



SMALL BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

January 9, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Bank of Brookfield-Purdin, National Association
Charter Number 16976**

**939 Park Circle Drive
Brookfield, Missouri 64628**

**Comptroller of the Currency
Kansas City South Field Office
6700 Antioch Road, Suite 450
Merriam, Kansas 66204**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, 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'S COMMUNITY REINVESTMENT ACT (CRA) RATING

This institution is rated Outstanding.

Bank of Brookfield-Purdin's (BBP) performance of lending to borrowers of different incomes, and loans to small agricultural operations is excellent.

The distribution of loans, given the demographics of the assessment area (AA), reflects very good penetration among individuals of different income levels, as well as agricultural operations of different sizes. We selected agricultural loans, which include farmland real estate, and 1-4 family real estate loans as the bank's primary types based on originations since the last CRA evaluation. Since April 2001, agricultural loans represented 45% of loans by number and 58% by dollar, and 1-4 family real estate loans represented 10% by number and 20% by dollar. Consumer installment loans represented 34% of loans funded by number and 11% by dollar. Examiners reviewed a sample of 25 loans for each primary product type originated in the period of April 2001 through August 2005.

The bank's real estate lending for purchase money and refinancing to low- and moderate-income individuals is very good and shows stronger performance since the last CRA evaluation. Demographic data from the 2000 census indicates 22% and 19% of families in the AA are designated low- and moderate-income, respectively. Based on the sample of 20 loans in the AA for real estate purchase purposes, 25% by number and 13% by dollar were made to low-income borrowers, and 45% by number and 33% by dollar were made to moderate-income borrowers. From the sample of 23 loans in the AA for refinancing purposes, 22% by number and 26% by dollar were made to low-income borrowers, and 26% by number and 16% by dollar were made to moderate-income borrowers. This is reasonable given that 16% of households in the AA are below poverty level.

The following tables provide a summary of the bank's real estate lending originations for purchase and refinancing activity.

Residential Real Estate Loan Originations					
Income Designation for Borrower	Families in Income Category	Home Purchase		Home Refinance	
		% by Number	% by Dollar	% by Number	% by Dollar
Low	21.70%	25.00%	12.76%	21.74%	25.72%
Moderate	18.70%	45.00%	33.50%	26.09%	16.50%
Middle	23.36%	20.00%	28.99%	21.74%	14.97%
Upper	36.25%	10.00%	24.75%	30.43%	42.80%

Lending for agricultural purposes reflects the demographics of the AA by number and dollar.

Demographic data from the 2000 census indicates 99% of the farm businesses in the AA have revenues less than \$1 million. Based on the sample of 19 agriculture related loans in the AA, all were made to farm operations with revenue less than \$1 million.

While not representing a significant dollar volume of the loan portfolio, the bank's performance for consumer lending to low- and moderate-income individuals reflects its commitment to meet the credit needs of its AA. From the bank's analysis of loan size over the same April 2001 through August 2005 period as our sample, consumer loans for less than \$1,000 represented 62% of the loans originated. Over this period, 43% of all consumer loans originated were for amounts less than \$2,500. Demographic data from the 2000 census indicates 26% and 18% of households in the AA are designated low- and moderate-income respectively.

BBP's average quarterly loan-to-deposit ratio is satisfactory.

The bank's loan-to-deposit (LTD) ratio reflects reasonable responsiveness to the credit needs of its AA. The bank's quarterly average LTD ratio since its last CRA examination is 56.75% based on nineteen quarters. The bank's LTD ratio is reasonable to two similarly situated banks in the AA and slightly below the average of 66.12% over the same period.

BBP's record of lending within its AA is very good.

A substantial majority of all loans originated are located in the AA. For agricultural production and real estate loan categories sampled, the bank originated 83% by number and 76% by dollar amount within the AA.

An analysis of BBP's geographic distribution of credit is not meaningful. All census tracts in the bank's AA were designated as middle-income tracts.

BBP did not receive any complaints about its performance in helping to meet the credit needs in the AA during the evaluation period.

We found no evidence of illegal discrimination or other illegal credit practices.

DESCRIPTION OF INSTITUTION

BBP is a \$67 million institution located in Brookfield, Missouri. The bank also operates three full service facilities, two of which have ATM facilities in Purdin, Winigan, and Meadville, Missouri. Agricultural and real estate loans (1-4 family residential and farmland) are the primary focus of the bank's loan portfolio. BBP received a "Satisfactory" CRA rating at the last examination dated June 25, 2001. There are no legal or financial factors that impede the bank's ability to help meet the credit needs of the AA.

The bank is also actively engaged in a renewed community development activity through the Home Town Competitiveness (HTC) effort. Employees of BBP serve as board or committee members as

efforts are being directed towards the longer-term growth and economic stability of Brookfield and nearby communities. State government funding was recently granted and the various committees are in process of completing their chartering efforts. Additional time is needed to see the results and benefits of this effort, which has the support of local banks, businesses, and city government.

DESCRIPTION OF ASSESSMENT AREA

BBP's AA consists of five block numbering areas (BNA) located in Linn and Sullivan counties in Missouri. The AA meets the requirements of the regulation, as the BNAs are contiguous, include geographies where the bank, all branches, and ATMs are located, and where a substantial majority of the bank's loans are originated. There are two other independently owned banks, as well as branches of large and other community banks, which provide competition in BBP's AA.

We reviewed one community contact during this examination. This contact indicated all financial institutions in the area assist in meeting the primary credit needs of the surrounding communities.

Please refer to the bank's CRA Public File for more information.