



## **PUBLIC DISCLOSURE**

February 19, 2019

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

The Citizens National Bank of Quitman  
Charter Number 14255

100 East Stevens Street  
Quitman, GA 31643-0270

Office of the Comptroller of the Currency

Three Ravinia Drive, Suite 1950,  
Atlanta, GA 30346

**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:** This lending institution is rated **Satisfactory**.

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

The Citizens National Bank of Quitman (CNB) has a satisfactory record of meeting community credit needs based on the following:

- *CNB's quarterly loan-to-deposit (LTD) ratio is reasonable.*
- *A majority of the bank's lending is inside its assessment area (AA).*
- *The overall geographic distribution of loans reflects reasonable dispersion in low- and moderate-income geographies.*
- *The distribution of loans to businesses and farms of different sizes is reasonable.*
- *The level of community development (CD) activities is satisfactory in relation to the bank's performance context, and reflects adequate responsiveness to AA needs.*

## 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 refinancings, 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**

The Citizens National Bank of Quitman is a single branch community bank located in Quitman, Brooks County, GA. The bank is not owned by a holding company. The bank operates a drive through facility and one automated teller machine (ATM), which does not accept deposits. The bank has one assessment area (AA), comprised of two counties which are part of the Valdosta Metropolitan Statistical Area (MSA). The bank is located in a middle-income geography within the AA. No branches were opened or closed during the review period. There have not been any significant changes to CNB's corporate structure, including merger or acquisition activities

CNB offers traditional lending products with an emphasis on farm and business loans. The bank offers indirect auto loans through established relationships with a variety of auto dealerships. CNB offers traditional deposit products and services to businesses and consumers and provides access to accounts via online banking.

As of December 31, 2018, CNB reported total assets of \$104 million, net loans of \$69 million, and total deposits of \$89 million. Net loans represented 66 percent of total assets. Tier-one capital totaled \$13 million, and represented 18 percent of risk-weighted assets. Primary loan categories included real estate-related loans which represent 73 percent of net loans, including agricultural land (32 percent of net loans) and 1-4 family first lien residential loans (22 percent of net loans). Other primary loan categories included consumer loans (20 percent of net loans) and other agricultural-related loans (5 percent of net loans).

CNB encounters strong competition from large, regional, and community banks in the AA. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2018, there are nineteen financial institutions in the AA. Of the nineteen banks, only CNB and Barwick Bank have single locations in the AA. CNB had \$84 million in deposits, representing 3.95 percent of the market. Barwick Bank, at total assets of \$13 million, had less than 1 percent of the market with \$10 million in deposits. Synovus Bank and Guardian maintain a majority of the market with total deposits of 19.19 percent and 12.42 percent, respectively.

There are no legal or financial impediments that hinder the bank's ability to meet the credit needs of the community. CNB received a "Satisfactory" rating at the prior examination dated January 13, 2014.

## **Scope of the Evaluation**

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

This Performance Evaluation (PE) is an assessment of CNB's ability to meet the credit needs of the community in which it operates. To determine the bank's performance,



examiners utilized the Small Bank CRA examination procedures, which includes a lending test. This test evaluates a bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period for the lending test is January 1, 2015 to December 31, 2017.

At CNB's request, examiners evaluated the bank's responsiveness to community development (CD) needs in its AA through qualified lending, investments, and services. The evaluation period for the CD test is January 15, 2014 to December 31, 2017.

CNB's primary loan products were business and farm loans originated during the evaluation period. Internally generated loan reports revealed that farm and business loans represented 37 percent and 23 percent, respectively, of the total originated loans. We selected a random sampling of 80 loans to assess the bank's lending and geographic distribution of loans within its AA.

CNB originates indirect auto loans from a variety of dealerships throughout several states including Georgia, Alabama, and Florida. This type of relationship lending is difficult to establish in small rural communities with a limited number of auto dealerships.

CNB collects and reports data under the requirements of the Home Mortgage Disclosure Act (HMDA). Home loan originations were not a primary loan product during the evaluation period.

## **Data Integrity**

During this evaluation, we verified the data management collected and provided to us for farm and business loans. We found the loan data was reliable for all three years included in the evaluation period.

