



## **PUBLIC DISCLOSURE**

October 2, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Douglas National Bank  
Charter Number: 24249

211 East Ward Street  
Douglas, Georgia 31533

Office of the Comptroller of the Currency

4042 Park Oaks Blvd  
Suite 240  
Tampa, FL 33610

**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 major factors that support this rating include:

- Considering the bank's size, financial condition, and credit needs of the assessment area, the bank's net loan-to-deposit ratio is more than reasonable.
- A majority of the bank's loans are inside its Assessment Area (AA).
- The distribution of the bank's small business loan originations across geographies of different income levels and to businesses of different sizes is excellent.
- The bank's level of PPP loans to small businesses in its assessment area during the COVID-19 pandemic is substantial.
- The distribution of loans by borrower income level is reasonable.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is more than reasonable.

Douglas National Bank (Douglas NB) quarterly average loan-to-deposit ratio for the 12 quarters since the preceding evaluation is 81.37 percent, which exceeds the 74.27 percent of similarly situated banks in the assessment area. The quarterly average high net loan-to-deposit ratios for the similarly situated banks was 82.10 percent and the average low was 63.35 percent. This peer banks offers similar lending and deposit products.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment area.

The bank originated and/or purchased 83 percent of its total loans inside the bank's AAs during the evaluation period. 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.

Table D - 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		
	#	%	#	%		\$	%	\$	%	
	Small Business	83	83	17		17	100	2,538,013	88	
<b>Total</b>	83	83	17	17	100	2,538,013	88	340,327	12	2,878,340

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

This analysis factored favorably into the overall analysis of the geographic distribution of lending by income level of the borrower.

## Description of Institution

Douglas National Bank is a single-state institution established in 2001 headquartered in Douglas, Georgia. The bank is wholly owned subsidiary of DNB Financial Services Inc., a one-bank holding company located in Douglas, Georgia. Since inception, the bank has operated out of one office in Douglas, Coffee County. Douglas National Bank has delineated Coffee County as its AA in its entirety, which consists of nine census tracts. The assessment area meets the requirements of CRA and does not arbitrarily exclude low- and moderate-income geographies.

Douglas National Bank offers traditional full-service banking products, including automated teller machine access and drive-up facility at the bank's office. A specialty deposit product is a senior checking account that requires a \$100 minimum deposit to open and limited monthly maintenance fees. The bank offers investment advisory services through a third-party relationship with a financial services company. The bank's alternative delivery systems include online and mobile banking with bill-pay and mobile banking. Customers are provided real-time access to accounts and with bill-pay services using a smart phone or other similar devices. The bank also offers merchant and cash management services to businesses.

Douglas National Bank offers a variety of consumer loans including personal lines of credit, Home Equity Lines of Credit and variable-rate, fixed-rate, and balloon home mortgage loans.

Douglas National Bank offers an array of business loan products and is a qualified U.S. Small Business Administration (SBA) lender, which allows the bank to address the lending needs of small businesses throughout the bank's assessment area. During the evaluation period, the bank originated 712 SBA loans with proceeds of \$26 million in the assessment area.

As of December 31, 2021, Douglas National Bank reported total assets of \$257.3 million with net loans accounting for \$146.8 million or 57 percent of total assets. The bank's lending strategy is focused on commercial lending, representing 51.8 percent of bank reported net loans by volume. The remaining loan portfolio is comprised of farm loans and loans secured by farmland representing 16.4 percent of the total loan portfolio and 1-4 home mortgage and consumer loans representing 32.5 percent.

On March 20, 2020, the World Health Organization declared COVID-19 a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place order, a significant number of businesses deemed non-essential were shut down or limited in operations. During COVID-19, Douglas participated in initiatives to address economic hardships associated with the pandemic. Douglas participated in the SBA's Paycheck Protection Program (PPP), which is an SBA-backed loan that helped businesses keep their workforce employed during the pandemic. Between 2020-2021, Douglas originated 596 PPP loans with proceeds of \$12.5 million. This lending is a positive contributing factor in the overall lending test assessment.

There are no financial or legal obstacles affecting Douglas National Bank's ability to meet its community credit needs. The last Community Reinvestment Act (CRA) evaluation of Douglas National Bank was completed in May 2019 when the bank received an "Outstanding" rating.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

This Performance Evaluation (PE) assesses Douglas National Bank's record of meeting the credit needs of the community in which it operates. We evaluated the bank using the Community Reinvestment Act Small Bank examination procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of its assessment area through its lending activities.

