

### **PUBLIC DISCLOSURE**

December 10, 2018

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First American National Bank Charter Number 15386

1251 First American Drive luka, MS 38852

Office of the Comptroller of the Currency Birmingham Field Office 3595 Grandview Pkwy, Ste 655 Birmingham, AL 35243

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 institution is rated: Satisfactory.

The Lending Test is rated: Satisfactory.

First American National Bank (FANB) has a satisfactory record of meeting the credit needs of its community. We based this assessment on the following:

- FANB's level of lending, as reflected in its loan-to-deposit ratio, is reasonable.
- FANB originates a substantial majority of loans inside the assessment area (AA).
- FANB's borrower distribution reflects reasonable penetration of home mortgage and consumer loans to borrowers of different income levels.
- FANB did not receive any Community Reinvestment Act (CRA)-related consumer complaints during the review period.

#### **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**

First American National Bank (FANB) is a single-state national bank wholly owned by First American Bancshares, Inc., a one-bank holding company. FANB is headquartered in luka, Mississippi, which is situated in Tishomingo County, Mississippi. At December 31, 2017, FANB reported \$253 million in total assets, \$221 million in total deposits, \$127.5 million in net loans, and \$29.9 million in tier 1 capital.

FANB operates ten branches, including the main office. FANB offers an on-site drive-through at nine of their locations. Automated teller machines (ATMs) are located at all locations, and eight of the ATMs accept deposits. FANB did not close any branch offices during the evaluation period, but did convert a loan production office in Tupelo, Mississippi to a full-service branch. FANB operates during customary banking hours Monday through Thursday and offers extended hours in the drive-through on Fridays and Saturday mornings. FANB operates a website, offers on-line banking and a variety of traditional deposit and loan products including checking, savings, certificates of deposit and individual retirement accounts as well as consumer, mortgage, and commercial loans.

FANB has a single assessment area (AA) comprised of Itawamba, Lee, Prentiss, and Tishomingo counties. The AA is located in North-East Mississippi, which is a rural geography and is not situated in a Metropolitan Statistical Area (MSA). The AA contains 32 census tracts: zero low-income, three moderate-income, 19 middle-income, and 10 upper-income. FANB's AA meets regulatory requirements and consists of complete political subdivisions that do not arbitrarily exclude low- or moderate-income geographies.

FANB's lending focuses primarily on residential mortgage loans for the purchase, refinance, improvement, and construction of one-to-four family dwellings. At December 31, 2017, net loans represented 54 percent of FANB's average assets. The loan portfolio mix is as follows: one-to-four family residential real estate loans (57 percent), commercial real estate (18 percent), consumer loans (12 percent), construction and development (5 percent), commercial and industrial loans (4 percent), farmland (3 percent), and multifamily properties (1 percent).

Competition from other AA financial institutions is strong. Thirteen financial institutions operate branch offices in the AA, including FANB. These financial institutions include community banks, branches of regional banks, and branches of a large bank. Based on June 30, 2017 Federal Deposit Insurance Corporation deposit market share data, FANB ranks third among competitors for market share, at 7 percent.

FANB was rated "Satisfactory" at the last CRA evaluation, dated August 5, 2013. There are no legal, financial, or other factors impeding FANB's ability to help meet the credit needs of its AA.

## Scope of the Evaluation

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

We evaluated FANB's CRA performance using the lending test criteria for small bank examinations. The lending test evaluates an institution's record of meeting the credit needs of its AA through lending activities.

The CRA evaluation covers the period since the date of the previous CRA examination, August 5, 2013, through December 10, 2018. Conclusions regarding the Bank's lending performance were based on a random sample of primary loan product originations between January 1, 2015 and December 31, 2017. Based on the number and dollar volume of loans, FANB's primary loan products are residential real estate and consumer loans. Separate analyses were conducted, with 2015 and 2016 combined, and 2017 analyzed separately due to 2015 American Community Survey (ACS) US Census updates that apply to 2017. The 2010 US Census applies to the years 2015 and 2016. Comparative data was different due to the Census change and the change of the income level of some census tracts (CTs), also referred to as geographies.

#### **Data Integrity**

We did not perform a data integrity review, as FANB is not a Home Mortgage Disclosure Act (HMDA) reporter.

