniences its AA.

Deposit services and loan products can be obtained at the branch or through the bank's Internet site. CNB offers two types of free, no minimum balance check account products; one is available to all customers and one is targeted toward customers over fifty. The bank also offers other types of free checking account products with varying minimum balance requirements. CNB offers brochures both in English and Spanish in their offices and have multilingual personnel.

The bank has one ATM, located at the branch. This ATM is available 24 hours and accepts deposits.

### **Community Development Services**

CNB provided a limited level of community development services in the Nuckolls County AA. The Senior Lender provides his financial expertise to an organization that promotes affordable housing and small business development in the local community. Few opportunities to participate in community development services exist in the AA.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): January 1, 2002 to December 31, 2004 Investment, Service Tests and CD Loans: (May 13, 2002 to August 22, 2005)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Central National Bank (CNB) Junction City, Kansas	Small Business, Small Farm, Home Mortgage Loans, and Qualified Investments.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Central Charities	Subsidiary of Holding Company	Qualified Investments
Loan Production Office	Affiliate of Bank	Home Mortgage Loans
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Kansas Rural Non-MA#1 Rural Non-MA#2 Lawrence MA #4150 Topeka MA #8440 Wichita AA	Full-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope	
State of Nebraska Nuckolls County	Full-Scope	

## Appendix B: Summary of State Ratings

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RATINGS					CENTRAL NATIONAL BANK				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating					
Central National Bank	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory					
State Rating:									
Kansas	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory					
Nebraska	Low Satisfactory	Needs To Improve	Low Satisfactory	Satisfactory					

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

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

### State of Kansas

#### Rural Non-MA#1

Demographic Information for Full-Scope Area: Rural Non-MA#1							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	55	N/A	14.55	63.64	21.82	N/A	
Population by Geography	230,959	N/A	12.23	63.33	24.44	N/A	
Owner-Occupied Housing by Geography	56,108	N/A	4.61	65.94	29.45	N/A	
Businesses by Geography	14,514	N/A	11.76	65.70	22.54	N/A	
Farms by Geography	1,898	N/A	1.69	72.87	25.45	N/A	
Family Distribution by Income Level	58,304	16.16	18.35	24.92	40.67	N/A	
Distribution of Low- and Moderate-Income Families throughout AA Geographies	20,118	N/A	17.03	65.98	16.99	N/A	
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$41,637 = \$46,800 = 12.26%	Median Housing Value Unemployment Rate				= \$60,009 = 2.25%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2000 U.S. Census, and 2004 HUD updated MFI.

Rural Non-MA#1 AA consists of eight counties: Dickinson, Geary, Marion, McPherson, Morris, Pottawatomie, Riley, and Saline. Of the 55 tracts in the AA, none are low-income tracts, and eight are moderate-income tracts. Three of the moderate-income tracts are located in the business district of Junction City in Dickinson County with one on the tracts being adjacent to Interstate 70. Riley and Pottawatomie Counties were only added to this assessment area last year with the opening of two branches in Manhattan, Kansas. The AA complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

CNB has 15 branches and operates 33 ATMs within this AA. Five branches are in Junction City, two in Salina, two in Manhattan, and one in each of the cities of Herington, Durham, Hillsboro, Marion, White City, and Gypsum.

The AA is rural with an agricultural and military basis. Fort Riley, located north of Junction City, has a strong impact on the area. There is a need for military housing. Grain and cattle are the primary agricultural products. Two of the larger cities in the AA, Junction City and Salina are centers for retail trade. Economic conditions are stable in the area. Growth and development plans vary across the AA. The unemployment rate for the area was 2.25%.

**State of Kansas**

**Rural Non-MA#2**

Demographic Information for Full-Scope Area: Rural Non-MA#2						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	7	N/A	14.29	86.71	N/A	N/A
Population by Geography	16,558	N/A	8.61	91.39	N/A	N/A
Owner-Occupied Housing by Geography	5,501	N/A	9.76	90.24	N/A	N/A
Businesses by Geography	1,492	N/A	5.63	94.37	N/A	N/A
Farms by Geography	593	N/A	13.49	86.51	N/A	N/A
Family Distribution by Income Level	4,647	17.45	22.29	29.31	30.94	N/A
Distribution of Low- and Moderate-Income Families throughout AA Geographies	1,847	N/A	11.75	88.25	N/A	N/A
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$41,637 = \$46,800 = 12.26%	Median Housing Value Unemployment Rate		= \$60,009 = 2.25%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2004 HUD updated MFI.

The Rural Non-MA#2 AA consists of Cloud, Jewell, Mitchell, and Republic Counties in Kansas. It is to the north and east of Rural Non-MA#1. Of the seven tracts in the AA, none are low-income tracts and one is a moderate-income tract. The AA complies with the regulation and does not arbitrary exclude any low- or moderate-income areas.

CNB has 7 branches and four ATMs within this AA. Branches are located in Beloit, Concordia, Formoso, Glasco, Glen Elder, Mankato, and Tipton, Kansas.

The AA is rural and agriculturally based. Grain and cattle are the primary products. Area farms are decreasing in number, as the mid-size farmers are unable to compete with the efficiency of automation provided by the larger farm operations.

Economic conditions in the AA are stable. Growth and development plans are limited. Major employment industries include agriculture, school districts, and some manufacturing. The unemployment rate for the area was 2.25%.

## State of Nebraska

### Nuckolls County

Demographic Information for Full-Scope Area: Nuckolls County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2	N/A	N/A	100.00	N/A	N/A
Population by Geography	5,057	N/A	N/A	100.00	N/A	N/A
Owner-Occupied Housing by Geography	1,774	N/A	N/A	100.00	N/A	N/A
Businesses by Geography	422	N/A	N/A	100.00	N/A	N/A
Farms by Geography	162	N/A	N/A	100.00	N/A	N/A
Family Distribution by Income Level	1,441	20.12	26.02	28.80	25.05	N/A
Distribution of Low- and Moderate-Income Families throughout AA Geographies	665	N/A	N/A	100.00	N/A	N/A
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$41,596 = \$48,600 = 10.98%	Median Housing Value Unemployment Rate		= \$66,973 = 1.78%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census, and 2004 HUD updated MFI.

The Nuckolls County AA in Nebraska is north of Rural Non-MA#2. There are no low- or moderate-income tracts in the AA. The AA complies with the regulation and does not arbitrary exclude any low- or moderate-income areas. CNB has one branch and one ATM within the AA. The branch and ATM is located in the town of Superior. A residential mortgage service center is headquartered at the Superior office's facility.

Nuckolls County is rural and largely influenced by agriculture. Economic conditions in the AA are stable. The local economy consists of farming, cattle feeding, plus some manufacturing and sales. Agriculture has been stressed in past years. Farmers have a heavy reliance in the area on government payments. Major employment industries include agriculture, health care, banks, and the schools systems. The unemployment rate is at 1.78% and has increased slightly over the past year.

The trend in population is decreasing. Within Superior there is concern with decreases in population as people move pursuing job opportunities. To promote needed job growth within the city the Superior Economic Development Council, Superior Chamber of Commerce and the City of Superior cooperate as the CEC in a joint effort to promote business growth. The creation of jobs is seen as a primary need. The CEC plans incentives using funds available through a sales tax increase. The tax funds are designated for economic development, and are made available based on job creation or capital investments.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

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

## Tables of Performance Data

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### State of Kansas and Nebraska