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Comptroller of the Currency

Large

Administrator of National Banks

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Bank

## **Public Disclosure**

October 25, 1999

# **Community Reinvestment Act Performance Evaluation**

**INTRUST Bank National Association**

**Charter Number: 2782**

**105 N. Main**

**Wichita, Kansas 67202**

**Office of the Comptroller of the Currency**

**Midwestern District**

**3450 N. Rock Road, Suite 505**

**Wichita, Kansas 67226**

**NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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## General Information

*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 neighborhoods, consistent with 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 **INTRUST Bank, National Association** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **October 25, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

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

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

**Full-Scope Review** - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

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

**Home Mortgage Disclosure Act (HMDA)** - The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

**Income Levels** - These relate to individuals, families, households, or the geography.

**Low-Income** - Income levels that are less than 50 percent of the Median Family Income (MFI).

**Middle-Income** - Income levels that are at least 80 percent and less than 120 percent of the MFI.

**Moderate-Income** - Income level that are at least 50 percent and less than 80 percent of the median income.

**Upper-Income** - Income levels that are 120 percent or more of the MFI.

**Limited-Scope 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, branch distribution).

**Median Family Income (MFI)** - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. The Department of Housing and Urban Development determines the annual median income 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 Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Poverty Level** - An income level that is less than 30 percent of the median income.

**Qualified Investment** - A level investment that has as its *primary* purpose community development.

**Small Business Loans** - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

**Tier 1 Capital** - The total of common shareholders' equity, perpetual preferred shareholders=equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

## Overall CRA Rating

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

The following table indicates the performance level of **INTRUST Bank, N. A.** with respect to the Lending, Investment, and Service Tests since its previous CRA evaluation on September 10, 1997:

Performance Levels	INTRUST Bank, N. A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	<b>X</b>		
Low Satisfactory		<b>X</b>	<b>X</b>
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- INTRUST demonstrated good responsiveness to the home mortgage and small business credit needs of its assessment areas (AAs). The bank's penetration of moderate-income geographies and borrowers was particularly strong.
- INTRUST originated 90 percent of all loans inside its AAs.
- INTRUST originated a high level of community development loans, further demonstrating good responsiveness to its AA credit needs.
- INTRUST provided an adequate level of qualified community development investments that responded primarily to organizations providing services to low- and moderate-income (LMI) individuals and a Small Business Investment Company that provided funding to Kansas businesses.
- INTRUST delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs. Bank personnel proved an adequate level of community development services through their involvement in organizations that provide services to LMI individuals and promote business development.

## Description of Institution

INTRUST Bank, National Association (INTRUST), a \$2.2 billion financial institution, is headquartered in Wichita, Kansas. The bank is a wholly-owned subsidiary of INTRUST Financial Corporation (IFC), a \$2.3 billion holding company. INTRUST has 33 branches and 97 automated teller machines (ATMs) in the state of Kansas. INTRUST's affiliate INTRUST Community Development Corporation (ICDC) is also a wholly-owned subsidiary of IFC.

INTRUST has four AAs, all within Kansas. They are as follows: All of the Wichita MSA #9040 (which includes the counties of Sedgwick, Butler, and Harvey), Johnson County (part of the Kansas City, MO-KS MSA #3760), and the nonMSA areas comprised of Franklin County and Lyon County. Further details of the bank's AAs are discussed later in this evaluation.

INTRUST is a full-service banking institution and offers a full range of commercial and industrial, real estate, and consumer credit products. The bank's net loans and leases totaled \$1.5 billion as of September 30, 1999. This represents 68 percent of the bank's total assets. The bank's loan portfolio consists of 51 percent commercial and commercial real estate, 28 percent consumer, 12 percent residential real estate, eight percent agricultural, and one percent other loans. Tier one capital totaled \$164 million.

The bank's loan-to-deposit ratio was 87 percent on September 30, 1999. INTRUST experienced a significant decline in its loan-to-deposit ratio during the third quarter of 1999 due to the purchase of U.S. Bank deposits in Kansas. INTRUST also purchased 20 U.S. Bank branch locations throughout Kansas. These branch locations were not, however, considered as part of this CRA evaluation. The U.S. Bank purchase closed on September 24, 1999, therefore, INTRUST has not had any performance with these branches to evaluate.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The Office of the Comptroller of the Currency last evaluated INTRUST CRA performance on September 10, 1997. The bank received an overall rating of "Satisfactory."