## Selection of Areas for Full-Scope Review

FANB has one AA, the entirety of Itawamba, Lee, Prentiss, and Tishomingo Counties. These counties are contiguous and not part of a MSA. We performed a full scope review of this AA. See Appendix A for additional information.

## Ratings

The Bank's overall rating is based on our full-scope review. There are no low-income geographies in the AA, and only three moderate-income geographies. Because of this, we determined the geographic distribution analysis was not meaningful and placed more weight on our analysis of lending to borrowers of different incomes.

## **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 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 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**

#### **LENDING TEST**

FANB's lending performance is satisfactory.

#### Loan-to-Deposit Ratio

FANB's loan to deposit (LTD) ratio is reasonable considering bank size and AA credit needs. FANB's LTD ratio averaged 54 percent over the 21 quarters since the preceding CRA examination, with a quarterly high of 59.2 percent and a quarterly low of 49.2 percent. FANB's LTD ratio is below the 63.9 percent average of seven similarly situated institutions. Based on FANB's business model of making a high level of low-dollar consumer loans, the LTD ratio is reasonable.

#### **Lending in Assessment Area**

Table D - Lending Inside and Outside of the Assessment Area													
Number of Loans \$(000s)													
Insi	ide	Out	side	Total	Insid	le	Outsi	de	Total				
#	%	#	%	#	\$	%	\$	%	\$(000s)				
60	83.3	12	16.7	72	3,587	73.8	1,271	26.2	4,858				
60	88.2	8	11.8	68	689	84.1	130	15.9	819				
120	85.7	20	14.3	140	4,276	75.3	1,401	24.7	5,677				
	Nu Insi # 60 60	Number of the last	Number of Loa  Inside Out  # % # 60 83.3 12 60 88.2 8	Number of Loans           Inside         Outside           #         %         #         %           60         83.3         12         16.7           60         88.2         8         11.8	Number of Loans           Inside         Outside         Total           #         %         #         %         #           60         83.3         12         16.7         72           60         88.2         8         11.8         68	Number of Loans         Dollar           Inside         Outside         Total         Inside           #         %         #         \$           60         83.3         12         16.7         72         3,587           60         88.2         8         11.8         68         689	Number of Loans       Dollar Amou \$(00)         Inside       Outside       Total       Inside         #       %       #       %       *       \$       %         60       83.3       12       16.7       72       3,587       73.8         60       88.2       8       11.8       68       689       84.1	Number of Loans         Dollar Amount of Loa \$(000s)           Inside         Outside         Total         Inside         Outside           #         %         #         \$         %         \$           60         83.3         12         16.7         72         3,587         73.8         1,271           60         88.2         8         11.8         68         689         84.1         130	Number of Loans         Dollar Amount of Loans \$(000s)           Inside         Outside         Total         Inside         Outside           #         %         #         \$         %         \$         %           60         83.3         12         16.7         72         3,587         73.8         1,271         26.2           60         88.2         8         11.8         68         689         84.1         130         15.9				

Source: 01/01/2015-12/31/2017 Bank Data Due to rounding, totals may not equal 100.0

FANB originated a substantial majority of loans inside the AA. Based on a sample of residential real estate and consumer loans originated during the evaluation period, FANB originated 85.7 percent of the number of loans, and 75.3 percent of the dollar amount of loans, inside the AA.

#### **Lending to Borrowers of Different Incomes**

FANB's borrower distribution reflects reasonable penetration among borrowers of different incomes in the AA, meeting the standard for satisfactory performance. Refer to Appendix C, Tables P and V for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage and consumer loans, respectively. Each table separates lending information for the 2015-2016 period from the 2017 period. Loans from 2015-2016 were compared to 2010 U.S. Census data, and 2017 loans were compared to 2015 ACS Census data.

#### Home Mortgage Loans

FANB's borrower distribution of home mortgage loans is reasonable. For 2015-2016, the percentage of home loans to low-income borrowers, at 5.1 percent, was significantly lower than the percentage of low-income AA families of 19.7 percent. However, FANB's performance is similar to peer bank performance of 4.7 percent. In addition, because 15.6 percent of AA families lived below the poverty level in 2015-2016, this impeded the Bank's ability to make home loans to qualified low-income borrowers. The percentage of home mortgage loans to moderate-income borrowers, at 17.9 percent, exceeds the percentage of moderate-income AA families of 16.5 percent, and exceeds peer bank performance of 11.8 percent.

