



PUBLIC DISCLOSURE

October 23, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Monterey
Charter Number 9784

Main Street
Monterey, IN 46960

Office of the Comptroller of the Currency

Indianapolis Office
8777 Purdue Road, Suite 105
Indianapolis, IN 46268

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, and should not 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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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding.

The lending test is rated: Outstanding.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on excellent performance in the State of Indiana. The First National Bank of Monterey (FNBM or bank) originated a substantial majority of loans in its assessment area (AA) with an excellent distribution among borrowers and geographies of different income levels.
- The Community Development (CD) Test rating is based on excellent performance in the State of Indiana. FNBM demonstrated excellent responsiveness to CD needs in its AA by engaging in a combination of CD loans, qualified investments, and CD services.

Loan-to-Deposit Ratio

FNBM's loan-to-deposit (LTD) ratio is reasonable considering its size, financial condition, and credit needs of the AA. As calculated on a bank-wide basis, FNBM's quarterly LTD ratio averaged 60.9 percent over the 12-quarter period ending December 31, 2022. During this timeframe, the LTD ratio ranged from a low of 50.1 percent to a high of 72.7 percent. FNBM's LTD ratio ranked second among the three banks headquartered in the AA. The quarterly LTD ratio of the other two banks averaged 54.6 percent and 89.1 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. Based on the OCC-selected loan sample, FNBM originated and purchased 86.7 percent of its loans inside the AA, based on the number of loans originated. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

The table below shows the number and dollar volume of loans originated inside and outside the bank's AA. This data is based on a random sample of 40 home mortgage, 40 small business, and 40 small farm loans. All loans in this analysis were made between January 1, 2020, and December 31, 2022.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	35	87.5	5	12.5	40	3,929	79.8	994	20.2	4,923
Small Business	33	82.5	7	17.5	40	4,356	79.4	1,133	20.6	5,489
Small Farm	36	90.0	4	10.0	40	3,527	92.4	291	7.6	3,818
Total	104	86.7	16	13.3	120	11,812	83.0	2,418	17.0	14,230

Description of Institution

FNBM is an intrastate, federally chartered national bank headquartered in Monterey, Indiana. The bank is not owned by a holding company, but does have an operating subsidiary, FNBM Investments, Inc. As a full-service institution, the bank offers various financial products and services for personal or business needs. Loan products include agricultural loans or leases, commercial loans or leases, home mortgage loans, and consumer loans. Deposit products consist of checking and savings accounts, certificates of deposit, individual retirement accounts, and health savings accounts. Other available banking services include safe deposit boxes and trust administration.

The bank did not have any merger/acquisition activity or changes to its branch network during the evaluation period. FNBM serves all or a portion of four contiguous counties in northwestern Indiana from four office locations. The main office and one branch are in Pulaski County (Monterey and Winamac). In addition, the bank has one branch in Marshall County (Culver) and another in Starke County (North Judson). Each branch has a deposit-taking automated teller machine (ATM). All four counties in FNBM's market footprint are part of the nonmetropolitan statistical area in Indiana. As such, FNBM has one rating area, the State of Indiana, with a single AA, the Indiana Non-MSA (IN Non-MSA). Additional information about the AA is discussed below under Description of Institution's Operations in Indiana.

As of December 31, 2022, FNBM had total assets of \$417.3 million and tier 1 capital of \$50 million. Total deposits equaled \$356.9 million or 85.5 percent of total assets, with the largest share from the Winamac office in Pulaski County. Gross loans and leases of \$217.6 million represented 52.1 percent of total assets. The loan portfolio composition and lending activity reflect FNBM's history of serving farmers and efforts to serve the credit needs of individuals and businesses in the AA. Based on the number and dollar volume of loan originations in 2020, 2021, and 2022, farm loans, business loans, and home mortgage loans are the primary products. In 2020 and 2021, FNBM originated a notable number of loans under the Small Business Administration's Paycheck Protection Program (SBA's PPP).

The following tables provide a summary of FNBM's deposit data, loan originations, and loan portfolio composition.

