



Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

Public Disclosure

August 2, 2006

Community Reinvestment Act Performance Evaluation

First National Bank Charter Number: 14163

202 East 11th Goodland, Kansas 67735

Office of the Comptroller of the Currency

Denver Field Office 1225 17th Street, Suite 450 Denver, CO 80202

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.

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION	7
SCOPE OF THE EVALUATION	-
FAIR LENDING REVIEW	9
KANSAS STATE RATING	10
COLORADO STATE RATING	16
APPENDIX A: SCOPE OF EXAMINATION	21
APPENDIX B: SUMMARY OF STATE RATINGS	22
APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS	23
APPENDIX D: TABLES OF PERFORMANCE DATA	26

Overall CRA Rating

Institution's CRA Rating: This institution is rated "Satisfactory."

The institution's rating in the State of Kansas is "Satisfactory." The institution's rating in the State of Colorado is "Satisfactory."

The following table indicates the performance level of **First National Bank** ("FNB" or the "bank") with respect to the Lending, Investment, and Service tests:

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

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

The major factors that support this rating include:

- FNB has an excellent volume of small loans to businesses and farms, with excellent concentration in the AAs. The bank achieved excellent borrower distribution in its small loans to businesses and farms.
- The bank has an excellent level of investments that benefit distressed and/or underserved counties.
- FNB's service delivery systems are accessible to individuals and geographies of different income levels and located in predominately distressed and/or underserved counties.
- FNB provided a good level of community development services to its delineated communities.

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/AA.

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

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

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

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 household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan 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).

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of

individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan area (CMSA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

First National Bank (FNB) is a \$337 million dollar bank, headquartered in Goodland, Kansas. The bank is an interstate community bank with operations in the States of Kansas and Colorado. FNB serves two rural assessment areas (AAs) comprised mostly of distressed and/or underserved counties. One AA is in northwestern Kansas and the other in Colorado. FNB's main office is located in Goodland, Kansas, 17 miles east of the Colorado state line, and 50 miles south of Nebraska. Full service branches are located in Sharon Springs, St. Francis, Colby, Quinter, Bird City and Oberlin Kansas, as well as Bennett and Kirk, Colorado. The bank operates 19 automated teller machines (ATMs). All branches and ATMs are located in FNB's AAs.

FNB is owned by First National Bancshares, Inc., a one-bank holding company. First National Bancshares, Inc., is located in Goodland, Kansas.

As of March 31, 2006, FNB had total assets of \$337 million and Tier 1 Capital of \$27 million. Net loans make up 56% of total assets. The bank held total loans of \$189 million, comprised of agricultural loans (56%), consumer mortgage loans (9%), commercial real estate loans (22%), commercial loans (8%), consumer loans (4%), and other loans (1%). Agricultural lending has historically been FNB's primary market focus because the bank serves rural farming communities.

The last CRA examination of FNB was performed January 6, 2003, at which time a "Satisfactory" rating was assigned. FNB was examined under the Large Bank performance standards at that time.

The bank is not restricted in its ability to meet community credit needs. There are no legal impediments or other factors preventing the bank from lending in its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB's CRA performance using the Large Bank Tests in the revised CRA regulation. For the lending test, we considered loan originations beginning January 1, 2003, through December 31, 2005. For community development (CD) loans, investments, and services, the evaluation period is from January 1, 2003, through June 30, 2006. HMDA data used in the lending test is only available for 2005. This is because FNB became a HMDA reporter during this period.

Market comparisons for small farm and small business lending are based on the 2004 peer data. This is the most recent data available at the time of this evaluation.

Considering the bank's small farm and small business lending focus, we weighted these loan types accordingly. As of March 31, 2006, small farm and small business loans accounted for about 48% of the bank's total loans by dollar volume. The bank became a Home Mortgage Disclosure Act (HMDA) reporter in 2005. So market share information for those loan types are not available for the 2003 and 2004 reporting periods. We place little emphasis on the HMDA loans since the amount of loans originated by the bank are minimal in comparison to other loan products offered by the bank.

For the Investment Test, we evaluated qualifying investments and donations. For the Service Test, we evaluated retail services, including branch distribution and accessibility, alternative delivery systems, and CD services.

Data Integrity

At a separate examination, we reviewed the bank's system for ensuring the accuracy of publicly reported CRA loan data. During this CRA examination, we reviewed the accuracy of other CRA performance data. We found the publicly reported CRA data had significant errors but management made corrections prior to officially reporting the data.

