

## *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.

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 that quarter. This list is available from the Regional Director, Division of Depositor and Consumer Protection, FDIC 1100 Walnut St, Suite 2100, Kansas City, MO 64106. You may send written comments about our performance in helping to meet community credit needs to Shannon Damron, President of Tri-County Trust Company, 103 Commerce St, P.O. Box 217, Glasgow, MO 65254, and FDIC Regional Director. You may also submit comments electronically through the FDIC's Web site at [www.fdic.gov/regulations/cra](http://www.fdic.gov/regulations/cra). 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 Director. You may also request from the FDIC Regional Director an announcement of our applications covered by the CRA filed with the FDIC. We are an affiliate of Bancshares of Glasgow, a bank holding company. You may request from Jeff Imgarten, Assistant Vice President, Federal Reserve Bank of Kansas City, One Memorial Drive, Kansas City, MO, 64198, an announcement of applications covered by the CRA filed by bank holding companies.

As of 3/31/2025 Tri-County Trust has had no requests for our CRA file and there have been public comments.

# **TRI-COUNTY TRUST COMPANY**

103 Commerce St., P.O. Box 217, Glasgow, MO 65254

Phone: 660-338-2234

[tricity@tricitytrust.com](mailto:tricity@tricitytrust.com)

[www.tricitytrust.com](http://www.tricitytrust.com)

Census Tract 9603

## **BUSINESS HOURS**

### **LOBBY HOURS:**

***MONDAY-FRIDAY***

8:00a.m. – 4:30p.m.

***SATURDAY***

**CLOSED-BY APPOINTMENT ONLY**

### **DRIVE UP HOURS:**

***MONDAY-FRIDAY***

8:00a.m. - 4:30p.m.

***SATURDAY***

8:00a.m. - 12:00p.m.

# HOMIE MORTGAGE DISCLOSURE ACT NOTICE

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The HMDA data about our residential mortgage lending are available Online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online. For more information, visit the Consumer Financial Protection Bureau's Web site ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

## FEE SCHEDULE

**Tri-County Trust Company**  
103 Commerce Street  
P. O. Box 217  
Glasgow, Missouri 65254  
(660)338-2234  
tricitytrust.com  
tricity@tricitytrust.com

The service charge information listed in this schedule applies to the various checking, savings and IRA accounts that we offer. The miscellaneous fees may be assessed if certain conditions are met or specific services are requested.

### Overdraft Fees (Checks paid)

Overdraft Fees (each overdraft paid) \$27  
Overdraft Fees (daily maximum) \$162

### Insufficient Funds Fees (Checks returned unpaid)

Insufficient Funds Fees (each returned check) \$27  
Insufficient Funds Fees (daily maximum) \$162

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

Check printing fees vary by the style of check ordered.

An overdraft fee of \$27.00 will be charged per item for covering overdrafts created by check or draft, in-person withdrawal, or other electronic means.

3rd Party Check Reversal Fee	\$5.00
Stop Payment	\$20.00
Replace debit card	\$5.00
Cashier's Check or Money Order	\$3.00
Wire Transfer (Outgoing)	\$25.00
Fax Transmittal (minimum fee)	\$3.00
Notary Public (Non-customers)	\$2.00
3 X 5 Safety Deposit Box Annual Rent (\$5.00 discount with auto-debit)	\$25.00
3 X 10 Safety Deposit Box Annual Rent (\$5.00 discount with auto-debit)	\$35.00
6 X 10 Safety Deposit Box Annual Rent (\$5.00 discount with auto-debit)	\$45.00
Vault Locker (\$5.00 discount with auto-debit)	\$20.00
Christmas Club Early Withdrawal Fee (per withdrawal)	\$25.00
ACH Origination Returned Fee	\$5.00

Account Research fee is \$20.00 per hour, minimum 1 hour

Safety Deposit Box forced entry: Actual Cost

Christmas Club Early Account Closure: Accrued interest will be forfeited if account is closed before annual disbursement date.

# Tri-County Trust Deposit Products

Account Product Name	Minimum deposit to open account	Minimum balance to obtain APY
My Rewards Checking <sup>b*</sup>		Positive Balance <sup>c</sup>
Select Interest Checking <sup>b</sup>		Positive Balance <sup>c</sup>
Select Interest Checking <sup>b</sup>		\$100,000 <sup>c</sup>
Business Interest Checking <sup>b</sup>	\$2,500.00	Positive Balance <sup>c</sup>
IRA <sup>b</sup>		Positive Balance <sup>c</sup>
Statement Savings Account <sup>b</sup>	\$100.00	Positive Balance <sup>c</sup>
Save Up Savings Account <sup>b**</sup>		Positive Balance <sup>c</sup>
Christmas Club Account <sup>b</sup>		Positive Balance <sup>c</sup>
3 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>
6 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>
12 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>
18 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>
24 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>
36 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>
48 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>
60 Month Certificate of Deposit <sup>a</sup>	\$1,000.00	\$1,000.00 <sup>c</sup>

a) A penalty may be imposed for early withdrawal.

b) The interest rate and annual percentage yield may change after account opening.

c) Daily balance. The amount of the principal in the account each day.