Refer to Appendix B: Market Profile of Full-Scope Areas, to review the demographic data for the bank's AA.



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We examined INTRUST's CRA performance using the FFIEC Interagency Large Bank CRA examination procedures. The evaluation covers lending, investment, and service activities since the bank's previous CRA examination on September 10, 1997. Demographic data from the 1990 U.S. Census was used to compare the bank's lending performance to potential opportunities in its AA. We used deposit information from the Federal Deposit Insurance Corporation to determine INTRUST's market share and market presence in the Wichita MSA AA relative to other financial institutions in the AA. The most recent deposit information available is as of June 30, 1998.

- Lending Test

Our analysis of small business and small farm lending included reported loan originations for the years 1997 and 1998. We also used HMDA reportable loans for 1997 and 1998 in our lending test. Since loan data is aggregated and reported in whole years we used full-year data for both years and did not include year-to-date 1999 data.

- Investment Test

We reviewed community investments in the Wichita MSA AA from September 10, 1997, to October 25, 1999. In addition, we reviewed community investments in the limited-scope AAs, which had minimal activity.

- Service Test

The evaluation period for the performance under the Service Test is between September 10, 1997, and October 25, 1999. We considered the number and location of bank delivery systems and community development services.

### Data Integrity

The bank reported data is considered accurate. We selected a statistical sample of 183 small business/small farm loans and 70 home mortgage loans originated during 1998 to test the accuracy of data reported by the bank.

### **Selection of Areas for Full-Scope Review**

We performed a full-scope evaluation of the Wichita MSA AA. This area comprises 92 percent of INTRUST's total deposits and 90 percent of small farm, small business, and HMDA reportable loans. In addition, 84 percent of INTRUST's branches and 89 percent of INTRUST's ATMs are located in the Wichita MSA AA.

We performed a limited-scope review of Johnson County AA and the nonMSA AAs. We did not identify any significant variances in the bank's performance in the limited-scope AAs to warrant expanding our review in these areas.

Refer to the table in Appendix A for more information.

### **Fair Lending Review**

We did not identify any substantive violations of antidiscrimination laws. Our fair lending review consisted of analyzing the rates and terms given individual male and female borrowers on 150 direct loans for the purchase of, and secured by, used autos during the months of May 1999 through September 1999. We did not find any evidence of differential treatment of borrowers based on their gender.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

The bank's performance under the Lending Test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Wichita MSA AA is good.

#### **Lending Activity**

INTRUST's origination of home improvement and small business loans demonstrated good responsiveness to AA credit needs. In the Wichita MSA, the bank ranked first in home improvement and small business loan originations among all lenders reporting this data in 1998. The bank ranked nineteenth in home purchases loans. INTRUST made 2,802 home mortgage loans totaling \$103 million. Of this total, 603 were home purchase loans, 1,580 were home improvement loans, 616 were refinance loans, and three were multi-family loans. INTRUST also made 6,549 small business loans during this evaluation period. The bank originated 87 percent of all loans inside the Wichita MSA AA. INTRUST ranks first in deposit market share with 24 percent of all deposits.

The evaluation is focused on home purchase, home improvement, and small business loans in the Wichita MSA AA. An analysis of small farm loan originations for this AA would not be meaningful since this loan type represents less than two percent of the bank's reported loans and small farm loans were not identified as a credit need. Home mortgage refinance loans, which also were not identified as a primary credit need, make up just six percent of INTRUST's reported loans.

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity in the AA.

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

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

INTRUST achieved good penetration of moderate-income geographies in the Wichita MSA AA. For home purchase loans, the bank's portion of loans originated in these geographies was comparable to the percentage of owner-occupied housing. Although penetration was not as strong in low-income geographies, it is considered good. Opportunities for home ownership are limited in low-income areas as indicated by the small percentage of owner-occupied housing (three percent). Particularly noteworthy, the bank's market share for home purchase loans in both LMI geographies was greater than its overall market share of home purchase originations in 1998. Distribution of home improvement loans in low-income geographies is considered good. Although slightly below the percentage of owner-occupied housing in moderate-income areas the distribution of home improvement loans is satisfactory.

