# PUBLIC DISCLOSURE

September 14, 2020

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Fowler State Bank Certificate Number: 13450

401 Main Street Fowler, Kansas 67844

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.

#### **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 following points summarize the bank's performance.

- The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of the small farm and small business loans reviewed were originated in the assessment area.
- The distribution of borrowers reflects reasonable penetration among farms and businesses of different revenue sizes.
- The assessment area consists entirely of middle, and upper-income census tracts; therefore, the geographic distribution criterion was not evaluated.
- The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

#### **DESCRIPTION OF INSTITUTION**

#### Background

The Fowler State Bank is a full-service community bank headquartered in Fowler, Kansas. The institution is wholly owned by FSB Bankshares, Inc., a one-bank holding company. The bank received a "Satisfactory" rating at the previous FDIC performance evaluation dated July 21, 2014, using Interagency Small Institution Examination Procedures.

#### **Operations**

The Fowler State Bank operates a total of three offices in southwestern Kansas. Two offices are located in Meade County, Kansas, the main office in Fowler and one branch office in the city of Meade. The third branch office is located in the city of Cimarron, which is in Gray County, Kansas. In addition, the bank operates an automated teller machine (ATM) at each of its offices.

The institution offers traditional loan products for agricultural, commercial, and consumer loan purposes. Agricultural lending continues to be the institution's primary business focus. In April 2010, the bank discontinued offering residential real estate loans. However, assessment area residents are able to apply for residential real estate loans at other financial institutions operating within the assessment area. Deposit services include checking, savings, money market deposit accounts, and certificates of deposit.

#### **Ability and Capacity**

The institution reported total assets of \$87.9 million, total loans of \$34.7 million, and total deposits of \$80.1 million on the June 30, 2020, Reports of Condition and Income. The following table illustrates the loan portfolio.

Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	0	0.0
Secured by Farmland	8,329	24.0
Secured by 1-4 Family Residential Properties	2,438	7.0
Secured by Multi-family (5 or more) Residential Properties	912	2.6
Secured by Non-farm Non-Residential Properties	6,067	17.5
Total Real Estate Loans	17,746	51.1
Commercial and Industrial Loans	7,017	20.2
Agricultural Production and Other Loans to Farmers	8,590	24.8
Consumer	1,150	3.3
Obligations of States and Political Subdivisions in the United States	0	0.0
Other Loans	0	0.0
Lease Financing Receivables (net of unearned income)	197	0.6
Less: Unearned Income	0	0.0
Total Loans	34,700	100.0

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

#### **DESCRIPTION OF ASSESSMENT AREA**

The Fowler State Bank continues to designate all of Gray and Meade counties as its sole assessment area. This area is categorized as nonmetropolitan and is considered rural. The following section shows demographic and economic information for the assessment area.

#### Economic and Demographic Data

The assessment area is comprised of four census tracts, with three middle-income and one upper-income census tracts according to the 2015 American Community Survey (ACS). The upper-income census tract comprises northern Gray County. The following table illustrates select demographic characteristics of the assessment area.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	4	0.0	0.0	75.0	25,0
Population by Geography	10,448	0.0	0.0	71.3	28.7
Housing Units by Geography	4,331	0.0	0.0	73.6	26.4
Owner-Occupied Units by Geography	2,769	0.0	0.0	75.3	24.7
Occupied Rental Units by Geography	1,075	0.0	0.0	66.3	33.7
Vacant Units by Geography	487	0.0	0.0	79.9	20.1
Businesses by Geography	624	0.0	0.0	76.0	24.0
Farms by Geography	229	0.0	0.0	82.1	17.9
Family Distribution by Income Level	2,925	11.8	14.1	28.1	46.0
Household Distribution by Income Level	3,844	14.5	12.0	20.0	53.6
Median Family Income Nonmetropolitan Kan-	sas	\$57,229	Median Housin	g Value	\$98,900
Families Below Poverty Level		7.5%	Median Gross	Rent	\$648

D&B data for 2019 indicates that the primary industry operating in the assessment area is the agriculture, forestry, and fishing industry, which comprises 26.9 percent of all area businesses (farm and non-farm), followed by services at 26.1 percent, and retail trade at 9.5 percent. This data also indicates that most of these operations are relatively small, with 89.4 percent having nine or fewer employees and 83.9 percent operating from a single location.

