CARSON BANK

# CARSON BANK

### COMMUNITY REINVESTMENT ACT

The Board of Directors of Carson Bank are committed to helping meet the credit and community needs of its assessment area, including loans, services and investments that will benefit low and moderate income individuals and geography's consistent with the safe and sound operations of the institution.

### **DELINEATION OF BANK'S ASSESSMENT AREAS**

The Carson Bank's assessment area consists of the following:

All of Sumner County and all of Sedgwick County, State of Kansas

A map showing the boundaries of the area is attached hereto.

### ANTI-DISCRIMINATION POLICY

It is the policy of the Bank to comply with the letter and intent of all applicable consumer and fair lending laws. The Bank will not deny services to any individual due to discrimination because of race, color, religion, national origin, sex, marital status, age, physical condition, family status, or disability, because all or part of the applicant's income is derived from any public assistance program, or because the applicant has in good faith exercised any right under the Consumer Protection Act. Employees are instructed to treat all personal fairly and will not discourage an individual from applying for credit. The Bank will accept and consider all completed written and verbal applications for credit and will grant credit based on safe and sound banking principals.

### **LOCATIONS**

The Bank has the following locations in Mulvane, Derby, and Wichita, Kansas

Main Bank Office Automated Teller Machine 122 W. Main Mulvane, KS 67110 Located in BNA 9921 Census Tract 9621.00 Sumner County, KS

Branch Bank in Mulvane, KS Automated Teller Machine 1305 N. Rock Road Mulvane, KS 67110 Census Tract 0099.02 Sedgwick County, KS Branch Bank in Derby, KS Automated Teller Machine 255 N Rock Rd. Derby, KS 67037 Census Tract 0098.04 Sedgwick County, KS

Branch Bank in Wichita, KS Automated Teller Machine 4641 E. Douglas Wichita, KS 67218 Census Tract 0022.00 Sedgwick County, KS

### **BRANCHES OPENED OR CLOSED**

The Bank closed the branch at 201 E Madison Ave, Derby, KS on March 13, 2020 and opened a branch at 255 N Rock Rd. Derby, KS on March 16, 2020. The branch moved 1.5 miles east.

### **HOURS OF OPERATION**

Lobby Hours		
Main Bank	Monday through Friday	9:00a to 5:00p
	Saturday	Closed
All Branches	Monday through Thursday	9:00a to 5:00p
Mulvane & Derby	Friday	9:00a to 6:00p
	Saturday	By appointment only
Wichita	Friday	9:00a to 5:00p
	Saturday	Closed
Drive-In Hours		
Main Bank	Monday through Friday	8:00a to 5:00p
	Saturday	Closed
Mulvane & Derby	Monday through Friday	9:00a to 6:00p
	Saturday	9:00a to 12:00p
Wichita	Monday through Friday	8:00a to 5:00p
	Saturday	Closed

CARSON BANK

### CREDIT SERVICES OFFERED

#### COMMERCIAL

Business loans for individuals as well as corporations including manufacturers, retailers, wholesalers and farmers on both a secured and unsecured basis may be extended in the form of:

Term and working capital loans Equipment loans Inventory loans Real Estate construction loans Long term real estate loans Small business loans

#### REAL ESTATE LOANS

Loan may be provided for one to four family residential owner-occupied properties as well as income producing properties designed for one or multi-family use and include:

Fixed-rate loans Adjustable-rate loans 2<sup>nd</sup> Mortgage any purpose Home improvement loans Home Equity Lines of Credit Construction loans Land purchase

#### CONSUMER

Automobile (new and used) Mobile home loans Personal loans (secured and unsecured)

#### CASH, STOCKS AND BONDS

Certificate of Deposit Savings account Municipal, Federal, Government Bonds

### **DEPOSIT PRODUCTS**

#### **Consumer Accounts**

<u>Checking Accounts</u>: True Checking E-Checking Student Checking NOW Account Premier Money Market Platinum Money Market Golden Checking Bank@Work Account

#### **Business Accounts**

<u>Checking Accounts:</u> Business Checking Business NOW Interest Business Checking Small Business Checking Business Premier Money Market Organization Checking Savings Accounts: Personal Savings Overdraft Protection Savings Children's Savings Certificates of Deposit Individual Retirement Accounts Christmas Club

<u>Savings Accounts:</u> Business Savings Account Business Certificate of Deposit

### **DELIVERY SYSTEMS**

Carson Bank offers the capability to perform functions through various channels. Some or all of these channels are widely available to all customers. Traditional avenues (personal visits) are available during normal hours of operation and by appointment.

Telephone Banking services are available to all customers. The automated telephone service is accessible to all customers 24 hours a day, and offers a full array of services including the ability to retrieve balances and transfer funds.

Online Banking and Mobile Banking are offered at no charge to all consumer and commercial customers. There is a charge for commercial accounts with cash management functions. The system allows customers to retrieve balances, transfer funds, view statements, contact the bank, access account history, view check images and utilize bill payment features.

# CARSON BANK

Mobile Deposit is a function of the Mobile Banking system and allows a customer to electronically deposit checks.

In addition, Carson Bank maintains a website, CarsonBank.com, which provides access to online banking, bank information including product and service descriptions, employment opportunities, bank history and the ability to contact the bank.

