



PUBLIC DISCLOSURE

June 27, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank & Trust Company of McAlester
Charter Number 5052

235 East Choctaw
McAlester, Oklahoma

Office of the Comptroller of the Currency

8282 S. Memorial Drive, Suite 300
Tulsa, Oklahoma

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 (CD) test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of loans were originated or purchased inside the bank's assessment area (AA).
- The bank exhibits excellent geographic distribution of loans.
- The bank exhibits excellent distribution of loans to individuals of different income levels.
- The Lending Test rating is based on the single full-scope AA in the state of Oklahoma.
- The CD test rating is based on the one non-metropolitan statistical area (MSA) AA in the state of Oklahoma.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD is reasonable.

The quarterly LTD ratio since the previous Community Reinvestment Act (CRA) performance evaluation (PE) averaged 62.4 percent. First National Bank & Trust Company of McAlester's (FNBM) LTD ratio had an average high ratio of 66.1 percent in fourth quarter 2018. We compared the bank's LTD ratio to three similarly situated banks (peer group banks) located in McAlester, Antlers, and Poteau, Oklahoma ranging in total asset sizes of \$329 million to \$576 million. The peer group bank's average LTD ratio was 73.4 percent with a high average ratio of 82.2 percent and a low average ratio of 58.0 percent.

Lending in Assessment Area

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

The bank originated or purchased 87 percent of its total loans inside the AA 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		
	#	%	#	%		\$	%	\$	%	
Home Mortgage Loans	20	87	3	13	23	\$2,256	88.2	\$302	11.8	\$2,558
Commercial Loans	20	87	3	13	23	\$2,099	92.6	\$167	7.4	\$2,266
Total	40	87	6	13	46	\$4,355	90.3	\$469	9.7	\$4,824

Description of Institution

FNBM is a \$568 million rural community bank, headquartered in McAlester, Oklahoma. As of December 31, 2021, FNBM had loans of \$324 million, or 57 percent of total assets. FNBM is a single-state institution with the main bank facility located in downtown McAlester, Oklahoma. FNBM is a subsidiary of First of McAlester Corporation, a single bank holding company headquartered at the main bank address. FNBM operates a non-profit subsidiary Community Development Corporation named First National Development Corporation.

The bank has one rating area located in the state of Oklahoma, with one AA comprising all of Pittsburg, Latimer, and LeFlore Counties. The bank operates six branches within its AA. The main McAlester branch, the Second Street drive-in, and the Parkway drive-in are located in McAlester, Oklahoma, and the Hartshorne branch is located in Hartshorne, Oklahoma. In September 2020, FNBM established a loan production office (LPO) in Poteau, Oklahoma which is in LeFlore County. In December 2021, the OCC approved FNBM to establish a Poteau branch location (the previous LPO) at 824 S. Broadway, Poteau, Oklahoma. The Poteau branch opened on February 1, 2022. The bank acquired Wilburton State Bank in November 2016, which added two additional branches in Wilburton, Oklahoma and expanded its AA to include Latimer County. The Wilburton branch location at 123 E. Main closed on May 25, 2021. The Wilburton main branch is located at 741 Highway 2 North. The bank offers reasonable branch hours Monday through Friday, with additional hours offered on Saturday at three locations throughout their footprint.

The bank also operates six automated teller machines (ATMs). The main bank, the Parkway drive-in, the Hartshorne branch, and the Wilburton Highway 2 North branch each have an ATM onsite. There is also one stand-alone ATM on South Highway 69 and one at the Pruett's Foods in McAlester, Oklahoma.

The bank's primary focus is commercial lending, although it offers a variety of loan and deposit products to meet the needs of the community. As of December 31, 2021, tier 1 capital was approximately \$60 million, and loans totaled \$328 million or 58 percent of total assets. The loan portfolio included 60 percent commercial loans, 14 percent residential real estate loans, 6 percent agriculture/farm loans, 8 percent construction and land development loans, 4 percent consumer loans, and 7 percent other loans. Service fees are consistent across all locations. The bank also offers electronic banking services which includes telephone banking, internet/online banking, and mobile banking.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. A CRA PE was last prepared as of May 13, 2019, and the bank received an overall rating of "Satisfactory."