\*A higher interest rate may be obtained by meeting minimum statement cycle requirements.

\*\*Minimum \$10 transfer from checking to savings each monthly statement cycle.

**For current rate information call (660) 338-2234.**

**Member  
FDIC**



# TRI-COUNTY TRUST COMPANY

## LOAN PRODUCTS AVAILABLE

AUTO LOANS

PERSONAL LOANS

RESIDENTIAL REAL ESTATE LOANS

- HELOC
- USDA

PARTICIPATION LOANS

- MPF Xtra
- MPF Traditional 125

FARM REAL ESTATE LOANS

COMMERCIAL REAL ESTATE LOANS

FARM OPERATING LOANS

FARM MACHINERY AND EQUIPMENT LOANS

BUSINESS LOANS

INTERNET/MOBILE BANKING/ACH PAYMENT ORIGINATION  
PRINTABLE APPLICATIONS ONLY

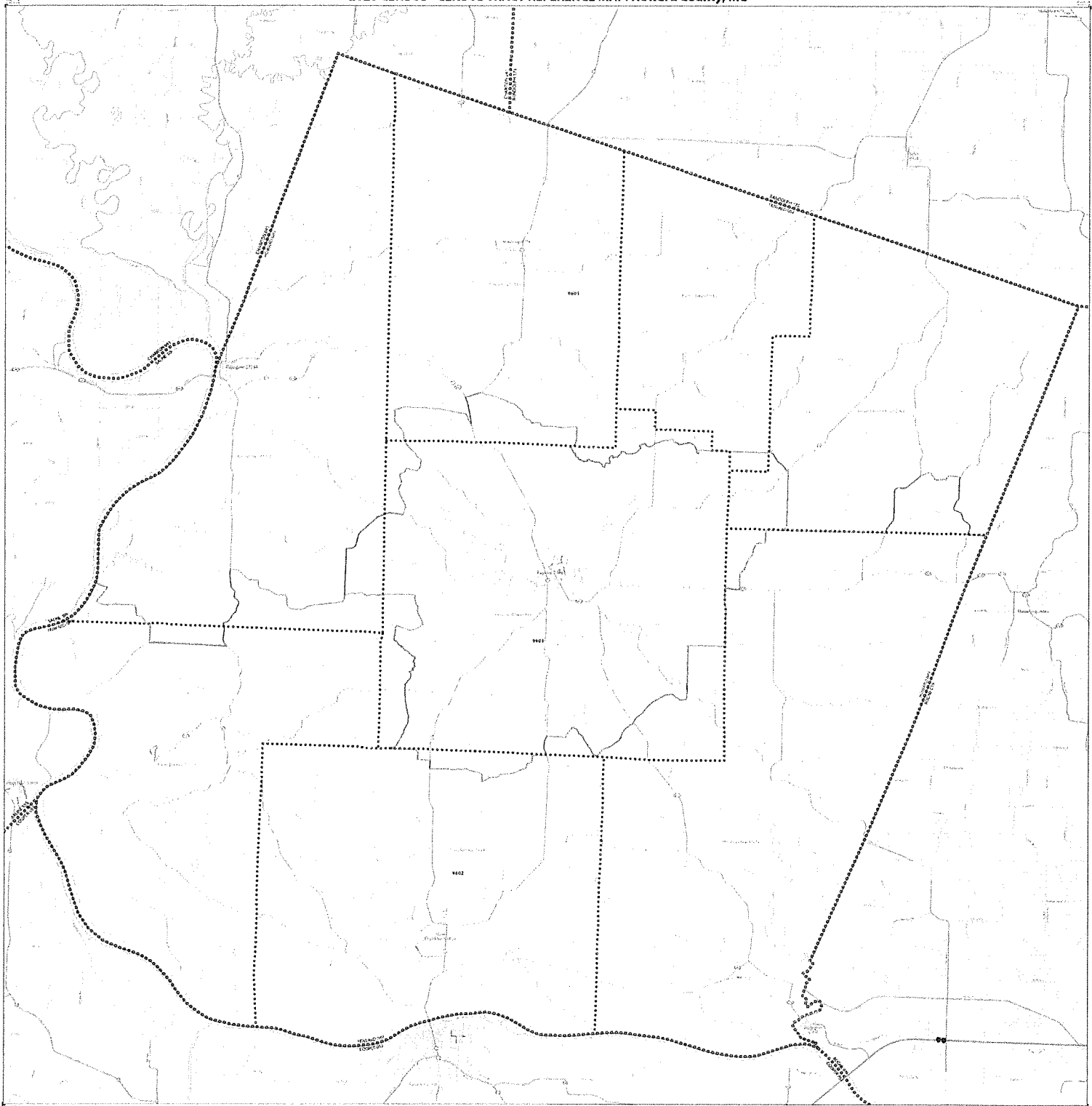
***A LATE CHARGE OF 5.00% OF THE REGULARLY SCHEDULED  
PAYEMENT OR \$15.00 WHICHEVER IS GREATER IS CHARGED  
AFTER THE 15 DAY GRACE PERIOD.***