Refer to Tables 2, 3, and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations in the AA.

### ***Small Business Loans***

The bank's small business loan penetration in moderate-income geographies was excellent. The portion of the bank's small business loans originated in moderate-income geographies exceeded the percentage of businesses located in moderate-income areas. In addition, INTRUST's market share of small business loans in low-income geographies was equal to its overall market share. The bank's market share in moderate-income geographies substantially exceeded its market share of small business loan originations overall.

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

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

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

INTRUST achieved a good distribution of home purchase and home improvement loans among borrowers of different income levels. The bank's percentage of home purchase and home improvement loan originations to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. For low-income borrowers, the bank's portion of home purchase loans was reasonably consistent with the percentage of low-income families. This performance is particularly notable, given that 11 percent of low-income families in the AA live below the poverty level, which presents a significant barrier to home ownership.

Based on 1998 HMDA data for all reporting lenders in the AA, the bank's market share to LMI borrowers was greater than its overall market share for home improvement loans. For home purchase loans, the bank's market share for low-income borrowers was almost twice as large as its overall market share.

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

### ***Small Business Loans***

The bank's distribution of small business loans to businesses of different sizes is good. INTRUST originated 65 percent of its small business loans to firms with revenues of \$1 million or less. This compares favorably with the other lenders in the AA with only 56 percent of small business loans to firms with revenues of \$1 million or less. According to demographic data, 70 percent of AA businesses had revenues of \$1 million or less. Seventy-five percent of the bank's small business loans were for amounts less than \$100 thousand.

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

## Community Development Lending

INTRUST extended a high level of community development loans during the evaluation period totaling \$13.2 million. The majority of its lending helped revitalize and stabilize LMI areas by funding new businesses. Other community development loans provided funding for affordable housing and community services for LMI individuals.

Examples of the bank's qualified community development loans included:

- \$7 million start-up loan for a new business in a low-income area that primarily hires low-income individuals. The bank extended a second loan for \$500 thousand to expand the business and hire additional employees, again, primarily low-income persons.
- \$4 million loan to construct affordable multi-family housing for LMI individuals. This housing also stabilized the area.
- \$285 thousand, represented by five notes, to construct or remodel multi-family affordable housing in low-income areas.
- \$250 thousand loan to erect multi-family housing in a low-income empowerment zone. The housing is designated for individuals with LMI levels.
- \$453 thousand loan to a non-profit organization to construct an educational building for use in the welfare-to-work program.
- \$275 thousand loan to a non-profit organization to construct a building used by various social agencies for educational and child-care purposes for LMI individuals.
- \$117 thousand loan to a non-profit organization to purchase land for building affordable housing for LMI people.
- \$300 thousand line of credit to construct a speculative building for small business development.

INTRUST also identified seven loans totaling \$455 thousand that had a community development purpose but were already reported as small business or HMDA loans. These small business and HMDA loans are further evidence of the bank's commitment to community development in its AAs.

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

## **Product Innovation and Flexibility**

The bank offers a flexible home mortgage program, The First Time Home Buyers Loan Program, which assists LMI borrowers in obtaining mortgage financing. The program offers conventional financing with three percent down payment, no private mortgage insurance and no origination fees. INTRUST originated 30 loans totaling \$1.2 million during this evaluation period and these loans are included in the totals for home purchase loans. Other affordable mortgage loan programs include national, state, and local government-sponsored programs, which offer, fixed rates, low down payments and other special underwriting features.

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

Based on a limited-scope review, the bank's performance under the Lending Test in the Johnson County AA and the NonMSA AAs is consistent with its overall High Satisfactory performance under the Lending Test. Our conclusion is based solely on borrower distribution of HMDA and small business and small farm loans. Because there are no LMI geographies in the Johnson County or NonMSA AAs, we were unable to conclude on the geographic distribution of the bank's lending in these areas.