Selection of Areas for Full-Scope Review

FNB has two AAs, one in Kansas and one in Colorado. We assign a rating for the bank's performance in each state where it has branches. Thus, we performed full scope reviews in the Kansas Non-MSA and the Colorado Non-MSA Areas.

Ratings

The bank's overall rating is a blend of the state ratings. We placed the most weight in arriving at our overall conclusion on the bank's performance in the State of Kansas, since a substantial majority of the bank's operations are in Kansas. FNB obtained 97% of its deposits and 93% of its reported CRA loans from the Kansas Non-MSA Area. The bank only obtained 3% of its deposits and 7% of its reported CRA loans from the Colorado Non-MSA Area.

Fair Lending Review

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

Kansas State Rating

CRA Rating for Kansas: <u>Satisfactory</u>

The lending test is rated:
The investment test is rated:
The service test is rated:

High Satisfactory
High Satisfactory

The major factors that support this rating include:

- FNB demonstrates excellent responsiveness to credit needs within the AA.
- FNB achieved an excellent level of extending small loans to farms and businesses and an excellent level of CD lending in view of the limited opportunities available in its rural market areas.
- FNB has an excellent concentration of lending in its AA.
- FNB's branch delivery systems provide excellent accessibility within the Kansas AA, most of which is designated "Underserved" and "Distressed".
- Bank personnel provide a good level of CD services.
- FNB demonstrated good performance in providing donations to meet community needs in the AA.

Description of Institution's Operations in Kansas

The majority of FNB's operations are in the state of Kansas. FNB operates 7 branches and 16 ATMs in Kansas, representing 78% of the bank's branches and 84% of the banks ATMs.

FNB is a full service bank with a focus on agricultural lending. A total of 33 financial institutions reported making small loans to businesses or farms in 2004 in the AA. Major banking competitors include credit card banks, large interstate banks, and other community banks.

Refer to the market profiles for the State of Kansas in Appendix C for detailed demographics and other performance context information for the AA.

Scope of Evaluation in Kansas

We evaluated the bank's performance in Kansas by performing a full-scope review of the one AA in the state.

As previously stated, we gave the most weight to small loans to farms, followed by small loans to businesses in the Lending Test. We gave minimal weight to home mortgage loans due to the low volume of such loans. Farm lending in this market represents the bank's most important lending product by a wide margin. Business lending received less consideration.

For the Investment Test, we reviewed qualifying investments and donations. We assessed their complexity, innovativeness, and how well they met community needs, including those of low- and moderate-income (LMI) persons.

For the Service Test, we evaluated the distribution of bank branches, their accessibility to all segments of the AA, branch opening and closing activity, use of alternative delivery systems, and CD services.

LENDING TEST

The bank's performance under the lending test in Kansas is rated "High Satisfactory." This is based on a full-scope review of the bank's performance in the Kansas Non-MSA Area.

Lending Activity

(Refer to Table 1 in the State of Kansas section of Appendix D for the facts and data used to evaluate the bank's lending activity.)

FNB's CRA reportable loans totaled 4,806 by number and \$291 million by dollar volume over the evaluation period. FNB's lending levels reflect an excellent responsiveness in relation to area credit needs. Agricultural and business loans are essential to the local economy and are expressed credit needs. The bank's deposit market share and lending market share reflect a good record of reinvesting deposits into the community. As of June 30, 2005, FNB ranked first in deposit market share at 30% of total area deposits. In 2004, FNB attained a 64% market share for reportable small business loans, ranking first among 33 lenders.

Distribution of Loans by Income Level of the Geography

All of the census tracts in the AA are designated middle income. Therefore, further analysis of the distribution of loans by income level would not be meaningful.

Lending Gap Analysis

Maps and reports detailing FNB's lending activity over the evaluation period for small loans to farms and businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

The reported loan information was not segregated by state, so we computed one bank-wide inside/outside ratio for the two major lending products. FNB's lending activity demonstrated an excellent concentration in its AAs. A little over 90% of the bank's small loans to farms were made to borrowers located within its AAs. And slightly more than 90% of FNB's small loans to businesses were made to borrowers in its AAs.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of FNB's small loans to businesses and farms reflects excellent dispersion among borrowers of different income levels in the Kansas Non-MSA AA.