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

Examiners conducted a full-scope review of the Quitman AA. There are no limited-scope areas. *For more information regarding the scope of this examination, see Appendix A: Scope of Evaluation.*

## **Ratings**

CNB has one AA. The bank's overall rating is based on the full-scope review of the Quitman AA. *Refer to Appendix A 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 [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.

## Conclusions with Respect to Performance Tests

CNB's performance under the lending test is satisfactory. Examiners selected a random sampling of 80 farm and business loans to determine the bank's lending inside the AA, the geographic distribution of loans, and lending to borrowers of different sizes and income

### LENDING TEST

#### Loan-to-Deposit Ratio

CNB's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and local economic conditions within the AA. We evaluated the bank's LTD ratio over 21 quarters from December 31, 2013 to December 31, 2018. During this period, the bank's loan-to-deposit ratio averaged 81.24 percent, with a quarterly low of 74.12 percent and a quarterly high of 92.01 percent.

CNB experiences a high volume of competition among the other eighteen financial institutions with offices in the AA. Fourteen of these institutions are much larger with respect to total assets, branch networks, and multiple state operations. The bank's loan-to-deposit ratio compares favorably with three community banks of similar location and product offerings. Those three banks had quarterly loan-to-deposit ratios averaging 79.92% and ranging from 73.79% to 86.22%.

#### Lending in Assessment Area

CNB originates a majority of loans inside the AA and meets the standard for satisfactory performance. During the evaluation period, 70 percent of the loans by number and 97 percent by dollar volume were originated within the bank's AA. The following table details the bank's lending inside and outside the AA.

**Table D - Lending Inside and Outside of the Assessment Area**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Farm Loans	34	85.0	6	15.0	40	6,317	95.2	320	4.8	6,637
Business Loans	36	90.0	4	10.0	40	4,816	98.3	81	1.7	4,897
<b>Total</b>	70	87.5	10	12.5	80	11,133	96.5	401	3.5	11,534

Source: 01/01/2015-12/31/2017 Bank Data

## **Geographic Distribution of Loans**

### **Business Loans**

The geographic distribution of the bank's business and farm loan originations across geographies of different income levels reflects reasonable distribution. During the evaluation period, the percent of bank loans to businesses in low- and moderate-income geographies was below the percent of businesses located in low- and moderate-income geographies. However, the bank's only location is in Brooks County, where a majority of lending activity occurs. The county has five CTs, with only one moderate -income and four middle-income geographies. This supports a reasonable distribution.

Refer to Table Q in Appendix C-3 for details.

### **Farm Loans**

In 2015-2016, the percent of farm loan originations to farms in moderate-income geographies exceeded the percent of farms located in moderate-income geographies. In year 2017, farm loan originations were slightly below the percent of farms located in moderate-income CTs. During the evaluation period, the bank had no farm loan originations in low-income CTs. Based on Dunn & Bradstreet demographic data for the corresponding years, few farms were located in low-income geographies.

Refer to Table S in Appendix C-4 for details.

### **Lending to Businesses and Farms of Different Sizes**

The overall borrower distribution of loans reflects reasonable distribution to businesses of different sizes. During the evaluation period, the percent of bank loans to businesses and farms with revenues less than \$1 million was comparable to the percent of businesses and farms with revenues less than \$1 million. The bank's farm loan originations significantly exceeded the percent of loans originated and purchased by all reporting lenders throughout the AA.

Refer to Table R in Appendix C-5 and Table T in Appendix C-6 for details.

### **Responses to Complaints**

Neither CNB nor the OCC received complaints related to the bank's CRA performance since the prior CRA evaluation.

## **COMMUNITY DEVELOPMENT TEST**

CNB's performance under the community development (CD) test is Satisfactory. The bank demonstrates adequate responsiveness to the community development needs within its AA. The bank offers student checking accounts and accounts to non-profit organizations with no service fees; and free cash advance services to under-banked individuals. CD activities include qualified donations and one loan.

### **Number and Amount of Qualified Donations**

CNB provided an adequate level of CD donations in its AA. We identified three community service organizations which received multiple donations during this evaluation period totaling approximately \$33 thousand.

### **Number and Amount of Community Development Loans**

The bank has one prior period \$1.1 million loan origination which helped to stabilize the AA by creating jobs. The approximate balance at year-end 2017 was \$618 thousand.

### **Responsiveness to Community Development Needs**

The bank's level of CD activities demonstrates adequate responsiveness to the needs and opportunities in its AA. A community contact with a local community group identified a need for affordable housing and financial literacy training.