The evaluation period includes the three-year period of January 1, 2019, to December 31, 2021. Douglas National Bank's primary loan product during the evaluation period was small business lending which reflects the lending strategy for the past three years. Due to the volume of business lending, in relation to home mortgage, farm, and consumer lending, our evaluation of the bank's lending performance focused on small business lending.

### **Selection of Areas for Full-Scope Review**

The bank's sole AA was selected for a full-scope review.

### **Ratings**

The bank's overall rating is based entirely on the lending performance in the state of Georgia.

## **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 as part of the institution's lending 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 Georgia

**CRA rating for the state of Georgia<sup>1</sup>:** Outstanding.

**The Lending Test is rated:** Outstanding.

The major factors that support this rating include:

- An excellent geographic distribution of small business loans in the AA.
- An excellent distribution of small loans to small businesses in the AA
- The bank's level of PPP loans to small businesses in its assessment area during the COVID-19 pandemic is substantial.

### Description of Institution's Operations in Coffee County, GA

Douglas National Bank's primary loan product during the evaluation period was business lending which is reflective of the business strategy for the past three years. Over the review period, Douglas National Bank originated a total of 2,289 loans, The majority of loans were small business loans (63.98 percent of total dollar volume or 65.27 percent in total number). Other lending products included farm loans representing 16.47 percent in dollar and 13.67 percent in number of total originations and 1-4 family and other consumer loans representing 19.55 percent and 21.05 percent of total dollar and number of originations respectively.

Based on the FDIC Deposit Market Share Report dated June 30, 2022, Douglas National Bank has the highest market share with 23.4 percent deposit market share in Coffee County. Of the other eight competitor banks in the county, three have a market share higher than 10 percent, First National Bank of Coffee County (19.8 percent), Ameris Bank (18.4 percent), and Colony Bank (13.2 percent).

In 2021, based on the 2010 Census, there are no low-income census tracts in Coffee County. There was one moderate- and seven middle-income census tracts with the remaining tract being upper income. All seven middle-income tracts were designated as distressed nonmetropolitan geographies by the banking agencies due to the economic conditions in Coffee County specifically, the percentage of families with income below the poverty level.

Based on 2021 Dun & Bradstreet business demographic data and 2015 ACS Census, there were 3,816 or 93.9 percent of small non-farm businesses (revenues less than \$1 million) in the assessment area of which 2,789 or 83.2 percent of small businesses were located in distressed middle-income tracts and 11.2 percent or 404 located in upper-income tracts.

As of December 31, 2021, unemployment in Coffee County is 3.0 percent, slightly higher than the State of Georgia of 2.9 percent, but lower than the national rate of 3.9 percent. Per various city and county

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<sup>1</sup> This rating reflects performance within the MMSA. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

sources, the economic outlook is positive. Coffee County's economy is driven by a diverse base of industries including healthcare, retail trade, educational services, agriculture, and manufacturing. The county is one of the largest concentrations of cargo trailer manufacturers in the United States and home to Premium Peanut, the largest peanut shelling operation in the world. In addition, Coffee County is conveniently situated between four interstates, and proximity to the Savannah, Jacksonville, and Brunswick ports allows for global importing/exporting. The U.S. Bureau of Economic Analysis indicates that Coffee County has seen steady gross domestic product growth from \$1 billion in 2010 to \$1.7 billion in 2021.