### LOAN – TO – DEPOSIT RATIO

The Bank's loan-to-deposit ratio for each quarter of the prior calendar year and current year-to-date is as follows:

	2023	2024
March	68.42%	75.15%
June	73.63%	
September	76.36%	
December	78.41%	

### WRITTEN COMMENTS AND RESPONSES

Written comments received from the public for the current year and each of the prior two calendar years relating to the Bank's performance in helping meet community credit needs and responses to these comments by the Bank are contained in this file.

### **CRA PERFORMANCE**

A copy of the public section of the Bank's most recent CRA Performance Evaluation prepared by the FDIC is contained in this file.

### HOME MORTGAGE DISCLOSURE ACT (HMDA)

A copy of the Bank's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (Bureau's) Web site at *www.consumerfinance.gov/hmda*.

### COMMUNITY REINVESTMENT ACT NOTICE

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

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA. You may review today the public section of our most recent CRA evaluation, prepared by the FDIC, and a list of services provided at this branch. You may also have access to the following additional information, which we will make available to you at this branch within five calendar days after you make a request to us: (1) a map showing the assessment area containing this branch, which is the area in which the FDIC evaluates our CRA performance in the community; (2) information about our branches in the assessment area; (3) a list of services we provide at those locations; (4) data on our lending performance in this assessment area; and copies of all written comments received by us that specifically relate to our CRA performance in this assessment area, and any responses we have made to those comments. If we are operating under an approved strategic plan, you may also have access to a copy of the plan. If you would like to review information about our CRA performance in other communities served by us, the public file for our entire bank is available at Carson Bank, 122 West Main, Mulvane, KS.

At least 30 days before the beginning of each quarter, the FDIC publishes a nationwide list of the banks that are scheduled for CRA examination in the quarter. This list is available from the Regional Manager, Division of Compliance and Consumer Affairs, of the Federal Deposit Insurance Corporation, 1100 Walnut Street, Suite 2100, Kansas City, Missouri, 64106. Telephone: (816) 234-8000; Fax: (816) 234-8182. You may send written comments about our performance in helping to meet community credit needs to Carson Bank, Frank L. Carson IV, President, P.O. Box 158, Mulvane, KS, and the FDIC Regional Manager. Your letter, together with any response by us, will be considered by the FDIC in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the FDIC Regional Manager. You may also request from the FDIC Regional Manager an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Mulvane Bankshares, Inc., 122 W. Main, Mulvane, KS 67110, a bank holding company. You may request from the Federal Reserve Bank of Kansas City, 1 Memorial Drive, Kansas City, Missouri 64198-0001 an announcement of applications covered by the CRA filed by bank holding companies.

Branch Notice.

CARSON BANK

### COMMUNITY REINVESTMENT ACT NOTICE

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

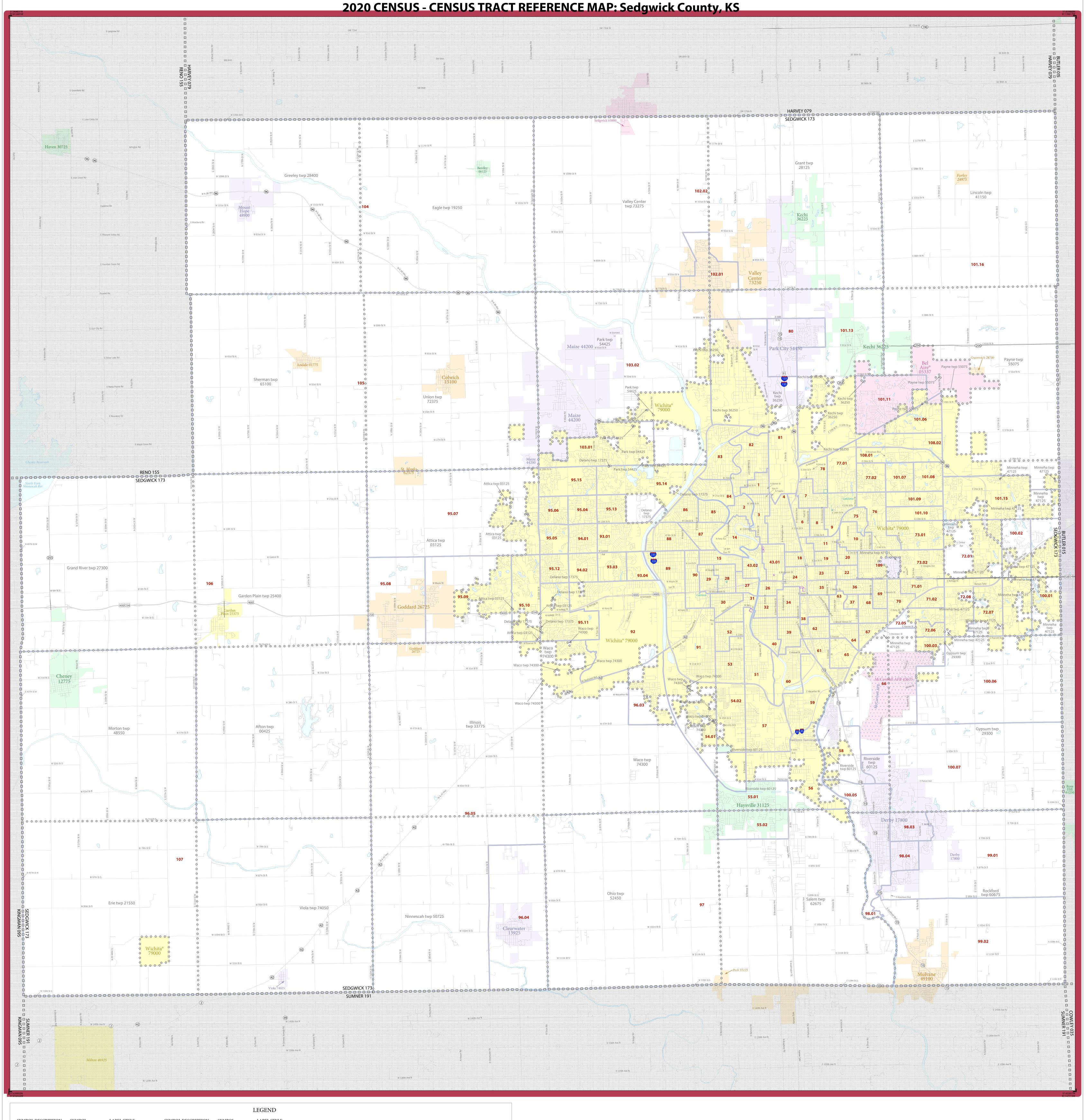
Your involvement is encouraged.

