



PUBLIC DISCLOSURE

March 31, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sunflower Bank, National Association
Charter Number 4742

3025 Cortland Circle
Salina, KS 67401

Office of the Comptroller of the Currency

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Suite 1600
Overland Park, KS 66210

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	1
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION.....	7
SCOPE OF THE EVALUATION.....	8
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	10
STATE RATING	11
STATE OF KANSAS	11
STATE OF COLORADO	20
STATE OF MISSOURI	33
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF STATE RATINGS	B-1
APPENDIX C: MARKET PROFILES FOR FULL-SCOPE AREAS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-7

General Information and Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Sunflower Bank, National Association issued by the OCC, the institution’s supervisory agency, for the evaluation period ending March 31, 2014. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

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

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

Performance Levels	Sunflower Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X		
Needs to Improve		X	
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:

- An overall good lending activity of home mortgage loans and small loans to farms. An overall adequate lending activity of small loans to businesses.
- An overall poor geographic distribution and overall adequate borrower distribution of home mortgage loans.
- An overall excellent geographic distribution and overall good borrower distribution of small loans to businesses.
- An overall poor geographic distribution and overall good borrower distribution of small loans to farms.

- An overall poor level of qualified investments and donations.
- Sunflower Bank's service delivery systems provide good access to low- and moderate-income geographies and individuals. The overall level of CD services is adequate.

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.

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and

sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

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

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

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

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

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

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

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

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

Median Family Income (MFI): The median income 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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

Sunflower Bank, National Association (Sunflower) is a \$1.7 billion interstate financial institution headquartered in Salina, Kansas. Sunflower is a wholly owned subsidiary of Sunflower Financial, Inc., a \$1.7 billion one-bank holding company also headquartered in Salina, Kansas.

Sunflower is a full-service banking institution offering a wide variety of retail and commercial banking services. The primary lending focus is home mortgage and commercial lending. As of December 31, 2013, Sunflower's loan portfolio, by dollar volume, consisted of 48 percent commercial, 44 percent residential real estate, 4 percent agriculture, and 4 percent consumer loans. Net loans represent 60 percent of total assets. Net Tier One Capital is \$162 million.

Sunflower operates 30 branches throughout 16 assessment areas (AAs) in the states of Kansas, Colorado, and Missouri. The AAs consist of four metropolitan areas in Kansas (Wichita, Manhattan, Lawrence, and Topeka) and three metropolitan areas in Colorado (Pueblo, Denver-Aurora-Broomfield, and Boulder). In addition, Sunflower has non-metropolitan AAs: six in Kansas, two in Colorado, and one in Missouri.

During the evaluation period, Sunflower opened three new branches in Colorado; two in the Denver-Aurora-Broomfield (Denver) metropolitan area and one in the Boulder metropolitan area. In Denver, Sunflower opened a branch in Denver county and Arapahoe county on May 6, 2013 and October 14, 2013, respectively. The Boulder county branch is in the city of Longmont and opened December 16, 2013. We did not analyze Sunflower's performance in these AAs since they are new to Sunflower within the last 12 months.

There are no legal, financial, or other factors that impede Sunflower's ability to help meet credit needs in its AAs. Sunflower received a "Satisfactory" rating at its last CRA examination dated July 20, 2011.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test, excluding community development (CD) loans is January 1, 2010 to December 31, 2012. Our analysis did not include multifamily home mortgage loans. The number of reported loans for this product type is insufficient for meaningful analysis in all AAs.

For CD loans, the Investment Test, and Service Test, the evaluation period is from July 20, 2011 to March 31, 2014. The Investment Test included a review of investments and donations originated in Sunflower's AAs that meet the definitions of CD investments. The Service Test included a review of retail and CD services provided in Sunflower's AAs.

Performance Tables 1-12 in Appendix D includes only data covered by the 2000 Census, namely 2010 through 2011. Data from 2012 is discussed in the applicable narrative sections of the evaluation. We used deposit information, reported to the Federal Deposit Insurance Corporation (FDIC) annually, to determine Sunflower's deposit market share and rank within its AAs.

Data Integrity

We verified the accuracy of 2010-2013 Home Mortgage Disclosure Act (HMDA) reportable loans. We also verified the accuracy of 2011-2013 small loans to businesses and small loans to farms; we relied on Sunflower's internal monitoring reviews to assess the accuracy of 2010 data for these loans. Our review found significant data integrity errors in 2013 HMDA data. Therefore, we excluded 2013 loan data from this evaluation. All 2010-2012 data is accurate and reliable. We evaluated CD loan, investment, and service information to determine eligibility and accuracy during the evaluation. All activities included in this evaluation met the CD definition.

Selection of Areas for Full-Scope Review

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

Ratings

Sunflower's overall rating is a blend of the state ratings. CRA performance in the state of Kansas received the most weight. This area constitutes 79 percent of Sunflower's total deposit base and 84 percent of total reported loans (by number) during the evaluation period.

The state of Colorado received the next highest weighting followed by the state of Missouri. The state of Colorado constitutes 20 percent of total deposits and 15 percent of total reported loans (by number). The state of Missouri represents one percent of total deposits and reported loans (by number).

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the “Scope” section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), in determining a national bank's (bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by Sunflower, or in any assessment area by an affiliate whose loans have been considered as part of Sunflower's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

State Rating

State of Kansas

CRA Rating for Kansas¹:	Satisfactory
The lending test is rated:	Low Satisfactory
The investment test is rated:	Needs to Improve
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending test performance in the non-MA KS AA is adequate. The overall geographic distribution of loans is poor and borrower distribution of loans is adequate. Lending activity is excellent.
- Investment test performance in the non-MA KS AA is poor as demonstrated by the level of qualified investments and donations.
- Branch distribution is readily accessible to geographies and individuals of different income levels in the non-MA KS. Bank personnel provided an adequate level of community development services during the evaluation period. Performance in limited-scope AAs impacted the overall service test rating.

Description of Institution's Operations in Kansas

Sunflower operates 25 branches and 32 ATMs within its AAs in the state of Kansas. Home mortgage loans are the primary business focus in the non-MA AAs, which received a full-scope review. The state of Kansas AAs represents 79 percent of Sunflower's total deposit base and 84 percent of total reported loans (by number) during the evaluation period. In addition, 83 percent of the dollar volume of total reported loans is in the Kansas AAs.

Non-MA AAs in Kansas were combined for analysis purposes and represents the entire counties of Thomas, Ford, Barton, Ellis, Russell, Osborne, Seward, Saline, and McPherson. Sunflower AAs also consist of the entire Lawrence MSA; Shawnee county in the Topeka MSA, and Sedgwick county in the Wichita MSA. The Manhattan MSA AA includes Riley county, Geary county, and one of four tracts in Pottawatomie county. All tracts in Pottawatomie county are middle- or upper-income.

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

The non-MA KS AA represents 84 percent of total deposits in state of Kansas and 64 percent of total bank deposits. Sunflower ranks first in deposit market share in the non-MA KS AA at 15 percent. The AA also has 75 percent of loan originations (by number) in the state of Kansas. Sunflower operates 17 branches and 24 ATMs in the AA. Competition is provided by 55 institutions; a majority are headquartered in the state of Kansas.

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

Scope of Evaluation in Kansas

We evaluated performance in the state of Kansas by performing a full-scope review in the non-MA KS AAs, which were combined for analysis purposes. This AA received a full-scope review since it has the majority of deposits and loans in Kansas. We performed limited-scope reviews in the Wichita, Manhattan, Lawrence, and Topeka AAs. The state rating is based primarily on results of those areas that received full-scope reviews. Refer to Appendix A for more information.

Home mortgage loans received the most weight under the Lending Test since it is the primary business focus in the AA and has a majority of lending volume. These loans represent 59 percent by number and 60 percent by dollar volume of total reported loans in the non-MA KS AA. Small business lending received the next highest weight at 25 percent by number and 28 percent by dollar volume of total reported loans in the AA. In our analysis of home mortgage lending, home refinance loans received the most weight since they represent 48 percent of Sunflower's total home mortgage lending by number. The next highest weight was placed on home purchase loans, followed by home improvement loans, which are 32 percent and 20 percent of total home mortgage lending by number, respectively.

To identify community credit needs, we considered one community contact conducted by OCC staff within the last 12 months with a local government organization. The contact identified agriculture and consumer loans as the primary banking needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the lending test in Kansas is rated "Satisfactory". Based on full-scope reviews, Sunflower's performance in the non-MA KS AA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Kansas section of appendix D for the facts and data used to evaluate Sunflower's lending activity. For purposes of this review, we used deposit information as of June 30, 2011.

Sunflower's lending activity in the non-MA KS AA is excellent. As of June 30, 2011, Sunflower ranks first in deposit market share at 15.41 percent among 55 depository institutions.

Based on 2011 peer data, Sunflower ranks first (by number) for home purchase, home improvement, and home refinance loans at 10.31 percent, 51.83 percent, and 11.98 percent, respectively. Competition is strong for home purchase and home refinance loans with 102 and 117 lenders in the AA, respectively.

For small loans to businesses, Sunflower ranks fourth (by number) at 9.04 percent. Sunflower ranks in the top ten percent of lenders in the market. The top three lenders are nationwide credit card companies with a combined market share of 30 percent.

For small loans to farms, Sunflower ranks second (by number) at 23.20 percent. Sunflower ranks in the top ten percent of lenders in the market.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is poor. There are no low-income census tracts in the non-MA KS AA.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans in the non-MA KS AA is poor.

The overall geographic distribution of home purchase loans is poor. Sunflower's geographic distribution of these loans during 2010 and 2011 is poor. The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is below the overall market share and is adequate. Performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

The overall geographic distribution of home improvement loans is poor. Sunflower's geographic distribution of these loans during 2010 and 2011 is very poor. The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is below the overall market share and is adequate. Performance in 2012 was stronger than Sunflower's performance noted in 2010 and 2011 and is adequate. The stronger performance was due to good market share in moderate-income geographies, which substantially meets the overall market share.