Home Mortgage Loans

FNB transitioned into a HMDA reporter after entering into the Denver MSA with the addition of the Bennett branch. As detailed in the tables, HMDA loan volume is low and conclusions carry little weight when assessing the bank's overall lending performance for geographic distribution. From January 1, 2005 through December 31, 2005, the bank extended 120 home mortgage loans. Peer market share data is unavailable for the 2005 HMDA reporting period.

Small Loans to Businesses

(Refer to Table 4 in the State of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.)

The distribution of small loans to businesses is excellent. FNB's portion of small loans to small businesses is significantly higher than the portion of businesses that are defined as such in the AA. Loans of \$100 thousand or less is also significantly higher than the portion of businesses that are defined as small businesses.

While the size of the loan is the least reliable indicator of the bank's performance, it is worthwhile to note that the competition includes credit card lenders who specialize in small loans.

Small Loans to Farms

(Refer to Table 5 in the State of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.)

In the Kansas Non-MSA AA, FNB shows excellent distribution of lending to farms of different revenue sizes, with a significant majority of loans to farms with revenues of \$1 million or less. The percentage of bank loans to farms with revenues of \$1 million or less is slightly above the percentage of small farms in the AA. A majority of the bank's small farm loans are in original amounts of \$100 thousand or less. FNB ranks first among all lenders in overall market share of small loans to farms, underscoring the bank's emphasis on agricultural lending needs.

Community Development Lending

(Refer to Table 1 in the State of Kansas section of Appendix D for the facts and data used to evaluate the bank's level of CD lending.)

FNB has a excellent level of community development loans in the AA considering the limited opportunities in this rural area. The bank made three CD loans totaling \$8 million during this evaluation period. All three loans are located in the city of Goodland, which is located in Sherman County, an Underserved Middle-Income Nonmetropolitan Tract. We compared CD loans to net Tier One Capital as one measure of FNB'S capacity. Total CD loans originated during this evaluation period equaled 28% of average Tier One Capital. This indicates a strong commitment of funds to meet community needs. CD lending had a positive impact on our conclusions about the bank's performance under the Lending Test. The following is a summary of CD loans that FNB has originated during this assessment period:

- Goodland Energy Resources, LLC. This loan originated May 2, 2006 in the amount of \$3.5 million for the construction of a coal-fire electric power plant that will be the primary provider of energy for the city of Goodland.
- E-Caruso, LLC. This loan originated November 1, 2005 for the amount of \$3.5 Million. The purpose of this loan is to construct an ethanol production facility.
- RER Bio-diesel now known as Kanza Energy, LLC. This \$1,000,000 loan originated December 9, 2005 and is for the construction of a bio diesel production facility which will be located in the city of Goodland.

INVESTMENT TEST

The bank's level of qualified investments in the Kansas AA is excellent. Qualified investment opportunities within the Kansas Non-MSA AA are limited. However FNB demonstrated creativity by facilitating the creation of investment opportunities that directly benefit Sherman County, a designated underserved middle-income tract. These investments also benefit low- and moderate-income individuals in this underserved community through permanent job creation. FNB's qualified investments exceeded 8% of Tier 1 capital when they were made, which demonstrates an excellent commitment to community development. Following are the qualified investments made by FNB:

- \$1.3 million dollar investment in E-Caruso LLC. This company owns the proposed ethanol production facility in Sherman County.
- \$1 million invested in RER Bio-diesel, LLC now know as Kanza Energy, LLC. This company owns the bio-diesel production facility in Sherman County.

FNB donated \$169 thousand to revitalization efforts during this assessment period. Recipients of these donations were:

- Northwest Kansas Planning & Development Commission
- Greeley/Wallace County Healthcare Foundation
- Northwest Kansas area Medical Foundation
- Gove County Healthcare Endowment Foundation
- · Goodland Regional Medical Center.

All of the above directly benefit the revitalization of underserved and/or distressed middle-income tracts and provide services to low- to moderate-income individuals.

SERVICE TEST

The bank's performance under the service test in Kansas is rated "High Satisfactory." Overall, FNB's branch delivery systems provide good accessibility to all individuals in the AA. Since the AA does not have any LMI block numbering areas, we assessed this factor on the services provided. The AA includes the counties of Cheyenne, Decatur, Gove, Sheridan, Rawlins, Thomas, and Trego which are designated as "Middle-Income Nonmetropolitan Distressed and Underserved Geographies". Sherman and Wallace Counties in the bank's AA are designated as "Underserved". The bank provides much needed banking services to these communities.