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

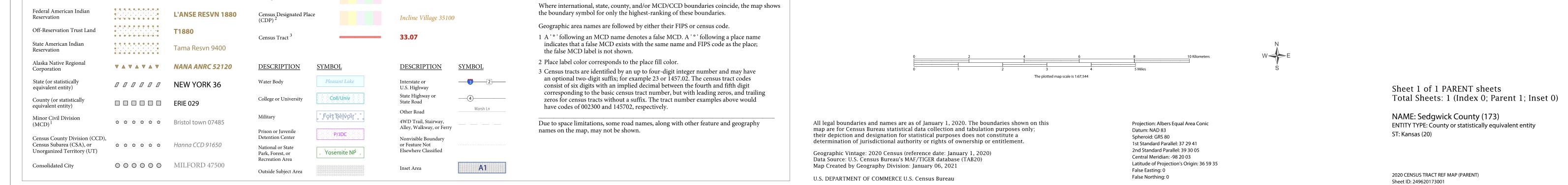
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Main Bank Notice.



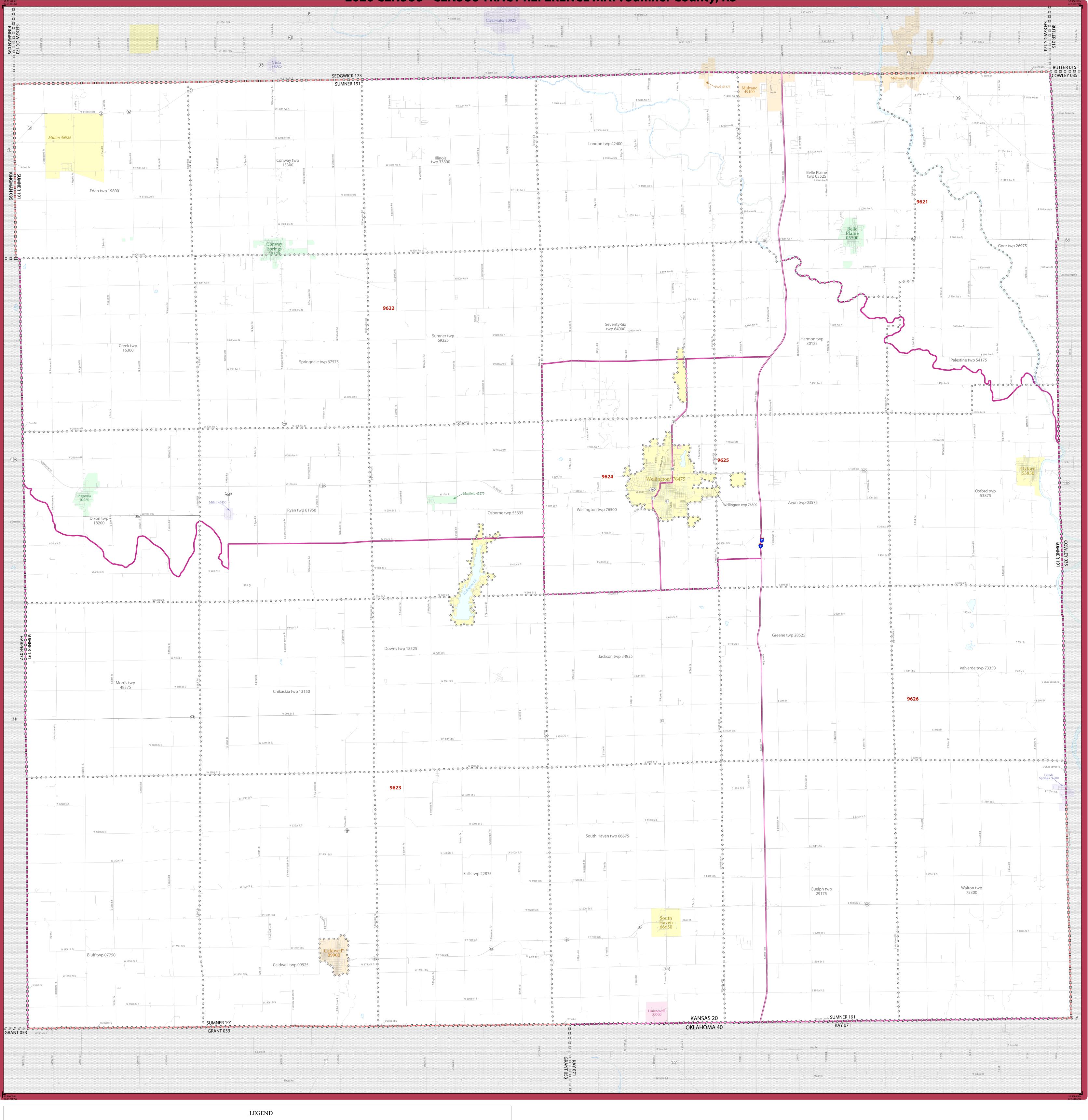
SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International		CANADA	Incorporated Place <sup>1,2</sup>		Davis 18100