Refer to tables 1 through 11 in Appendix C for facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

INTRUST's performance under the investment test is rated "Low Satisfactory." The bank's level of qualified community development investments and grants showed an adequate response to meeting the needs of the Wichita MSA AA. Qualified investments and grants from the bank and its affiliate, INTRUST Community Development Corporation (ICDC), totaled \$3.192 million. INTRUST funded \$1.128 million during this evaluation period and had \$2.064 million outstanding from prior evaluation periods. The bank is active in the local community, particularly in LMI areas, and contributes to more than 50 organizations that benefit LMI areas or individuals. The bank has an officer whose job description includes working with organizations that assist LMI individuals to determine how to best utilize the bank's investment and donation budgets to meet the needs of LMI individuals in the AAs. The City of Wichita appears to have issued several Industrial Revenue Bonds or General Obligation Bonds that would have qualified as community development investments, although the bank did not participate in these investment opportunities.

Significant investments or donations are:

- INTRUST invested \$100 thousand in a community development financial institution that provides zero percent loans to low-income persons to purchase homes. The bank has a five-year commitment to this organization.
- INTRUST invested \$537 thousand in a Small Business Investment Company that has provided capital, loans, and management assistance to 28 businesses in the state of Kansas. Three of the businesses are in the Wichita MSA.
- INTRUST invested \$55 thousand in a community housing service that provides funds to allow LMI individuals to purchase homes, then sells the loans on the secondary market.
- INTRUST donated almost \$437 thousand to fund various community development organizations that provide food, shelter, health care, emergency housing repair, day care facilities, youth counseling, and job skills training to LMI individuals.



Investments outstanding from prior evaluation periods include the following:

- INTRUST maintained an \$100 thousand investment in an area credit union that provides small emergency loans to low-income individuals and very small business entities.
- INTRUST's affiliate, ICDC, has \$890 thousand in tax credits, \$405 thousand in Industrial Revenue Bonds, and a \$669 thousand capital investment to construct a LMI senior living center in the Wichita MSA AA.

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

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Johnson County AA and the NonMSA AAs, is weaker than the bank's performance in the Wichita MSA; however, it did not change the overall Investment Test rating. The main bank office in Wichita handles all investment and grant activity and, except for a few instances, the funds primarily benefit the Wichita MSA AA. Only limited funds benefited the limited-scope AAs.

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

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Wichita MSA AA is adequate.

## Retail Banking Services

INTRUST's delivery systems are reasonably accessible to people living throughout the AAs. The bank has 28 branch locations and 87 ATMs in the Wichita MSA AA. The geographic distribution of branches and ATMs to LMI census tracts is below the demographics of the AA, i. e. the percentage of population in these census tracts. Although the bank has no branches and only three ATMs in the ten low-income census tracts, management states the bank products and services are delivered to individuals residing in these census tracts through the in-grocery store branches located in neighboring tracts. In addition, the bank has only three offices (main office and two branches) in the 25 moderate-income census tracts, which again is below the demographics of the AA. Bank generated reports support management's assertion that products and services are delivered to individuals in these LMI tracts. These reports show seven percent of the households in the low-income tracts have INTRUST loan products while 23 percent have INTRUST deposit products. These reports also show ten percent of the households in moderate-income tracts have INTRUST loan products and 26 percent have INTRUST deposit products.

The bank constructed two new bank branches at existing locations and subsequently closed the existing branches. One branch was closed and relocated inside a grocery store in the same vicinity. The bank also opened a branch inside a newly constructed grocery store. Seven of the 20 recently purchased U.S. Bank locations were in the Wichita MSA AA. INTRUST kept two of these offices open while the remaining five were consolidated into nearby INTRUST locations. One closed branch, located in a low-income geography, was merged into the main office one block away. The remaining four locations were in mid- or upper-income areas.