During a CRA evaluation, it is customary for examiners to contact various persons and organizations within the institution's assessment area to gain insight regarding local economic conditions and credit needs. As part of this evaluation, the OCC completed community contacts with four organizations working in the AA, one affordable housing organization, one local government and two economic development organizations. The contacts reported needs such as investment in infrastructure, including sewers. Additional needs are down payment and closing costs assistance for affordable homeownership. The most critical credit needs in the area are funding for affordable housing, and access to capital for new entrepreneurs and small businesses.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Coffee County, Georgia 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	9	0.0	11.1	77.8	11.1	0.0
Population by Geography	43,003	0.0	14.2	72.6	13.1	0.0
Housing Units by Geography	16,974	0.0	8.5	78.2	13.3	0.0
Owner-Occupied Units by Geography	9,553	0.0	8.6	73.7	17.8	0.0
Occupied Rental Units by Geography	4,768	0.0	5.1	88.9	6.0	0.0
Vacant Units by Geography	2,653	0.0	14.5	75.1	10.4	0.0
Businesses by Geography	3,816	0.0	5.6	83.2	11.2	0.0
Farms by Geography	246	0.0	10.2	65.9	24.0	0.0
Family Distribution by Income Level	9,422	22.1	18.6	21.7	37.6	0.0
Household Distribution by Income Level	14,321	27.2	16.5	18.6	37.7	0.0
Median Family Income Non-MSAs - GA		\$45,886	Median Housing Value			\$85,950
			Median Gross Rent			\$559
			Families Below Poverty Level			17.9%

*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.*

## Scope of Evaluation in the state of Georgia

The rating for the state of Georgia is based on a full-scope review of the performance in Coffee County AA.

Small business lending was the primary loan product for the evaluation period and reflects the lending strategy for the past three years representing 63.98 percent or \$150.8 million in dollar volume. As such,



our evaluation of the bank's lending performance focused on small business lending rather than home mortgage, farm, and consumer lending. As part of our geographic and income distribution analysis, we used a sample of 100 business loans originated in the assessment area during the evaluation period. We also considered the number of PPP loans made during the COVID-19 Pandemic.

## **LENDING TEST**

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

Based on a full-scope review, the bank's performance in Coffee County AA is excellent.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the state.

#### ***Small Loans to Businesses***

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

For 2019-2021, there were no low-income geographies in the AA. The distribution of loans to small businesses in moderate-income geographies exceeds both the percentage of businesses and the aggregate lending data. The distribution of loans to small businesses in middle-income geographies is somewhat lower than the percentage of small businesses and the aggregate lending data.

Seven of the nine geographies in the AA for 2019-2021 are designated distressed middle-income geographies, which reflects the high levels of poverty in the middle-income geographies of the AA

#### ***Lending Gap Analysis***

We performed a lending gap analysis that included an analysis of the bank's assessment area map and distribution of lending based on our sample of 100 business loans. We did not identify any unexplained conspicuous gaps in the bank's assessment area.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank.

#### ***Small Loans to Businesses***

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

Based on the data in Table R, and performance context considerations described in the Description of the Institution section, we concluded the bank's lending to businesses of different sizes reflects reasonable distribution.

The distribution of loans to small businesses with revenues of less than or equal to \$1 million was somewhat lower than the percentage of businesses but exceeded the aggregate lending data.

### **Responses to Complaints**

There were no complaints related to Douglas National Bank's CRA performance during the evaluation period.

# Appendix A: Scope of Examination

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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 MSAs and non-MSAs 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”.

<b>Time Period Reviewed:</b>	1/1/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Small Business Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Georgia</b>		
Coffee County	Full-Scope	Coffee County

## Appendix B: Summary of State Ratings

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RATINGS	DOUGLAS NATIONAL BANK
Overall Bank:	Lending Test Rating
DOUGLAS NATIONAL BANK	Outstanding
State:	
GEORGIA	Outstanding

## Appendix C: Definitions and Common Abbreviations

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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.

**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.

**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.

**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.

**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.

**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.

**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

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### 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 30<sup>th</sup> 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 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.



Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
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	
Coffee County	83	\$2,538,013	100	923	0.0	0.0	0.0	5.6	7.2	5.9	83.2	77.1	80.2	11.2	15.6	14.0	0.0	--	0.0	
<b>Total</b>	<b>83</b>	<b>\$2,538,013</b>	<b>100</b>	<b>923</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.6</b>	<b>7.2</b>	<b>5.9</b>	<b>83.2</b>	<b>77.1</b>	<b>80.2</b>	<b>11.2</b>	<b>15.6</b>	<b>14.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-21</b>	
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	
Coffee County	1,868	194,582,368	81.6	923	88.8	71.7	39.9	3.1	28.3	8.2	0	
<b>Total</b>	<b>1,868</b>	<b>194,582,368</b>	<b>81.6</b>	<b>923</b>	<b>88.8</b>	<b>71.7</b>	<b>39.9</b>	<b>3.1</b>	<b>28.3</b>	<b>8.2</b>	<b>0</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.