***ORIGINATION LOAN FEES VARY BASED ON THE TYPE OF LOAN***





2020 CENSUS - CENSUS TRACT REFERENCE MAP: Howard County, MO



SYMBOL	NAME	EXPLANATION	SYMBOL	EXPLANATION
.....	CANADA	International Boundary	.....	Water
.....	STATE BOUNDARY	State Boundary	.....	Water
.....	COUNTY BOUNDARY	County Boundary	.....	Water
.....	CENSUS TRACT BOUNDARY	Census Tract Boundary	.....	Water
.....	NEW YORK ST	State Route	.....	Water
.....	US HIGHWAY	US Highway	.....	Water
.....	ROAD	Road	.....	Water
.....	RAILROAD	Railroad	.....	Water
.....	PO	Post Office	.....	Water
.....	PO BOX	Post Office Box	.....	Water
.....	UNINCORPORATED AREA	Unincorporated Area	.....	Water
.....	INCORPORATED AREA	Incorporated Area	.....	Water
.....	UNINCORPORATED AREA	Unincorporated Area	.....	Water
.....	INCORPORATED AREA	Incorporated Area	.....	Water
.....	UNINCORPORATED AREA	Unincorporated Area	.....	Water
.....	INCORPORATED AREA	Incorporated Area	.....	Water