Retail Banking Services

FNB did not close any branches during our evaluation period. FNB opened one branch during our evaluation period in the Colorado AA. The branch is located in the city of Bennett, Colorado which is in middle-income geographies.

Business hours of the branches do not vary in a way that would inconvenience LMI persons. Full service banking is offered during all regular business hours. FNB offers low-cost checking accounts to all customers. Other products offered include low-cost business accounts designed for small businesses and small farms.

FNB operates 16 ATMs in the Kansas AA. Most branches have ATMs. Alternate delivery systems also include Internet banking services, banking by mail, and Telecommunication Device for the Deaf (TDD). This allows customers to obtain deposit and loan account information, pay bills electronically, and transfer funds. We did not place significant weight on the alternative delivery systems since these services are not targeted toward low- or moderate-income individuals or geographies.

Community Development Services

FNB loan officers serve on the loan committee for the Revolving Loan Fund of Sherman, Decatur and Gove Counties. All of which are designated Distressed Middle-Income Nonmetropolitan Tracts. An FNB employee also serves as loan officer and is on the Board of Directors for Pioneer Country Development Inc, a SBA Certified Development Company located in Hill City, KS. An FNB employee provides technical services by serving on the Sherman County Economic Development Board of Directors. This non-profit organization is tasked with business recruitment as well as local economic revitalization in this underserved county.

Colorado State Rating

CRA Rating for Colorado: <u>Satisfactory</u>

The lending test is rated:
The investment test is rated:
The Service Test is rated:
High Satisfactory
High Satisfactory

The major factors that support this rating include:

- FNB has an excellent record of lending to small farms of various revenue levels in the Colorado AA.
- FNB has a good record of lending to small businesses and has a good record of lending to borrowers of various revenue levels.
- FNB did not originate any loans or make any investments that qualified as CD in the Colorado AA during the review period. The opportunities in the Colorado AA are very limited.
- FNB's branch delivery systems provide good accessibility and serves primarily distressed and underserved middle-income tracts.

Description of Institution's Operations in Colorado

FNB's Colorado operations play a minor roll in the bank's overall operations. Only 3% of the bank's deposits and 7% of its CRA reportable loans are in the Colorado Non-MSA Area. The bank opened a branch in Bennett, Colorado, in April of 2005. The branch is in a middle-income geography within the AA.

FNB operates two branches in Colorado and has designated four full counties and two partial counties serving two census tracts in each county. FNB's primary business focus in the Colorado AA is agricultural and small business lending. The bank offers a full range of products at its Colorado branches.

(Refer to the market profile for the State of Colorado in Appendix C for detailed demographics and other performance context information.)

Scope of Evaluation in Colorado

The performance in the Colorado AA had limited weight on FNB's overall rating, since the volume of business in the AA is a small part of FNB's overall business.

We performed a full scope review of the bank's performance in this AA. In the Lending Test, we focused on the bank's lending activity in small loans to farms and businesses. With the bank's historical focus on agricultural lending, and the preponderance of that product in its reported lending activity, we place the most weight on FNB's small loans to farms in our evaluation. The limited information available indicated that the volume of home mortgage loans in this AA was negligible, so an analysis of these loans would not have provided meaningful results. The bank did not report any CD loans, CD services, or qualifying investments in this AA. We evaluated FNB's retail services.

LENDING TEST

We rated the bank's performance "High Satisfactory" under the lending test in Colorado.

Lending Activity

(Refer to Table 1 in the State of Colorado section of appendix D for the facts and data used to evaluate the bank's lending activity.)

FNB's CRA reportable loans totaled 344 by number and \$25 million by dollar volume over the evaluation period. FNB's lending levels reflect an excellent responsiveness in relation to area credit needs. Agricultural and business loans are essential to the local economy and are expressed credit needs. The bank's deposit and lending market share reflects a good record of reinvesting deposits into the community.

Distribution of Loans by Income Level of the Geography

All of the census tracts in the AA are designated middle income. Therefore, further analysis of the distribution of loans by income level would not be meaningful

Lending Gap Analysis

Maps and reports detailing FNB's lending activity over the evaluation period for small loans to farms and businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The borrower distribution of FNB's small loans to businesses and farms reflects excellent dispersion among borrowers of different income levels in the Colorado Non-MSA AA.

