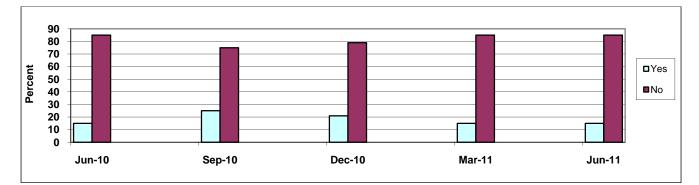
# **EXAMINER'S BANKING PRACTICES SURVEY**

This survey is completed by bank examiners at the conclusion of each examination. Second Quarter 2011 results are compiled from 34 responses.

## LENDING

1. Since the last examination, has the institution <u>significantly</u> increased lending activity in any particular segment of the portfolio? "Significantly" means growth of 20% or more.



### Of yes responses:

| Loan Type             | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|-----------------------|--------|--------|--------|--------|--------|
| RE/Const/Land Devel   | 13%    | 18%    | 29%    | 11%    | 12%    |
| RE/Agricultural       | 12%    | 10%    | 7%     | 0%     | 13%    |
| RE/Commercial/Indust  | 25%    | 18%    | 7응     | 08     | 25%    |
| RE/Residential        | 13%    | 18%    | 7%     | 22%    | 25%    |
| Agricultural          | 12%    | 18%    | 14%    | 11%    | 12%    |
| Commercial/Industrial | 13%    | 18%    | 14%    | 45%    | 13%    |
| Consumer              | 12%    | 0%     | 22%    | 11%    | 08     |

2. Is the institution active in making the following types of loans?

|                             | Sej    | Sep-10 |        | Dec-10 |        | Mar-11 |        | -11    |
|-----------------------------|--------|--------|--------|--------|--------|--------|--------|--------|
|                             | Yes 6% | No 94% | Yes 3% | No 97% | Yes 3% | No 97% | Yes 6% | No 94% |
| Of Yes Responses-Loan type  |        |        |        | •      |        |        |        |        |
| Sub-prime/Predatory lending | 33%    |        | 0%     |        | 0%     |        | 50%    |        |
| Dealer paper                | 67%    |        | 100%   |        | 100%   |        | 50%    |        |
| Low or No-doc bus. lending  | 0%     |        | 0%     |        | 0%     |        | 0%     |        |
| High LTV home eq. lending   | 0%     |        | 0%     |        | 0%     |        | 0%     |        |

3. Is the bank offering below market interest rates or reduced fees to attract loans?

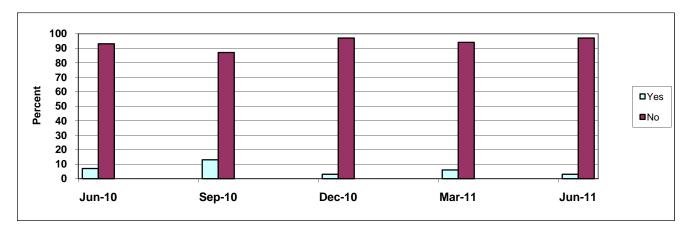
|     | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|-----|--------|--------|--------|--------|--------|
| Yes | 0%     | 6%     | 6%     | 0%     | 0%     |
| No  | 100%   | 94%    | 94%    | 100%   | 100%   |

# Examiner's Banking Practices Survey

4. Does the institution use credit scoring models for loan decisions?

|                              | Sep     | Sep-10 |         | Dec-10 |        | -11    | Jun-11  |        |
|------------------------------|---------|--------|---------|--------|--------|--------|---------|--------|
|                              | Yes 16% | No 84% | Yes 12% | No 88% | Yes 9% | No 91% | Yes 12% | No 88% |
| Of Yes Responses - Loan type |         |        |         |        |        |        |         |        |
| Credit card                  | 16%     |        | 0%      |        | 12%    |        | 0%      |        |
| Consumer                     | 26%     |        | 30%     |        | 33%    |        | 40%     |        |
| Residential mortgage         | 21%     |        | 40%     |        | 33%    |        | 30%     |        |
| Small business               | 21%     |        | 20%     |        | 22%    |        | 30%     |        |
| Other                        | 16%     |        | 10%     | ]      | 0%     |        | 0%      |        |

5. Are there indications the bank is incurring "more-than-normal" risk to boost new loans?



Of yes responses:

|  | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|--|--------|--------|--------|--------|--------|
| Making collateral based loans?                 | 38%    | 29%    | 20%    | 25%    | 33%    |
| Reduced collateral margins?                    | 12%    | 0%     | 20%    | 0%     | 0%     |
| Not requiring cash flow projections?           | 25%    | 29%    | 20%    | 25%    | 33%    |
| Liberal repayment terms? (reduced debt service | 25%    | 29%    | 20%    | 25%    | 33%    |
| ratios; interest only; deferred, extended,     |        |        |        |        |        |
| balloon or negative amortization payments)     |        |        |        |        |        |
| Waiving guarantees or other documentation?     | 0%     | 13%    | 20%    | 0%     | 0%     |
| Other  | 0%     | 0%     | 0%     | 25%    | 0%     |