United States°

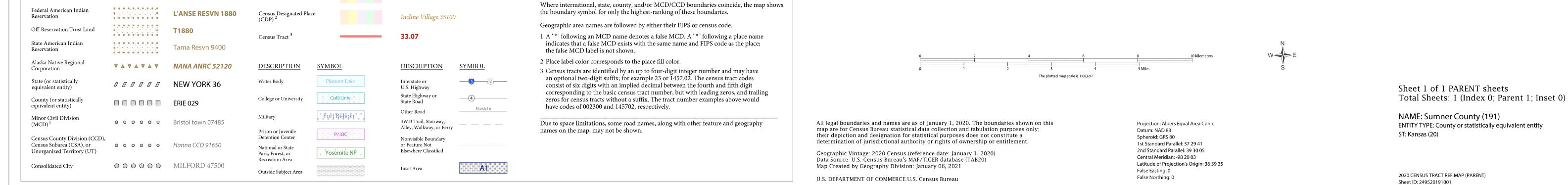
Census 2020

# 2020 CENSUS - CENSUS TRACT REFERENCE MAP: Sumner County, KS



 SYMBOL DESCRIPTION
 SYMBOL
 LABEL STYLE
 SYMBOL DESCRIPTION
 SYMBOL
 LABEL STYLE

 International
 会会会会会
 CANADA
 Incorporated Place <sup>1,2</sup>
 Davis 18100



United States°

Census 2020

## **PUBLIC DISCLOSURE**

January 22, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Carson Bank Certificate Number: 17369

122 West Main Street Mulvane, Kansas 67110

Federal Deposit Insurance Corporation Division of Depositor and Consumer Protection Kansas City Regional Office

> 1100 Walnut Street, Suite 2100 Kansas City, Missouri 64106

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, nor should it 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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### **INSTITUTION RATING**

### INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The bank's Community Reinvestment Act (CRA) performance under all applicable criteria supports the overall rating. The following points summarize this performance.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and credit needs of the assessment area.
- A majority of the reviewed loans are in the institution's assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration among businesses of different sizes and individuals of different income levels.
- The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not impact the rating.

### **DESCRIPTION OF INSTITUTION**

Carson Bank is a full-service community bank headquartered in Mulvane, Kansas. Mulvane Bankshares, Inc., in Mulvane, Kansas, a one-bank holding company, wholly owns the institution's outstanding stock. Carson Bank received a Satisfactory rating under the Interagency Small Institution Examination Procedures at its prior FDIC performance evaluation dated February 12, 2018.

Carson Bank operates four full-service offices in south central Kansas, which are located in Sedgwick and Sumner counties. The offices are in Mulvane (2), Derby, and Wichita. In 2020, the bank relocated the Madison Street branch in Derby to a new location approximately 1.5 miles away; however, continues to serve the same market. The bank has not been involved in any mergers or acquisitions since the previous evaluation.

The institution offers traditional home mortgage, commercial, agriculture, and consumer loans, as well as government guaranteed loans through the Small Business Administration. The bank also originated loans under the Small Business Administration's Paycheck Protection Program (PPP), which was established in 2020 to provide relief to small businesses during the Corona Virus Disease 2019 (COVID-19) pandemic. Home mortgage lending includes loans retained in the portfolio, as

well as loans sold on the secondary market. The primary lending focus continues to be commercial and home mortgage loans.

The bank provides a variety of deposit services including checking, savings, money market deposit accounts, and certificates of deposit. Alternative banking services include internet and mobile banking, electronic bill pay, and four bank-owned ATMs.

According to the September 30, 2023 Reports of Condition and Income, the institution reported total assets of \$187.1 million, total loans of \$120.2 million, and total deposits of \$155.3 million. The following table shows the distribution for each loan category by dollar volume.

Loan Portfolio Distribution as of 9/30/2023				
Loan Category	\$(000s)	%		
Construction, Land Development, and Other Land Loans	15,630	13.0		
Secured by Farmland	1,650	1.4		
Secured by 1-4 Family Residential Properties	39,000	32.4		
Secured by Multi-family (5 or more) Residential Properties	6,070	5.1		
Secured by Non-farm Non-Residential Properties	43,383	36.1		
Total Real Estate Loans	105,733	88.0		
Commercial and Industrial Loans	11,061	9.2		
Agricultural Production and Other Loans to Farmers	872	0.7		
Consumer	2,416	2.0		
Obligations of State and Political Subdivisions in the U.S.	121	0.1		
Other Loans	9	-		
Lease Financing Receivables (net of unearned income)	-	-		
Less: Unearned Income	-	-		
Total Loans	120,203	100.0		
Source: Reports of Condition and Income				

Examiners did not identify any financial, legal, or other impediments that would affect the bank's ability to meet the credit needs of the assessment areas.