Deposit Data			
Office	County	Amount (000s)	% of Total
Culver	Marshall	\$ 54,306	14.9%
Monterey	Pulaski	\$ 76,934	21.1%
Winamac	Pulaski	\$ 161,485	44.3%
North Judson	Starke	\$ 71,673	19.7%
	Total	\$ 364,398	100.0%

Source: FDIC Summary Deposits Report for June 30, 2022

Loan Originations		
Loan Category	% of # of Loans	% of \$ of Loans
Farm Loans	32.1%	57.1%
Business Loans	25.9%	16.1%
Home Mortgage Loans	13.9%	23.2%
Consumer Loans	28.1%	3.6%
Total Loan Originations	100.0%	100.0%

Source: Internal Reports for Loan Originations in 2020, 2021, and 2022

Loan Portfolio Composition			
Loan Category	Amount (000's)	% of Total Loans/Leases	% of Total Assets
Residential Loans	\$ 47,122	21.6%	11.3%
Farm Loans	\$ 133,790	61.5%	32.1%
Business Loans	\$ 26,249	12.1%	6.3%
Consumer Loans	\$ 3,000	1.4%	0.7%
Other Loans	\$ 31	0.0%	0.0%
Total Loans	\$ 210,192	96.6%	50.4%
Leases	\$ 7,425	3.4%	1.8%
Total Loans/Leases	\$ 217,617	100.0%	52.2%

Source: Call Report as of December 31, 2022

FNBM's lending activities are consistent with its size, expertise, financial capacity, and local economic conditions. There are no legal, financial, or other factors that affect its ability to meet the credit needs of its AA. FNBM received a rating of "Satisfactory" at its prior CRA evaluation dated August 11, 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation considers FNBM's CRA performance from January 1, 2020, to December 31, 2022. The OCC assessed this performance using Intermediate Small Bank examination procedures which include a Lending Test and a CD Test. For the Lending Test, the OCC

considered the bank’s record of meeting the credit needs of the AA through its primary loan products. Under the CD Test, the OCC considered FNBM’s responsiveness to the CD needs of the AA through loans, qualified investments, and services with a CD purpose.

FNBM is not required to report home mortgage under the Home Mortgage Disclosure Act (HMDA), or small farm and small business under CRA. As such, the OCC analyzed FNBM’s performance under the Lending Test using a representative sample of the three primary loan products. The OCC evaluated relevant loan data from a randomly selected sample of 60 loans from each analysis period. The sample was divided equally among home mortgage, small business, and small farm loans. No affiliate activity is included.

The borrower and geographic loan distributions were analyzed using two time periods, 2020-2021 and 2022. This is due to census changes that became effective in 2022. For the 2020-2021 analysis period, the demographic data being used is from the 2015 ACS and 2021 Dunn and Bradstreet (D&B). The demographic data for the 2022 analysis period is from the 2020 ACS and 2022 D&B. Unless otherwise noted, the OCC placed more weight on 2020-2021 as it represents a larger portion of the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

FNBM operates in one state with a single AA, so the rating for the State of Indiana is based on its performance in the Indiana Non-MSA AA. If performance varied among loan products, results were weighted according to the number of loans originated. The OCC gave the most weight to farm loans and then more weight to business loans than home mortgage loans.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered part of the institution's performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Indiana

CRA rating for the State of Indiana: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- an excellent distribution of loans among geographies and borrowers of different income levels; and,
- excellent responsiveness to CD needs through a combination of CD loans, qualified investments, and CD services.

Description of Institution's Operations in Indiana

FNBM has four office locations in northwestern Indiana that serve all or a portion of Fulton, Marshall, Pulaski, and Starke counties. The bank also has three deposit-taking ATMs, one at each branch location. According to demographic data from the 2015 ACS, all four offices were in a middle-income CT at the start of the evaluation period. However, updated data from the 2020 ACS shows the CT for the branch office in Winamac (Pulaski County) is now a moderate-income geography.