In August 2014, the state of Kansas unemployment rate was 4.4 percent, which was slightly higher than the unemployment rate for Gray and Meade counties, at 3.0 percent and 2.8 percent respectively. The state and county unemployment rates declined during most of the review period to a low of 2.8 percent for the state of Kansas, and 2.0 percent in Gray and Meade counties in March of 2020. However, since the beginning of the COVID-19 pandemic, unemployment rates have increased. Gray and Meade Counties experienced a slight increase in unemployment rates, at 2.9 percent and 3.4 percent, respectively, in July 2020. The state of Kansas experienced a more drastic increase, with the July 2020 state unemployment rate at 7.2 percent. The recent unemployment data suggests the assessment area was impacted slightly less than the State of Kansas as a whole as a result of the unemployment increase since the beginning of the COVID-19 pandemic.

#### Competition

According to FDIC Deposit Market Share Reports as of June 30, 2020, there were four other banks operating in Gray and Meade counties. The Fowler State Bank had the third largest deposit market share at 20.5 percent. While the number of banks operating in the assessment area is low, there is still notable competition given the small population base in those counties. Further, several non-bank financial service providers also compete for agricultural lending services in the assessment area.

#### **Community Contacts**

During the evaluation, examiners interviewed an individual from the assessment area (community contact) to obtain a profile of the communities, identify community development opportunities and general credit needs, and assess opportunities for participation by local financial institutions. The community contact stated the local economy is stable with good commodity and livestock prices, and strong land values. The contact also indicated business activity in the area is limited because of the small population base and the rural location. The contact specified that there were many downtown locations available for sale in the small communities; however, there has been no demand to acquire these locations and utilize the buildings as businesses, due to concerns with the ability to maintain a thriving business in a rural area. The contact stated that the community credit needs include predominately agriculture-related loans. The contact felt that the area financial institutions are responsive to the lending needs in the area, and that they are doing a good job of meeting those needs.

#### **Credit Needs**

Examiners identify the credit needs of an assessment area based on information from the community contact, bank management, and demographic and economic data. Accordingly, examiners determined small farm and small business loans are primary credit needs in this area.

#### SCOPE OF EVALUATION

#### **General Information**

This evaluation covers the period from the prior evaluation dated July 21, 2014, to the current evaluation dated September 14, 2020. Examiners used the Interagency Small Institution Examination Procedures to evaluate the bank's CRA performance.

#### **Activities Reviewed**

For the above referenced procedures, examiners generally review home mortgage, small business, and small farm loans if each of these categories is a major product line of the institution. A review of the loan portfolio composition showed that agriculture and commercial lending are both significant product lines for the bank; however, home mortgage lending activity is not a focus of the bank, as the bank ceased offering home mortgage loans in April 2010. Based on this information, examiners analyzed the small farm and small business lending categories for this evaluation. Agricultural loans represent the majority of the loan portfolio and agricultural lending is the bank's primary business focus, so the small farm lending category received the most weight in determining overall conclusions.

For both loan categories reviewed, examiners focused on all loans originated in 2019. Bank management confirmed that the loan activity in 2019 is generally representative of the institution's overall lending patterns since the previous evaluation. Bank data for 2019 showed 28 small farm loans totaling \$6.1 million, and 38 small business loans totaling \$4.9 million. All of these loans were included in the Assessment Area Concentration review. Additionally, all of these loans extended to farms and businesses within the assessment area were included in the Borrower Profile analyses. Farm and business demographic information obtained from 2019 D&B data was used for

comparison purposes for the Borrower Profile criterion. Both the number and dollar volume of loans were analyzed for these reviews; however, examiners primarily focused on performance by number of loans because it is a better indicator of the number of farms and businesses served.

#### CONCLUSIONS ON PERFORMANCE CRITERIA

## LENDING TEST

The Fowler State Bank demonstrates satisfactory performance under the Lending Test. This conclusion is primarily supported by reasonable performance in the Loan-to-Deposit, Assessment Area Concentration, and Borrower Profile criteria.

#### Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. In evaluating performance under this criterion, the average of the bank's quarterly loan-to-deposit ratios since the previous evaluation was calculated and analyzed in relation to the bank's capacity to lend and the lending opportunities available in the assessment area. The bank's average loan-to-deposit ratio was then compared to the ratio of an institution that was considered to be a similarly situated bank. The similarly situated bank was determined based on various factors, including asset size, geographic location, and product mix. See the following table for details.

tal Assets as of	Average Net LTD
6/30/2019 \$(000s)	Ratio %
87,861	69.9
118,443	54.5
	87,861

#### **Assessment Area Concentration**

A majority of reviewed loans, both by number and dollar volume, are to borrowers within the assessment area. See the following table for details.

	]	Number o	f Loans			Dollar A	mount o	of Loans \$	(000s)	
Loan Category	Ins	ide	Out	side	Total	Insid	de	Outs	ide	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Farm	25	89.3	3	10.7	28	5,546	91.0	547	9.0	6,093
Small Business	26	68.4	12	31.6	38	2,900	58.8	2,031	41.2	4,931
Total	51	77.3	15	22.7	66	8,446	76.6	2,578	23.4	11,024

#### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among farms and businesses of different revenue sizes. Examiners focused on lending to farms and businesses with gross annual revenues of \$1 million or less.

#### Small Farm Loans

The distribution of borrowers reflects reasonable penetration among farms of different revenue sizes. As presented in the following table, the bank's level of lending to businesses with gross annual revenues less than \$1 million trails the percentage of farms in this income category. The bank's level of lending is considered reasonable, as there are a limited number of farms within the assessment area and there is considerable competition among other bank and non-bank agricultural lenders.

Gross Revenue Level	% of Farms	#	%	\$(000s)	%
<=\$1,000,000	93.5	20	80.0	3,787	68.3
>1,000,000	4.8	5	20.0	1,759	31.7
Revenue Not Available	1.7	0	0.0	0	0.0
Total	100.0	25	100.0	5,546	100.0

#### Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes. The percentage of loans, by number, to businesses with gross annual revenues of \$1 million or less is comparable than the percentage of businesses in this revenue category. See the following table for details.

Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000	72.1	18	69.2	787	27.1
>1,000,000	7.7	7	26.9	2,108	72.7
Revenue Not Available	20.2	1	3.9	5	0.2
Total	100.0	26	100.0	2,900	100.0

#### Geographic Distribution

The assessment area consists entirely of middle, and upper-income geographies based on 2015 ACS data. Since the assessment area does not contain any low- or moderate-income census tracts, a geographic distribution analysis of the institution's lending performance within the assessment area would not provide meaningful conclusions. Therefore, this criterion was not evaluated.

# Response to Complaints

The bank 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

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

#### **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:

- 1) 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 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;
- 4) The geographic distribution of the bank's loans; 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.

**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 metropolitan 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.



#### **Bank Locations:**

Integrity Bank 401 Main Street PO Box 50

Fowler, KS 67844

Integrity Bank 18309 State Hwy 50

PO Box 228

Cimarron, KS 67835

Integrity Bank 115 E. West Plains

PO Box 130

Meade, KS 67864

Integrity Bank

200 N Apache PO Box 397

Montezuma, KS 67867

BANK'S WEBSITE: www.integrityks.bank

The bank has 24/7 Internet Banking

#### **HOURS OF OPERATION (All Locations):**

LOBBY:

Monday – Friday 9:00 a.m. to 4:00 p.m.

**DRIVE UP:** 

Monday – Thursday 8:00 a.m. to 4:00 p.m.

Friday 8:00 a.m. to 5:00 p.m.