The overall geographic distribution of home refinance loans is very poor. Sunflower's geographic distribution of these loans during 2010 and 2011 is very poor. The percentage of loans in moderate-income geographies was significantly below the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is significantly below the overall market share and is poor. Performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent. Sunflower's geographic distribution of small loans to businesses during 2010 and 2011 was excellent. The percentage of loans in moderate-income geographies exceeds the percentage of businesses in these areas. Sunflower's market share in these geographies also exceeds the overall market share and is excellent. Performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

Small Loans to Farms

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

The overall geographic distribution of small loans to farms is poor. Sunflower did not make any of these loans in moderate-income tracts. Lending opportunities are limited as only 3.20 percent of farms are in these census tracts. Sunflower's performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

Lending Gap Analysis

We reviewed summary reports to analyze Sunflower's home mortgage, small business, and small farm lending activity over the evaluation period and identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. Sunflower's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- and moderate-income areas.

Inside/Outside Ratio

This ratio is a bank-wide calculation and is not calculated by individual AAs. Analysis is limited to bank originations and purchases and does not include any affiliate data. For the evaluation period, Sunflower made a substantial majority of all loan products inside its AAs (82.09 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home refinance (87.21 percent), home purchase (81.90 percent), home improvement (86.59 percent), small loans to businesses (82.31 percent) and small loans to farms (68.31 percent).

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of Sunflower's lending is adequate.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in the “Multistate Metropolitan Area(s)” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans in the non-MA KS AA is adequate. The percentage of families below poverty level is 7.84 percent and 9.30 percent based on 2000 and 2010 census data, respectively. This information is considered in the analysis.

The overall borrower distribution of home purchase loans is adequate. Sunflower’s borrower distribution of these loans during 2010 and 2011 is adequate. The percentage of loans to low-income borrowers is below demographics and adequate considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is excellent and near to demographics. The market share of loans to low- and moderate-income borrowers is significantly below the overall market share. Market share performance to low- and moderate-income borrowers is very poor and poor, respectively. Performance in 2012 was stronger than Sunflower’s performance noted in 2010 and 2011 and is good. The stronger performance was due to the excellent percentage of loans to low-income borrowers considering the percent of families below poverty. The market share of these loans is also excellent and exceeds the overall market share.

The overall borrower distribution of home improvement loans is adequate. Sunflower’s borrower distribution of these loans during 2010 and 2011 is adequate. The percentage of loans to low-income borrowers is below demographics and adequate considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is good and near to demographics. The market share of loans to low-income borrowers is below the overall market share and adequate. The market share of loans to moderate-income borrowers substantially meets the overall market share and is good. Performance in 2012 was stronger than Sunflower’s performance noted in 2010 and 2011 and is good. The stronger performance was due to the good percentage of loans to low-income borrowers considering the percent of families below poverty.

The overall borrower distribution of home refinance loans is adequate. Sunflower’s borrower distribution of these loans during 2010 and 2011 is adequate. The percentage of loans to low-income borrowers is below demographics and adequate considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is poor and significantly below demographics. The market share of loans to low-income borrowers is adequate and below the overall market share. The market share of loans to moderate-income borrowers is poor and significantly below the overall market share. Sunflower’s performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

Small Loans to Businesses

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

The overall borrower distribution of small loans to businesses is good. Sunflower’s borrower distribution of these loans during 2010 and 2011 is good. The percentage of small loans to

businesses with gross annual revenue of \$1 million or less is below demographics and adequate. The market share of these loans exceeds the overall market share and is excellent. Sunflower's performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

Small Loans to Farms

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

The overall borrower distribution of small loans to farms is good. Sunflower's borrower distribution of these loans during 2010 and 2011 is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less is near to demographics and good. The market share of these loans exceeds the overall market share and is excellent. Sunflower's performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

Community Development Lending

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

CD lending had a neutral impact on lending performance in the non-MA Kansas AA. Sunflower did not originate any CD loans in the AA during the evaluation period.

Product Innovation and Flexibility

Sunflower offers a traditional mix of lending products in the non-MA KS AA. We did not consider any bank products or services innovative. Impact on the Lending Test rating is neutral.

Sunflower offers flexible mortgage loan programs that assist borrowers by providing loans up to 100 percent of the value of a home, reduced closing costs, and fixed rates. Sunflower also offers programs to assist beginning farmers by offering lower rates and down payment assistance.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Sunflower's performance under the lending test in the Wichita MA is not inconsistent with Sunflower's overall "Low Satisfactory" performance under the lending test in Kansas. In the Manhattan, Lawrence, and Topeka MAs, performance is weaker than Sunflower's overall performance in the state. In the Manhattan MA, the overall borrower distribution of loans is very poor. In the Lawrence and Topeka MAs, the overall borrower distribution of loans is poor. Performance in limited-scope AAs does not impact the overall conclusions.

Refer to the Tables 1-13 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the investment test in Kansas is rated "Needs to Improve". Based on full-scope reviews, Sunflower's performance in the non-MA KS AA is poor.

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

Investment performance in the non-MA KS AA is poor. During the evaluation period, Sunflower made three donations totaling \$36 thousand. These donations represented approximately 0.03 percent of allocated Tier One Capital for the AA.

Sunflower's responsiveness to CD needs in the AA is poor. The identified primary credit need is agriculture and consumer loans, which Sunflower's donations did not address.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the performance under the investment test in the Wichita MA is stronger than Sunflower's overall "Needs to Improve" performance under the investment test in Kansas. In the Manhattan, Lawrence, and Topeka MAs, performance is weaker than Sunflower's overall performance in the state. In the Wichita MA, the level of qualified investments is excellent. In the Manhattan, Lawrence, and Topeka MAs, the level of qualified investments is very poor. Performance in limited-scope AAs does not impact the overall conclusion.

Refer to the Table 14 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's overall performance under the service test in Kansas is rated "High Satisfactory". Based on full-scope reviews, Sunflower's performance in the non-MA KS AA is excellent. Performance in limited-scope AAs had weaker performance, which significantly impacted the overall service test rating. Service delivery systems are reasonably accessible in the Manhattan, Lawrence and Topeka MAs. In the Wichita, Manhattan and Topeka MAs, Sunflower did not provide any CD services. Sunflower provided two CD services in the Lawrence MA. Numerous opportunities exist in the limited-scope MAs to provide CD services.

Retail Banking Services

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

Sunflower's service delivery systems are readily accessible to geographies and individuals of different income levels in the non-MA KS AA. There are no low-income geographies in this AA. Sunflower operates 17 branches and 24 ATMs within the AA. Five branches and seven ATMs are located in moderate-income geographies. The percentage of branches in moderate-income geographies exceeds the percentage of population residing in these tracts.

Sunflower did not open or close any branches during the evaluation period. There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours on Friday and Saturday and ATMs offer 24-hour service.

Sunflower provides other alternative delivery services such as internet, telephone and mobile banking. Small business customers can also make remote deposits. Sunflower does not maintain information to demonstrate the effectiveness or impact of alternative delivery systems in low- or moderate-income geographies or use of these systems by low- and moderate-income individuals. Therefore, these services did not impact the service test rating for the non-MA KS AA.

Community Development Services

Sunflower provided a good level of community development services in the non-MA KS AA.

Sunflower's staff provided financial expertise to 19 different organizations that promote community development initiatives in the AA. This involved 13 employees for a total of 1,570 hours. Fourteen organizations provide community services targeted to low- and moderate-income individuals. Two organizations provide affordable housing and three organizations help revitalize and stabilize low- and moderate-income geographies. Following are some examples of CD services provided:

- Big Brothers Big Sisters of Ellis County – provides financial review and fundraising expertise to the organization that primarily benefits at-risk youth. Approximately 75 percent of the youth are from low- and moderate-income (LMI) families.
- Court Appointed Special Advocates – serves on the Board and provides budget input. The organization is an advocate for children in courtrooms and communities. A majority of the children are from LMI families.
- Kansas Head Start Association – provides financial literacy to low-income parents.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Sunflower's performance under the service test in the Wichita MA is not inconsistent with Sunflower's overall "High Satisfactory" performance in Kansas. In the Manhattan, Lawrence, and Topeka MAs, performance is weaker than Sunflower's overall

performance in the state. Weaker performance is due to the distribution of branches. In addition, Sunflower did not provide CD Services in the Manhattan and Topeka MAs. Performance in limited-scope AAs impacted the overall service test rating. Refer to Table 15 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

State Rating

State of Colorado

CRA Rating for Colorado²:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Substantial Noncompliance
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending test performance is good. In both the Pueblo MA and non-MA CO AA, the geographic distribution and borrower distribution of loans is adequate. Lending activity is adequate in both AAs. The level of community development lending in the Pueblo MA is very high and had a significantly positive impact on Sunflower's lending test rating.
- Investment test performance is very poor. There were no qualified investments or donations provided in either the Pueblo MA or non-MA CO AA.
- Branch distribution is readily accessible to geographies and individuals of different income levels. Bank personnel provided a poor level of community development services during the evaluation period.

Description of Institution's Operations in Colorado

Sunflower operates six branches and six ATMs within its AAs in the state of Colorado. Home mortgage loans are the primary business focus in both the Pueblo MA and non-MA CO AAs, which received full-scope reviews. The state of Colorado AAs represent 20 percent of Sunflower's total deposit base and 15 percent of total reported loans (by number) during the evaluation period. In addition, 17 percent of the dollar volume of total reported loans is in the Colorado AAs.

Non-MA AAs in Colorado were combined for analysis purposes and represent the entire counties of Fremont and Rio Grande. This AA represents 67 percent of total deposits in the state of Colorado and 13 percent of total bank deposits. The non-MA CO AA has 38 percent of loan originations (by number) in the state of Colorado. Sunflower ranks first in deposit market share in the non-MA CO AA at 22 percent as of June 30, 2011. There are 14 institutions in the market.

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

The Pueblo AA includes the entire MSA. This AA represents 29 percent of total deposits in the state of Colorado and six percent of total bank deposits. The Pueblo MSA AA has 62 percent of loan originations (by number) in the state of Colorado. Sunflower ranks seventh in deposit market share in the Pueblo MSA at five percent as of June 30, 2011. There are 14 institutions in the market.

The remaining deposits in the state of Colorado are in the Denver MSA and Boulder county AAs. This evaluation did not include an assessment of performance in these AAs.

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

Scope of Evaluation in Colorado

We evaluated performance in the state of Colorado by performing full-scope reviews in the non-MA CO AAs, which were combined for analysis purposes, and the Pueblo MSA AA. The non-MA CO AA received a full-scope review since it has the majority of deposits in Colorado. The Pueblo MSA AA also received a full-scope review since it has the majority of loans in the state. Refer to Appendix A for more information.