Additional information regarding demographic data, job market, housing cost, competition, and credit needs, is discussed below to provide further context for FNBM's operations in its only AA, the IN Non-MSA AA.

Indiana Non-MSA AA

The delineated AA includes 16 of the 29 CTs in this four-county area within the IN Non-MSA. This is the portion of the four-county area that FNBM can reasonably serve based on its asset size, business model, and office locations. The 16 CTs are contiguous, and the AA does not arbitrarily exclude LMI geographies or reflect illegal discrimination.

Table A – Demographic Information of the Assessment Area						
Assessment Area: IN Non-MSA AA (2020-2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	12.5	87.5	0.0	0.0
Population by Geography	56,185	0.0	16.7	83.3	0.0	0.0
Housing Units by Geography	26,662	0.0	17.0	83.0	0.0	0.0
Owner-Occupied Units by Geography	17,031	0.0	14.3	85.7	0.0	0.0
Occupied Rental Units by Geography	4,880	0.0	31.2	68.8	0.0	0.0
Vacant Units by Geography	4,751	0.0	11.8	88.2	0.0	0.0
Businesses by Geography	3,983	0.0	23.9	76.1	0.0	0.0
Farms by Geography	555	0.0	2.7	97.3	0.0	0.0
Family Distribution by Income Level	14,881	19.8	20.9	24.4	34.8	0.0
Household Distribution by Income Level	21,911	24.0	17.0	21.2	37.9	0.0
Median Family Income Non-MSAs - IN		\$55,715	Median Housing Value			\$99,637
FFIEC Updated Median Family Income		\$64,600	Median Gross Rent			\$670
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: IN Non-MSA AA (2022)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	18.8	81.3	0.0	0.0
Population by Geography	55,496	0.0	19.6	80.4	0.0	0.0
Housing Units by Geography	26,775	0.0	18.5	81.5	0.0	0.0
Owner-Occupied Units by Geography	16,359	0.0	16.8	83.2	0.0	0.0
Occupied Rental Units by Geography	4,726	0.0	26.1	73.9	0.0	0.0
Vacant Units by Geography	5,690	0.0	17.1	82.9	0.0	0.0
Businesses by Geography	4,468	0.0	24.8	75.2	0.0	0.0
Farms by Geography	610	0.0	9.0	91.0	0.0	0.0
Family Distribution by Income Level	13,748	20.3	22.2	21.3	36.3	0.0
Household Distribution by Income Level	21,085	23.4	19.4	20.0	37.2	0.0
Median Family Income Non-MSAs - IN		\$67,032	Median Housing Value			\$118,737
FFIEC Updated Median Family Income		\$74,500	Median Gross Rent			\$682
			Families Below Poverty Level			10.0%
<i>Source: 2020 U.S. Census and 2022 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Job Market

Business demographic data from the 2020 ACS census and 2022 Dun and Bradstreet shows the primary industries in the four-county AA are services (29.8%), agriculture, forestry, and fishing, (12%), retail trade (11.4%), and finance, insurance, and real estate (7.5%). In addition, a notable percentage of establishments are categorized as non-classifiable (18.5%).

Local schools and government offices offer employment opportunities throughout the AA. According to Data Axle, other major employers include:

Major Employers	
Fulton County	Rochester Metal Products and Woodlawn Home Health Care
Marshall County	Southwire Company, Nishikawa Copper LLC, and Walmart
Pulaski County	Braunability, Pulaski Memorial Hospital, and Wasteequip
Starke County	Pathfinder Services Inc, MPI Indiana Fineblanking, and American Oak Preserving Co Inc
<i>Source: STATS Indiana (Data Axle)</i>	

The average annual unemployment rate for each county in the IN Non-MSA AA improved during the three-year evaluation period. The higher rates for 2020 reflect the impact of the COVID-19 pandemic. All counties experienced a significant spike in unemployment in April 2020 that was followed by a gradual recovery through the end of 2021 and continued

improvement in 2022. The unemployment rate for three of the four counties remained at or below the statewide rate, while the rate for Starke County remained slightly higher. The following table summarizes these unemployment rates:

Average Annual Unemployment Rates				
	2019	2020	2021	2022
State of Indiana	3.3	7.3	3.9	3.0
Fulton County	3.1	6.7	3.6	3.0
Marshall County	3.1	6.5	2.9	2.6
Pulaski County	3.0	6.2	3.2	2.6
Starke County	4.3	8.2	4.7	3.8

Source: Bureau of Labor Statistics; Rates Not Seasonally Adjusted

Housing Cost

A home mortgage loan may not be affordable for all LMI families in the AA. As shown in the table below, the median housing value for the AA was at least 3.1 times the annual income of a low-income family and at least 1.9 times the annual income of a moderate-income family. Therefore, some LMI families may not be able to afford and maintain a home or qualify for a mortgage when also considering the down payment requirement, homeowner costs such as taxes and insurance, and other debt payments.

Housing Value vs Annual Income		
	2021	2022
Median Housing Value (MHV)	\$99,637	\$118,737
Median Family Income (MFI)	\$64,600	\$74,500
Low Income Level (<50% MFI)	\$32,300	\$37,250
Moderate-Income Level (<80% MFI)	\$51,680	\$59,600

Source: 2015 and 2020 ACS Census; 2021 and 2022 Updated FFIEC MFI

Competition

Competition for deposits is notable due to the number and size of financial institutions with offices in the AA. As of June 30, 2022, FDIC deposit data showed FNBM along with 12 other national and state banks operated 35 branches in Fulton, Marshall, Pulaski, and/or Starke counties. FNBM’s four offices with \$364.3 million of deposits represented a market share of 15.5 percent; this market share ranks FNBM third. In comparison to its competitors, FNBM is the only financial institution that does not have any offices outside the four-county AA. The top two competitors, 1st Source Bank and First Federal Savings, have a market share of 29.2 percent and 16.3 percent, respectively.

Strong competition for home mortgage, farm, and business loans also exists. Aggregate data collected from all lenders required to report home mortgage and CRA loan indicates the following:

- Aggregate HMDA data for 2021 shows 201 lenders originated or purchased 2,506 home mortgage loans. In 2022, 169 lenders originated or purchased 1,655 loans. The top five lenders captured 38.8 percent of the market share in 2021 and 33.7 percent in 2022. First

Federal Savings Bank was the top lender in 2021 and 2022 with a market share of approximately 12.5 percent each year. Other top lenders in 2021 were 21st Mortgage, Ruoff Mortgage, Rocket Mortgage, and 1st Source Bank. In 2022, the other top lenders were Ruoff Mortgage, 1st Source Bank, Teachers Credit Union, and Rocket Mortgage.

- Aggregate CRA data for 2021 shows 62 lenders originated or purchased 2,128 small loans to businesses, and 19 lenders originated 325 small loans to farms. The top five lenders captured 62.5 percent of the business loan market share, and the top four lenders captured 67.1 percent of the farm loan market share. 1st Source Bank was the top business lender with a market share of 32.6 percent. 1st Source and John Deere Financial FSB were the top farm lenders with a market share of 18.5 percent. The 2022 CRA data was not available at the time of this evaluation.

Community Contact

The OCC considered comments from a community contact regarding credit and community development needs and opportunities. The organization primarily serves northeastern Indiana, but the service area for some programs extends to Fulton, Marshall, Pulaski, and/or Starke counties. The contact noted an increase in the need for transportation and childcare in 2022-2023. The contact further stated there is still a need for affordable housing units.

According to the contact, the agency regularly seeks bank investors for various activities. Opportunities for banks to invest include:

- affordable mortgages for clients of the agency's homebuyer counseling program,
- construction financing for multi-family projects,
- a grant, investment, or matching funds for loan loss reserves,
- operating support or permanent financing,
- FHLB sponsor to access grants and low-cost financing,
- investment in small business pools,
- service on the board of directors or loan review committee, and,
- bank referrals to the agency for customers that do not qualify for bank loans.