6. Describe potential risk in <u>current</u> underwriting practices for:

| Γ                  | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|--------------------|--------|--------|--------|--------|--------|
| Agricultural Loans |        |        |        |        |        |
| Minimal            | 92%    | 75%    | 91%    | 76%    | 82%    |
| Moderate           | 88     | 25%    | 9%     | 21%    | 15%    |
| Substantial        | 0%     | 0%     | 0%     | 3%     | 3%     |
| Commercial Loans   |        |        |        |        |        |
| Minimal            | 54%    | 47%    | 59%    | 58%    | 62%    |
| Moderate           | 33%    | 47%    | 38%    | 39%    | 32%    |
| Substantial        | 13%    | 6%     | 3%     | 3%     | 6%     |
| Consumer Loans     |        |        |        |        |        |
| Minimal            | 77%    | 66%    | 77%    | 85%    | 76%    |
| Moderate           | 23%    | 34%    | 20%    | 12%    | 21%    |
| Substantial        | 0%     | 08     | 3%     | 3%     | 3%     |
| Residential Loans  |        |        |        |        |        |
| Minimal            | 77%    | 66%    | 74%    | 85%    | 74%    |
| Moderate           | 23%    | 34%    | 20%    | 12%    | 23%    |
| Substantial        | 0%     | 0%     | 6%     | 3%     | 3%     |

# Examiner's Banking Practices Survey

| 7. Differences between actual lending practices and written policies a | 7. | Differences | between | actual | lending | practices | and | written | policies | are | : |
|--|----|-------------|---------|--------|---------|-----------|-----|---------|----------|-----|---|
|--|----|-------------|---------|--------|---------|-----------|-----|---------|----------|-----|---|

|                    | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|--------------------|--------|--------|--------|--------|--------|
| Agricultural Loans |        |        |        |        |        |
| Minimal            | 97%    | 91%    | 94%    | 91%    | 91%    |
| Moderate           | 3%     | 98     | 6%     | 9%     | 6%     |
| Substantial        | 0%     | 0%     | 0%     | 0%     | 3%     |
| Commercial Loans   |        |        |        |        |        |
| Minimal            | 77%    | 62%    | 79%    | 88%    | 79%    |
| Moderate           | 18%    | 38%    | 21%    | 12%    | 18%    |
| Substantial        | 5%     | 0%     | 0%     | 0%     | 3%     |
| Consumer Loans     |        |        |        |        |        |
| Minimal            | 97%    | 91%    | 91%    | 100%   | 888    |
| Moderate           | 0%     | 98     | 6%     | 0%     | 98     |
| Substantial        | 3%     | 0%     | 3%     | 0%     | 3%     |
| Residential Loans  |        |        |        |        |        |
| Minimal            | 97%    | 91%    | 94%    | 91%    | 85%    |
| Moderate           | 0%     | 98     | 3%     | 9%     | 12%    |
| Substantial        | 3%     | 08     | 3%     | 0%     | 3%     |

8. With regard to agricultural loans, describe the potential risk the bank faces from:

|                             | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|-----------------------------|--------|--------|--------|--------|--------|
| Carryover Debt              |        |        |        |        |        |
| Minimal                     | 85%    | 78%    | 97%    | 94%    | 88%    |
| Moderate                    | 15%    | 22%    | 3%     | 6%     | 12%    |
| Substantial                 | 0%     | 0%     | 0%     | 0%     | 0%     |
| Phase-out of Farm Subsidies |        |        |        |        |        |
| Minimal                     | 92%    | 84%    | 97%    | 94%    | 91%    |
| Moderate                    | 8%     | 16%    | 3%     | 6%     | 9%     |
| Substantial                 | 0%     | 0%     | 0%     | 0%     | 0%     |
| Drop in Land Values         |        |        |        |        |        |
| Minimal                     | 80%    | 81%    | 91%    | 82%    | 76%    |
| Moderate                    | 20%    | 19%    | 6%     | 18%    | 21%    |
| Substantial                 | 0%     | 0%     | 3%     | 0%     | 3%     |

9. Has the ratio of Total Adversely Classified Items/Tier 1 Capital & ALLL increased (+) or decreased (-) since the prior examination?