Home mortgage loans received the most weight under the Lending Test since it is the primary business focus in the AA and has a majority of lending volume. In the non-MA AA, these loans represent 48 percent by number of total reported loans in the AA. In the Pueblo MSA AA, these loans represent 51 percent by number of total reported loans in the AA. Small business lending received the next highest weight at 43 percent and 45 percent of total reported loans by number in the non-MA AA and Pueblo MSA AA, respectively.

In our analysis of home mortgage lending in the non-MA AA, home refinance loans received the most weight since they represent 55 percent of the total home mortgage loans (by number) in the AA. The next highest weight was placed on home purchase loans followed by home improvement loans, which are 24 percent and 20 percent of home mortgage lending (by number), respectively. In the Pueblo MA AA, home purchase loans received the most weight since they represent 44 percent of total home mortgage loans (by number) in the AA. The next highest weight was placed on home refinance loans followed by home improvement loans, which are 38 percent and 18 percent of home mortgage lending (by number), respectively.

To identify community credit needs, we considered one community contact in the non-MA CO AA and two community contacts in the Pueblo MSA AA that the OCC conducted within the last 12 months. In the non-MA AA, the contact was with a government organization that identified affordable housing as a credit need and stated that CD opportunities are limited. In the Pueblo MSA AA, both contacts were with government organizations that identified the following credit needs: affordable housing, financing to purchase foreclosed property, and commercial real estate loans. The contacts also identified a need for small business financing such as loans for start-up capital, small lines of credit, and credit cards.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the lending test in Colorado is rated "High Satisfactory." Based on full-scope reviews, Sunflower's performance in the non-MA CO AA is good and performance in the Pueblo MSA AA is excellent. Performance in the non-MA CO AA is given greater weight because it represents the majority of Sunflower's deposits and operations in Colorado.

Lending Activity

Refer to Table 1 Lending Volume in the state of Colorado section of appendix D for the facts and data used to evaluate Sunflower's lending activity. For purposes of this review, we used deposit information as of June 30, 2011.

Sunflower's overall lending activity in the state of Colorado is adequate.

Non-MA CO AA

Sunflower's lending activity in the non-MA CO AA is adequate. As of June 30, 2011, Sunflower ranks first in deposit market share at 21.71 percent among 14 depository institutions.

Based on 2011 peer data, Sunflower ranks 11th (by number) for home purchase loans and 14th (by number) for home refinance loans at 1.76 percent and 1.87 percent, respectively. For both loan products, Sunflower ranks in the top 15 percent of lenders in the market. Competition is strong for home purchase and home refinance loans with 88 and 125 lenders in the AA, respectively. For home purchase and home refinance loans, the top five lenders in the market accounted for 52.47 percent and 45.99 percent of the market, respectively. Three of the top five home purchase lenders and four of the top five home refinance lenders have a nationwide presence. For home improvement loans, Sunflower ranks second (by number) at 20.45 percent.

For small loans to businesses, Sunflower ranks eighth (by number) at 4.94 percent. Sunflower ranks in the top 30 percent of lenders in the market. The top five lenders are nationwide credit card companies with a combined market share of 65.98 percent.

For small loans to farms, Sunflower ranks second (by number) at 12.20 percent. Sunflower ranks in the top 20 percent of lenders in the market. The top lender has a market share of 56.10 percent.

Pueblo MSA AA

Sunflower's lending activity in the Pueblo MSA AA is adequate. As of June 30, 2011, Sunflower ranks seventh in deposit market share at 5.16 percent among 14 depository institutions.

Based on 2011 peer data, Sunflower ranks 14th (by number) for home purchase loans at 1.87 percent; this ranks in the top 10 percent of lenders in the market. For home refinance loans, Sunflower ranks 28th (by number) at 0.60 percent, this is within the top 20 percent of market lenders. Competition is strong for home purchase and home refinance loans with 125 and 179 lenders in the AA, respectively. For home improvement loans, Sunflower ranks seventh (by number) at 4.10 percent, which is in the top 25 percent of lenders in the market. For home purchase, home improvement, and home refinance loans, the top five lenders in the market accounted for 52.26 percent, 72.09 percent, and 42.06 percent, respectively.

For small loans to businesses, Sunflower ranks 11th (by number) at 3.05 percent. Sunflower ranks in the top 30 percent of lenders in the market. The top five lenders are nationwide credit card companies with a combined market share of 61.86 percent.

For small loans to farms, Sunflower ranks second (by number) at 15.15 percent. Sunflower ranks in the top 20 percent of lenders in the market. The top lender has a market share of 21.21 percent.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans is adequate. There are no low-income census tracts in the non-MA CO AA. During 2010 and 2011, there were no low-income census tracts in the Pueblo MSA AA.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is adequate

Non-MA CO AA

The overall geographic distribution of home mortgage loans in the non-MA CO AA is adequate.

The overall geographic distribution of home purchase loans is poor. Sunflower's geographic distribution of these loans during 2010 and 2011 is very poor since Sunflower did not make any loans in moderate-income geographies. Performance in 2012 is stronger than performance in 2010-2011 and is adequate. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies and adequate. Sunflower's market share in these geographies is below the overall market share and is adequate.

The overall geographic distribution of home improvement loans is adequate. Sunflower's geographic distribution of these loans during 2010 and 2011 is very poor since Sunflower did not make any loans in moderate-income geographies. Performance in 2012 is stronger than performance in 2010-2011 and is excellent. The percentage of loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies.

Sunflower's market share in these geographies also exceeds the overall market share and is excellent.

The overall geographic distribution of home refinance loans is good. Sunflower's geographic distribution of these loans during 2010 and 2011 is adequate. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is excellent and exceeds the overall market share. Performance in 2012 was not inconsistent with performance noted in 2010 and 2011.

Pueblo MSA AA

The overall geographic distribution of home mortgage loans in the Pueblo MSA AA is adequate.

The overall geographic distribution of home purchase loans is good. Sunflower's geographic distribution of these loans during 2010 and 2011 is adequate. The percentage of loans in moderate-income geographies is below the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is excellent and exceeds the overall market share. Performance in 2012 is not inconsistent with performance noted in 2010 and 2011.

The overall geographic distribution of home improvement loans is adequate. Sunflower's geographic distribution of loans during 2010 and 2011 is poor. The percentage of loans in moderate-income geographies is significantly below the percentage of owner-occupied units in these geographies. Sunflower's market share in these geographies is adequate and below the overall market share. Performance in 2012 is stronger than performance in 2010-2011 and is good. Sunflower did not make any loans in low-income geographies. The percentage of loans in moderate-income geographies exceeds demographics. The market share in these geographies substantially meets the overall market share and is good.

The overall geographic distribution of home refinance loans is poor. Sunflower's geographic distribution of loans during 2010 and 2011 is very poor. The percentage of loans in moderate-income geographies is significantly below the percentage of owner-occupied units in these geographies. Performance in 2012 is stronger than performance in 2010-2011 and is poor. The percentage of these loans in low- and moderate-income geographies is significantly below demographics. Market share is not meaningful since the overall market share of these loans is one percent or less.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent.

Non-MA CO AA

The overall geographic distribution of small loans to businesses in the non-MA CO AA is excellent. Sunflower's geographic distribution of small loans to businesses during 2010 and 2011 is excellent. The percentage of loans in moderate-income geographies exceeds the percentage of businesses in these areas. Sunflower's market share in these geographies exceeds the overall market share and is excellent. Performance in 2012 is weaker than performance in 2010-2011 and is good. Sunflower's geographic distribution of small loans to businesses is adequate. The percentage of loans in moderate-income geographies is below demographics and adequate.

Pueblo MSA AA

The overall geographic distribution of small loans to businesses in the Pueblo MSA AA is excellent. Sunflower's geographic distribution of small loans to businesses during 2010 and 2011 is good. The percentage of loans in moderate-income geographies exceeds the percentage of businesses in these areas. Sunflower's market share in these geographies is below the overall market share and is adequate. Performance in 2012 is stronger than performance in 2010 and 2011 and excellent. Sunflower's market share in both low- and moderate-income geographies is excellent and exceeds the overall market share.

Small Loans to Farms

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

The overall geographic distribution of small loans to farms is adequate. More weight is placed on performance in the non-MA CO AA since it has a majority of deposits and 62 percent of small farm loans originated in the state.

Non-MA CO AA

The overall geographic distribution of small loans to farms in the non-MA CO AA is adequate. Sunflower's geographic distribution of small loans to farms during 2010 and 2011 is excellent. The percentage of loans in moderate-income geographies exceeds the percentage of businesses in these areas. Sunflower's market share in these geographies is excellent and exceeds the overall market share. Performance in 2012 is weaker than performance in 2010-2011 and very poor. Sunflower did not make any loans in low- or moderate-income geographies during this period. This is mitigated by the fact that Sunflower only made eight loans during 2012.

Pueblo MSA AA

The overall geographic distribution of small loans to farms in the Pueblo MSA AA is very poor. Sunflower's geographic distribution of small loans to farms during 2010 and 2011 is poor. The percentage of loans in moderate-income geographies is significantly below the percentage of farms in these areas. Based on peer data, Sunflower does not have any market share in

moderate-income geographies. Performance in 2012 is weaker than performance in 2010 and 2011 and very poor. Sunflower did not make any loans in low- or moderate-income geographies in 2012. Sunflower only made ten and six loans during 2010-2011 and 2012, respectively, which mitigates performance.

Lending Gap Analysis

We reviewed summary reports to analyze Sunflower's home mortgage, small business, and small farm lending activity over the evaluation period and identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. Sunflower's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- and moderate-income areas.

Inside/Outside Ratio

We performed an analysis of the inside/outside ratio at Sunflower level. A majority of Sunflower's loans originated within Sunflower's defined AAs. Refer to conclusions in the State of Kansas Rating section of this document for detail regarding lending percentages overall and for each loan product.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of Sunflower's lending is adequate.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is adequate.

Non-MA CO AA:

The overall borrower distribution of home mortgage loans in the non-MA CO AA is good. The percentage of families below poverty is 9.06 percent and 9.92 percent based on 2000 and 2010 census data, respectively. This information is considered in the analysis.

