



## **PUBLIC DISCLOSURE**

July 24, 2017

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

First National Bank of Chadron  
Charter Number 14637

202 Main Street  
Chadron, NE 69337

Office of the Comptroller of the Currency

1225 17th Street  
Suite 450  
Denver, CO 80202-5534

**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 is Satisfactory.**

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

First National Bank of Chadron (FNBC) satisfactorily meets the credit needs of its assessment area (AA). This rating is based on the bank's performance with regard to farm loans.

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the AA credit needs.
- FNBC originated a majority of its loans within its delineated AA.
- The borrower distribution of loans reflects a reasonable penetration of loans to farms with revenues of one million dollars or less in the bank's AA.
- The bank's geographic distribution of farm loans is excellent.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancing, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

## Description of Institution

First National Bank of Chadron (FNBC) is a \$122 million intrastate financial institution headquartered in Chadron, Nebraska. Chadron is located in the northwest corner of Nebraska, approximately 100 miles south of Rapid City, South Dakota. The main office is located in downtown Chadron. The bank operates one additional branch in Ainsworth, Nebraska, which is approximately 185 miles east of Chadron. Additionally, FNBC has two deposit-taking ATM machines; one located in Chadron, the other in Ainsworth.

FNBC is 100 percent owned by C.S.B. Company, a two-bank holding company located in Cozad, Nebraska. FNBC offers insurance, annuity, and retail non-deposit investment products through its financial subsidiary, First National Financial Services, Inc.

The bank has not opened or closed any offices since the prior CRA examination.

FNBC offers a variety of credit products. The primary product by dollar volume is farm loans, which includes farmland real estate loans. Our rating of the bank's CRA performance is based on an analysis of this loan product. Table 1 below reflects the loan portfolio composition as of June 23, 2017. Net loans represented 57.41 percent of total assets, as of March 31, 2017.

| <b>Table 1 – Loan Portfolio Composition</b> |                                      |                                  |
|---|--------------------------------------|----------------------------------|
| <b>Loan Category</b>                        | <b>In Dollars<br/>(in thousands)</b> | <b>Percent of Loan Portfolio</b> |
| Farm  | \$ 67,437                            | 84%                              |
| Commercial and Industrial                   | \$ 9,244                             | 11%                              |
| Non-Farm Non-Residential                    | \$ 2,533                             | 3%                               |
| Consumer                                    | \$ 1,397                             | 2%                               |

There are no legal or financial factors that impede the bank's ability to help meet the credit needs in its AA.

FNBC received a "Satisfactory" rating at the last CRA examination dated April 8, 2013. Please refer to the bank's CRA Public File for additional information.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We performed a full-scope review of the bank's CRA performance using the lending test criteria for small bank examinations.

The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The bank's AA includes five rural counties in Nebraska.



To determine the bank's primary loan products, we analyzed both the number and dollar amount of loans originated and purchased from 2015 through 2017. Based on this analysis, we identified farm loans, including operating and farmland real estate loans, as the bank's primary loan product in the bank's AA.

To evaluate lending performance, we sampled 24 farm loans originated from January 1, 2015 through June 23, 2017. The bank's lending during this review period is representative of the bank's lending strategy since the last CRA examination.

We also contacted a community representative in the AA to gather information on the local economy and general banking needs. Please refer to Appendix B: Community Profiles for Full-Scope Areas for information.

### **Data Integrity**

FNBC is not a Home Mortgage Disclosure Act reporting institution; therefore, a data integrity examination was not necessary.

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

The bank has designated two rural AAs in Nebraska. The Chadron AA consists of two counties in northwest Nebraska. The Ainsworth AA consists of three counties in north-central Nebraska. The AAs meet the requirements of the regulation. They are comprised of whole political subdivisions and do not arbitrarily exclude any low- or moderate-income areas. Due to the similar demographic composition of the two AAs, we combined them to evaluate the bank's CRA lending performance for borrower distribution and geographic analysis. Please refer to Appendix B for more information.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §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 assessment area 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 has engaged in discriminatory or other illegal credit practices.

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

#### Loan-to-Deposit Ratio

FNBC's loan-to-deposit (LTD) ratio is reasonable given area competition and credit needs of the community. The bank's quarterly average LTD ratio since the previous CRA examination is 74 percent. FNBC ranks fourth among a total of six similarly situated banks serving its AA. The other five banks had quarterly average LTD ratios ranging from 55 percent to 82 percent, with an average of 71 percent. Similarly situated banks are banks of comparable asset size with similar business lines operating in the same geographies.

#### Lending in Assessment Area

FNBC originates a majority of its farm loans inside the AA. For the loans sampled, the bank originated 80 percent by number and 63 percent by dollar volume within its AA.

#### Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

FNBC's distribution of agricultural loans reflects a reasonable penetration in lending to small farms in the AA.