Scope of Evaluation in Indiana

OCC performed a full-scope review of FNBM's only AA, the Indiana Non-MSA. Refer to the table in Appendix A: Scope of Examination for additional information.

Conclusions in Respect to Performance Tests in Indiana

Lending Test

The bank's performance under the Lending Test in Indiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Indiana is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in the state. OCC noted the AA had no low-income CTs during the evaluation period, two moderate-income CTs in 2020-2021, and three moderate-income CTs in 2022. OCC also generally gave more weight to performance in 2020-2021. However, performance in 2022 may still have a positive impact on the overall conclusion depending on the relative strength.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans is excellent. FNBM's stronger performance in 2022 enhances its 2020-2021 performance.

- In 2020-2021, FNBM originated 15 percent of its home mortgage loans in moderate-income CTs. This performance is comparable to the percentage of OOHUs but is below the aggregate lending in these geographies.
- In 2022, FNBM originated 30 percent of its home mortgage loans in moderate-income CTs. This performance exceeds the percentage of OOHUs and aggregate lending.
- In total, nine of 40 loans, or 22.5 percent of the home mortgage loans sampled, were made in moderate-income CTs.

Refer to Table O in the state of Indiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The overall geographic distribution of small loans to businesses is excellent. FNBM's performance in 2020-2021 and 2022 is excellent.

- In 2020-2021, FNBM originated 31.8 percent of its small loans to businesses in moderate-income CTs. This performance exceeds the percentage of businesses and aggregate lending in these geographies.
- In 2022, FNBM originated 25 percent of its small loans to business in moderate-income CTs. This performance is comparable to the percentage of businesses in these geographies.
- In total, 12 of 42 loans, or 28.5 percent of the business loans sampled, were made in moderate-income CTs.

Refer to Table Q in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Small Loans to Farms

The overall geographic distribution of small loans to farms is reasonable. FNBM's performance in both 2020-2021 and 2022 is reasonable. The OCC considered opportunities to lend in the moderate-income geographies were limited by the low number of farms present. As shown in Table A above, there were two-moderate income CTs with just 15 farms in 2020-2021 and three-moderate income CTs with only 55 farms in 2022.

- In 2020-2021, FNBM did not originate any small loans to farms in moderate-income CTs.
- In 2022, FNBM originated two small loans to farms in moderate-income CTs. This performance is comparable to the percentage of farms in these geographies.
- In total, two of 40 loans, or 5 percent of the small farm loans sampled, were made in moderate-income CTs.

Refer to Table S in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The distribution of home mortgage loans among borrowers of different incomes is excellent. FNBM's performance among both low- and moderate-income borrowers is excellent for 2020-2021 and 2022.

- In 2020-2021, FNBM originated 20 percent of its home mortgage loans to low-income borrowers. This performance is comparable to the percentage of low-income families in the AA and exceeds the aggregate lending percentage. FNBM originated 30 percent of its home loans to moderate-income borrowers. This performance exceeds the percentage of moderate-income families in the AA and the aggregate lending percentage.
- In 2022, FNBM originated 20 percent of its home mortgage loans to low-income borrowers. This performance is comparable to the percentage of low-income families and exceeds the aggregate lending percentage. FNBM originated 45 percent of its home mortgage loans to moderate-income borrowers. This performance exceeds the percentage of moderate-income families in the AA and the aggregate lending percentage.
- In total, 8 of 40 (20 percent) of the home mortgage loans sampled were made to low-income borrowers and 15 of 40 (37.5 percent) were made to moderate-income borrowers.

Refer to Table P in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Small Loans to Businesses

The distribution of loans to businesses of different sizes is excellent. FNBM's performance in both 2020-2021 and 2022 is excellent.

- In 2020-2021, FNBM originated 77.3 percent of its loans to businesses with revenues of \$1 million or less. This performance is near to the percentage of small businesses in the AA and significantly above the aggregate lending percentage.
- In 2022, FNBM originated 85 percent of its loans of its loans to businesses with revenues of \$1 million or less. This performance is comparable to the percentage of small businesses in the AA.
- In total, 34 of 42 loans or 81 percent were made to businesses with revenues of \$1 million or less. In addition, most of the businesses with revenues greater than \$1 million were still considered relatively small businesses. Five of these eight loans were made to businesses with revenues between \$1.1 and \$1.8 million.