The overall distribution of home purchase loans is poor. Sunflower's borrower distribution of these loans during 2010 and 2011 is poor. The percentage of loans to low-income borrowers is significantly below demographics; performance is adequate considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is poor and significantly below demographics. Based on peer data, Sunflower does not have any market share to low-income borrowers. The market share of loans to moderate-income borrowers is poor and significantly below the overall market share. Performance in 2012 is weaker than performance in 2010 and 2011 and very poor. Sunflower did not make any loans to low-income borrowers during 2012. The percentage of loans to moderate-income borrowers

is very poor and significantly below demographics. The market share of these loans is very poor and significantly below the overall market share.

The overall distribution of home improvement loans is excellent. Sunflower's borrower distribution of these loans during 2010 and 2011 is excellent. The percentage of loans to low-income borrowers is excellent and exceeds demographics. The percentage of loans to moderate-income borrowers is adequate and below demographics. The market share of loans to both low- and moderate-income borrowers is excellent and exceeds the overall market share. Performance in 2012 is weaker than performance in 2010-2011 and is good. The market share of loans to moderate-income borrowers is poor and significantly below the overall market share.

The overall distribution of home refinance loans is good. Sunflower's borrower distribution of these loans during 2010 and 2011 is excellent. The percentage of loans to low-income borrowers is good considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is near to demographics and performance is good. The market share of loans to both low- and moderate-income borrowers is excellent and exceeds the overall market share. Performance in 2012 is weaker than performance in 2010-2011 and adequate. The percentage of loans to low-income borrowers is significantly below demographics; performance is good considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is poor and significantly below demographics. The market share of loans to low-income borrowers substantially meets the overall market share and is good. The market share of loans to moderate-income borrowers is below the overall market share and is adequate.

Pueblo MSA AA

The overall borrower distribution of home mortgage loans in the Pueblo MSA AA is adequate. The percentage of families below poverty is 11.18 percent and 13.61 percent based on 2000 and 2010 census data, respectively. This information is considered in the analysis.

The overall distribution of home purchase loans is adequate. Sunflower's borrower distribution of these loans during 2010 and 2011 is adequate. The percentage of loans to low-income borrowers is significantly below demographics; performance is good considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is adequate and below demographics. The market share to both low- and moderate-income borrowers significantly below the overall market share and is poor and very poor, respectively. Performance in 2012 is not inconsistent with performance noted in 2010 and 2011.

The overall distribution of home improvement loans is excellent. Sunflower's borrower distribution of these loans during 2010 and 2011 is good. The percentage of loans to low-income borrowers is significantly below demographics; performance is good considering the percent of families that live below poverty. The percentage of loans to moderate-income borrowers is excellent and exceeds demographics. The market share of loans to low-income borrowers is excellent and exceeds the overall market share. The market share of loans to moderate-income borrowers is below the overall market share and is adequate. Performance in 2012 is stronger than performance in 2010-2011 and excellent. The percentage of loans to low- and moderate-income borrowers is excellent and exceeds demographics. The market

share of loans to low- and moderate-income borrowers is excellent and exceeds the overall market share.

The overall distribution of home refinance loans is adequate. Sunflower's borrower distribution of these loans during 2010 and 2011 is adequate. The percentage of loans to both low- and moderate-income borrowers is below demographics and performance is adequate. The market share of these loans is not meaningful since the overall market share is less than one percent. Performance in 2012 is weaker than performance in 2010-2011 and poor. The percentage of loans to moderate-income borrowers is significantly below demographics and poor. The market share of loans to low- and moderate-income borrowers is significantly below the overall market share and is very poor and poor, respectively.

Small Loans to Businesses

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

The overall borrower distribution of small loans to businesses is good. More weight is given to performance in the Pueblo MSA AA since 64 percent of small business loans are in this AA.

Non-MA CO AA

The overall borrower distribution of small business loans in the non-MA CO AA is adequate. Sunflower's borrower distribution of these loans during 2010 and 2011 is good. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is below demographics and adequate. The market share of these loans is excellent and exceeds the overall market share. Sunflower's performance in 2012 is weaker than performance in 2010-2011 and adequate. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is significantly below demographics and poor.

Pueblo MSA AA

The overall borrower distribution of small business loans in the Pueblo MSA AA is good. Sunflower's borrower distribution of these loans during 2010 and 2011 is good. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is near to demographics and good. The market share of these loans is excellent and exceeds the overall market share. Sunflower's performance in 2012 is not inconsistent with performance in 2010-2011.

Small Loans to Farms

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

The overall borrower distribution of small loans to farms is good.

Non-MA CO AA

The overall borrower distribution of small farm loans in the non-MA CO AA is good. Sunflower's borrower distribution of these loans during 2010 and 2011 is good. The percentage of small loans to farms with gross annual revenue of \$1 million or less is below demographics and adequate. The market share of these loans is excellent and exceeds the overall market share. Sunflower's performance in 2012 is not inconsistent with performance in 2010-2011.

Pueblo MSA AA

The overall borrower distribution of small farm loans in the Pueblo MSA AA is good. Sunflower's borrower distribution of these loans during 2010 and 2011 is good. The percentage of small loans to businesses with gross annual revenue of \$1 million or less is below demographics and adequate. The market share of these loans is excellent and exceeds the overall market share. Sunflower's performance in 2012 is weaker than performance in 2010-2011 and is adequate. The percentage of loans to farms with gross annual revenue of \$1 million or less is poor and significantly below demographics.

Community Development Lending

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

Sunflower's level of community development lending had a significantly positive impact on its overall lending performance in the Pueblo AA. Overall, CD lending is excellent. The level of CD loans in the Pueblo AA represents 40.1 percent of allocated tier one capital in the state of Colorado.

Non-MA CO AA

CD lending had a neutral impact on lending performance in the non-MA CO AA. Sunflower did not originate any CD loans in the AA during the evaluation period.

Pueblo MSA AA

Sunflower's level of CD lending had a significant positive impact on the overall lending performance in the Pueblo MSA AA. During the evaluation period, Sunflower originated four loans totaling \$12.9 million. This represented approximately 137 percent of allocated tier one capital. A majority of CD lending, three loans totaling \$8.9 million, provided affordable housing. Affordable housing is an identified credit need in this AA. One loan totaling \$4 million helped revitalize and stabilize low- and moderate-income geographies.

Product Innovation and Flexibility

Sunflower offers a traditional mix of lending products in the non-MA CO and Pueblo MSA AAs. We did not consider any bank products or services innovative. Impact on the Lending Test rating is neutral.

Sunflower offers flexible mortgage loan programs that assist borrowers by providing loans up to 100 percent of the value of a home, reduced closing costs and fixed rates. Sunflower also offers programs to assist beginning farmers by offering lower rates and down payment assistance.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the investment test in Colorado is rated "Substantial Noncompliance". Based on full-scope reviews, Sunflower's performance in the non-MA CO AA and Pueblo MSA AA is very poor.

Refer to Table 14 in the state of Colorado section of appendix D for the facts and data used to evaluate Sunflower's level of qualified investments.

Investment performance in the non-MA CO AA and Pueblo MSA AA is very poor. During the evaluation period, Sunflower did not make any qualified investments or donations in these AAs. CD opportunities are limited in the non-MA CO AA. However, based on community contact information there are opportunities in this AA to support organizations with a CD purpose. In the Pueblo MSA AA, there are many opportunities to provide CD investments and donations.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the service test in Colorado is rated "High Satisfactory". Based on full-scope reviews, Sunflower's performance in the non-MA CO AA and Pueblo MSA AA is good.

Retail Banking Services

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

Non-MA CO AA

Sunflower's service delivery systems are readily accessible to geographies and individuals of different income levels in the non-MA CO AA. There are no low-income geographies in this

AA. Sunflower operates three branches and three ATMs within the AA, which are all located moderate-income geographies. The percentage of branches in moderate-income geographies exceeds the percentage of population residing in these tracts.

During the evaluation period, Sunflower did not open any branches and closed one branch in a middle-income geography. The branch closing was due to a lack of profitability. There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours on Friday and Saturday and ATMs offer 24-hour service.

Refer to the Service Test comment for the State of Kansas Rating section of this document for detail on Sunflower's other alternative delivery systems.

Pueblo MSA AA

Sunflower's service delivery systems are accessible to geographies and individuals of different income levels in the Pueblo MSA AA. Sunflower operates three branches and three ATMs in this AA. One branch and one ATM are located in a moderate-income geography. There are no branches in low-income census tracts. There are four low-income geographies in the AA. The percentage of branches in moderate-income tracts exceeds the percentage of population residing in these geographies.

Sunflower did not open or close any branches in this AA during the evaluation period. There are no material differences in services offered at branch locations. Banking hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and individuals. Drive-up facilities offer extended hours on Friday and Saturday and ATMs offer 24-hour service.

Refer to the Service Test comment for the State of Kansas Rating section of this document for detail on Sunflower's other alternative delivery systems.

Community Development Services

Non-MA CO AA

Sunflower provided a poor level of community development services in the non-MA CO AA.

Sunflower bank staff provided their financial expertise to one organization that promotes community development initiatives in the AA. This organization provided community services targeted to low- and moderate-income individuals.

Pueblo MSA AA

Sunflower provided a poor level of community development services in the Pueblo MSA AA.

Sunflower bank staff provided their financial expertise to three different organizations that promote community development initiatives in the AA. These organizations provided community services targeted to low- and moderate-income individuals.

State Rating

State of Missouri

CRA Rating for Missouri³:	Needs to Improve
The lending test is rated:	Low Satisfactory
The investment test is rated:	Needs to Improve
The service test is rated:	Low Satisfactory

The major factors that support this rating:

Lending test performance in the non-MA MO AA is adequate. The overall borrower distribution of loans is adequate. Lending activity is adequate.

Investment test performance is poor. There were no qualified investments or donations provided in the non-MA MO AA.

Branch distribution is reasonably accessible to geographies of different income levels. Bank personnel provided a poor level of community development services during the evaluation period.

Description of Institution's Operations in Missouri

Sunflower operates one branch and two ATMs in Missouri. Home mortgage loans are the primary business focus in the non-MA MO AA, which received a full-scope review and is the only AA in the state. The state of Missouri AA represents 0.79 percent of Sunflower's total deposit base and one percent of total reported loans (by number) during the evaluation period. The non-MA MO AA includes all of Johnson County. Sunflower ranks eighth in deposit market share in the non-MA MO AA at two percent. Competition is provided by nine institutions; a majority are headquartered in the state of Missouri.