### **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more assessment areas within which its CRA performance will be evaluated. Carson Bank has designated one assessment area, which is comprised of Sedgwick and Sumner counties. These adjacent counties make up a portion of the Wichita, Kansas Metropolitan Statistical Area (MSA). The bank's designated assessment area has not changed since the previous evaluation.

### **Economic and Demographic Data**

This assessment area consists of 141 census tracts, including 8 low-, 42 moderate-, 54 middle-, 35 upper-, and 2 unknown-income census tracts. The following table illustrates select demographic characteristics of the assessment area.

Demogra	aphic Inforn	nation of th	e Assessment	Area		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	141	5.7	29.8	38.3	24.8	1.4
Population by Geography	546,206	3.7	26.6	38.0	31.1	0.6
Housing Units by Geography	231,652	4.5	29.4	38.1	27.0	1.1
Owner-Occupied Units by Geography	130,943	2.0	20.5	42.2	35.2	0.2
Occupied Rental Units by Geography	77,839	7.3	40.9	33.7	15.9	2.2
Vacant Units by Geography	22,870	9.4	41.4	30.0	17.0	2.2
Businesses by Geography	45,606	2.5	21.4	33.7	39.4	3.0
Farms by Geography	1,639	1.0	13.4	43.0	41.4	1.1
Family Distribution by Income Level	132,448	20.4	18.5	21.2	39.9	0.0
Household Distribution by Income Level	208,782	23.7	17.7	17.7	40.9	0.0
Median Family Income - 48620 Wichit	a, KS MSA	\$74,120	Median Housi	ng Value		\$140,763
Families Below Poverty Level		9.2%	Median Gross	Rent		\$835

The 2023 D&B data indicates the services industry represents the largest portion of businesses at 37.0 percent; followed by non-classifiable establishments at 17.7 percent; and finance, insurance, and real estate at 12.7 percent. Agricultural operations comprise 3.5 percent of assessment area businesses. The data also indicates a notable number of area businesses are relatively small, with 90.4 percent having 9 or fewer employees, and 89.8 percent operating from a single location.

Examiners used the Federal Financial Institutions Examination Council's (FFIEC) median family income figure for the Wichita, Kansas MSA in 2022 to analyze home mortgage Borrower Profile performance. This figure, along with the corresponding income thresholds, is shown in the following table.

Median Family Income Ranges							
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%			
2022 (\$85,700)	<\$42,850	\$42,850 to <\$68,560	\$68,560 to <\$102,840	≥\$102,840			
Source: FFIEC							

### **Competition**

There is significant competition for financial services in this assessment area. According to June 30, 2023 FDIC Deposit Market Share data, there are 43 banks operating 170 offices in the assessment area. Carson Bank has the 16<sup>th</sup> highest market share, holding 0.8 percent of the market's deposits.

There is also substantial competition for loans in the assessment area. The 2022 HMDA aggregate data showed that 358 lenders reported 16,165 home mortgage loans in the assessment area. Carson Bank ranked 65<sup>th</sup>, with a 0.4 percent market share. Although the bank is not required to report small business and small farm lending data, aggregate CRA lending data for those reporting institutions (generally large institutions) provides insight on the level of competition and demand for small business and small farm loans. The data for 2021 (the most recent year available) showed 110 lenders reported 9,989 small business loans, and 20 lenders reported 259 small farm loans in the assessment area.

### **Community Contacts**

As part of the evaluation process, examiners contact third parties active in the assessment area to provide insight on the credit needs of the community. This also helps determine whether local financial institutions are responsive to those needs.

For this evaluation, examiners relied on information from a community contact conducted in late 2023 with a community official knowledgeable of the assessment area. The individual noted that the area economy is heavily reliant on Wichita's aircraft industry, which has improved since the COVID-19 pandemic. Specifically, there have not been any notable industry layoffs in recent years. The contact indicated that the area credit needs includes commercial, home mortgage, agriculture, and consumer loans. The individual believes that area financial institutions are favorably regarded and do a good job of serving the community credit needs.

### Credit Needs

Based on information from economic and demographic data, the community contact, and bank management, examiners determined that small business and home mortgage loans are the primary credit needs in the assessment area. The area demographics regarding the number of businesses and housing units in the assessment area, as well as data from lenders that report home mortgage and small business loan information supports this conclusion.

### SCOPE OF EVALUATION

### **General Information**

This evaluation covers the period from the prior evaluation dated February 12, 2018, to the current evaluation dated January 22, 2024. Examiners used Interagency Small Institution Examination Procedures to evaluate the bank's CRA performance. This evaluation does not include any affiliate lending activities.

### Activities Reviewed

Examiners reviewed small business and home mortgage loans to evaluate performance for this evaluation. Examiners selected the loan products reviewed based on the bank's business strategy and loan volume during the evaluation period. Both loan categories received equal weight when drawing overall conclusions because lending activity is similar for both product types. The small farm loan category was not reviewed since the bank's agricultural lending activity is nominal.