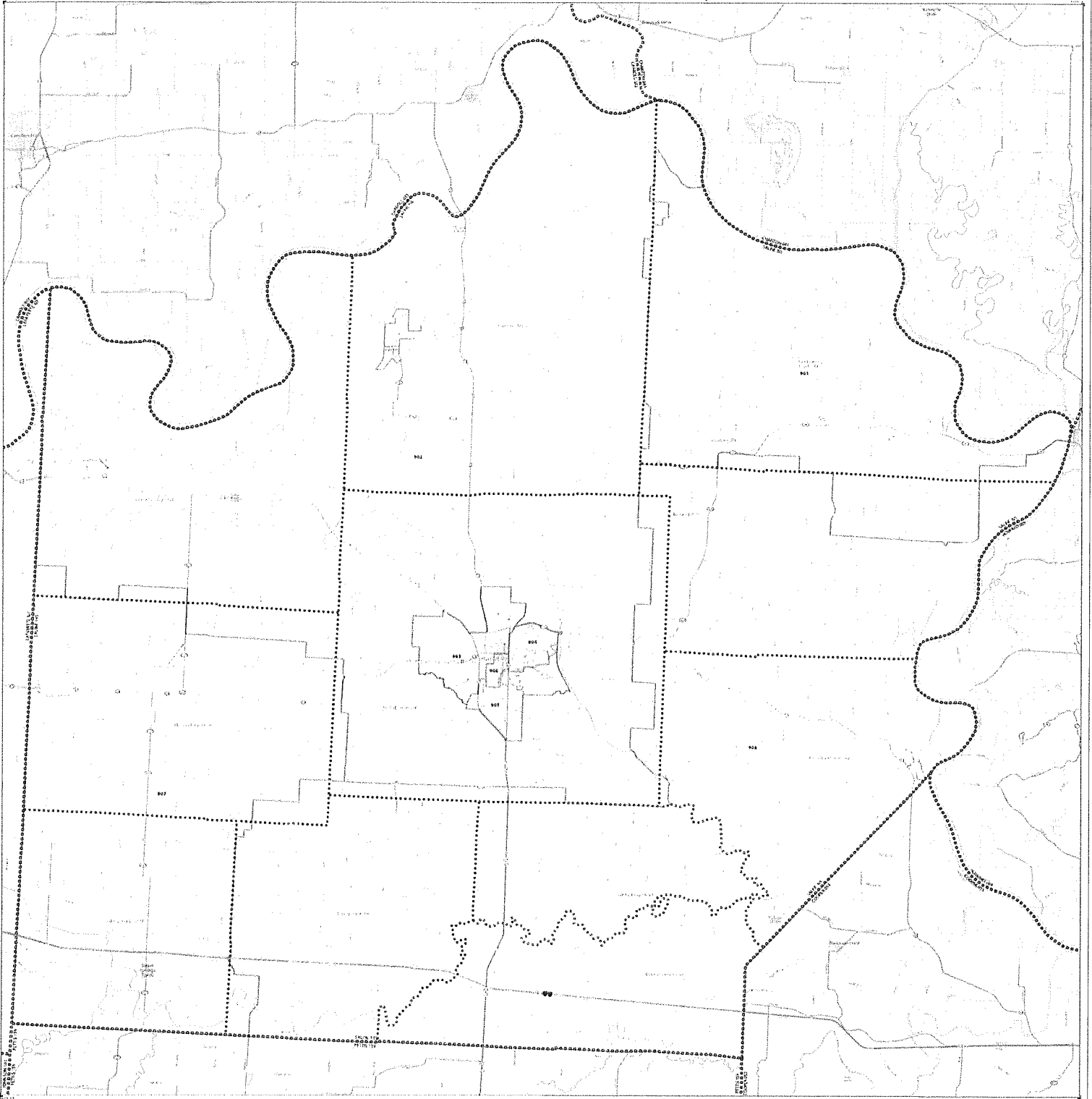


Sheet 1 of 1 (PARTIAL) shows  
Total Sheets 1 (Sheet 0, PARTIAL, Sheet 0)

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Howard County, Missouri  
2020 Census  
Census Tract Reference Map

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Saline County, MO



**LEGEND**

Symbol/Description	Symbol	Label	Symbol/Description	Symbol	Label
(Solid line)	-----	ROADWAY	(Dashed line)	- - - - -	TRACT BOUNDARY
(Thick dashed line)	- - - - -	WATER	(Thin dashed line)	- - - - -	TRACT BOUNDARY
(Dotted line)	.....	TRACT BOUNDARY	(Thick solid line)	—————	TRACT BOUNDARY
(Thin solid line)	—————	TRACT BOUNDARY	(Thick solid line)	—————	TRACT BOUNDARY
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(Thin solid line)	—————	TRACT BOUNDARY	(Thick solid line)	—————	TRACT BOUNDARY
(Thin solid line)	—————	TRACT BOUNDARY	(Thick solid line)	—————	TRACT BOUNDARY
(Thin solid line)	—————	TRACT BOUNDARY	(Thick solid line)	—————	TRACT BOUNDARY

*Note: The map uses a variety of line styles and thicknesses to denote different types of boundaries and features. Thick dashed lines represent the primary census tract boundaries. Other line styles represent roads, water bodies, and secondary boundaries.*

**Map Information:**

- Scale: 1 inch = 2 miles
- North Arrow: Indicated by a crosshair symbol.

**Metadata:**

Sheet 1 of 1 PAENT AREA  
 NAME: Saline County (193)  
 FIPS: 20-15000-00000-0000  
 11/18/2020

**Census 2020**

03/31/2025  
COMMUNITY REINVESTMENT ACT  
PUBLIC FILE

Information available to the public:

1. All written comments received from the public for the current year and the prior two calendar years. There have been no public comments as of the date above.
2. A copy of the Public Disclosure of the bank's most recent CRA Performance Evaluation prepared by the FDIC.
3. The bank has no branches.
4. The bank has never opened or closed a branch.
5. The bank's assessment area includes all of Howard County, Missouri (Tract Map #9601, 9602, & 9603); Saline County, Missouri (Tract Map #901, 902, 903, 904, 905, 906, 907 & 908); Chariton County, Missouri (Tract Map #4701, 4702 & 4703). Maps are enclosed.
6. The bank's loan to deposit ration for each quarter was:

	<u>Loans</u>	<u>Deposits</u>	<u>Ratio</u>
3-31-97	13,614M	20,884M	65.19%
6-30-97	14,305M	19,992M	73.05%
9-30-97	14,522M	20,715M	70.10%
12-31-97	14,523M	20,609M	70.47%
3-31-98	14,599M	20,714M	70.48%
6-30-98	14,409M	21,022M	68.54%
9-30-98	14,829M	21,554M	68.80%
12-30-98	14,817M	22,606M	65.54%
3-31-99	14,176M	23,800M	59.56%
6-30-99	14,551M	22,279M	65.31%
9-30-99	14,448M	21,832M	66.18%
12-31-99	14,352M	22,985M	62.44%
3-31-00	13,471M	22,723M	59.00%
6-30-00	13,995M	21,144M	66.00%

CRA Public File

	Loans	Deposits	Ratio
9-30-00	14,382M	22,295M	65.00%
12-31-00	14,333M	22,565M	64.00%
3-31-01	14,718M	22,331M	66.00%
6-30-01	15,239M	22,821M	67.00%
9-30-01	15,386M	23,182M	66.00%
12-31-01	14,944M	24,090M	62.00%
3-31-02	15,417M	24,679M	62.00%
6-30-02	15,916M	24,642M	65.00%
9-30-02	16,471M	24,352M	68.00%
12-31-02	16,676M	25,650M	65.00%
3-31-03	16,627M	26,960M	62.00%
6-30-03	17,389M	26,199M	66.00%
9-30-03	18,023M	25,770M	69.00%
12-31-03	17,839M	25,110M	70.00%
3-31-04	18,392M	25,474M	71.00%
6-30-04	21,083M	25,153M	82.00%
9-30-04	21,899M	25,957M	83.00%
12-31-04	21,925M	25,661M	84.00%
3-31-05	22,064M	26,452M	82.00%
6-30-05	23,326M	25,031M	91.00%
9-30-05	25,028M	24,926M	99.00%
12-31-05	25,041M	25,075M	98.00%
3-31-06	24,279M	25,578M	95.00%
6-30-06	24,877M	28,215M	88.00%