INTRUST offers convenient business hours. The in-grocery store branches maintain extended hours Monday through Friday of 10 A.M. to 8 P.M. The two retirement center branches are open two days a week 10 A.M. to 4 P.M. The main bank maintains hours from 8 A.M. to 5 P.M., while the other Wichita branches have 9 A.M. to 6 P.M. hours. Branches in towns surrounding Wichita open at 9 A.M. and have various closing hours between 3 P.M. and 6 P.M. In-grocery store branch Saturday hours are 10 A.M. to 6 P.M., while other branches have Saturday hours from 9 A.M. to 12 Noon. Of the three offices in moderate-income areas, two are in-grocery store branches with the extended Saturday hours. The main office, which is located in a moderate-income, is closed on Saturdays. All other locations, except the Willowbend branch and the two retirement center branches,

offer Saturday hours.

A wide range of financial products and services are offered at each branch. INTRUST has a full line of commercial, agricultural, real estate, and consumer loan products. Loan officers are located at the main office in Wichita and the offices in EIDorado, Valley Center, and Haysville. The Wichita branches and the in-grocery store branches do not have lenders physically present. All branch locations accept loan applications. Branches without loan officers send loan applications to the main bank or branches with loan officers for processing. Loan officers regularly make themselves available to assist loan applicants at all locations.

INTRUST offers automated twenty-four hour telephone banking. Telephone banking services include information on existing accounts, applying for loans, and paying bills. The telephone banking also offers TDD access for the hearing impaired and multilingual lines. INTRUST offers banking online through its Internet web site. Online banking includes accessing existing accounts, opening deposit accounts, and applying for loans. However, no information is available to show whether these services are an effective alternative delivery system in reaching LMI individuals and geographies. We did not place any significant weight on these alternative delivery systems in determining the bank's overall performance since data is not available.

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and opening and closing of those branches.

### **Community Development Services**

INTRUST provides a good level of community development services in the Wichita MSA AA.

Bank associates provided several qualified services to community organizations that promote financial and homeownership education, job skills and budgeting classes, and that promote home ownership and small business development in LMI areas.

The following examples demonstrate how bank associates lent their financial expertise to these organizations:

- Bank management taught classes in banking and credit at local schools, churches, and community centers in LMI areas.
- Bank officers provided financial training in welfare-to-work programs to enable at-risk youth and other welfare recipients to increase their job skills.
- A bank officer served on the committee of an organization and wrote a grant used to complete the construction of a community center in an LMI area.
- Bank officers participated in the loan committees of three organizations that provide affordable housing to LMI individuals and allocate funds for those needs.
- Bank officials served on boards that promote small business development, including promoting and financing new businesses.
- Bank management served on fund raising committees of organizations that provide health care for LMI people.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Johnson County AA and the NonMSA AAs, is weaker than the bank's performance in the Wichita MSA AA; however, it did not change the overall Service Test rating. We determined that the distribution of branches and ATMs in the Johnson County AA and the NonMSA AAs was not meaningful, as these AAs do not contain any low- or moderate-income tracts. We did not review community development services for the Johnson County AA and the NonMSA AAs.

The bank performed limited services in the NonMSA AAs. Bank officials served on the board of an organization that obtains grants and low interest loans for businesses in the downtown area. They also provided loan documentation of financial counseling for an organization that assists LMI individuals in obtaining home ownership.

## Appendix A: Scope of Examination

The following table identifies the time periods covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "Full-Scope" and those that received a less comprehensive review (designated by the term "Limited-Scope").

<b>Time Period Reviewed</b>	Lending Test: January 1, 1997 to December 31, 1998 Investment Test: September 10, 1997 to October 25, 1999 Service Test: September 10, 1997 to October 25, 1999	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
INTRUST Bank, N. A.	HMDA, Small Business, and Small Farm Loans; Qualified Investments	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
INTRUST Community Development Corporation (ICDC)	Subsidiary of IFC	Qualified Investments
List of Assessment Areas and Type of Examination		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Wichita MSA Johnson County Franklin County Lyon County	Full-Scope Limited-Scope Limited-Scope Limited-Scope	

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

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#### Market Profiles for Areas Receiving Full-Scope Reviews