## 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 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: 1/01/15 to 12/31/17  Community Development Test: 1/15/14 to 12/31/17	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Citizens National Bank Quitman (CNB) Quitman, Georgia	Business and Farm loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Georgia Quitman, Georgia AA	Full-Scope	AA comprises Brooks and Lowndes Counties, and is part of the Valdosta MSA.

## Appendix B: Community Profiles for Full-Scope Area

### Quitman AA

Demographic Information						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	10.00	26.67	33.33	30.00	0.00
Population by Geography	128,840	8.41	27.49	33.18	30.92	0.00
Owner-Occupied Housing by Geography	24,740	5.09	16.81	39.86	38.24	0.00
Businesses by Geography	7,538	10.0	31.59	24.08	34.33	0.00
Farms by Geography	345	3.77	13.62	49.28	33.33	0.00
Family Distribution by Income Level	28,641	8.05	23.94	34.29	33.72	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	11,675	26.11	69.66	63.67	40.56	0.00
Median Family Income	= \$50,211					
HUD Adjusted Median Family Income for 2017	= \$49,500					
Households Below the Poverty Level	= 11,081					
				Median Housing Value	= \$119,989	
				Unemployment Rate	= 7.91%	

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 2010 U.S. Census, and 2017 HUD updated MFI.

CNB designates one AA that consists of all CTs in Brooks and Lowndes counties. The counties are contiguous and located within the Valdosta, Georgia Metropolitan Statistical Area (MSA). The AA consists of 30 CTs comprising 3 low- (10%), 8 moderate- (27%), 10 middle- (33%), and 9 upper-income (30%) geographies. The AA does not arbitrarily exclude low- or moderate-income geographies.

### Description of MSA

The Valdosta MSA contains four counties. In addition to Brooks and Lowndes Counties, the MSA includes Echols and Lanier Counties. The MSA is located in south-central Georgia on the Florida state border. As of the 2010 census, the MSA had a population of 139,588. Valdosta, the 14<sup>th</sup> largest city in Georgia, is the principal city of the MSA.

## **Description of AA**

### **Brooks County**

Brooks County is one of the most southern counties in Georgia which borders the state of Florida. The county is well known for its abundant wildlife including quail, dove, ducks, and deer. Many lakes and streams are open to the public for fishing. The county maintains a small regional airport. The county seat is Quitman. There are 1 moderate- and 4 middle-income geographies in Brooks County.

As of the 2010 US Census, there were 16,243 people, 6,457 households, and 4,379 families residing in the county. The median household income was \$41,309 and the median family income was \$47,599. Approximately 14.7% of families and 17.0% of the population live below the poverty line. According to the Georgia Department of Labor, as of 2017 the unemployment rate was 4.5 percent.

The top 10 employers include: AG-Pro LLC, Archibold Medical Center, Inc. – SGSA, BCT Gin Co., Inc., Brookscos Dairy LLC, Crown Health Care Laundry Services, Fellowship Home At Brookside, Harveys Supermarkets, Oak Pond Nursery, O’steen – Mccard Motors, Inc., and TLC Mouldings.

### **Lowndes County**

Lowndes County is home to the MSA’s principal city, Valdosta. The county is a major commercial, educational, and manufacturing center of South Georgia. Besides Valdosta, the county is home to four other small cities and Moody Air Force Base, a “census-designated place” delineated by the US Census Bureau. The 25 CTs located in Lowndes County comprise 3 low-, 7 moderate-, 6 middle- and 9 upper-income geographies.

As of the 2010 United States Census, there were 109,233 people, 39,747 households, and 26,191 families residing in the county. The median household income was \$39,096 and the median family income was \$48,296. Approximately, 15.3% of families and 21.6% of the population live below the poverty line. According to the Georgia Department of Labor, as of 2017 the unemployment was 4.7 percent.

Top employers include Data Software Service LLC, Lowe’s Home Centers Inc., Packaging Corp of America, Parkwood Development Center, Teamtemps Personnel Staffing Inc., The Home Depot, Valdosta State University, Walmart, Wild Adventures, and Zachry Industrial Inc.