Scope of the Evaluation

FNBM's AA includes the full counties of Pittsburg, Latimer, and LeFlore. FNBM serves Pittsburg County through the main banking location and branch locations in McAlester, Oklahoma and its branch location in Hartshorne, Oklahoma. The bank serves Latimer County through its branch location in Wilburton, Oklahoma and serves LeFlore County through its branch in Poteau, Oklahoma. FNBM's AA received a full-scope review. There are no limited scope review areas.

Evaluation Period/Products Evaluated

We completed a full-scope review of FNBM's CRA activities in its AA under the Intermediate Small Bank CRA procedures, which includes the Lending Test and the CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AA through qualified CD loans, investments and donations, and services.

Conclusions regarding the Lending Test are based on samples of small business and residential real estate loans originated from the date of the previous PE, May 13, 2019, through December 31, 2021. Conclusions regarding the CD Test are based on the bank's CD activities during the same period.

Selection of Areas for Full-Scope Review

For purposes of this evaluation, 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 the 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

The bank's overall rating is based on performance in the AA. As of December 31, 2021, small loans to businesses represented 60.3 percent of total bank loans. For the Lending Test, we analyzed both home mortgage loans and small loans to businesses. We placed greater weight on small loans to businesses based on the percentage of loan activities, which is consistent with FNBM's lending strategy.

FNBM has only one AA in one state. Ratings are based solely on the results of this AA.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under the state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 Bureau of Consumer Financial Protection, 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 PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution throughout the AA.
- The distribution of loans to individuals of different income levels is excellent.
- The bank's performance under the CD Test in the state of Oklahoma AA is rated Satisfactory.

Description of Institution's Operations in Oklahoma

FNBM has one AA in the state of Oklahoma, which meets the requirements of the regulation, and does not arbitrarily exclude low- and moderate-income (LMI) geographies. The AA includes all of Pittsburg, Latimer, and LeFlore Counties. The AA consists of 28 census tracts (CTs), including 13 in Pittsburg County, three in Latimer County, and 12 in LeFlore County. Within the AA, there are five moderate-income CTs, 20 middle-income CTs, and three upper-income CTs. There are no CTs designated as low-income in the AA.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the 2015 U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2020 Dunn and Bradstreet (D&B) small business demographic data; 2020 peer mortgage loan data reported under Home Mortgage Disclosure Act; and 2020 peer small business data reported under CRA.

In evaluating the geographic distribution and borrower income criteria under the Lending Test, the 2019 through 2021 loan data was analyzed and aggregated. Performance Tables O, P, Q, and R in Appendix D include data covered by the analysis period 2019 through 2021. FNBM currently has six locations within its AA. Four locations are in Pittsburgh County, one location is in Latimer County, and one location is in LeFlore County.

The level of banking competition in the bank’s market area is strong. Banking offices in their market area total 13 and include several commercial state-chartered banks and branches of non-local banks. The AA includes several entities including finance companies, credit unions, and payday lenders that are also competing for various bank services.

Table A – Demographic Information of the Assessment Area 2019-2021						
Assessment Area: Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	0.0	17.9	71.4	10.7	0.0
Population by Geography	105,634	0.0	16.0	74.2	9.8	0.0
Housing Units by Geography	49,476	0.0	14.4	77.3	8.3	0.0
Owner-Occupied Units by Geography	29,254	0.0	14.1	77.0	8.9	0.0
Occupied Rental Units by Geography	11,132	0.0	16.7	74.2	9.1	0.0
Vacant Units by Geography	9,090	0.0	12.5	82.3	5.2	0.0
Businesses by Geography	5,845	0.0	10.1	76.9	13.0	0.0
Farms by Geography	317	0.0	10.7	83.3	6.0	0.0
Family Distribution by Income Level	27,539	22.0	17.9	19.4	40.7	0.0
Household Distribution by Income Level	40,386	26.0	15.7	16.9	41.4	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$88,669
			Median Gross Rent			\$605
			Families Below Poverty Level			15.5%
<i>Source: 2015 ACS and 2020 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>						

Pittsburg County is located in Southeastern Oklahoma. Its county seat is the city of McAlester. Other major cities within the county include Haileyville, Hartshorne, and Krebs, Oklahoma. The McAlester main bank, two drive-thru facilities, and the full-service Hartshorne branch are located in Pittsburg County. Approximately 90 percent of the bank’s deposits are attributed to Pittsburg County, and the bank holds 40 percent of the deposit market share in this county. Pittsburg County consists of two moderate income CTs (15 percent), eight middle-income CTs (62 percent), and three-upper-income CTs (23 percent). The McAlester main bank is located in an upper-income CT, two drive-thru facilities and the Hartshorne branch are located in middle-income CTs.