##### Wichita MSA #9040

Demographic Information for Full-Scope Area: Wichita MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	118	9%	21%	54%	16%	NA
Population by Geography	485,270	6%	17%	57%	20%	NA
Owner-Occupied Housing by Geography	121,606	3%	14%	61%	22%	NA
Businesses by Geography	17,260	8%	24%	49%	19%	NA
Farms by Geography	525	2%	7%	71%	20%	NA
Family Distribution by Income Level	131,435	18%	18%	26%	38%	NA
Distribution of Low- and Moderate-Income Families throughout AA Geographies	48,028	10%	25%	57%	8%	NA
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$35,931 = \$50,700 = % 11%	Median Housing Value Unemployment Rate				= \$57,805 = 3.8%

Source: 1990 U.S. Census, and 199X HUD updated MFI.

The AA consists of the Wichita, KS MSA #9040. The Wichita MSA includes Sedgwick, Butler, and Harvey Counties in south central Kansas with a 1990 population of 485,270. The AA has 118 census tracts which are designated eight percent low-, 21 percent moderate-, 54 percent middle-, and 16 percent upper-income per the 1990 U.S. Census. Twelve percent of the AA's population is over the age of 65 and 11 percent of the households in the AA have incomes below the poverty level. The weighted average of MSA updated median family income for 1999 in the Wichita MSA is \$50,700. Ninety-two percent of the bank's deposits are in the Wichita MSA.

INTRUST has 28 branches and 87 ATMs in the AA (see **Service Test** for details). The bank has the largest deposit market share of all banks in Sedgwick County with 24 percent of all deposits. Within Sedgwick County there are 34 other FDIC-insured financial institutions with 119 offices. The bank with the next largest deposit market share has garnered only an 18 percent share. INTRUST's primary competition is Bank of America N.A., Commerce Bank N.A., and Emprise Bank. Despite competition, the bank is generally a leader in small business and small farm loan originations. The bank's market share for loan products is described under the **Lending Test**.

The area's economy is strong and stable. The city of Wichita is best known as the "Air Capital of the World," and headquarters several general aviation manufactures (i.e., Boeing, Raytheon, Cessna, and Bombardier/Learjet). Aircraft manufacturing employment is estimated at 45,000. Boeing is the largest local employer with over seventeen thousand employees. The area also has great diversity with wholesale and retail trade, service, and petroleum refining industries. Local unemployment figures (3.8% as of September 1999) have risen only slightly over the past year (3.4% as of June 1998); however, unemployment remains beneath the national level (4.1% as of September 1999).

During this evaluation we contacted two local organizations that provide services to LMI individuals and reviewed four other recent contacts conducted by our Office. These interviews indicated housing loans were the primary credit need in the Wichita AA.



## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the **Abank** include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/AA; 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 MSA/AA. 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 MSA/AA.

**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 rank and market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See description for Table 2.

**Table 4. Geographic Distribution of Refinance Loans** - See description for Table 2.

**Table 5. 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 rank and market share information based on the most recent aggregate market data available.

- Table 6. 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 rank and market share information based on the most recent aggregate market data available.
- Table 7. 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 MSA/AA. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See description for Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See description for Table 7.
- Table 10. 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. The table also compares the bank's percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. The table also compares the bank's percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

**Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

**Table 1. Lending Volume**

LENDING VOLUME												Evaluation Period: From January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
<b>Full-Scope:</b>													
Wichita MSA AA	92.00%	2,284	\$83,981	5,187	\$563,437	171	\$9,689	13	13,179	7,652	\$670,179	90.48%	
<b>Limited-Scope:</b>													
Johnson County AA	4.00%	143	\$7,213	204	\$23,887	1	\$2	1	\$300	349	\$31,402	4.13%	
NonMSA AAs	4.00%	195	\$4,604	119	\$3,720	142	\$1,726	0	\$0	456	\$10,050	5.39%	

\* Deposit data as of September 30, 1999.