Home Mortgage Loans

The level of the bank's home mortgage lending activity was not significant in this AA. Therefore, we did not review the borrower distribution of home mortgage loans.

Small Loans to Businesses

(Refer to Table 4 of the State of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.)

The distribution of small loans to businesses in the Colorado Non-MSA Area is excellent. FNB's percentage of small loans to small businesses of 95.56% is significantly higher than the percentage of small businesses in the AA of 59.36%. The bank's percentage of loans of \$100 thousand or less is also significantly higher than the percentage of businesses that are defined as small businesses in the AA.

Small Loans to Farms

(Refer to Table 5 in the State of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.)

The distribution of loans to farms that meet the revenue definition is excellent. FNB's percentage of loans to small farms of 97.07% exceeds the percentage of small farms in the AA of 90.06%. The bank's percentage of loans in amounts of \$100 thousand or less is reasonably close to the percentage of small farms in the AA. Generally, the size of the loan is a less reliable indicator of the bank's performance in this element because there is no direct relationship between loan size and the revenue stream of the borrower.

Community Development Lending

(Refer to Table 1 in the State of Colorado section of Appendix D for the facts and data used to evaluate the bank's CD lending.)

The bank does not have any CD loans in the Colorado AA. The lack of CD loans in this area does not negatively impact the bank's performance. The opportunity to extend

loans with a CD purpose is low in this AA, given the low population and relative lack of development and redevelopment activities.

Product Innovation and Flexibility

During the evaluation period, FNB participated in SBA and USDA Rural Development Agency loan programs. Through the use of government guaranties, flexible underwriting, and technical assistance, these programs enabled the bank to lend to businesses and small farms, which would not otherwise qualify for credit. This lending activity demonstrates additional responsiveness to area credit needs. Most of the loans originated in these programs were included in the bank's reported loan numbers in the tables in the Appendix.

INVESTMENT TEST

The bank did not have any qualified investments in the Colorado AA. Investment opportunities in this AA are very limited.

SERVICE TEST

The bank's performance under the Service Test in Colorado is rated "High Satisfactory." FNB's branch provides good accessibility to individuals living in the moderate-income geography, and there are no low-income geographies in the AA. The AA includes Kit Carson, Washington, and Yuma counties all of which are designated as "Under-Served". Washington County is also designated as "Distressed." FNB provides much needed banking services to these communities.

Retail Banking Services

Service delivery systems are reasonably accessible to all geographies and individuals of different income levels throughout the full-scope AA. Banking hours are tailored to meet the needs of the community. Full service banking is offered during all regular business hours. FNB offers low-cost checking accounts to all customers. Other products offered include low-cost business accounts designed for small businesses and small farms.

FNB operates three ATMs in the Colorado AA. Two of the three ATMs are located in Bennett, Colorado. One of the Bennett ATMs is located on bank premises and the other is located at a local convenience store. The other Colorado ATM is located in Stratton along the Interstate 70 Highway corridor. Alternate delivery systems also include Internet banking services. This allows customers to obtain deposit and loan account information, pay bills electronically, and transfer funds. We did not place significant weight on the alternative delivery systems since these services are not

targeted toward LMI individuals or geographies.

Community Development Services

The bank did not provide any significant services that qualify under the CD service test in this AA. Due to the bank's limited presence in Colorado and the relative absence of opportunities, the lack of CD services in the AA does not negatively impact the bank's performance.

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").

Time Period Reviewed	,	oans): (1/1/2003 to 12/31/2005) s and CD Loans: (1/1/2003 to 6/30/2006)					
Financial Institution		Products Reviewed					
First National Bank (FNB) Goodland, Kansas		Loans, Investments & Services					
Affiliate(s)	Affiliate Relationship	Products Reviewed					
Not Reviewed	NA	NA					
List of Assessment Areas	and Type of Examination						
Assessment Area	Type of Exam	Other Information					
Kansas Non-MSA Area Colorado Non-MSA Area	Full Scope Full Scope	None None					

Appendix B: Summary of State Ratings

	RATINGS	First Nationa	al Bank	
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
First National Bank	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Kansas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Colorado	High Satisfactory	Low Satisfactory	High 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