Refer to Table R in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Small Loans to Farms

The distribution of loans to farms of different sizes is excellent. FNBM's performance in both 2020-2021 and 2022 is excellent.

- In 2020-2021, FNBM originated 90 percent of its loans to farms with revenues of \$1 million or less. This performance is near the percentage of small farms in the AA and significantly above the aggregate lending percentage.
- In 2022, FNBM originated 95 percent of its loans of its loans to farms with revenues of \$1 million or less. This performance is comparable to the percentage of small farms in the AA.
- In total, 37 of 40 loans or 92.5 percent were made to farms with revenues of \$1 million or less. In addition, most of the farms with revenues greater than \$1 million were still considered relatively small. Two of these three loans were made to farms with revenues between \$1.1 and \$1.6 million.

Refer to Table T in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Responses to Complaints

FNBM did not receive any complaints regarding its CRA performance during the evaluation period.

Community Development Test

The bank's performance under the Community Development Test in the state of Indiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$ (000's)	% of Total \$
IN Non-MSA	188	84.7	5,877	86.8
Statewide	34	15.3	893	13.2
Total	222	100.0	6,770	100.0

FNBM originated 222 CD loans in the AA totaling \$6.7 million or 13.5 percent of tier one capital. These loans provided financing for affordable housing, community services, and the SBA's PPP as follows:

- A \$380,567 loan to Pulaski County Health Foundation for repairs to a 24-unit, low-income housing tax credit project that provides affordable living for seniors or disabled persons;
- Two annual renewals of a \$250,000 loan that originally financed the construction of a 48-unit, low-income housing tax credit project that consists of apartments and rent-to-own townhomes;
- Three loans totaling \$24,000 to Pulaski County Human Services, a non-profit organization that assists low-income, disabled, and elderly households;
- A \$20,000 loan to Habitat for Humanity; and,
- A total of 220 PPP loans in the amount of \$5.9 million in Indiana. Of this total, 183 loans equaling \$5 million were in the AA. These loans helped businesses and farms keep their workforce employed during the COVID-19 pandemic. Loans made before October 1, 2020, were qualified under the 1995 Rule, while loans made after this date were qualified under the June 2020 Rule.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
IN Non-MSA			31	2,206	1	100.0	2,206	100.0		
Total			31	2,206	1	100.0	2,206	100.0		

* *Prior Period Investments'* means investments made in a previous evaluation period that are outstanding as of the examination date.

** *Unfunded Commitments'* means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, FNBM made qualified investments of \$2.2 million or approximately 4.4 percent of tier one capital. This total primarily consists of the following:

- The \$2.1 million allocated portion of a \$5.6 million municipal bond investment that supports essential infrastructure. The renovation of the Justice Center benefits all residents of Pulaski County, including LMI families. The allocated amount represents the percentage of LMI families in Pulaski County.
- A total of 30 donations equaling \$56,434 that primarily supported affordable housing and community services for LMI residents. This total includes donations of \$36,480 to Starke-Pulaski Habitat for Humanity, \$9,600 to various food pantries, and \$6,965 to local schools for delinquent lunch accounts of LMI students.

Extent to Which the Bank Provides Community Development Services

Six bank employees provided 3,206 hours of service. One bank officer served in a leadership role as the executive director for Starke/Pulaski Habitat for Humanity throughout the evaluation period. In addition, three bank employees taught financial literacy in local schools and two bank employees volunteered at a fundraising event to benefit Habitat for Humanity.