For 2017, FANB's percentage of home loans to low-income borrowers, at 0 percent, was significantly lower than the percentage of low-income AA families of 18.9 percent, and below peer bank performance of 3 percent. FANB's percentage of home mortgage loans to moderate-income borrowers, at 10 percent, is lower than the percentage of moderate-income AA families of 16.3 percent, and lower than peer bank performance of 14.2 percent. Because 14.9 percent of AA families lived below the poverty level in 2017, this impeded the Bank's ability to make home loans to qualified low- and moderate-income borrowers.

#### Consumer Loans

FANB's borrower distribution of consumer loans is reasonable. For 2015-2016, the percentage of consumer loans to low-income borrowers, at 15 percent, was lower than the percentage of low-income AA households of 21.1 percent. The percentage of consumer loans to moderate-income borrowers, at 25 percent, exceeds the percentage of moderate-income AA households of 14.9 percent.

For 2017, FANB's percentage of consumer loans to low-income borrowers, at 17.7 percent, was near to the percentage of low-income AA households of 21.3 percent. FANB's percentage of consumer loans to moderate-income borrowers, at 29.4 percent, exceeds the percentage of moderate-income AA households of 14.9 percent.

#### **Geographic Distribution of Loans**

We did not perform an analysis of the geographic distribution of FANB's lending as part of this evaluation. The analysis would not be meaningful, as there are very little demographically distinct geographies within FANB's AA. The AA contains no low-income census tracts, and only three moderate-income census tracts.

#### **Responses to Complaints**

FANB did not received any CRA-related complaints during the review 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").

Time Period Reviewed	Lending Test (excludes CD Investment and Service Tes CD Loans: Not Applicable	D loans): (01/01/15 to 12/31/17) sts: Not Applicable
Financial Institution		Products Reviewed
First American National Bank 1251 First American Drive Iuka, MS 38852		Residential Real Estate Consumer Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Ty	pe of Examination	
Assessment Area	Type of Exam	Other Information
Itawamba County, Mississippi Lee County, Mississippi Prentiss County, Mississippi Tishomingo County, Mississippi	Full-Scope	Reference Appendix B for additional information.

# **Appendix B: Community Profiles for Full-Scope Areas**

FANB AA 2015-2016: Census 2010

Table A – Demo	of the Asses	sment Area				
Ass	American AA					
Demographic Characteristics	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
Geographies (Census Tracts)	33	0.0	6.1	66.7	24.2	3.0
Population by Geography	151,180	0.0	3.0	69.1	27.9	0.0
Housing Units by Geography	66,513	0.0	3.5	71.3	25.2	0.0
Owner-Occupied Units by Geography	42,756	0.0	3.0	69.1	27.9	0.0
Occupied Rental Units by Geography	14,938	0.0	5.0	74.6	20.4	0.0
Vacant Units by Geography	8,819	0.0	3.7	76.1	20.2	0.0
Businesses by Geography	8,449	0.0	4.4	68.8	26.5	0.4
Farms by Geography	252	0.0	2.8	71.4	25.8	0.0
Family Distribution by Income Level	41,877	19.7	16.5	17.4	46.4	0.0
Household Distribution by Income Level	57,694	21.1	14.9	17.3	46.8	0.0
Median Family Income Non-MSAs - MS		\$40,980	Median Hous	sing Value		\$94,987
			Median Gros	s Rent		\$538
			Families Belo	ow Poverty L	_evel	15.6%

Source: 2010 U.S. Census and 2016 D&B Data
Due to rounding, totals may not equal 100.0
(\*) The NA category consists of geographies that have not been assigned an income classification.