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

Geographic Distribution: HOME PURCHASE										Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Wichita MSA AA	3.0%	2.0%	14.0%	14.0%	61.0%	52.0%	22.0%	32.0%	19	1.20%	2.3%	1.5%	1.2%	1.0%	479	86.31%
<b>Limited-Scope:</b>																
Johnson County AA	NA	NA	NA	NA	33.0%	17.0%	67.0%	83.0%	83	0.1%	0.0%	0.0%	0.1%	0.1%	42	7.57%
NonMSA AAs	NA	NA	NA	NA	88.0%	100.0%	12.0%	0.0%	12	2.2%	0.0%	0.0%	2.7%	0.0%	34	6.13%

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Geographic Distribution: HOME IMPROVEMENT										Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Wichita MSA AA	3.0%	2.0%	14.0%	10.0%	61.0%	58.0%	22.0%	30.0%	1	27.3%	21.9%	22.1%	26.2%	32.5%	1,364	91.36%
<b>Limited-Scope:</b>																
Johnson County AA	NA	NA	NA	NA	33.0%	39.0%	67.0%	61.0%	10	3.0%	0.0%	0.0%	4.1%	2.4%	66	4.42%
NonMSA AAs	NA	NA	NA	NA	88.0%	100.0%	12.0%	0.0%	1	24.4%	0.0%	0.0%	28.6%	0.0%	63	4.22%

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Wichita MSA AA	3.0%	1.0%	14.0%	9.0%	61.0%	65.0%	22.0%	25.0%	11	2.0%	1.1%	2.7%	2.2%	1.4%	438	76.71%
<b>Limited-Scope:</b>																
Johnson County AA	NA	NA	NA	NA	33.0%	23.0%	67.0%	77.0%	118	0.1%	0.0%	0.0%	0.1%	0.1%	35	6.13%
NonMSA AAs	NA	NA	NA	NA	88.0%	100.0%	12.0%	0.0%	4	6.4%	0.0%	0.0%	7.3%	0.0%	98	17.16%

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES										Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Wichita MSA AA	7.0%	6.0%	23.0%	27.0%	50.0%	35.0%	28.0%	31.0%	1	46.3%	46.2%	55.8%	38.2%	50.3%	5,188	94.14%
<b>Limited-Scope:</b>																
Johnson County AA	NA	NA	NA	NA	34.0%	26.0%	66.0%	74.0%	11	2.5%	0.0%	0.0%	1.9%	2.8%	204	3.70%
NonMSA AAs	NA	NA	NA	NA	92.0%	97.0%	8.0%	3.0%	1	19.2%	0.0%	0.0%	20.0%	11.1%	119	2.16%

(\*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

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



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

Geographic Distribution: SMALL LOANS TO FARMS										Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Wichita MSA AA	1.0%	0.0%	4.0%	0.0%	79.0%	91.0%	16.0%	9.0%	2	28.7%	0.0%	0.0%	26.8%	73.7%	171	54.46%
<b>Limited-Scope:</b>																
Johnson County AA	NA	NA	NA	NA	41.0%	100.0%	59.0%	0.0%	81	0.0%	0.0%	0.0%	0.0%	0.0%	1	0.32%
NonMSA AAs	NA	NA	NA	NA	98.0%	100.0%	2.0%	0.0%	1	79.3%	0.0%	0.0%	79.3%	0.0%	142	45.22%

(\*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE										Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**
<b>Full-Scope:</b>																
Wichita MSA AA	18.0%	16.0%	18.0%	20.0%	26.0%	18.0%	38.0%	44.0%	19	1.2%	2.1%	0.8%	1.0%	1.8%	479	86.31%
<b>Limited-Scope:</b>																
Johnson County AA	8.0%	2.0%	13.0%	5.0%	22.0%	26.0%	57.0%	67.0%	83	0.1%	0.0%	0.0%	0.2%	0.2%	42	7.57%
NonMSA AAs	17.0%	3.0%	16.0%	21.0%	25.0%	35.0%	42.0%	41.0%	12	2.2%	2.6%	2.0%	1.7%	3.3%	34	6.13%

(\*) As a percentage of loans with borrower income information available.