## CRA Public File

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	Loans	Deposits	Ratio
09-30-06	26,189M	28,988M	90.00%
12-31-06	25,828M	30,171M	86.00%
03-31-07	26,284M	31,721M	83.00%
06-30-07	28,384M	31317M	91.00%
09-30-07	30,036M	29,370M	1.02%
12-31-07	30,556M	31,780M	96.00%
03-31-08	30,570M	33,029M	93.00%
06-30-08	32,005M	34,660M	92.00%
09-30-08	34,462M	34,959M	99.00%
12-31-08	35,558M	34,322M	1.04%
03-31-09	35,013M	41,876M	84.00%
06-30-09	35,890M	40,719M	88.00%
09-30-09	35,522M	41,013M	87.00%
12-31-09	36,592M	42,691M	86.00%
03-31-10	35,103M	44,232M	80.00%
06-30-10	35,335M	45,993M	77.00%
09-30-10	36,579M	43,945M	84.00%
12-31-10	5,692M	4,407M	81.00%
03-31-11	34,468M	4,612M	77.00%
06-30-11	34,567M	44,566M	77.00%
09-30-11	35,221M	45,898M	76.00%
12-31-11	35,062M	45,260M	77.00%

	<u>Loans</u>	<u>Deposits</u>	Ratio
03/31/2012	34,926M	50,098M	70.00%
06/30/2012	36,012M	50,164M	72.00%
09/30/2012	36,004M	49,547M	73.00%
12/31/2012	36,518M	48,477M	76.00%
03/31/2013	35,038M	50,654M	69.00%
06/30/2013	34,760M	48,840M	71.00%
09/30/2013	33,777M	47,124M	72.00%
12/31/2013	34,157M	48,248M	71.00%
03/31/2014	33,207M	48,183M	69.00%
06/30/2014	33,684M	49,220M	69.00%
09/30/2014	34,645M	48,097M	72.00%
12/31/2014	34,651M	45,238M	77.00%
03/31/2015	34,124M	46,929M	73.00%
06/30/2015	36,233M	45,881M	79.00%
09/30/2015	36,355M	46,014M	79.00%
12/31/2015	38,131M	45,191M	85.00%
03/31/2016	37,518M	47,816M	79.00%
06/30/2016	41,055M	48,026M	85.00%
09/30/2016	42,180M	48,886M	86.00%
12/31/2016	41,848M	49,343M	84.00%
03/31/2017	40,539M	49,115M	83.00%
06/30/2017	40,917M	47,105M	87.00%
09/30/2017	42,040M	48,377M	87.00%
12/31/2017	43,153M	48,137M	90.00%
03/31/2018	40,686M	47,961M	85.00%
06/30/2018	40,881M	49,096M	84.00%
09/30/2018	42,090M	46,927M	90.00%
12/31/2018	41,716M	50,707M	83.00%
03/31/2019	41,596M	51,447M	81.00%
06/30/2019	42,263M	51,521M	82.00%
09/30/2019	41,994M	50,019M	84.00%
12/31/2019	41,307M	50,659M	82.00%

<u>Date</u>	<u>Loans</u>	<u>Deposits</u>	<u>Ratio</u>
03/31/2020	41,908M	51,420M	82.00%
06/30/2020	42,902M	54,178M	80.00%
09/30/2020	44,431M	54,997M	81.00%
12/31/2020	42,120M	55,170M	77.00%
03/31/2021	41,090M	57,576M	72.00%
06/30/2021	39,750M	55,129M	73.00%
09/30/2021	39,735M	51,191M	78.00%
12/31/2021	38,536M	51,871M	75.00%
03/31/2022	37,296M	55,871M	67.00%
06/30/2022	38,613M	53,002M	73.00%
09/30/2022	39,630M	52,699M	76.00%
12/31/2022	39,287M	52,673M	75.00%
03/31/2023	37,885M	56,145M	68.00%
06/30/2023	40,556M	52,136M	78.00%
09/30/2023	42,678M	48,865M	88.00%
12/31/2023	43,414M	48,425M	90.00%
03/31/2024	42,096M	50,030M	85.00%
06/30/2024	42,652M	48,848M	88.00%
09/30/2024	42,765M	48,355M	89.00%
12/31/2024	43,477M	48,356M	90.00%
03/31/2025	40,999M	49,098M	84.00%

# **PUBLIC DISCLOSURE**

September 23, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Tri-County Trust Company  
Certificate Number: 11465

103 Commerce Street  
Glasgow, Missouri 65254

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.