|                                       | Sep-10 |       | Dec-  | Dec-10 |       | -11    | Jun-11 |       |
|---------------------------------------|--------|-------|-------|--------|-------|--------|--------|-------|
| No. Banks with Inc/(Dec) in ratio (%) | + 69%  | - 31% | + 41% | - 59%  | + 58% | - 42%  | + 50%  | - 50% |
| Average Inc/(Dec)in Ratio             | 19.8   | (8.6) | 13.3  | (14.3) | 15.1  | (14.3) | 14.0   | (9.1) |
| Cause of Increase                     |        |       |       |        |       |        |        |       |
| Eased underwriting standards          | 6%     |       | 3%    |        | 88    |        | 3%     |       |
| Deterioration in new loans            | 4%     |       | 11%   |        | 3%    |        | 3%     |       |
| Deterioration in older loans          | 45%    |       | 45%   |        | 48%   |        | 41%    |       |
| Participations or out-of-territory    | 88     |       | 0%    |        | 3%    |        | 88     |       |
| Economic conditions                   | 33%    |       | 38%   |        | 27%   |        | 32%    |       |
| Changes in lending personnel          | 0%     |       | 3%    |        | 3%    |        | 0%     |       |
| New types of lending activity         | 0%     |       | 0%    |        | 0%    |        | 0%     |       |
| Other                                 | 4%     |       | 0%    |        | 8%    |        | 13%    |       |

10. Estimate loan classifications at this examination into the following types:

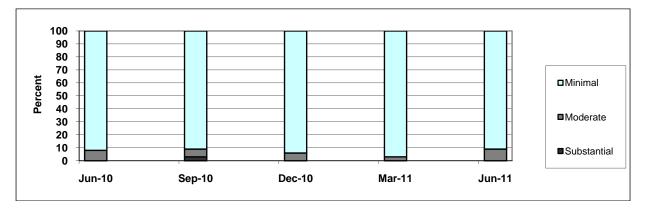
| Loan Type                 | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |  |
|---------------------------|--------|--------|--------|--------|--------|--|
| RE/Const/Land Development | 26%    | 35%    | 42%    | 32%    | 19%    |  |
| RE/Agriculture            | 2%     | 3%     | 1%     | 3%     | 4%     |  |
| RE/Commercial/Industrial  | 44%    | 38%    | 38%    | 44%    | 57%    |  |
| RE/Residential            | 11%    | 98     | 7%     | 88     | 98     |  |
| Agricultural              | 1%     | 0%     | 1%     | 2%     | 1%     |  |
| Commercial/Industrial     | 13%    | 13%    | 98     | 98     | 88     |  |
| Consumer                  | 3%     | 2%     | 2%     | 2%     | 2%     |  |

# INVESTMENTS

11. Since the last examination, has the institution purchased securities without understanding the characteristics of the issue?

|     | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|-----|--------|--------|--------|--------|--------|
| Yes | 3%     | 3%     | 0%     | 0%     | 3%     |
| No  | 97%    | 97%    | 100%   | 100%   | 97%    |

12. Differences between actual investment practices and written policies are:



### OTHER

13. Has the bank established a borrowing line with FHLB?

|  |  | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |  |  |
|--|--|--------|--------|--------|--------|--------|--|--|
| Yes  |  | 87%    | 81%    | 85%    | 97%    | 94%    |  |  |
| No   |  | 13%    | 19%    | 15%    | 3%     | 6%     |  |  |
| If yes, does the bank actively borrow from the FHLB? |  |        |        |        |        |        |  |  |
| Yes  |  | 82%    | 89%    | 76%    | 75%    | 75%    |  |  |
| No   |  | 18%    | 11%    | 24%    | 25%    | 25%    |  |  |

14. Does the bank hold off-balance sheet derivatives?

|     | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|-----|--------|--------|--------|--------|--------|
| Yes | 15%    | 12%    | 98     | 6%     | 15%    |
| No  | 85%    | 88%    | 91%    | 94%    | 85%    |

15. List nontraditional activity the institution is engaged in.

| Γ  | Jun-10 | Sep-10 | Dec-10 | Mar-11 | Jun-11 |
|--|--------|--------|--------|--------|--------|
| Yes  | 85%    | 75%    | 97%    | 91%    | 94%    |
| No   | 15%    | 25%    | 3%     | 9%     | 6%     |
| Of those that do:                          |        |        |        |        |        |
| Nondeposit Investment Sales                | 13%    | 15%    | 12%    | 19%    | 14%    |
| Insurance Sales                            | 10%    | 98     | 6%     | 8%     | 12%    |
| Real Estate Loan Secondary<br>Market Sales | 29%    | 25%    | 33%    | 24%    | 23%    |
| Non-transactional Web Site                 | 7%     | 7%     | 6%     | 3%     | 5%     |
| Transactional Web Site                     | 40%    | 40%    | 41%    | 43%    | 45%    |
| Other                                      | 1%     | 4%     | 2%     | 3%     | 1%     |