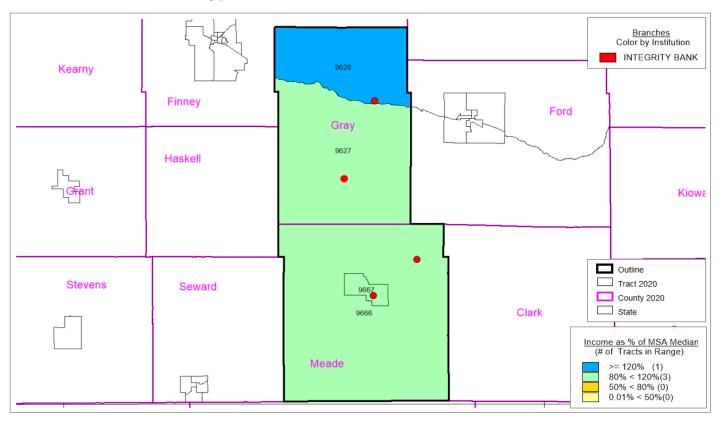
(Bank Locations are closed on Saturday and Sunday) (ATMs at all four locations)

#### CRA ASSESSMENT AREA (CENSUS TRACT MAPS ON FILE):

- Integrity Bank, Fowler, Kansas, Meade County Census Tract 9666
- Integrity Bank, Cimarron, Kansas, Gray County Census Tract 9626 and 9627
- Integrity Bank, Meade, Kansas, Meade County Census Tract 9667
- Integrity Bank, Montezuma, Kansas, Gray County Census Tract 9627

#### **BANK PRODUCTS AND SERVICES:**

- **DEPOSIT ACCOUNTS:** E-Checking, Choice Checking, Interest Checking, Business Choice Checking, Business Interest Checking, Money Market, Business Money Market, Regular Savings, Certificate of Deposits (CDs), and Individual Retirement Accounts (IRAs).
- LOANS: Consumer Loans (including Personal Loans, Auto Loans, Unsecured Loans, Credit Card Programs), Agriculture Loans (including Lines of Credit, Machinery & Equipment Loans, Livestock Loans, Real Estate Financing Options, FSA & Farmer Mac Partnership Financing, Input Financing), Commercial Loans (including Lines of Credit, Construction Loans, Real Estate Financing Options, Aircraft Lending, Business Credit Card Programs.)



# Integrity Bank Loan to Deposit Ratio

2020					
March	50.90%				
June	43.73%				
September	46.98%				
December	42.92%				

2021				
28.00%				
24.00%				
26.00%				
37.00%				

2022				
March	27.00%			
June	33.00%			
September	37.00%			
December	46.00%			

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March	36%
June	37%
September	45%
December	54%

202	4
March	50%
June	36%
September	41%
December	

2025		
March		
June		
September		
December		

#### IMPORTANT ACCOUNT INFORMATION FOR OUR CUSTOMERS

from

INTEGRITY BANK 401 MAIN STREET FOWLER, KS 67844 (620)646-5253

#### **COMMON FEATURES**

Limits and fees - The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Check printing - Fee depends on style of check ordered	Varies
Deposited checks (and other items) returned unpaid	\$5.00 ea
Returned check fee	\$35.00 ea
Overdraft fee	\$35,00 ea
The fee applies to overdrafts "created by check, in person withdrawal, ATM withdrawal, or other electronic napplicable.	neans," as
Account research - \$15.00 per hour, one hour minimum plus \$.15 per page	
Dormant Fee	\$5,00 ea
Special statement	\$2.00 ea
Stop payments-Regular Banking	\$25.00 ea
Stop Payments - Online Bill Pay	\$30.00 ea
Domestic Wire Transfer (incoming)	\$15,00 ea
Domestic Wire Transfer (outgoing)	\$25.00 ea
International Wire Transfer (incoming)	\$30.00 ea
International Wire Transfer (outgoing)	\$50.00 ea
Cashier's checks (over \$2,000.00)	\$5.00 ea
Money Orders	\$5.00 ea
Securities (purchase of securities)	\$50,00 ea
ISA/ Cross Border Debit Card Purchases & ATM Withdrawals	1.5%
Re-Issue Debit Card	\$5,00 ea
Collection fees	\$10.00 ea
Self serve copies	\$.25 per page
Faxing	
Incoming \$.50 per page Outgoing \$2.00 1st page & \$.50 ea additional page	

LIMITS AND FEES DISCLOSURE

Safe deposit box (annual rent)

3x5	\$12.00
3x6	\$15.00
3x10	\$30.00
4x5	\$15.00
4x10	\$45.00
5X5	\$25.00
5x10	\$50.00
6x6	\$30.00
10/10	\$65.00