Tri-County Trust Company's satisfactory performance under the Lending Test supports the overall rating. 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 substantial majority of home mortgage and small farm loans reviewed were made in the assessment area.
- The geographic distribution of home mortgage and small farm loans reflects excellent dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and farms of different revenue sizes.
- The institution did not receive any CRA-related complaints since the prior evaluation performed as of October 9, 2018.

## **DESCRIPTION OF INSTITUTION**

Tri-County Trust Company is a full-service community bank headquartered in Glasgow, Missouri. The bank continues to be wholly owned by Bancshares of Glasgow Inc., Glasgow, Missouri, a one bank holding company. A satisfactory CRA rating was assigned at the bank's October 9, 2018, FDIC Performance Evaluation, based on Federal Financial Institution Examination Council (FFIEC) Small Institution Examination Procedures.

The bank operates from its sole office in Glasgow, Missouri, and operates a deposit-taking ATM in Glasgow that opened in 2020. There have been no other changes in branching or ATM structure since the prior evaluation. The bank offers a variety of deposit services including checking, savings, money market deposit accounts, and certificates of deposit. The bank also offers traditional loan products such as home mortgage, agricultural, commercial, and consumer loans. Alternative banking services include an ATM, debit cards, internet banking, and mobile banking.

As of June 30, 2024, the bank reported total assets of \$61.0 million, total loans of \$42.7 million, and total deposits of \$49.1 million. As illustrated in the following table, the bank's primary business focus is home mortgage and agricultural lending, representing 32.2 percent and 39.8 percent of the loan portfolio, respectively.

<b>Loan Portfolio Distribution as of 06/30/2024</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	1,327	3.1
Secured by Farmland	8,145	19.1
Secured by 1-4 Family Residential Properties	13,719	32.2
Secured by Multifamily (5 or more) Residential Properties	0	0
Secured by Nonfarm Nonresidential Properties	1,835	4.3
<b>Total Real Estate Loans</b>	<b>25,026</b>	<b>58.7</b>
Commercial and Industrial Loans	4,682	11.0
Agricultural Production and Other Loans to Farmers	8,833	20.7
Consumer Loans	4,111	9.6
Obligations of State and Political Subdivisions in the U.S.	0	0
Other Loans	0	0
Lease Financing Receivable (net of unearned income)	0	0
Less: Unearned Income	0	0
<b>Total Loans</b>	<b>42,652</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

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

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires financial institutions to define one or more assessment areas within which examiners will evaluate CRA performance. Tri-County Trust Company has delineated a single contiguous assessment area in central Missouri that includes Howard, Chariton, and Saline counties. Howard County is part of the Columbia, Missouri Metropolitan Statistical Area (MSA) and Chariton and Saline counties are part of the nonmetropolitan portion of Missouri. However, this area will be reviewed as one assessment area, as the bank only operates an office in Howard County and no offices are located in Chariton or Saline counties. Since the prior evaluation, management expanded the assessment area to include all of Chariton and Saline counties.

### **Economic and Demographic Data**

According to 2020 U.S. Census data, the assessment area consists of one moderate-, ten middle-, and three upper-income census tracts. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area					
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #
Geographies (Census Tracts)	14	0.0	7.1	71.4	21.4
Population by Geography	40,892	0.0	7.3	69.1	23.6
Housing Units by Geography	18,944	0.0	7.7	72.3	20.0
Owner-Occupied Units by Geography	10,687	0.0	9.2	68.6	22.2
Occupied Rental Units by Geography	3,731	0.0	3.8	79.2	17.0
Vacant Units by Geography	4,526	0.0	7.5	75.2	17.3
Businesses by Geography	4,278	0.0	7.9	70.7	21.5
Farms by Geography	586	0.0	8.7	70.0	21.3
Family Distribution by Income Level	9,402	17.9	16.8	22.9	42.5
Household Distribution by Income Level	14,418	21.7	16.8	18.5	43.0
Median Family Income - Columbia, MO MSA		\$78,168	Median Housing Value		\$117,224
Median Family Income Non-MSAs - MO		\$56,957	Median Gross Rent		\$605
Families Below Poverty Level		8.2%			
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i>					
<i>Due to rounding, totals may not equal 100.0%</i>					

Examiners used the FFIEC median family incomes for the Columbia, Missouri MSA and nonmetropolitan Missouri to analyze home mortgage loans under the Borrower Profile criterion. The following table presents the low-, moderate-, middle-, and upper-income categories.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
<b>Columbia, Missouri MSA Median Family Income</b>				
2023 (\$101,200)	<\$50,600	\$50,600 to <\$80,960	\$80,960 to <\$121,440	≥\$121,440
<b>Nonmetropolitan Missouri Median Family Income</b>				
2023 (\$71,000)	<\$35,500	\$35,500 to <\$56,800	\$56,800 to <\$85,200	≥\$85,200
<i>Source: FFIEC</i>				

### **Competition**

The assessment area is moderately competitive for financial services and includes a combination of community banks, regional banks, and credit unions. According to the June 30, 2024, FDIC Deposit Market Share data, 12 financial institutions operate 27 offices in the assessment area. Tri-County Trust Company ranked 8<sup>th</sup> with 3.7 percent of the deposit market share.