(\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Borrower Distribution: HOME IMPROVEMENT																Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans		
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**	
<b>Full-Scope:</b>																	
Wichita MSA AA	18.0%	10.0%	18.0%	21.0%	26.0%	26.0%	38.0%	42.0%	1	27.3%	30.5%	28.8%	24.7%	29.1%	1,364	91.36%	
<b>Limited-Scope:</b>																	
Johnson County AA	8.0%	6.0%	13.0%	11.0%	22.0%	24.0%	57.0%	58.0%	10	3.0%	3.7%	2.1%	2.1%	3.9%	66	4.42%	
NonMSA AAs	17.0%	8.0%	16.0%	27.0%	25.0%	37.0%	42.0%	27.0%	1	24.4%	45.5%	32.1%	35.9%	13.2%	63	4.22%	

(\*) As a percentage of loans with borrower income information available.

(\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE										Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
<b>Full-Scope:</b>																
Wichita MSA AA	18.0%	8.0%	18.0%	20.0%	26.0%	17.0%	38.0%	53.0%	11	2.0%	3.1%	3.0%	1.3%	2.7%	438	76.71%
<b>Limited-Scope:</b>																
Johnson County AA	8.0%	0.0%	13.0%	14.0%	22.0%	11.0%	57.0%	74.0%	118	0.1%	0.0%	0.1%	0.0%	0.1%	35	6.13%
NonMSA AAs	17.0%	12.0%	16.0%	10.0%	25.0%	31.0%	42.0%	44.0%	4	6.4%	22.9%	8.6%	8.1%	5.1%	98	17.16%

(\*) As a percentage of loans with borrower income information available.

(\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Evaluation Period: January 1, 1997 TO December 31, 1998							
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Loans to Businesses	
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total*****
<b>Full-Scope:</b>										
Wichita MSA AA	70.10%	64.61%	56.33%	74.62%	13.22%	12.14%	46.33%	41.94%	5,187	94.14%
<b>Limited-Scope:</b>										
Johnson County AA	66.59%	78.81%	54.68%	72.55%	14.71%	12.74%	2.53%	2.55%	204	3.70%
NonMSA AAs	72.47%	97.10%	56.97%	92.44%	7.56%	0.00%	19.21%	25.13%	119	2.16%

(\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*) 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 12% of small loans to businesses originated and purchased by the bank.

(\*\*\*) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1998 Aggregate Small Business Data only.

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

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

Borrower Distribution: SMALL LOANS TO FARMS				Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total*****
<b>Full-Scope:</b>										
Wichita MSA AA	94.54%	96.10%	63.16%	83.63%	12.87%	3.50%	26.68%	27.93%	171	54.45%
<b>Limited-Scope:</b>										
Johnson County AA	92.77%	100.00%	87.10%	100.00%	0.00%	0.00%	0.00%	0.00%	1	0.32%
NonMSA AAs	95.63%	100.00%	71.73%	98.59%	1.41%	0.00%	79.35%	77.27%	142	45.22%

(\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*) 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 13% of small loans to farms originated and purchased by the bank.

(\*\*\*) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.

(\*\*\*\*) Based on 1998 Aggregate Small Farm Data only.

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

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS State: Kansas Evaluation Period: September 10, 1997 TO October 25, 1999									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$=	#	\$ (000's)
<b>Full-Scope:</b>									
Wichita MSA AA	4	\$2,064	54	\$1,128	58	\$3.192	100%	0	0
<b>Limited-Scope:</b>									
Johnson County AA	0	0	0	0	0	0	0%	0	0
NonMSA AAs	0	0	0	0	0	0	0%	0	0

\*) Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.  
 \*\*) Unfunded Commitments means legally binding investment commitments reported on the Report of Condition Schedule-L Off Balance Sheet Items.

**Table 13. Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
			State: Kansas				Evaluation Period: September 10, 1997 TO October 25, 1999										
MSA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full-Scope:</b>																	
Wichita MSA AA	92%	28	85%	NA	11%	53%	36%	87	90%	3%	24%	51%	22%	6%	17%	57%	20%
<b>Limited-Scope:</b>																	
Johnson County AA	4%	3	9%	NA	NA	NA	100%	5	5%	NA	NA	20%	80%	NA	NA	36%	64%
NonMSA AAs	4%	2	6%	NA	NA	100%	NA	5	5%	NA	NA	80%	20%	NA	NA	89%	11%