Table 2A shows the bank originated 90 percent by number and 40 percent by dollar volume of its loans to small farms in the Chadron/Ainsworth AA. We placed more weight on the number of loans, as Table 2B shows the majority of loans in our sample were less than one hundred thousand dollars in size.

| Farm Revenues               | ≤\$1,000,000 | >\$1,000,000 | Unavailable/<br>Unknown | Total |
|-----------------------------|--------------|--------------|-------------------------|-------|
| % of AA Farms               | 98.8%        | 0.7%         | 0.5%                    | 100%  |
| % of Bank Loans in AA by #  | 90%          | 10%          | 0%                      | 100%  |
| % of Bank Loans in AA by \$ | 40%          | 60%          | 0%                      | 100%  |

*Source: 2010 US Census; Dun and Bradstreet data as of June 2016; Loan sample.*

| Loan Size (000's)     | Number of<br>Loans | Percent of<br>Number | Dollar Volume of<br>Loans (000s) | Percent of Dollar<br>Volume |
|-----------------------|--------------------|----------------------|----------------------------------|-----------------------------|
| \$0 - \$100,000       | 15                 | 75%                  | \$441                            | 21%                         |
| \$100,001 - \$250,000 | 3                  | 15%                  | \$416                            | 20%                         |

|                       |   |    |       |     |
|-----------------------|---|----|-------|-----|
| \$250,001 - \$500,000 | 1 | 5% | \$362 | 17% |
| Over \$500,000        | 1 | 5% | \$900 | 42% |

Source: Loan sample.

### Geographic Distribution of Loans

FNBC's geographic distribution of farm loans reflects excellent dispersion throughout the geographies of different income levels.

Table 3 shows the percentage of farm loans by number originated in moderate-income areas of the Chadron/Ainsworth AA significantly exceeds the demographic comparator. The bank originated 30 percent of its farm loans in moderate-income CTs compared to only 9 percent of AA farms located in moderate-income tracts. As previously mentioned, there are no low-income CTs in the Chadron/Ainsworth AA.

| Census Tract<br>Income Level | Low              |                               | Moderate         |                               | Middle           |                               | Upper            |                               |
|------------------------------|------------------|-------------------------------|------------------|-------------------------------|------------------|-------------------------------|------------------|-------------------------------|
|                              | % of AA<br>Farms | % of<br>Number<br>of<br>Loans | % of AA<br>Farms | % of<br>Number<br>of<br>Loans | % of AA<br>Farms | % of<br>Number<br>of<br>Loans | % of AA<br>Farms | % of<br>Number<br>of<br>Loans |
| Farm Loans                   | 0%               | 0%                            | 9%               | 30%                           | 91%              | 70%                           | 0%               | 0%                            |

Source: 2010 US Census; Dun and Bradstreet data as of June 2016; Loan sample.

### Responses to Complaints

The bank has not received any CRA-related complaints during the evaluation period.

## 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").

|   |  |                          |
|---|--|--------------------------|
| <b>Time Period Reviewed</b>                             | Lending Test (excludes CD loans): (1/1/15 to 6/23/17)<br>Investment and Service Tests and<br>CD Loans: Not applicable for Small Bank |                          |
| <b>Financial Institution</b>                            | <b>Products Reviewed</b>   |                          |
| First National Bank of Chadron (FNBC)<br>Chadron, NE    | Farm Products  |                          |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>  | <b>Products Reviewed</b> |
| Not applicable  | Not applicable   | Not applicable           |
| <b>List of Assessment Areas and Type of Examination</b> |  |                          |
| <b>Assessment Area</b>                                  | <b>Type of Exam</b>  | <b>Other Information</b> |
| Nebraska<br>Chadron AA<br>Ainsworth AA                  | Full-scope<br>Full-scope   |                          |

# Appendix B: Community Profiles for Full-Scope Areas

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## Chadron Assessment Area

The Chadron AA consists of the two contiguous rural counties of Dawes and Sioux in northwest Nebraska. The AA contains three middle-income CTs; two are designated as underserved middle-income nonmetropolitan tracts and one is designated as a distressed middle-income nonmetropolitan tract. There are no low- or upper-income CTs in this AA.

The bank operates its main office in this AA. Competition for loans and deposits is considerable as there are five other financial institutions within the Chadron AA: First National Bank of Omaha; Sandhills State Bank; Farmers State Bank; Security First Bank; and Bank of the West. According to the FDIC Deposit Market Share Report dated June 30, 2016, FNBC has the largest deposit market share at 29.50 percent. Deposit market share percentages for the other five institutions range from four percent to twenty-four percent.

According to 2010 U.S. Census data, the total population for the Chadron AA is 10,493 individuals. The Weighted Average of FFIEC Updated MSA Median Family Income is \$60,500. There are 2,375 families residing in this AA, of which 39 percent are considered low- and moderate-income. Income designations are determined based on annual income as a percentage of the non-MSA median family income. The Chadron AA unemployment rate of 2.4 percent is lower than both the Nebraska state unemployment rate of 2.9 percent and the national unemployment rate of 4.4 percent, per the U.S. Bureau of Labor Statistics.