Table of Contents

Kansas Non-MSA Area	C-	-2	,4
Colorado Non-MSA Area	C-	-2	5

State of Kansas

Institution ID: FNB Goodland

Kansas Non-MSA

Demographic Information for Full Scope	Area: Kansas					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	14	0.00	0.00	100.00	0.00	0.00
Population by Geography	35,492	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	10,872	0.00	0.00	100.00	0.00	0.00
Business by Geography	4,101	0.00	0.00	100.00	0.00	0.00
Farms by Geography	1,285	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	9,841	18.12	22.60	25.11	34.17	0.00
Distribution of Low and Moderate Income 4,007 Families throughout AA Geographies		0.00	0.00	100.00	0.00	0.00
Median Family Income HUD Adjusted Median Family Income for 2 Households Below Poverty Level	004	41,637 46,800 12%	Median Housing Unemployment R Census)			

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

Source: 2000 US Census and 2004 HUD updated MFI

The defined AA for Kansas consists of nine contiguous counties located in the northwest corner of Kansas. This includes the counties of Cheyenne, Decatur, Gove, Rawlins, Sherman, Thomas, Sheridan, Trego, and Wallace. There are 14 Census Tracts/BNAs within the AA, all of which are designated middle income. The AA meets the regulatory requirements and does not arbitrarily exclude low- or moderate-income areas.

FNB operates 7 full-service branches and 16 Automated Teller Machines (ATMs) within the AA. FNB's main office is in Goodland, Kansas, 17 miles east of the Colorado state line, and 50 miles south of the Nebraska border. Other branches are located in St. Francis, Bird City, Oberlin, Quinter, Colby, and Sharon Springs. FNB's AA includes the counties of Cheyenne, Decatur, Gove, Sheridan, and Thomas which are designated as "Middle-Income Nonmetropolitan Distressed and Underserved Geographies". Sherman and Wallace Counties in the bank's AA are designated as "Underserved."

FNB is a full service bank offering a variety of loan products, including agricultural loans, commercial loans, residential mortgage loans, and consumer loans. Agricultural lending has historically been FNB's primary market focus. Competition is strong with 11 chartered banks in the AA. Two banks have total assets exceeding \$250 million, while the remaining nine community banks are significantly smaller in asset size. Farm Credit Services provides additional competition for agriculture loans. And, several credit card banks and large interstate banks actively lend in this AA.

State of Colorado

Institution ID: FNB Goodland

Colorado Non-MSA

Demographic Information for Full Scope A	Area: COLOR	ADO				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	11	0.00	0.00	100.00	0.00	0.00
Population by Geography	36,043	0.00	0.00	100.00	0.00	0.00
Owner-Occupied Housing by Geography	10,196	0.00	0.00	100.00	0.00	0.00
Business by Geography	3,484	0.00	0.00	100.00	0.00	0.00
Farms by Geography	974	0.00	0.00	100.00	0.00	0.00
Family Distribution by Income Level	9,818	21.06	21.86	26.05	31.02	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies 4,214		0.00	0.00	100.00	0.00	0.00
Median Family Income HUD Adjusted Median Family Income for 20 Households Below Poverty Level	004	57,138 64,493 10%	Median Housing Unemployment R Census)			

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

Source: 2000 US Census and 2004 HUD updated MFI

The defined AA for Colorado consists of Adams County US Census Tracts 84.01 & 84.02 only; Arapahoe County US Census Tracts 71.01 and 71.02 only; as well as, Yuma, Washington and Kit Carson Counties. There are 11 Census Tracts/BNAs within the AA. All are designated moderate income. The AA meets the regulatory requirements and does not arbitrarily exclude any LMI areas.

FNB operates two full-service branches and 3 ATMs within the AA. The branches are located in Kirk and Bennett, Colorado. The ATMs are located one in Stratton, and two in Bennett, along a major interstate highway.

The Kirk and Bennett branches offer a full line of banking products. Loan products include agricultural loans, commercial loans, residential mortgage loans, and consumer loans. Agricultural lending has historically been FNB's primary market focus in this AA. Competition is strong, with nine chartered banks competing for deposits in the AA. Farm Credit Services does provide competition for agricultural loans, and out-of-area credit card banks and large interstate banks compete with FNB for small loans to businesses.