For the home mortgage loan review, examiners considered all 70 loans totaling \$12.5 million that were reported on the bank's 2022 Home Mortgage Disclosure Act (HMDA) Loan Application Register. Carson Bank was not a HMDA reporter in 2021. For the small business loan review, examiners focused on 2023 lending activity. Bank records show the institution originated or purchased 102 small business loans totaling \$15.0 million in 2023. Bank management confirmed the institution's lending patterns for the reviewed year would be reasonably representative of the bank's lending throughout the evaluation period for both loan products.

For the Assessment Area Concentration criterion, examiners analyzed all of the home mortgage and small business loans for the respective year of review. The Geographic Distribution and Borrower Profile criterion analyses for both loan products included all of these loans that were extended to borrowers in the assessment area. Examiners used prescribed comparative data for determining performance for the Geographic Distribution and Borrower Profile criterion. HMDA aggregate data for 2022 is the primary standard of comparison for the bank's home mortgage lending performance, and 2023 D&B data is the standard of comparison for the bank's small business lending performance. Although both the number and dollar volume of loans are shown throughout this evaluation, examiners emphasize performance by number of loans because it is a better indicator of the number of individuals and businesses served.

### **CONCLUSIONS ON PERFORMANCE CRITERIA**

### LENDING TEST

Carson Bank demonstrated satisfactory performance under the Lending Test. Performance in all evaluated criteria supports this conclusion.

### Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and the credit needs of the assessment area. The bank's performance was evaluated based on the average of the 23 quarterly net loan-to-deposit ratios since the previous evaluation. The bank's resulting average net loan-to-deposit ratio is similar to comparable banks during the same evaluation period. Examiners selected comparable banks based on their asset size, geographic location, and product mix. See the following table for details.

Loan-to-Deposit Ratio Comparison					
Bank	Total Assets as of 9/30/2023 (\$000s)	Average Net Loan-to-Deposit Ratio (%)			
Carson Bank, Mulvane, Kansas	187,142	71.5			
Andover State Bank, Andover, Kansas	188,295	98.5			
The Valley State Bank, Belle Plaine, Kansas	188,136	71.7			
Conway Bank, Conway Springs, Kansas	102,691	82.2			
Vintage Bank Kansas, Leon, Kansas	231,423	73.0			
Source: Reports of Condition and Income 3/31/2018 – 9/30/2023	·				

### Assessment Area Concentration

As shown in the following table, a majority of the small business and home mortgage loans reviewed were located inside the assessment area.

	Lending Inside and Outside of the Assessment Area									
	Number of Loans				Dollar Amount of Loans \$(000s)					
Loan Category	Ins	ide	Out	side	Total	Total Inside Outsi		ide	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business	88	86.3	14	13.7	102	11,291	75.3	3,706	24.7	14,997
Home Mortgage	62	88.6	8	11.4	70	10,864	86.8	1,647	13.2	12,511
Total	150	87.2	22	12.8	172	22,155	80.5	5,353	19.5	27,508
Source: Bank Data	-					-	-		-	•

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's lending performance in both lending categories supports this conclusion.

### Small Business Loans

The geographic distribution of small business loans is reasonable. As illustrated in the following table, the bank's percentage of lending in low-income census tracts exceeds the corresponding demographic data, while the bank's percentage of lending in moderate-income census tracts lags the corresponding demographic data. Several borrowers had multiple loans, which partially skews the data. Therefore, examiners also calculated the bank's lending percentages by the number of borrowers served, as opposed to loans originated. On a per borrower basis, 5.7 percent of borrowers were located in a low-income census tract, and 15.1 percent were located in a moderate-income census tract, which reflects reasonable performance overall.

Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	2.5	7	8.0	331	2.9
Moderate	21.4	10	11.4	2,778	24.6
Middle	33.7	27	30.7	4,026	35.7
Upper	39.4	44	50.0	4,156	36.8
Not Available	3.0	0	0.0	0	0.0
Totals	100.0	88	100.0	11,291	100.0

### Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. As the following table shows, the bank's home mortgage lending in low- and moderate-income census tracts is comparable to aggregate lending data.

Tract Income Level	% of Owner- Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.0	1.4	0	0.0	0	0.0
Moderate	20.5	20.1	15	24.2	2,193	20.2
Middle	42.2	40.2	20	32.3	2,725	25.1
Upper	35.2	38.0	27	43.5	5,946	54.7
Not Available	0.2	0.2	0	0.0	0	0.0
Totals	100.0	100.0	62	100.0	10,864	100.0

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes and individuals of different incomes in the assessment area. The bank's reasonable lending performance for both loan categories supports this conclusion.

### Small Business Loans

The distribution of loans to businesses of different revenue sizes is reasonable. As illustrated in the following table, the bank's percentage of lending to small businesses with revenues of \$1 million or less lags the demographic data for this revenue category. Therefore, examiners also calculated the bank's lending percentages by the number of borrowers served, as opposed to loans originated. On a per borrower basis, 66.0 percent of borrowers had revenues of \$1 million or less. Finally, examiners considered the lending performance for two comparable institutions operating in the Wichita area. On a per borrower basis, the percentage of lending to small businesses with revenues of \$1 million or less was 71.4 percent for both comparable banks. Since Carson Bank's percentage

of lending to small businesses with revenues of \$1 million or less on a per borrower basis is similar to the comparable banks, performance is considered reasonable.