The largest industries of Pittsburg County are health care and social assistance, public administration, retail trade, and manufacturing. Many large and medium-sized companies operate in McAlester, Oklahoma. Top major employers include the McAlester Army Ammunition Plant, McAlester Regional Health Center, McAlester Public Schools, Oklahoma State Penitentiary, and county and city employment. As of December 2021, the unemployment rate for Pittsburg County was 2.8 percent. This level is consistent with the state unemployment rate of 2.8 percent and below the national rate of 3.9 percent as of December 2021.

Latimer County is also located in Southeastern Oklahoma and its county seat is Wilburton, Oklahoma. Nearby towns include Fanshawe and Red Oak, Oklahoma. Bank locations include the full-service Wilburton branch and drive-thru facility. Approximately 10 percent of the bank's deposits are attributed to the Latimer County locations. In addition, the bank's deposit market share within Latimer County is 28 percent. Latimer County consists of three middle-income CTs. Both banking facilities are located in the same middle-income CT. The largest industries of Latimer County are health care and social assistance, educational services, and retail trade. Major employers within the county include Choctaw Nation Hospital, Franklin Electric Company, and Eastern Oklahoma State College. As of December 2021, the unemployment rate for Latimer County was 3.9 percent. The level is above the state unemployment rate of 2.8 percent and consistent with the national rate of 3.9 percent as of December 2021.

LeFlore County is located on the Southeastern border of the state. Its county seat is Poteau, Oklahoma. The previously established LPO now functions as the bank's Poteau branch location. In 2021, the largest industries in LeFlore County are government, retail trade, and health care and social assistance. Eastern Oklahoma Medical Center is a major employer and has served the needs of LeFlore and the surrounding counties for over 60 years. As of December 2021, the unemployment rate for LeFlore County was 2.4 percent. The level is below both the state and national unemployment rates of 2.8 percent and 3.9 percent, respectively.

The table above summarize the demographic characteristics of the combined counties that make up the AA. The table shows the demographic characteristics of the AA according to the 2015 ACS and 2020 D&B data. Comparison of the two census periods indicates no significant change in the level of population and number of businesses. Median housing values decreased by 5.4 percent. The percentages of families below the poverty level increased from 14 percent to 15.5 percent.

The OCC relied on community contacts within the AA to gain a better understanding of the general community credit and development needs, as well as local economic conditions. The community contact stated that the driving forces in the community are community groups. The contact stated that an Indian Nation organization is developing housing with some units focused on LMI and elderly individuals. Health care facilities and jobs were considered the most pressing concerns in the area. According to the contact, the area has plenty of financial services available. Individuals in the area typically use government and conventional products when purchasing a home. Local institutions were noted as being proactive in developing relationships and offering assistance. Furthermore, the contact indicated local lenders are willing to work with first time home buyers and there has been no evidence of discrimination. The contact stated that local financial institutions in the area are meeting the banking needs of the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OKLAHOMA

LENDING TEST

The bank's performance under the Lending Test in the state of Oklahoma is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

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

Distribution of Loans by Income Level of the Geography

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

There are no low-income CTs in the AA. The bank's performance is based on its lending in the moderate-income CTs.

Home Mortgage Loans

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

The geographic distribution of home mortgage reflects excellent distribution.

For 2019-2021, the percentage of bank loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution in those CTs.

Small Loans to Businesses

Refer to Table Q in the state of Oklahoma 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.

The geographic distribution of small business loans to businesses reflects excellent distribution. For moderate-income geographies, the bank's lending exceeds both the percent of small businesses located in moderate-income geographies and the aggregate lending to small businesses in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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

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

During the evaluation period the distribution of home mortgage loans to low-moderate income families is reasonable.

The distribution of home mortgage loans by the income level of low-income borrowers in the AA is very poor. During the evaluation period, FNBM did not originate any home mortgage loans to low-income borrowers compared to the 22 percent of low-income families and the 4.3 percent aggregate bank peer performance.

The distribution of home mortgage loans to moderate-income borrowers is excellent. The percentage of bank loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate distribution of loans to those families.