Appendix D: Tables of Performance Data

Table of Contents

CONTENT OF STANDARDIZED TABLES	D-27
TABLES OF PERFORMANCE DATA	D-29

Content of Standardized Tables

References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/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 Volume 66, No. 134, 12(i) 5 and 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Community Development Loans" column.
- Table 2. 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 3. 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 4. 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 5. 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 6. 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

2004 - 2005

Institution ID: FNB Goodland

Table 1. Lending Volume

LENDING VOLUME		Geography: Kansas/Colorado Evaluation Period: JAN. 1, 2004 T											
	% of Rated Area Loans (#) in	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans*		•		% of Rated Area Deposits in MA/AA***	
MA/Assessment Area (2004):	MA/AA*	#	# \$ (000's)		\$ (000's)	# (000°)		#	\$ (000's)	#	\$(000's)		
		#	\$ (000.8)	#	\$ (000 S)	#	\$ (000's)	#	\$ (000 S)	#	\$(000.8)		
Full Review:													
Colorado AA	6.81	7	445	45	5,770	205	13,381	0	0	257	19,596	0.00	
Kansas AA	93.19	113	6,815	942	53,831	2,462	158,007	3	8,000	3,517	218,653	0.00	

^{*} Loan Data as of December 31, 2005. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2005 to December 31, 2005.

*** Deposit Data as of August 03, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Small Loans to Businesses

Geographic Distribu	tion: SMALL	LOANS T	O BUSINES	SSES		Geography: Kansas/Colorado Evaluation Per							riod: JAN. 1, 2004 TO DEC. 31, 2005				
	Total Sr Business I			Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*			*				
MA/Assessment Area:	#	% of Total* *	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp		
Full Review:			_							_							
Colorado AA	45	4.56	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Kansas AA	942	95.44	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		

^{*} Based on 2004 Peer Mortgage Data (Western)

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

*** Source Data - Dun and Bradstreet (2005).

Table 3. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: Kansas/Colorado Evaluation Period: JAN. 1, 2004 TO DEC. 31, 2005															
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				у*
MA/Assessment Area:	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BAN K Loans	% of Farms* **	% BANK Loans	% of Farms** *	% BAN K Loans	Overal 1	Low	Mod	Mid	Upp
Full Review:															
Colorado AA	205	7.70	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kansas AA	2,458	92.30	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2004 Peer Mortgage Data (Western)

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

*** Source Data - Dun and Bradstreet (2005).

Table 4. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: S	MALL LO	ANS TO E	BUSINESSES		Geography: Kar	nsas/Colorado	Evaluation Period: JAN. 1, 2004 TO DEC. 31, 2005				
	Total Small Loans to Businesses With Revenues of \$1 million or less				Loans b	y Original Amount Regardles	Market Share*				
MA/Assessment Area:	#	% of Total*	% of Businesses* **	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
Full Review:											
Colorado AA	45	4.56	59.36	95.56	68.89	17.78	13.33	0.00	0.00		
Kansas AA	942	95.44	51.13	84.29	87.37	7.75	4.88	0.00	0.00		

^{*} Based on 2004 Peer Mortgage Data (Western)

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2005).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.98% of small loans to businesses originated and purchased by the bank.

Table 5. Borrower Distribution of Small Loans to Farms

Borrower Distribution:	SMALL I	OANS TO) FARMS		Geography: k	Kansas/Colorado	Evaluation Period: JAN. 1, 2004 TO DEC. 31, 2005				
Total Small Farms With Revenues of \$1 Loans to Farms million or less					Loans	by Original Amount Regardle	Market Share*				
MA/Assessment Area:	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
Full Review:											
Colorado AA	205	7.70	90.66	97.07	82.93	13.17	3.90	0.00	0.00		
Kansas AA	2,458	92.30	95.64	96.46	82.42	13.10	4.48	0.00	0.00		

^{*} Based on 2004 Peer Mortgage Data (Western)

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2005).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.95% of small loans to farms originated and purchased by the bank.