Distribution of Small Business Loans by Gross Annual Revenue Category						
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%	
<=\$1,000,000	85.5	45	51.1	5,100	45.2	
>\$1,000,000	4.7	43	48.9	6,191	54.8	
Revenue Not Available	9.8	0	0.0	0	0.0	
Total	100.0	88	100.0	11,291	100.0	

### Home Mortgage Loans

The distribution of loans to individuals of different income levels is reasonable. As shown in the following table, the bank's level of lending to low- and moderate-income borrowers is similar to the corresponding aggregate lending data for both income categories.

Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	20.4	9.9	5	8.1	571	5.3
Moderate	18.5	21.2	10	16.1	1,337	12.3
Middle	21.2	19.5	9	14.5	1,194	11.0
Upper	39.9	26.4	20	32.3	4,671	43.0
Not Available	0.0	23.0	18	29.0	3,091	28.5
Total	100.0	100.0	62	100.0	10,864	100.0

### **Response to Complaints**

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

### DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

### APPENDICES

### SMALL BANK PERFORMANCE CRITERIA

### Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

### GLOSSARY

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

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

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

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

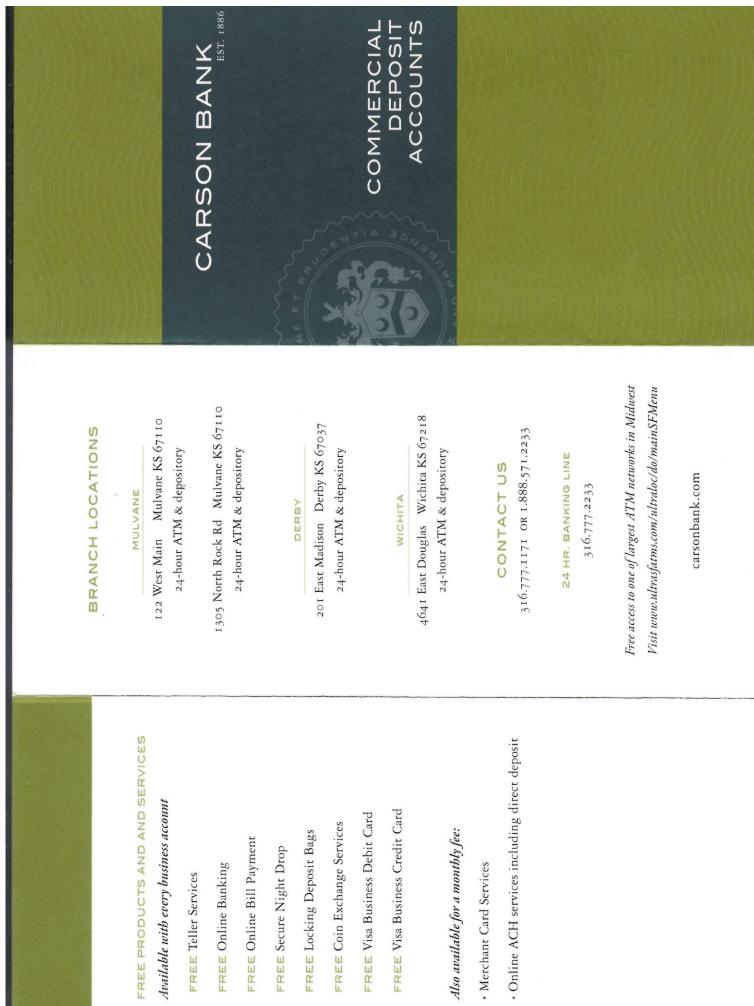
**Small Business Loan:** A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.





<ul> <li>BUSINESS CHECKING</li> <li>A traditional business checking account in whisome account fees are offset by an earnings cred some account fees are offset by an earnings cred business the of \$.06</li> <li>No minimum balance</li> <li>S1 service charge per month</li> <li>Per deposit item fee of \$.04</li> <li>Per deposit item fee of \$.04</li> <li>Per deposit item fee of \$.04</li> <li>These fees can be offset by an earnings credi based on your average collected balance.</li> <li>These fees can be offset by an earnings credi based on your average collected balance.</li> <li>Earnings credit set by Carson Bank and subject to change at any time.</li> </ul>	INTEREST BUSINESS CHECKING the set of the secount that offers a competitive it. interest rate based on the average collected balance.	• Low minimum opening deposit	<ul> <li>No minimum balance</li> <li>\$1 service charge per month</li> </ul>	• Per debit item fee of \$.10	• Per deposit item fee of \$.15	Charge of \$1.25 per \$100 negative average collected balance.	<ul> <li>This is an interest bearing account. Interest rate set by Carson Bank and subject to</li> </ul>	change at any time.			-	.e.*	
	BUSINESS CHECKING A traditional business checking account in which some account fees are offset by an earnings credit.	• Low minimum opening deposit	<ul> <li>No minimum balance</li> <li>\$1 service charge per month</li> </ul>	• Per debit item fee of \$.06	• Per deposit item fee of \$.04	<ul> <li>Charge of \$1.25 per \$100 negative average collected balance.</li> </ul>	<ul> <li>These fees can be offset by an earnings credit based on your average collected balance.</li> </ul>	Earnings credit set by Carson Bank and	subject to change at any time.				See reverse side for all FREE products and services

SMALL BUSINESS CHECKING

A business checking account for lower activity accounts including Sole Proprietorships.

· Low minimum opening deposit

No minimum balance

• No monthly service charge

 Account allows a combination of up to 50 debits and credits per month at no charge. Additional debits and credits are charged at a rate of \$.25 each.

 Charge of \$1.25 per \$100 negative average collected balance.