There is a moderate level of competition for home mortgage loans within the assessment area. 2023 aggregate lending data indicates that 138 lenders originated 1,021 home mortgage loans throughout the assessment area. This aggregate lending data serves as a useful indicator of loan demand for home mortgage loans. Tri-County Trust Company ranked 18<sup>th</sup> with 1.6 percent of the home mortgage loan market share in the assessment area.

The bank is not required to collect or report small farm loans under CRA. Therefore, examiners did not compare the bank's small farm lending to aggregate lending data. Nonetheless, the aggregate lending data reflects the level of demand and competition for small farm loans within the assessment area. The 2022 aggregate lending data, which is the most recent year available, indicates that 20 lenders originated 213 small farm loans throughout the assessment area.

### **Community Contact**

Examiners conduct community contact interviews with third parties active in the assessment area to assist in identifying credit needs and opportunities. This information helps determine whether local financial institutions are responsive to these needs.

Examiners conducted a community contact interview with an individual from an economic development organization that focuses on Saline County. The contact identified the primary needs of the area to be affordable housing and additional workforce housing to support the large number of open manufacturing jobs in the area. In addition, the contact stated that agriculture continues to be a primary focus of the area and that local farmers can obtain adequate financing through local financial institutions. Overall, the contact indicated that local financial institutions are meeting the credit needs of the area and are very involved within the community.

### **Credit Needs**

Considering information from bank management, the community contact, and demographic and economic data, home mortgage and agricultural lending represent primary credit needs in the assessment area.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation dated October 9, 2018, to the current evaluation dated September 23, 2024. Examiners used the FFIEC Interagency Small Institution Examination Procedures to evaluate Tri-County Trust Company's CRA Performance. Please refer to the Small Bank Performance Criteria section in the Appendices for a summary of the criteria evaluated under the Lending Test.

### **Activities Reviewed**

Examiners considered the bank's business strategy, loan portfolio composition, and the number and dollar volume of loans originated during the evaluation period when determining which products to evaluate. As a result, examiners reviewed home mortgage and small farm loans originated during the evaluation period to evaluate CRA performance. Home mortgage and agricultural loans remain the primary business focus; therefore, examiners gave equal weight to both products when drawing overall conclusions. Examiners did not evaluate small business loans, as commercial loans represent a small portion of the loan portfolio and are not emphasized in the bank's business strategy.

This evaluation considered home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) in 2023, and small farm loans originated or purchased in 2023. Management

indicated that a review of lending activity from this timeframe would yield a representative analysis of lending since the prior evaluation.

For the Assessment Area Concentration analysis, examiners reviewed 15 home mortgage loans totaling \$1.4 million and 47 small farm loans totaling \$4.7 million. For the Geographic Distribution analysis, examiners reviewed all loans within the assessment area, consisting of 14 home mortgage loans totaling \$1.4 million and 45 small farm loans totaling \$4.5 million. For the Borrower Profile analysis, examiners reviewed all home mortgage loans within the assessment area, and a sample of small farm loans consisting of 33 loans totaling \$3.0 million. Examiners used 2020 U.S. Census data and 2023 home mortgage aggregate lending data as a comparison for home mortgage lending and 2023 D&B data as a comparison for small farm lending.

Examiners analyzed lending performance by both number and dollar volume of loans. However, examiners emphasized the performance by the number of loans for the Geographic Distribution and Borrower Profile analyses, as it is generally a better indicator of the number of individuals and farms served.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

Tri-County Trust Company demonstrated satisfactory performance under the Lending Test. The bank’s collective performance under the evaluated criteria supports this conclusion.

#### **Loan-to-Deposit Ratio**

The loan-to-deposit ratio is reasonable given the institution’s size, financial condition, and assessment area credit needs. The bank’s net loan-to-deposit ratio, calculated from Call Report data, averaged 77.9 percent over the 23 quarters from December 31, 2018, to June 30, 2024. The ratio ranged from a low of 65.4 percent as of March 31, 2022, to a high of 88.1 percent as of December 31, 2023. The bank’s average net loan-to-deposit ratio is comparable to the prior evaluation, when the net loan-to-deposit ratio averaged 77.5 percent.

As shown in the following table, the bank’s average net loan-to-deposit ratio is reasonable in comparison to the similarly situated institutions’ ratios. Examiners identified these institutions based on asset size, lending focus, branching structure, and markets served.

<b>Loan-to-Deposit (LTD) Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 06/30/2024 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>Tri-County Trust Company, Glasgow, Missouri</b>	<b>60,977</b>	<b>77.9</b>
County Bank, Brunswick, Missouri	122,602	68.2
Commercial Trust Company of Fayette, Fayette, Missouri	154,336	73.4
<i>Source: Reports of Condition and Income 12/31/2018 – 06/30/2024</i>		

**Assessment Area Concentration**

The bank originated a substantial majority of home mortgage and small farm loans within its assessment area, as illustrated in the following table.