Table 6. Distribution of Branch Delivery System and Branch Openings/Closings

Distribution of Bran	nch Delivery	System an	d Branch C)penings/	Closings		Geogr	raphy: Kan	sas/Colora	do		Evaluat	ion Perio	l : JAN. 1,	2004 TO 1	DEC. 31, 2	2005
	Deposit s		Branches						Branch Openings/Closings					Population			
MA/Assessment Area:	% of Rated	# of BANK	% of Rated		ocation of ome of Ge		•	# of	# of	Net cha	_	cation of B or -)	ranches	% o	-	on within F raphy	Each
	Area Deposit s in AA	Branch es	Area Branch es in	Low	Mod	Mid	Upp	Branch Openin gs	Branch Closing s	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:			AA														
Colorado AA	0.00	2	0.00	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Kansas AA	0.00	7	0.00	0.00	0.00	100.0	0.00	1	0	0	0	1	0	0.00	0.00	100.00	0.00

TABLES OF PERFORMANCE DATA 2003

Institution ID: FNB Goodland

Table 1. Lending Volume

	<u>-</u>												
LENDING VOLUME				Geography	y: Kansas/Co	lorado	Evalua	tion Period:	tion Period: JAN. 1, 2003 TO DEC. 31, 2003				
	% of Rated Area Loans (#) in	Home N	Mortgage		Loans to	Small Loan	ns to Farms	Comr Developme	nunity ent Loans**	Total Repo	orted Loans	% of Rated Area Deposits in MA/AA***	
MA/Assessment Area (2004):	MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
Full Review:										•			
Colorado AA	6.32	0	0	22	721	65	4,238	0	0	87	4,959	0.00	
Kansas AA	93.68	0	0	355	13,022	934	59,270	0	0	1,289	72,292	0.00	

^{*} Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.

*** Deposit Data as of August 03, 2006. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Small Loans to Businesses

Geographic Distribu	tion: SMALL	LOANS T	O BUSINES	SSES		Geograpl	hy: Kansas/C	olorado	Evaluation Period: JAN. 1, 2003 TO DEC. 31, 2003						
	Total Small Low-Income Business Loans Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*						
MA/Assessment Area:	#	% of Total* *	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Colorado AA	22	5.84	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kansas AA	355	94.16	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
*** Source Data - Dun and Bradstreet (2003).

Table 3. Geographic Distribution of Small Loans to Farms

Geographic Distribu	tion: SMALL L	OANS TO	FARMS	Ge	ography: K	Cansas/Col	orado		Evaluation	on Period	: JAN. 1, 2	2003 TO E	DEC. 31, 2	003	
	Total Small Loans			ncome aphies	Moderate- Geogra			-Income raphies	Upper-In Geogra		M	arket Shar	e (%) by	Geograph	<i>y</i> *
MA/Assessment Area:	#	% of Total**	% of Farms* **	% BANK Loans	% of Farms* **	% BAN K Loans	% of Farms* **	% BANK Loans	% of Farms** *	% BAN K Loans	Overal 1	Low	Mod	Mid	Upp
Full Review:											l			'	
Colorado AA	65	6.51	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kansas AA	934	93.49	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area. *** Source Data - Dun and Bradstreet (2003).

Table 4. Borrower Distribution of Small Loans to Businesses

Borrower Distribution	on: SMALL	LOANS T	O BUSINESSE	S	Geography: Kan	sas/Colorado	Evaluation Period: JAN. 1, 2003 TO DEC. 31, 2003				
	Total Small Loans to Businesses ## 00 of \$1 million or less				Loans b	y Original Amount Regardles	s of Business Size	Market Share*			
	#	% of Total*	% of Businesses*	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
MA/Assessment Area:		*	**								
Full Review:											
Colorado AA	22	5.84	62.14	90.91	90.91	9.09	0.00	0.00	0.00		
Kansas AA	355	94.16	56.30	86.48	92.11	5.07	2.82	0.00	0.00		

^{*} Based on 2003 Peer Small Business Data -- US and PR

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

^{****} Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.77% of small loans to businesses originated and purchased by the bank.

Table 5. Borrower Distribution of Small Loans to Farms

Borrower Distributi	on: SMALI	LOANS	TO FARMS	Geogr	raphy: Kansas/Colo	rado	Evaluation Period: JAN.	1, 2003 TO DEC	2. 31, 2003	
	Total Small Farms With Revenues of \$ million or less					by Original Amount Regardle	ess of Farm Size	Market Share*		
MA/Assessment Area:	#	% of Total*	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Colorado AA	65	6.51	92.19	95.38	76.92	20.00	3.08	0.00	0.00	
Kansas AA	934	93.49	95.73	96.25	81.48	14.88	3.64	0.00	0.00	

^{*} Based on 2003 Peer Small Business Data -- US and PR

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

^{***} Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

^{****} Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2.30% of small loans to farms originated and purchased by the bank.