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

Scope of Evaluation in Missouri

We evaluated performance in the state of Missouri by performing a full-scope review in the non-MA MO AA. This is the only AA in the state of Missouri. Refer to Appendix A for more information.

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

Home mortgage loans received the most weight under the Lending Test since it is the primary business focus in the AA and has the majority of lending volume. These loans represent 47 percent by number and 57 percent by dollar volume of total reported loans in the non-MA MO AA. Small farm lending received the next highest weight at 40 percent by number and 20 percent by dollar volume of total reported loans in the AA. In our analysis of home mortgage lending, we focused on home refinance loans since they represent 67 percent of Sunflower's total home mortgage lending by number. We did not analyze home purchase, home improvement, and small business loans as Sunflower originated less than ten of these loans and an analysis would not be meaningful.

To identify credit needs, we made one community contact during the evaluation with a local government organization. The contact stated that community development opportunities are limited and home loans are the primary credit need.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the lending test in Missouri is rated "Satisfactory". Based on full-scope reviews, Sunflower's performance in the non-MA MO AA is adequate.

Lending Activity

Refer to Table 1 Lending Volume in the state of Missouri section of appendix D for the facts and data used to evaluate Sunflower's lending activity. For purposes of this review, we used deposit information as of June 30, 2011.

Sunflower's lending activity in the non-MA MO AA is adequate. As of June 30, 2011, Sunflower ranks eighth in deposit market share at 2.15 percent among nine depository institutions.

Sunflower ranks 22nd by number for home refinance loans at 0.66 percent among 102 lenders. For home purchase and home improvement loans, Sunflower ranks 33rd and ninth, by number, at 0.25 percent and 2.74 percent, respectively. Competition is strong for home purchase loans with 65 lenders in the AA. Sunflower ranks within the top 25 percent of lenders in the market for home refinance loans. For home refinance, home purchase, and home improvement loans, the top five lenders in the market accounted for 48.82 percent, 64.05 percent, and 67.56 percent, respectively.

For small loans to farms, Sunflower ranked fifth at 3.81 percent among 11 lenders. The top four lenders in the market accounted for 88.98 percent.

For small business loans, Sunflower ranked 15th with a 0.92 percent market share among 36 lenders. Four nationwide credit card lenders dominated the market with a combined market share of 40 percent. The top five lenders in the market accounted for 64.84 percent.

Distribution of Loans by Income Level of the Geography

An analysis of the geographic distribution of loans is not meaningful since there are no low- or moderate-income census tracts in the non-MA MO AA.

Lending Gap Analysis

We reviewed summary reports to analyze Sunflower's home mortgage and small farm lending activity over the evaluation period and identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps. Sunflower's AA consists of whole geographies, meets the requirements of the CRA regulation, and does not arbitrarily exclude any low- and moderate-income areas.

Inside/Outside Ratio

We performed an analysis of the inside/outside ratio at Sunflower level. A majority of Sunflower's loans originated within Sunflower's defined AAs. Refer to conclusions in the State of Kansas Rating section of this document for detail regarding lending percentages overall and for each loan product.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of Sunflower's lending is adequate.

As previously noted, we did not evaluate home purchase, home improvement, or small business loans as Sunflower originated less than ten loans during the evaluation period and an analysis would not be meaningful.

Home Mortgage Loans

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

The overall borrower distribution of home refinance loans is poor. The borrower distribution of these loans during 2010 and 2011 is very poor. Sunflower did not make any loans to low- or moderate-income borrowers. Performance in 2012 is stronger than Sunflower's performance noted in 2010-2011 and is adequate. Sunflower did not make any loans to low-income borrowers. However, the percentage of loans to moderate-income borrowers is excellent and exceeds demographics. The market share of these loans is also excellent and exceeds demographics.

Small Loans to Farms

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

The overall borrower distribution of small loans to farms is good. Sunflower's borrower distribution of these loans during 2010 and 2011 is good. The percentage of small loans to farms with gross annual revenues of \$1 million or less is near to demographics and good. The market share of these loans is also good and substantially meets demographics. Sunflower's performance in 2012 was not inconsistent with performance in 2010-2011.

Community Development Lending

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

CD lending had a neutral impact on lending performance in the non-MA Missouri AA. Sunflower did not originate any CD loans in the AA during the evaluation period.

Product Innovation and Flexibility

Sunflower offers a traditional mix of lending products in the non-MA MO AA. We did not consider any bank products or services innovative. Impact on the Lending Test rating is neutral.

Sunflower offers flexible mortgage loan programs that assist borrowers by providing loans up to 100 percent of the value of a home, reduced closing costs and fixed rates. Sunflower also offers programs to assist beginning farmers by offering lower rates and down payment assistance.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's performance under the investment test in Missouri is rated "Needs to Improve". Based on full-scope reviews, Sunflower's performance in the non-MA MO AA is poor.

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

Investment performance in the non-MA MO AA is poor. During the evaluation period, Sunflower did not make any qualified investments or donations in these AAs. CD opportunities are limited in the non-MA MO AA. However, the AA includes CD organizations that serve low- and moderate-income individuals in need of support.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Sunflower's overall performance under the service test in Missouri is rated "Low Satisfactory". Based on full-scope reviews, Sunflower's performance in the non-MA MO AA is adequate.

Retail Banking Services

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

Sunflower's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the non-MA MO AA. Sunflower operates one branch and two ATMs within the AA. There are no low- and moderate-income geographies in this AA. Sunflower did not open or close any branches in the AA during the evaluation period.

Refer to the Service Test comment for the State of Kansas Rating section of this document for details on Sunflower's other alternative delivery systems.

Community Development Services

Sunflower provided a poor level of community development services in the non-MA MO AA.

Sunflower did not provide any CD services in the AA during the evaluation period. While opportunities are limited, the AA includes CD organizations that serve low- and moderate-income individuals in need of support.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD loans): 1/1/2010 to 12/31/2012 Investment and Service Tests and CD Loans: 7/20/2011 to 3/31/2014	
Financial Institution	Products Reviewed	
Sunflower Bank, National Association (Sunflower) Salina, Kansas	Home Purchase, Home Improvement, Home Refinance, Small Business, Small Farm, and Community Development Loans Data; Qualified Investments; Retail and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
State of Kansas: Non-MA Wichita MA #48620 Manhattan MA #31740 Lawrence MA #29940 Topeka MA #45820 State of Colorado: Non-MA Pueblo MA #39380 State of Missouri Non-MA	Full-scope Limited-scope Limited-scope Limited-scope Limited-scope Full-scope Full-scope Full-scope	Thomas, Ford, Barton, Ellis, Russell, Osborne, Seward, Saline, and McPherson Counties Sedgwick County Riley and Geary Counties, and census tract 1.00 in Pottawatomie County Shawnee County Fremont and Rio Grande Counties Johnson County

Appendix B: Summary of State Ratings

RATINGS Sunflower Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Sunflower Bank, N.A.	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
State:				
Kansas	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
Colorado	High Satisfactory	Substantial Noncompliance	High Satisfactory	Satisfactory
Missouri	Low Satisfactory	Needs to Improve	Low Satisfactory	Needs to Improve

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

Appendix C: Market Profiles for Full-Scope Areas

State of Kansas

Non-MA KS

Demographic Information for Full Scope Area: Non-MA KS AA 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	48	0.00	10.42	68.75	20.83	0.00
Population by Geography	213,833	0.00	9.85	68.18	21.98	0.00
Owner-Occupied Housing by Geography	56,325	0.00	7.67	67.96	24.36	0.00
Business by Geography	22,837	0.00	8.72	69.87	21.41	0.00
Farms by Geography	2,283	0.00	3.20	75.51	21.29	0.00
Family Distribution by Income Level	55,711	16.88	18.30	25.27	39.56	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	19,598	0.00	14.51	71.21	14.28	0.00
Median Family Income		41,490	Median Housing Value		71,919	
HUD Adjusted Median Family Income for 2011		53,700	Unemployment Rate (2000 US Census)		2.23%	
Households Below Poverty Level		11%				

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Non-MA KS AA 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	50	0.00	14.00	60.00	26.00	0.00
Population by Geography	216,440	0.00	14.09	55.80	30.10	0.00
Owner-Occupied Housing by Geography	57,793	0.00	9.26	57.80	32.94	0.00
Business by Geography	17,799	0.00	15.00	54.47	30.54	0.00
Farms by Geography	2,687	0.00	2.46	70.45	27.09	0.00
Family Distribution by Income Level	55,111	17.19	16.89	22.13	43.79	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,782	0.00	21.05	57.57	21.38	0.00
Median Family Income		52,362	Median Housing Value		96,556	
HUD Adjusted Median Family Income for 2012		54,400	Unemployment Rate (2010 US Census)		2.35%	
Households Below Poverty Level		13%				

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

Source: 2010 US Census and 2012 HUD updated MFI

The non-MA KS AA includes all of Barton, Ellis, Ford, McPherson, Osborne, Russell, Saline, Seward, and Thomas counties in Kansas. The population of the AA did not significantly change from the 2000 Census to the 2010 Census. As of June 30, 2013, there are 53 depository institutions in the AA. Sunflower ranks first with a deposit market share of 15.23 percent.

Median family income in the AA increased \$10,872, or 26 percent, between the 2000 Census and 2010 Census. Based on 2000 Census, families below poverty are 7.84 percent. This compares to 9.3 percent of families below poverty based on 2010 Census.

Sunflower has 17 branches and 24 ATMs in the AA. The non-MA KS AA represents 84 percent of total deposits in state of Kansas and 64 percent of total bank deposits.

Employment and Economic Factors

As of February 2014, the unemployment rate in the AA is below both the state and national averages. The Bureau of Labor Statistics (BLS) reports Barton County at 4.0 percent, Ellis County at 2.8 percent, Ford County at 4.0 percent, McPherson County at 3.8 percent, Osborne County at 4.6 percent, Russell County at 4.6 percent, Saline County at 5.2 percent, Seward County at 3.8 percent and Thomas County at 3.5 percent. The unemployment rates demonstrate significant improvement in the overall economy since our prior evaluation. Further, they compare favorably to both the statewide unemployment rate of 5.5 percent, and the national rate of 6.7 percent.