* *Prior Period Investments'* means investments made in a previous evaluation period that are outstanding as of the examination date.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	01/01/2020 to 12/31/2022	
Bank Products Reviewed	Home Mortgage, Small Business, and Small Farm Loans CD Loans, Qualified Investments, and CD Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Indiana		
IN Non-MSA	Full Scope	Full County: Pulaski Partial County: Fulton, Marshall, and Starke

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank of Monterey			
	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Overall Bank:			
First National Bank of Monterey	Outstanding	Outstanding	Outstanding
MMSA or State:			
State of Indiana	Outstanding	Outstanding	Outstanding

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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, other secured consumer loans, and other unsecured consumer loans.

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, which 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).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, 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 conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties 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 percent 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 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): 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 or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Non-MSA	20	2,112	100.0	2,506	0.0	0.0	0.0	14.3	15.0	21.7	85.7	85.0	78.3	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	2,112	100.0	2,506	0.0	0.0	0.0	14.3	15.0	21.7	85.7	85.0	78.3	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Non-MSA	20	2,510	100.0	1,655	0.0	0.0	0.0	16.8	30.0	19.9	83.2	70.0	80.1	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	2,510	100.0	1,655	0.0	0.0	0.0	16.8	30.0	19.9	83.2	70.0	80.1	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-21
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA	20	2,112	0.0	2,506	19.8	20.0	8.4	20.9	30.0	19.8	24.4	20.0	22.3	34.8	30.0	29.2	0.0	0.0	20.3
Total	20	2,112	0.0	2,506	19.8	20.0	8.4	20.9	30.0	19.8	24.4	20.0	22.3	34.8	30.0	29.2	0.0	0.0	20.3

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Non-MSA	20	2,510	0.0	1,655	20.3	20.0	14.3	22.2	45.0	24.2	21.3	20.0	23.0	36.3	15.0	24.2	0.0	0.0	14.3
Total	20	2,510	0.0	1,655	20.3	20.0	14.3	22.2	45.0	24.2	21.3	20.0	23.0	36.3	15.0	24.2	0.0	0.0	14.3

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-21
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA	22	1,949	100.0	1,020	0.0	0.0	0.0	23.9	31.8	16.7	76.1	68.2	83.3	0.0	0.0	0.0	0.0	0.0	0.0
Total	22	1,949	100.0	1,082	0.0	0.0	0.0	23.9	31.8	16.7	76.1	68.2	83.3	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA	20	2,137	100.0	--	0.0	0.0	--	24.8	25.0	--	75.2	70.0	--	0.0	5.0	--	0.0	0.0	--
Total	20	2,137	100.0	--	0.0	0.0	--	24.8	25.0	--	75.2	70.0	--	0.0	5.0	--	0.0	0.0	--

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-21
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA	22	1,949	100.0	1,020	84.2	77.3	48.3	3.8	22.7	12.0	--	
Total	22	1,949	100.0	1,020	84.2	77.3	48.3	3.8	22.7	12.0	--	

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Non-MSA	20	2,137	100.0	--	85.6	85.0	--	3.3	15.0	11.1	0.0	
Total	20	2,137	100.0	--	85.6	80.0	--	3.3	20.0	11.1	0.0	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2020-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Non-MSA	20	2,154	100.0	198	0.0	0.0	0.0	2.7	0.0	3.0	97.3	100.0	97.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	2,154	100.0	198	0.0	0.0	0.0	2.7	0.0	3.0	97.3	100.0	97.0	0.0	0.0	0.0	0.0	0.0	0.0	

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																				2022
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Non-MSA	20	2,371	100.0	--	0.0	0.0	--	9.0	10.0	--	91.0	90.0	--	0.0	0.0	--	0.0	0.0	--	
Total	20	2,371	100.0	--	0.0	0.0	--	9.0	10.0	--	91.0	90.0	--	0.0	0.0	--	0.0	0.0	--	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Non-MSA	20	2,154	100.0	198	97.1	90.0	43.4	2.0	10.0	0.9	0.0
Total	20	2,154	100.0	198	97.1	90.0	43.4	2.0	10.0	0.9	0.0

Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Non-MSA	20	2,371	100.0	--	97.7	95.0	--	1.6	5.0	0.7	--
Total	20	2,371	100.0	--	97.7	95.0	--	1.6	5.0	0.7	--

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