The AA is comprised primarily of small businesses. Census data reports 79 percent of farm and non-farm businesses have annual revenues of less than \$0.5 million and 77 percent of businesses employ 1 – 4 employees. The AA’s economy is comprised of services (42.04 percent), agriculture/forestry & fishing (19.76 percent), and retail trade (10.48 percent). The AA’s largest employers are Chadron State College, Wal-Mart, and Chadron Community Hospital.

| Demographic Information for Full-Scope Area: Chadron AA |        |            |                 |               |              |            |
|---|--------|------------|-----------------|---------------|--------------|------------|
| Demographic Characteristics                             | #      | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs)                        | 3      | 0%         | 0%              | 100%          | 0%           |            |
| Population by Geography                                 | 10,493 | 0%         | 0%              | 100%          | 0%           |            |
| Owner-Occupied Housing by Geography                     | 2,702  | 0%         | 0%              | 100%          | 0%           |            |
| Businesses by Geography                                 | 796    | 0%         | 0%              | 100%          | 0%           |            |

|   |        |                      |        |            |        |  |
|---|--------|----------------------|--------|------------|--------|--|
| Farms by Geography  | 196    | 0%                   | 0%     | 100%       | 0%     |  |
| Family Distribution by Income Level   | 2,375  | 20.34%               | 18.91% | 26.23%     | 34.53% |  |
| Distribution of Low- and Moderate-Income Families throughout AA Geographies | 932    | 0%                   | 0%     | 100%       | 0%     |  |
| Median Family Income  | 54,221 | Median Housing Value |        | = \$94,521 |        |  |
| FFIEC Adjusted Median Family Income for 2016                                | 60,500 | Unemployment Rate    |        | = 2.36%    |        |  |
| Households Below Poverty Level  | 22%    | (2010 US Census)     |        |            |        |  |

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, and 2016 FFIEC updated MFI.

### Ainsworth Assessment Area

The Ainsworth AA consists of the three contiguous rural counties of Brown, Rock, and Keya Paha in north central Nebraska. The AA contains one moderate-income CT and two middle-income CTs, which are designated as distressed and underserved middle-income nonmetropolitan tracts. There are no low- or upper-income CTs in this AA.

The bank operates its Ainsworth branch in this AA. Competition for loans and deposits is considerable as there are four other financial institutions within the Ainsworth AA: West Plains Bank; Sandhills State Bank; Union Bank and Trust; and Tri-County Bank. According to the FDIC Deposit Market Share Report dated June 30, 2016, West Plains Bank has the largest deposit market share at 39.35 percent, while FNBC has the third largest deposit market share at 16 percent.

According to 2010 U.S. Census data, the total population for the Ainsworth AA is 5,495 individuals. The Weighted Average of FFIEC Updated MSA Median Family Income is \$60,500. There are 1,448 families residing in this AA, of which 48 percent are considered low- and moderate-income. Income designations are determined based on annual income as a percentage of the non-MSA median family income. The Ainsworth AA unemployment rate of 0.78 percent is lower than both the Nebraska state unemployment rate of 2.9 percent and the national unemployment rate of 4.4 percent, per the U.S. Bureau of Labor Statistics.

The AA is comprised primarily of small businesses. Census data reports 80 percent of farm and non-farm businesses have annual revenues of less than \$0.5 million and 82 percent of businesses employ 1 – 4 employees. The AA's economy is comprised of services (32.31 percent), agriculture/forestry & fishing (27.26 percent), and retail trade (8.78 percent). The AA's largest employers are community hospitals and school districts.

We made one community contact with a local business organization in the Ainsworth AA during this examination. The organization promotes economic development through arranging events to attract businesses to the area. The contact reported many small business owners use standard business checking and savings accounts and lines of

credit to finance renovations. The contact indicated economic instability due to low population levels is a pressing concern in the area and presents challenges in developing and sustaining businesses.

| Demographic Information for Full-Scope Area: Ainsworth AA                   |        |                      |                    |                  |                 |               |
|---|--------|----------------------|--------------------|------------------|-----------------|---------------|
| Demographic Characteristics   | #      | Low<br>% of #        | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts/BNAs)  | 3      | 0%                   | 33.33%             | 66.67%           | 0%              |               |
| Population by Geography   | 5,495  | 0%                   | 15.00%             | 85.00%           | 0%              |               |
| Owner-Occupied Housing by Geography   | 1,839  | 0%                   | 15.77%             | 84.23%           | 0%              |               |
| Businesses by Geography   | 547    | 0%                   | 12.43%             | 87.57%           | 0%              |               |
| Farms by Geography  | 205    | 0%                   | 18.05%             | 81.95%           | 0%              |               |
| Family Distribution by Income Level   | 1,448  | 24.52%               | 23.76%             | 21.82%           | 29.90%          |               |
| Distribution of Low- and Moderate-Income Families throughout AA Geographies | 699    | 0%                   | 18.31%             | 81.69%           | 0%              |               |
| Median Family Income  | 54,221 | Median Housing Value |                    | = \$56,845       |                 |               |
| FFIEC Adjusted Median Family Income for 2016                                | 60,500 | Unemployment Rate    |                    | = 0.78%          |                 |               |
| Households Below Poverty Level  | 17%    | (2010 US Census)     |                    |                  |                 |               |

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census, and 2016 FFIEC updated MFI.