While still a major agricultural center, there is a diversification of businesses in the AA including manufacturing, wholesale trade, retail trade, professional, scientific and technical services, healthcare and social assistance; and accommodation and food service industries.

Major employers in the AA are Tony's Pizza, Salina Regional Health Center, USD 305, Exide, Great Plains Manufacturing, USD 428, Barton Community College, CPI Qualified Plan Consultants, Enersys, Rans Designs, Hays Medical Center, Fort Hays State University, Hays Public Schools, National Beef, Cargill Meat Solutions, USD 443, Midway Co-operative Grain Elevators, and the local government.

Housing

The median housing value increased \$24,637, or 34 percent, from the 2000 Census to 2010 Census. The non-MSA KS AA has a foreclosure rate of approximately 0.04 percent, which is less than the national average of 0.09 percent.

The number of vacant units increased from 8.03 percent in the 2000 census to 9.33 vacant units in the 2010 census. A majority of these units are in moderate-income census tracts.

Community Contacts

To identify community credit needs, we considered one community contact conducted by OCC staff within the last 12 months with a local government organization. The contact identified agriculture and consumer loans as the primary banking needs.

State of Colorado

Non-MA CO

Demographic Information for Full Scope Area: Sunflower – non-MA CO AA 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	17	0.00	11.76	70.59	5.88	11.76
Population by Geography	58,558	0.00	13.48	76.68	1.09	8.75
Owner-Occupied Housing by Geography	14,897	0.00	13.36	85.10	1.54	0.00
Business by Geography	6,175	0.00	14.56	82.40	2.98	0.06
Farms by Geography	370	0.00	9.19	88.38	2.43	0.00
Family Distribution by Income Level	13,973	22.44	21.32	24.81	31.43	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,114	0.00	19.05	80.14	0.80	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		44,319 60,200 13%	Median Housing Value Unemployment Rate (2000 US Census)		100,464 1.79%	

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

Demographic Information for Full Scope Area: Sunflower – non-MA CO AA 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	17	0.00	41.18	35.29	5.88	17.65
Population by Geography	58,806	0.00	47.73	35.78	2.98	13.51
Owner-Occupied Housing by Geography	15,745	0.00	54.66	41.92	3.42	0.00
Business by Geography	5,123	0.00	53.07	43.80	3.06	0.06
Farms by Geography	377	0.00	37.93	59.42	2.65	0.00
Family Distribution by Income Level	13,858	24.35	25.34	20.45	29.86	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,886	0.00	63.48	35.04	1.48	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		57,817 61,000 15%	Median Housing Value Unemployment Rate (2010 US Census)		154,166 2.24%	

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

The non-MA Co AA includes all of Fremont and Rio Grande Counties. The population of the AA from the 2000 Census did not significantly change in the 2010 Census. As of

June 30, 2013, there are 14 depository institutions in the AA. Sunflower ranks first with a deposit market share of 21.84 percent.

The median family income in the AA increased \$13,498, or 30 percent, between the 2000 Census and 2010 Census. Based on 2000 Census, families below poverty are 9.06 percent. This compares to 9.92 percent of families below poverty based on 2010 Census.

Sunflower has three branches and three ATMs in the AA. The non-MA CO AA represents 67 percent of total deposits in the state of Colorado and 13 percent of total bank deposits.

Employment and Economic Factors

As of February 2014, the unemployment rate in the AA averages 9.4 percent. The state of Colorado's unemployment rate is 6.1 percent while the national average is 6.7 percent. While still a major agricultural area, area leaders are working to diversify into manufacturing.

Major employers in the AA are State of Colorado Correctional Industries, Federal Bureau of Prisons, School District RE-1, St Thomas More Hospital-Centura Health, Holcim Inc., Rio Grande National Forrest, San Luis Valley Rural Electric Cooperative, Rio Grande Combined School Districts, and Rio Grande Hospital.

Housing

The median housing value in the non-MA CO AA increased \$53,702, or 53 percent, between the 2000 Census and 2010 Census. A majority of vacant homes is in moderate-income census tracts and increased from 13.89 percent in 2000 to 19.33 percent in 2010.

Community Contacts

We considered one community contact in the non-MA CO AA that the OCC conducted within the last 12 months. In the non-MA AA, the contact was with a government organization that identified affordable housing as a credit need and stated that CD opportunities are limited.

Pueblo MSA

Demographic Information for Full Scope Area: Sunflower - Pueblo CO MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	51	0.00	37.25	37.25	21.57	3.92
Population by Geography	141,472	0.00	30.02	43.31	25.47	1.21
Owner-Occupied Housing by Geography	38,434	0.00	24.22	46.83	28.95	0.00
Business by Geography	14,479	0.00	27.89	38.49	33.53	0.09
Farms by Geography	458	0.00	17.25	39.74	43.01	0.00
Family Distribution by Income Level	37,624	20.21	18.34	21.79	39.67	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,502	0.00	43.46	41.84	14.69	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		40,123 52,800 14%		Median Housing Value Unemployment Rate (2000 US Census)	94,716 2.85%	

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

Demographic Information for Full Scope Area: Sunflower - Pueblo CO MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	55	7.27	29.09	30.91	27.27	5.45
Population by Geography	159,063	7.79	23.43	35.03	32.43	1.33
Owner-Occupied Housing by Geography	42,914	4.85	18.98	36.89	39.29	0.00
Business by Geography	12,722	5.52	26.77	30.39	37.27	0.06
Farms by Geography	456	3.51	18.64	41.89	35.53	0.44
Family Distribution by Income Level	40,247	21.63	17.82	19.67	40.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,879	13.11	34.19	34.13	18.57	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		50,503 53,600 17%		Median Housing Value Unemployment Rate (2010 US Census)	134,796 4.38%	

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

The Pueblo MSA AA includes all of Pueblo County in south central Colorado. The population of the AA increased 17,591, or 12 percent, between the 2000 Census and the 2010 Census.

As of June 30, 2013, there are 14 depository institutions in the AA. Sunflower ranks seventh with a deposit market share of 5.84 percent. The top five banks with a combined deposit market share of 73.22 percent are Wells Fargo Bank, U.S. Bank, Vectra Bank Colorado, The Pueblo Bank and Trust Company, and Legacy Bank.

The median family income in the AA increased \$10,380, or 26 percent, between the 2000 Census and 2010 Census. In the 2000 Census, there were no low-income geographies. However, based on the 2010 Census, there are four low-income geographies. Based on 2000 Census, families below poverty are 11.18 percent. This compares to 13.61 percent of families below poverty based on 2010 Census.

Sunflower has three branches and three ATMs in the AA. This AA represents 29 percent of total deposits in the state of Colorado and six percent of total bank deposits.

Employment and Economic Factors

As of February 2014, the unemployment rate in the Pueblo MSA is significantly higher than the state and national averages. The Bureau of Labor Statistics (BLS) reports Pueblo County at 9.6 percent. The state and national averages are 6.1 percent and 6.7 percent, respectively.

While still a major manufacturing center, diversified businesses in the area allowed the economy to recover quickly from the recession of 2011. Employment in manufacturing, healthcare, and education are the top occupations in the MSA.

According to Livability.com, Pueblo is a growing Colorado city. The top employers are School Districts, Parkview and St Mary Corwin Hospitals, Loaf-N-Jug, Colorado Institute of Mental Health, Pueblo City and County, Trane Company and Convergys.

Housing

The median housing value in the Pueblo MSA increased \$40,080, or 42 percent, between the 2000 Census and 2010 Census. Foreclosure rates for the Pueblo MSA in February 2013 were 10.3 percent, the highest in the state of Colorado. Residential mortgage lending opportunities in low-income geographies are limited. Based on the 2010 Census, 49.59 percent of occupied housing units are rentals, and 13.41 percent of housing units are vacant. For moderate-income census tracts, the percentage of vacant housing units increased significantly from 8.49 percent in 2000 to 14.56 percent in 2010.

Community Contacts

To identify community credit needs, we considered two community contacts in the Pueblo MSA AA that the OCC conducted within the last 12 months. Both contacts were with government organizations that identified the following credit needs: affordable housing, financing to purchase foreclosed property, and commercial real estate loans. The contacts also identified a need for small business financing such as loans for start-up capital, small lines of credit, and credit cards.

State of Missouri

Non-MA MO

Demographic Information for Full Scope Area: Sunflower - non-MA MO – 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0.00	0.00	66.67	33.33	0.00
Population by Geography	48,258	0.00	0.00	56.29	43.71	0.00
Owner-Occupied Housing by Geography	10,709	0.00	0.00	46.05	53.95	0.00
Business by Geography	4,425	0.00	0.00	53.88	46.12	0.00
Farms by Geography	312	0.00	0.00	51.28	48.72	0.00
Family Distribution by Income Level	11,847	14.40	14.32	22.16	49.13	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,402	0.00	0.00	65.02	34.98	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		35,821 47,200 15%	Median Housing Value Unemployment Rate (2000 US Census)		82,022 2.95%	

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

Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Sunflower - non-MA MO – 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	9	0.00	0.00	33.33	66.67	0.00
Population by Geography	52,595	0.00	0.00	20.68	79.32	0.00
Owner-Occupied Housing by Geography	12,383	0.00	0.00	12.93	87.07	0.00
Business by Geography	3,425	0.00	0.00	28.88	71.12	0.00
Farms by Geography	367	0.00	0.00	7.63	92.37	0.00
Family Distribution by Income Level	12,614	12.76	15.16	19.74	52.35	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	3,521	0.00	0.00	30.76	69.24	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		45,840 47,800 14%	Median Housing Value Unemployment Rate (2010 US Census)		129,143 3.51%	

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

Source: 2010 US Census and 2012 HUD updated MFI

The non-MA MO AA includes all of Johnson County, Missouri. The population of the AA has increased by 4,337, or nine percent, between the 2000 Census and the 2010 Census. As of June 30, 2013, there are nine depository institutions in the AA. Sunflower ranks eighth with a deposit market share of 1.87 percent. The top five banks with a combined deposit market share of 87.45 percent are First Central Bank, UMB Bank, U.S. Bank, F&C Bank, and Equity Bank.

The median family income in the AA increased \$10,019, or 28 percent, between the 2000 Census and 2010 Census. There are no low- or moderate-income geographies in the AA. Based on the 2000 Census, families below poverty are 9.55 percent. This compares to 8.34 percent of families below poverty based on 2010 Census.