Small Loans to Businesses

Refer to Table R in the state of Oklahoma 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.

During the evaluation period, the bank's distribution of small loans to businesses by revenue is excellent. The bank's percentage of loans to small businesses with revenues less than \$1MM was near to the proportion of small businesses and exceeded the aggregate distribution of loans to those businesses.

Responses to Complaints

FNBM received no CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Oklahoma AA is rated Satisfactory.

Based on a full scope the review, the bank exhibits adequate responsiveness to CD needs in the AA through qualified investments and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

There were no community development loans made during the evaluation period.

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)
Tulsa AA	0	0	11	32	11	100	32	100	0	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.

The bank's level of qualified investments and donations demonstrates adequate responsiveness to the needs of its AA. Our evaluation period for CD activities was May 13, 2019 through December 31, 2021.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investments, including prior period investments that remain outstanding as of the examination date.

Qualified Investments

During the evaluation period, there were 11 current period donations and no prior period investments. Current period donations totaling \$32 thousand consist of nine qualifying community services totaling \$21 thousand and two activities that revitalize or stabilize LMI geographies totaling \$11 thousand. During the evaluation period, the bank did not make use of innovative or complex investments. The donations made to CD-qualified organizations support affordable housing and community services activities in the bank's AA.

Described below are some of the most significant qualified investments:

- Donations totaling \$5,500 to an organization that partners with organizations that provide critical home repairs to LMI individuals and a shelter that assist women and their children with homelessness.
- Donations totaling \$8,600 to an organization that is part of a revitalization plan for historic commercial districts focusing on economic restricting activities to recruit new businesses.
- Donations totaling \$7,500 to a women's organization that provided free mammograms, diagnostic procedures, and surgical services to men and women with limited financial resources and no health insurance.

Extent to Which the Bank Provides Community Development Services

FNBM exhibited an adequate responsiveness to CD needs. One executive and three senior level bank employees provided 268 hours of service, as board or committee members, for two organizations benefitting LMI individuals, youths, families, and communities. Services included health care to LMI individuals. One organization provides eyeglasses to individuals with limited financial means and the other organization is a health care facility geared to LMI individuals.

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 MSA(s) and non-MSA(s) 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:	5/13/2019 to 12/31/2021	
Bank Products Reviewed:	Home Mortgage loans and Small Business loans Community Development loans, Qualified Investments and Donations and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Oklahoma		
FNBM Non-MSA AA	Full -Scope	Counties of Pittsburg, Latimer, and LeFlore

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank of McAlester			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
First National Bank of McAlester	Outstanding	Satisfactory	Outstanding
State:			
Oklahoma	Outstanding	Satisfactory	Outstanding

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2019-2021

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	\$2,256	100	2,415	0.0	0.00	0.0	14.1	20.0	11.1	77.0	60	74.1	8.9	20	14.8	0.0	--	0.0
Total	20	\$2,256	100	2,415	0.0	0.00	0.0	14.1	20.0	11.1	77.0	60	74.1	8.9	20	14.8	0.0	--	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/21/2021 Bank Data, 2020 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 2019-2021

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% 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	\$2,256	100	2,415	22.0	0.0	4.3	17.9	30.0	13.1	19.4	35	17.6	40.7	35	40.7	0.0	--	24.3
Total	20	\$2,256	100	2,415	22.0	0.0	4.3	17.9	30.0	13.1	19.4	35	17.6	40.7	35	40.7	0.0	--	24.3

Source: 2015 ACS Census; 01/01/2019 - 12/21/2021 Bank Data, 2020 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 2019-2021

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	\$2,099	100	1,335	0.0	0.00	0.0	10.1	25.0	8.2	76.9	55	78.1	13.0	20	13.7	0.0	--	0.0
Total	20	\$2,099	100	1,335	0.0	0.00	0.0	10.1	25.0	8.2	76.9	55	78.1	13.0	20	13.7	0.0	--	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/21/2021 Bank Data; 2020 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 2019-2021

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	23	\$2,266	100	1,335	80.5	75.0	38.2	4.6	25	14.9	--
Total	23	\$2,266	100	1,335	80.5	75.0	38.2	4.6	25	14.9	--

Source: 2020 D&B Data; 01/01/2019 - 12/21/2021 Bank Data; 2020 CRA Aggregate Data "--" data not available.
 Due to rounding, totals may not equal 100.0%