<b>Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans</b>				<b>Total</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>\$ (000s)</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>	<b>\$</b>
Home Mortgage	14	93.3	1	6.7	15	1,410	98.3	24	1.7	1,434
Small Farm	45	95.7	2	4.3	47	4,508	95.2	225	4.8	4,733
<b>Total</b>	<b>59</b>	<b>95.2</b>	<b>3</b>	<b>4.8</b>	<b>62</b>	<b>5,918</b>	<b>96.0</b>	<b>249</b>	<b>4.0</b>	<b>6,167</b>

*Source: Bank Data  
Due to rounding, totals may not equal 100.0%*

**Geographic Distribution**

The geographic distribution of loans reflects excellent dispersion throughout the assessment area. This conclusion is supported by excellent lending performance in both loan categories. Examiners focused primarily on the percentage, by number of loans, in the sole moderate-income census tract within the assessment area.

***Home Mortgage***

The geographic distribution of home mortgage loans reflects excellent dispersion throughout the assessment area. As shown in the following table, the bank’s performance significantly exceeds both aggregate performance and comparable demographic data in the moderate-income census tract.

<b>Geographic Distribution of Home Mortgage Loans</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Moderate	9.2	6.6	6	42.9	621	44.0
Middle	68.6	76.2	8	57.1	790	56.0
Upper	22.2	17.2	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>1,410</b>	<b>100.0</b>

*Source: 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

***Small Farm***

The geographic distribution of small farm loans reflects excellent dispersion throughout the assessment area. As shown in the following table, the bank’s performance significantly exceeds comparable demographic data in the moderate-income census tract.

Geographic Distribution of Small Farm Loans					
Tract Income Level	% of Farms	#	%	\$(000s)	%
Moderate	8.7	16	35.6	1,884	41.8
Middle	70.0	23	51.1	2,059	45.7
Upper	21.3	6	13.3	565	12.5
<b>Totals</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>	<b>4,508</b>	<b>100.0</b>

*Source: 2023 D&B Data; Bank Data.  
Due to rounding, totals may not equal 100.0%*

### **Borrower Profile**

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and farms of different revenue sizes in the assessment area. This conclusion is supported by reasonable lending performance in both loan categories. Examiners primarily focused on the percentage, by number of loans, to low- and moderate-income borrowers and to farms with gross annual revenues of \$1 million or less.

### ***Home Mortgage***

The distribution of borrowers reflects reasonable penetration among individuals of different income levels, including low- and moderate-income individuals. As shown in the following table, the percentage of loans to low- and moderate-income individuals is consistent with comparable demographic data and aggregate lending data.

Distribution of Home Mortgage Loans by Borrower Income Level						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	17.9	11.8	2	14.3	176	12.5
Moderate	16.8	23.0	4	28.6	406	28.8
Middle	22.9	20.7	5	35.7	593	42.0
Upper	42.5	24.5	0	0.0	0	0.0
Not Available	0.0	19.9	3	21.4	236	16.7
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>1,410</b>	<b>100.0</b>

*Source: 2020 U.S. Census; Bank Data, 2023 HMDA Aggregate Data.  
Due to rounding, totals may not equal 100.0%*

### ***Small Farm***

The distribution of borrowers reflects reasonable penetration among farms of different revenue sizes. As indicated in the following table, the percentage of loans originated to farms with gross annual revenues of \$1 million or less is significantly below comparable demographic data. However, it is important to note that 36.4 percent of the sampled loans were originated or renewed where the lender did not require the submission of gross annual revenue information. Examiners conducted a supplemental analysis using loan size as a proxy for those loans with revenue not available. The analysis indicated that 11 of the 12 loans (91.7 percent) were for \$100,000 or less, which demonstrates that the bank is helping to meet the credit needs of small farms in the assessment area. In addition, 2022 Census of Agriculture data indicated that only 42.7 percent of



operators reported farming as their primary occupation. Therefore, approximately 57.3 percent of farms are operated by individuals with off-farm income. This additional income may reduce a farm's ongoing borrowing needs.

<b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b>					
<b>Gross Revenue Level</b>	<b>% of Farms</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
<=\$1,000,000	98.1	19	57.6	2,236	75.3
>\$1,000,000	0.7	2	6.1	236	7.9
Revenue Not Available	1.2	12	36.4	497	16.7
<b>Total</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>2,969</b>	<b>100.0</b>
<i>Source: 2023 D&amp;B Data, Bank Data. Due to rounding, totals may not equal 100.0%</i>					

**Response to Complaints**

Tri-County Trust Company has not received any CRA-related complaints since the previous CRA evaluation dated October 9, 2018; 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:

- 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 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.