## Appendix C: 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 areas 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 loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/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. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 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) throughout those geographies. Because 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 (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

**Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. 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 2015-2016**

AA	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CNB	20	3,696	1.0	2,092	5.0	0	3.7	34.4	20.0	35.0	21.5	70.0	20.0	39.0	10.0	41.3	0.0	0	0.0
<b>Total</b>	<b>20</b>	<b>3,696</b>	<b>1.0</b>	<b>2,092</b>	<b>5.0</b>	<b>0</b>	<b>3.7</b>	<b>34.4</b>	<b>20.0</b>	<b>35.0</b>	<b>21.5</b>	<b>70.0</b>	<b>20.0</b>	<b>39.0</b>	<b>10.0</b>	<b>41.3</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017**

AA	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CNB	20	2,022	0.9	2,190	10.0	0	7.8	31.6	15.0	28.2	24.1	80.0	28.9	34.3	5.0	35.1	0.0	0	0.0
<b>Total</b>	<b>20</b>	<b>2,022</b>	<b>0.9</b>	<b>2,190</b>	<b>10.0</b>	<b>0</b>	<b>7.8</b>	<b>31.6</b>	<b>15.0</b>	<b>28.2</b>	<b>24.1</b>	<b>80.0</b>	<b>28.9</b>	<b>34.3</b>	<b>5.0</b>	<b>35.1</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2015-2016</b>	
AA	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
CNB	20	4,023	29.0	69	0.8	0	0.0	19.0	25.0	20.3	42.4	75.0	47.8	37.8	0	31.9	0.0	0	0.0	
<b>Total</b>	<b>20</b>	<b>4,023</b>	<b>29.0</b>	<b>69</b>	<b>0.8</b>	<b>0</b>	<b>0.0</b>	<b>19.0</b>	<b>25.0</b>	<b>20.3</b>	<b>42.4</b>	<b>75.0</b>	<b>47.8</b>	<b>37.8</b>	<b>0</b>	<b>31.9</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	

*Source: 2016 D&B Data; 01/01/2015 - 12/13/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0*

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2017</b>	
AA	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
CNB	20	3,459	32.3	62	3.8	0.0	1.6	13.6	10.0	4.8	49.3	85.0	66.1	33.3	5.0	27.4	0.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>3,459</b>	<b>32.3</b>	<b>62</b>	<b>3.8</b>	<b>0.0</b>	<b>1.6</b>	<b>13.6</b>	<b>10.0</b>	<b>4.8</b>	<b>49.3</b>	<b>85.0</b>	<b>66.1</b>	<b>33.3</b>	<b>5.0</b>	<b>27.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2015-2016</b>	
AA	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
CNB	20	3,696	1.0	2,092	82.2	80.0	46.3	5.1	20.0	12.7	0.0	
<b>Total</b>	<b>20</b>	<b>3,696</b>	<b>1.0</b>	<b>2,092</b>	<b>82.2</b>	<b>80.0</b>	<b>46.3</b>	<b>5.1</b>	<b>20.0</b>	<b>12.7</b>	<b>0.0</b>	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017</b>	
AA	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	
CNB	20	2,022	0.9	2,190	81.9	85.0	44.5	5.2	10.0	12.9	5.0	
<b>Total</b>	<b>20</b>	<b>2,022</b>	<b>0.9</b>	<b>2,190</b>	<b>81.9</b>	<b>85.0</b>	<b>44.5</b>	<b>5.2</b>	<b>10.0</b>	<b>12.9</b>	<b>5.0</b>	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2015-16</b>
AA	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
CNB	20	4,023	29.0	69	93.0	90.0	53.6	4.9	10.0	2.0	0
<b>Total</b>	<b>20</b>	<b>4,023</b>	<b>29.0</b>	<b>69</b>	<b>93.0</b>	<b>90.0</b>	<b>53.6</b>	<b>4.9</b>	<b>10.0</b>	<b>2.0</b>	<b>0</b>

Source: 2016 D&B Data; 01/01/2015 - 12/13/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0.

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2017</b>
AA	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
CNB	20	3,459	32.3	62	94.5	90.0	25.8	4.1	5.0	1.4	5.0
<b>Total</b>	<b>20</b>	<b>3,459</b>	<b>32.3</b>	<b>62</b>	<b>94.5</b>	<b>90.0</b>	<b>25.8</b>	<b>4.1</b>	<b>5.0</b>	<b>1.4</b>	<b>5.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0.