Sunflower has one branch and two ATMs in the AA. The AA represents 0.79 percent of total bank deposits.

Employment and Economic Factors

As of February 2014, the unemployment rate in the non-MA MO AA is above both the state and national averages. The Bureau of Labor Statistics (BLS) reports Johnson County at 6.8 percent, with the state of Missouri at 5.8 percent and the national average at 6.7 percent.

The economy is stable with the military base at Whiteman, located just outside Knob Noster, and the University of Central Missouri, located in Warrensburg. Growth is expected to continue in the AA in educational, health and social services, retail trade, and manufacturing.

The top employers in the AA are Whiteman Air Force Base, University of Central Missouri, EnerSys Energy Products, Inc., Western Missouri Medical Center, Warrensburg R-VI School District, Stahl Specialty Company, Wal-Mart Super Center, Missouri Veterans Home, County of Johnson, and GE Transportation Intelligent Control Systems.

Housing

The median housing value in the AA increased \$47,121, or 57 percent, between the 2000 Census and 2010 Census.

Community Contacts

We made one community contact during the evaluation with a local government organization. The contact stated that community development opportunities are limited and home loans are the primary credit need.

Appendix D: Tables of Performance Data

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 30th of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

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

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Tables of Performance Data

State of Kansas
State of Colorado
State of Missouri

Table 1. Lending Volume

LENDING VOLUME		Geography: KANSAS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Non-MA KS	76.01	1,207	116,825	545	60,141	352	27,326	0	0	2,104	204,292	80.46
Limited Review:												
Wichita MSA	10.19	111	18,274	171	30,801	0	0	0	0	282	49,075	7.78
Manhattan MSA	8.82	182	24,490	61	10,516	1	40	0	0	244	35,046	7.40
Lawrence MSA	2.78	30	4,993	47	10,053	0	0	0	0	77	15,046	2.58
Topeka MSA	2.20	46	7,880	15	1,367	0	0	0	0	61	9,247	1.78

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

** The evaluation period for Community Development Loans is from July 20, 2011 to March 31, 2014.

*** Deposit Data as of February 28, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: KANSAS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Non-MA KS	394	76.65	0.00	0.00	7.67	3.81	67.96	58.88	24.36	37.31	10.31	0.00	8.49	8.91	13.41	
Limited Review:																
Wichita MSA	47	9.14	1.40	2.13	22.67	8.51	46.10	31.91	29.83	57.45	0.35	2.38	0.10	0.26	0.50	
Manhattan MSA	45	8.75	0.00	0.00	18.23	17.78	51.18	53.33	30.58	28.89	1.27	0.00	1.29	2.05	0.44	
Lawrence MSA	7	1.36	0.11	0.00	19.97	14.29	49.84	28.57	30.08	57.14	0.30	0.00	0.42	0.19	0.37	
Topeka MSA	21	4.09	0.65	0.00	21.77	4.76	41.36	23.81	36.23	71.43	0.41	0.00	0.39	0.21	0.62	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: KANSAS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA KS	245	81.13	0.00	0.00	7.67	2.86	67.96	64.49	24.36	32.65	51.83	0.00	36.36	48.70	64.15
Limited Review:															
Wichita MSA	13	4.30	1.40	0.00	22.67	15.38	46.10	46.15	29.83	38.46	0.46	0.00	0.68	0.19	0.79
Manhattan MSA	36	11.92	0.00	0.00	18.23	22.22	51.18	41.67	30.58	36.11	11.28	0.00	11.90	10.34	12.12
Lawrence MSA	3	0.99	0.11	0.00	19.97	0.00	49.84	66.67	30.08	33.33	0.95	0.00	0.00	2.13	0.00
Topeka MSA	5	1.66	0.65	0.00	21.77	0.00	41.36	40.00	36.23	60.00	1.86	0.00	0.00	1.89	2.73

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 2011			Geography: KANSAS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over-all	Low	Mod	Mid	Upp	
Full Review:																
Non-MA KS	568	74.74	0.00	0.00	7.67	2.46	67.96	57.75	24.36	39.79	11.98	0.00	6.76	11.23	13.86	
Limited Review:																
Wichita MSA	51	6.71	1.40	1.96	22.67	5.88	46.10	39.22	29.83	52.94	0.18	0.00	0.24	0.21	0.15	
Manhattan MSA	101	13.29	0.00	0.00	18.23	6.93	51.18	46.53	30.58	46.53	2.49	0.00	1.64	2.04	3.29	
Lawrence MSA	20	2.63	0.11	0.00	19.97	15.00	49.84	60.00	30.08	25.00	0.32	0.00	0.56	0.43	0.10	
Topeka MSA	20	2.63	0.65	5.00	21.77	0.00	41.36	35.00	36.23	60.00	0.32	11.11	0.00	0.44	0.24	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: KANSAS					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Non-MA KS	0	0.00	0.00	0.00	3.57	0.00	64.95	0.00	31.48	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Wichita MSA	0	0.00	4.30	0.00	32.79	0.00	42.30	0.00	20.62	0.00	0.00	0.00	0.00	0.00	0.00	
Manhattan MSA	0	0.00	0.00	0.00	34.16	0.00	45.99	0.00	19.84	0.00	0.00	0.00	0.00	0.00	0.00	
Lawrence MSA	0	0.00	10.24	0.00	34.66	0.00	37.90	0.00	17.20	0.00	0.00	0.00	0.00	0.00	0.00	
Topeka MSA	0	0.00	5.50	0.00	22.25	0.00	52.47	0.00	19.77	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES 2011			Geography: KANSAS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans						
Full Review:																
Non-MA KS	545	64.96	0.00	0.00	8.72	9.54	69.87	65.69	21.41	24.77	9.04	0.00	10.36	8.67	11.47	
Limited Review:																
Wichita MSA	171	20.38	1.98	8.19	24.75	28.07	41.13	39.77	32.14	23.98	1.29	4.67	1.40	1.45	0.81	
Manhattan MSA	61	7.27	0.00	0.00	31.02	19.67	44.46	31.15	24.52	49.18	1.73	0.00	1.16	1.03	4.60	
Lawrence MSA	47	5.60	2.14	0.00	24.42	34.04	43.29	34.04	30.15	31.91	1.36	0.00	2.41	0.74	1.51	
Topeka MSA	15	1.79	11.01	6.67	16.69	6.67	38.93	33.33	33.36	53.33	0.52	0.56	0.00	0.52	0.80	

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

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

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

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: KANSAS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA KS	352	99.72	0.00	0.00	3.20	0.00	75.51	93.18	21.29	6.82	23.20	0.00	0.00	24.57	18.42
Limited Review:															
Wichita MSA	0	0.00	0.95	0.00	11.76	0.00	51.75	0.00	35.53	0.00	0.00	0.00	0.00	0.00	0.00
Manhattan MSA	1	0.28	0.00	0.00	8.18	0.00	49.07	100.00	42.76	0.00	0.00	0.00	0.00	0.00	0.00
Lawrence MSA	0	0.00	0.28	0.00	13.93	0.00	52.65	0.00	33.15	0.00	0.00	0.00	0.00	0.00	0.00
Topeka MSA	0	0.00	2.68	0.00	7.04	0.00	49.92	0.00	40.37	0.00	0.00	0.00	0.00	0.00	0.00

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: KANSAS						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans***	% Families ⁴	% BANK Loans**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA KS	394	76.65	16.88	3.90	18.30	17.92	25.27	23.90	39.56	54.29	12.54	5.04	6.94	10.98	19.21
Limited Review:															
Wichita MSA	47	9.14	17.98	0.00	18.92	19.15	24.26	14.89	38.84	65.96	0.43	0.00	0.19	0.34	0.86
Manhattan MSA	45	8.75	19.46	13.64	19.38	22.73	21.53	20.45	39.63	43.18	1.66	5.88	2.56	1.21	1.28
Lawrence MSA	7	1.36	18.17	0.00	18.89	33.33	24.70	16.67	38.24	50.00	0.36	0.00	0.38	0.42	0.41
Topeka MSA	21	4.09	13.32	4.76	15.07	4.76	21.62	9.52	49.99	80.95	0.51	0.43	0.21	0.23	0.96

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchased by bank.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: KANSAS								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families*	% BANK Loans****	% Families ⁵	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Non-MA KS	245	81.13	16.88	5.33	18.30	16.39	25.27	27.46	39.56	50.82	53.33	41.67	52.17	61.29	50.00
Limited Review:															
Wichita MSA	13	4.30	17.98	7.69	18.92	23.08	24.26	38.46	38.84	30.77	0.48	0.80	0.00	0.71	0.47
Manhattan MSA	36	11.92	19.46	8.33	19.38	22.22	21.53	11.11	39.63	58.33	13.02	23.08	16.67	8.82	11.63
Lawrence MSA	3	0.99	18.17	0.00	18.89	33.33	24.70	0.00	38.24	66.67	1.01	0.00	5.88	0.00	0.00
Topeka MSA	5	1.66	13.32	0.00	15.07	0.00	21.62	0.00	49.99	100.00	1.99	0.00	0.00	0.00	4.67

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: KANSAS				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁶	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Non-MA KS	568	74.74	16.88	3.73	18.30	9.41	25.27	23.98	39.56	62.88	14.09	11.49	7.23	15.25	15.95	
Limited Review:																
Wichita MSA	51	6.71	17.98	2.08	18.92	12.50	24.26	25.00	38.84	60.42	0.23	0.00	0.40	0.11	0.28	
Manhattan MSA	101	13.29	19.46	1.00	19.38	8.00	21.53	17.00	39.63	74.00	3.70	1.61	2.38	2.24	4.76	
Lawrence MSA	20	2.63	18.17	10.00	18.89	5.00	24.70	20.00	38.24	65.00	0.39	1.46	0.27	0.19	0.39	
Topeka MSA	20	2.63	13.32	0.00	15.07	0.00	21.62	25.00	49.99	75.00	0.38	0.00	0.00	0.61	0.47	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

⁶ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 2011		Geography: KANSAS			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses ***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Non-MA KS	545	64.96	68.39	49.54	73.39	15.05	11.56	9.04	11.81
Limited Review:									
Wichita MSA	171	20.38	66.16	46.78	52.05	25.15	22.81	1.29	1.67
Manhattan MSA	61	7.27	68.48	44.26	57.38	19.67	22.95	1.73	1.59
Lawrence MSA	47	5.60	68.75	42.55	46.81	23.40	29.79	1.36	1.15
Topeka MSA	15	1.79	64.92	26.67	66.67	26.67	6.67	0.52	0.42