GOLDEN CHECKING	A personal checking account	<ul> <li>Designed for customers 65 years</li> </ul>	of age, or disabled	• Low minimum opening deposit	<ul> <li>Unlimited check writing</li> </ul>	Online Banking	Online Bill Payment	• No annual-fee ATM/Visa Debit	Card available	• No minimum balance requirement	Mobile Banking	Unlimited use Visa Debit Card			N.O.W. ACCOUNT	Write checks while earning interest	<ul> <li>Minimum deposit to open</li> </ul>	<ul> <li>If the average daily balance drops below \$1000</li> </ul>	during a statement cycle, a per item charge	will be applied to debit items in excess of 25	Online Banking	Online Bill Payment	• No annual-fee ATM/Visa Debit card available	Minimum monthly average balance	required to avoid monthly charges	Minimum 3 Debit Card transactions	per statement cycle to avoid service charge	• Mobile Banking	
TRUE CHECKING	A personal account anyone can believe in	<ul> <li>Low minimum opening deposit</li> </ul>	<ul> <li>Unlimited check writing</li> </ul>	Online Banking	Online Bill Payment	• No annual-fee ATM/Visa Debit	Card available	Minimum 3 Debit Card transactions	per statement cycle to avoid service charge	<ul> <li>Minimum daily balance required</li> </ul>	to avoid monthly service charge	Mobile Banking	• Unlimited use Visa Debit Card			PREMIER MONEY MARKET	Earn higher yields on higher balances	• Minimum deposit to open	Online Banking	<ul> <li>Online Bill Payment</li> </ul>	• Fee assessed if more than 6 transfers,	withdrawals, or combination thereof per month	<ul> <li>Minimum daily balance required to avoid</li> </ul>	monthly service charge	Mobile Banking				
E-CHECKING	An easy and secure way to bank electronically	<ul> <li>Low minimum opening deposit</li> </ul>	• Interest rate premium on	balances up to \$25,000	Unlimited use Visa Debit Card	Minimum 10 Debit Card purchases per	statement cycle to avoid service charge*	<ul> <li>Reimbursement for foreign</li> </ul>	ATM surcharges available	Online Banking	Online Bill Payment	• No annual-fee ATM/Visa Debit Card	• Post up to 5 checks each statement cycle	<ul> <li>Per check charge over 5 per statement cycle</li> </ul>	<ul> <li>No minimum balance requirement</li> </ul>	Mobile Banking		*Although the Visa Debit Card has free, unlimited	usage, a minimum of 10 purchase transactions must	be posted to your account, per statement cycle, or	an Activity Charge will be applied.		E E A	11 4			3		COE AND PAU

#### FEE SCHEDULE Fees and Services

# CARSON BANK

EST. 1886

MEMBER FDIC

An overdraft fee will be charged per item, per presentment for covering overdrafts created by check or draft, in-person withdrawal, and certain electronic transactions such as recurring debit card and ACH transactions.

FEES AND CHARGES. The following fees and charges may be assessed against your account:

Check printing fees vary by the style of check ordered.

Account Activity Printout/Snapshot Statement Fee	\$2.00
Account Balancing Assistance Fee - per hour	\$10.00
Account closed within 30 days	\$30,00
Account Research Fee - 1 hour minimum - per hour	\$25.00
Cashier's Check Fee - each	\$5.00
Collections	\$8.00
Faxing Services Fee (customer) Local	\$0.00
Faxing Services Fee (customer) Long Distance - \$3.00 and per page fee	\$0.50
Faxing Services Fee (non-customer) Local - per page	\$1.00
Faxing Services Fee (non-customer) Long Distance - \$3.00 and per page	\$0.50
Garnishments/Levies - each	\$15.00
Gift Card Fee - per card	\$4.50
Incoming Wire Fee (domestic)	\$12.00
Incoming Wire Fee (international)	\$25,00
Money Order Fee - each	\$3.00
Night Depository Box Key Deposit	\$5.00
Notary Service Fee (customer)	\$0.00
Notary Service Fee (non-customer)	\$3.00
Outgoing Wire Fee (domestic)	\$15.00
Outgoing Wire Fee (international)	\$45.00
Overdraft Item Fee (OD) - per item, per presentment	\$31.00
Overdraft Protection Automatic Transfer Charge - per item	S2.00
Photocopy Fee - per each	\$0.25
Replacement Safe Deposit Box Key Fee	\$5.00
Return Deposited Item Fee - per item	\$5.00
Return Item Fee (NSF) - per item, per presentment	\$31.00
Safe Deposit Box Drilling Fee	\$225.00
Service Charge for dormancy (12 mos. no activity) - per month	\$5.00
Service Charge to replace Debit Card	\$5.00
Statement Reproduction Fee - \$1.00 per page, per hour	\$35.00
Stop Pay Service Charge	\$31.00
Telephone Transfer Fee - each	\$2.00

We may require not less than 7 days notice in writing before each withdrawal from an interest-bearing account other than a time deposit, or from any other savings account as defined by Regulation D. Withdrawals from a time account prior to maturity or prior to any notice period may be restricted and my be subject to penalty. See your notice of penalty for early withdrawal.

OTHER SERVICES WE OFFER AT NO CHARGE TO BANK CUSTOMERS: Bank Inquiries Zippered Bank Bags Bank-By-Mail Notary Service 24 Hour Depository Direct Deposit

All Information is subject to change.