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 22.41% of small loans to businesses originated and purchased by Sunflower.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: KANSAS			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Non-MA KS	352	99.72	98.12	87.22	78.41	17.61	3.98	23.20	26.59
Limited Review:									
Wichita MSA	0	0.00	97.77	0.00	0.00	0.00	0.00	0.00	0.00
Manhattan MSA	1	0.28	96.26	100.00	100.00	0.00	0.00	0.00	0.00
Lawrence MSA	0	0.00	98.33	0.00	0.00	0.00	0.00	0.00	0.00
Topeka MSA	0	0.00	98.66	0.00	0.00	0.00	0.00	0.00	0.00

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

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 11.05% of small loans to farms originated and purchased by Sunflower.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: KANSAS				Evaluation Period: JULY 20, 2011 TO MARCH 31, 2014			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Non-MA KS	0	0	3	35,548	3	35,548	6.24	0	0
Limited Review:									
Wichita MSA	1	134,476	1	400,000	2	534,476	93.76	0	0
Manhattan MSA	0	0	0	0	0	0	0.00	0	0
Lawrence MSA	0	0	0	0	0	0	0.00	0	0
Topeka MSA	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										Geography: KANSAS				Evaluation Period: JULY 20, 2011 TO MARCH 31, 2014			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Non-MA KS	80.46	17	68.00	0	23.53	47.06	29.41	0	0	0	0	0	0	0.00	14.09	55.80	30.10
Limited Review:																	
Wichita MSA	7.78	3	12.00	33.34	33.33	33.33	0	0	1	0	0	0	1	7.93	29.95	29.65	32.47
Manhattan MSA	7.40	3	12.00	0	0	66.67	33.33	0	0	0	0	0	0	0.00	23.42	55.17	21.41
Lawrence MSA	2.58	1	4.00	0	0	0	100.00	0	0	0	0	0	0	8.96	20.19	48.38	22.46
Topeka MSA	1.77	1	4.00	0	0	100.00	0	0	0	0	0	0	0	10.67	22.77	35.97	30.59

Table 1. Lending Volume

LENDING VOLUME		Geography: COLORADO				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Non-MA CO	39.06	86	12,121	87	9,603	18	3,874	0	0	191	25,598	69.77
Pueblo MSA	60.94	143	15,574	141	18,102	10	392	4	12,871	298	46,939	30.23

^{*} Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.
^{**} The evaluation period for Community Development Loans is from July 20, 2011 to March 31, 2014.
^{***} Deposit Data as of February 28, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: COLORADO				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Non-MA CO	23	24.21	0.00	0.00	13.36	0.00	85.10	82.61	1.54	17.39	1.76	0.00	0.00	1.60	5.00	
Pueblo MSA	72	75.79	0.00	0.00	24.22	18.06	46.83	36.11	28.95	45.83	1.87	0.00	3.24	1.64	1.73	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: COLORADO						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA CO	21	47.73	0.00	0.00	13.36	0.00	85.10	90.48	1.54	9.52	20.45	0.00	0.00	19.51	33.33
Pueblo MSA	23	52.27	0.00	0.00	24.22	13.04	46.83	52.17	28.95	34.78	4.10	0.00	3.23	4.17	4.41

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 2011			Geography: COLORADO						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA CO	42	46.67	0.00	0.00	13.36	9.52	85.10	71.43	1.54	19.05	1.87	0.00	8.33	1.65	2.63
Pueblo MSA	48	53.33	0.00	0.00	24.22	6.25	46.83	43.75	28.95	50.00	0.60	0.00	0.31	0.59	0.67

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: COLORADO				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
Full Review:															
Non-MA CO	0	0.00	0.00	0.00	21.61	0.00	78.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pueblo MSA	0	0.00	0.00	0.00	46.91	0.00	48.33	0.00	4.76	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: COLORADO								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Non-MA CO	87	38.16	0.00	0.00	14.56	18.39	82.40	75.86	2.98	5.75	4.94	0.00	9.33	4.81	0.00
Pueblo MSA	141	61.84	0.00	0.00	27.89	28.37	38.49	43.26	33.53	28.37	3.05	0.00	2.62	3.88	2.64

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 2011			Geography: COLORADO				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Non-MA CO	18	64.29	0.00	0.00	9.19	11.11	88.38	88.89	2.43	0.00	12.20	0.00	33.33	10.67	0.00	
Pueblo MSA	10	35.71	0.00	0.00	17.25	10.00	39.74	40.00	43.01	50.00	15.15	0.00	0.00	12.50	27.27	

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: COLORADO						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ⁷				
	#	% of Total**	% Families***	% BANK Loans**	% Families ⁷	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA CO	23	24.21	22.44	4.35	21.32	13.04	24.81	8.70	31.43	73.91	2.07	0.00	1.34	0.00	5.30
Pueblo MSA	72	75.79	20.21	8.45	18.34	12.68	21.79	21.13	39.67	57.75	2.09	1.45	1.00	1.63	3.35

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

⁷ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: COLORADO								Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans***	% Families ⁸	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Non-MA CO	21	47.73	22.44	25.00	21.32	15.00	24.81	10.00	31.43	50.00	21.95	42.86	22.22	0.00	22.22
Pueblo MSA	23	52.27	20.21	8.70	18.34	26.09	21.79	21.74	39.67	43.48	4.40	5.88	3.13	6.52	3.45

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchased by bank.

⁸ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: COLORADO						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ⁹				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁹	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA CO	42	46.67	22.44	9.52	21.32	19.05	24.81	19.05	31.43	52.38	2.51	4.41	3.14	0.85	2.98
Pueblo MSA	48	53.33	20.21	6.38	18.34	14.89	21.79	17.02	39.67	61.70	0.80	1.27	0.71	0.49	0.92

* Based on 2011 Peer Mortgage Data (USPR)

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

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

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

⁹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 2011		Geography: COLORADO			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share ¹	
	#	% 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:									
Non-MA CO	87	38.16	73.28	55.17	66.67	19.54	13.79	4.94	5.59
Pueblo MSA	141	61.84	70.78	60.99	60.28	30.50	9.22	3.05	3.70

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

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

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

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 15.79% of small loans to businesses originated and purchased by Sunflower.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: COLORADO			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share ¹	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Non-MA CO	18	64.29	96.76	72.22	22.22	55.56	22.22	12.20	12.70
Pueblo MSA	10	35.71	98.03	80.00	100.00	0.00	0.00	15.15	17.39

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

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 14.29% of small loans to farms originated and purchased by Sunflower.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: COLORADO				Evaluation Period: JULY 20, 2011 TO MARCH 31, 2014			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Non-MA CO	0	0	0	0	0	0	0.00	0	0
Pueblo MSA	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: COLORADO				Evaluation Period: JULY 20, 2011 TO MARCH 31, 2014					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Non-MA CO	69.77	3	50.00	0.00	100.00	0.00	0.00	0	1	0		-1	0	0.00	47.73	35.78	2.98
Pueblo MSA	30.23	3	50.00	0.00	34.00	33.00	33.00	0	0	0	0	0	0	7.79	23.43	35.03	32.43

Table 1. Lending Volume

LENDING VOLUME		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
Assessment Area (2011):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Non-MA MO	100.00	11	849	5	697	9	337	0	0	25	1,883	100.00

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

** The evaluation period for Community Development Loans is from July 20, 2011 to March 31, 2014.

*** Deposit Data as of February 28, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MISSOURI					Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Non-MA MO	2	100.00	0.00	0.00	0.00	0.00	46.05	0.00	53.95	100.00	0.25	0.00	0.00	0.00	0.41	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Non-MA MO	2	100.00	0.00	0.00	0.00	0.00	46.05	100.00	53.95	0.00	2.74	0.00	0.00	6.90	0.00	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 2011			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Non-MA MO	7	100.00	0.00	0.00	0.00	0.00	46.05	71.43	53.95	28.57	0.66	0.00	0.00	1.28	0.30	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MISSOURI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa II	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
Full Review:															
Non-MA MO	0	0.00	0.00	0.00	0.00	0.00	74.91	0.00	25.09	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2011		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2010 TO							
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA MO	5	100.00	0.00	0.00	0.00	0.00	53.88	100.00	46.12	0.00	0.92	0.00	0.00	1.75	0.00

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

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

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

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over-all	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
Non-MA MO	9	100.00	0.00	0.00	0.00	0.00	51.28	55.56	48.72	44.44	3.81	0.00	0.00	4.27	3.36	

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

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

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

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MISSOURI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹⁰	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over-all	Low	Mod	Mid	Upp
Full Review:															
Non-MA MO	2	100.00	14.40	0.00	14.32	0.00	22.16	0.00	49.13	100.00	0.32	0.00	0.00	0.00	0.62

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

¹⁰ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MISSOURI						Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Non-MA MO	2	100.00	14.40	0.00	14.32	0.00	22.16	0.00	49.13	100.00	2.94	0.00	0.00	0.00	5.26

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

¹¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 2011			Geography: MISSOURI				Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31,					Market Share ¹				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over-all	Low	Mod	Mid	Upp	
Full Review:																
Non-MA MO	7	100.00	14.40	0.00	14.32	0.00	22.16	28.57	49.13	71.43	1.04	0.00	0.00	1.37	1.11	

* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

¹² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 2011		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share ¹	
	#	% 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:									
Non-MA MO	5	100.00	70.12	100.00	40.00	60.00	0.00	0.92	1.61

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

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

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

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

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: MISSOURI			Evaluation Period: JANUARY 1, 2010 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Non-MA MO	9	100.00	99.68	88.89	88.89	11.11	0.00	3.81	3.65

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

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

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

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 11.11% of small loans to farms originated and purchased by Sunflower.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MISSOURI				Evaluation Period: JULY 20, 2011 TO MARCH 31, 2014			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Non-MA MO	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS MARCH 31, 2014				Geography: MISSOURI				Evaluation Period: JULY 20, 2011 TO									
MA/Assessment Area:	Deposit s	Branches				Branch Openings/Closings				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branch es in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Non-MA MO	100.00	1	100.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	20.68	79.32