FANB AA 2017: 2015 ACS Census

Table A – Dem	ographic In	formation	of the Asses	sment Area	1	
Ass	sessment A	rea: First A	American AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	0.0	9.1	57.6	30.3	3.0
Population by Geography	153,406	0.0	6.2	60.3	33.5	0.0
Housing Units by Geography	67,682	0.0	6.8	62.3	31.0	0.0
Owner-Occupied Units by Geography	41,929	0.0	4.2	60.8	35.0	0.0
Occupied Rental Units by Geography	16,597	0.0	12.8	59.3	27.9	0.0
Vacant Units by Geography	9,156	0.0	7.6	74.0	18.4	0.0
Businesses by Geography	8,595	0.0	14.4	49.7	35.7	0.3
Farms by Geography	263	0.0	5.7	62.4	31.9	0.0
Family Distribution by Income Level	41,202	18.9	16.3	19.1	45.8	0.0
Household Distribution by Income Level	58,526	21.3	14.9	16.0	47.7	0.0
Median Family Income Non-MSAs - MS		\$43,702	Median Hous	sing Value		\$101,253
			Median Gros	s Rent		\$618
			Families Beld	ow Poverty L	_evel	14.9%

Source: 2015 ACS Census and 2017 D&B Data

Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

FANB's AA consists of Itawamba, Lee, Prentiss, and Tishomingo Counties in Mississippi. The Bank's AA does not arbitrarily exclude any areas, particularly low- or moderate-income areas. FANB provides a full range of loan and deposit products to the AA.

According to the Bureau of Labor Statistics, the State of Mississippi's unemployment rate for December 2015, 2016, and 2017 was 6.2 percent, 5.5 percent, and 4.8 percent respectively. The level of unemployment in Mississippi is higher than the national average. As presented in the table below, the unemployment rates of the counties that make up the assessment area are at lower levels than the state unemployment rates, and reflect declining trends. Major employers for the AA include manufacturing and healthcare.

<b>Unemployment Rates</b>	Dec-15	Dec-16	Dec-17
United States	5.0%	4.7%	4.1%
Mississippi	6.2%	5.5%	4.8%
Tishomingo County	6.0%	5.2%	4.3%
Lee County	5.0%	4.4%	3.5%
Prentiss County	6.0%	5.1%	3.9%
Itawamba County	5.4%	4.7%	3.5%

The AA's poverty level is high. Based on 2010 U.S. Census data, 15.6 percent of families in the AA were below the poverty line in 2015-2016. Based on the 2015 ACS Census data, 14.9 percent of families in the AA were below the poverty level in 2017. This is above the national average of 14 percent. The median family-income for the AA is \$40,980 for the 2015-2016 period and \$43,702 for the 2017 period. Low- and moderate-income families have difficulty purchasing homes given that low-income borrowers have incomes 50 percent or less than the median income. Moderate-income borrowers have income of 50 to 80 percent of the median family income.

A community contact familiar with the AA identified the need for more affordable housing in the area. The contact expressed that residents struggle to find affordable housing options and, as a result, many employees live outside of the area in which they work.

## **Appendix C: Tables of Performance Data**

#### **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 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 is compiled by the FDIC and is 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 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 MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2015-16

Assessment Area: # \$ \binom{\chi_0 of Total Market}{\text{Market}} \binom{\chi_0 dank}{\text{Market}} \binom{\chi_0 dank}{\text{Loans}} \binom{\chi_0 dank}{\text{Loans}} \binom{\chi_0 dank}{\text{Loans}} \binom{\chi_0 dank}{\text{Loans}} \binom{\chi_0 dank}{\text{Ramilies}} \binom{\chi_0 dank}{Ramili																				
Assessment Area: # \$   % of Total Market Families   Bank Loans   Aggregate   Families   Aggregate   Families   Bank Loans   Aggregate   Families   Bank Loans   Aggregate   Families   Bank Loans   Aggregate   Families   Aggregate   Families   Aggregate   Families   Aggregate   Aggre		Т	otal Home Mo	rtgage L	oans	Low-In	come Bo	orrowers	Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
AA A A A A A A A A A A A A A A A A A A		#	\$				Bank			Bank	Aggregate		Bank	Aggregate		Bank	Aggregate		Bank	Aggregate
Total 40 3,234 100 3.140 19.7 5.1 4.7 16.5 17.9 11.8 17.4 33.3 19.7 46.4 43.6 46.1 0.0 0.0 1		40	3,234	100	3,140	19.7	5.1	4.7	16.5	17.9	11.8	17.4	33.3	19.7	46.4	43.6	46.1	0.0	0.0	17.6
	Total	40	3,234	100	3.140	19.7	5.1	4.7	16.5	17.9	11.8	17.4	33.3	19.7	46.4	43.6	46.1	0.0	0.0	17.6

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0; \$ in '000s

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2017

	То	Total Home Mortgage Loans Low-Income Borrowers					Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FANB AA	20	1,318	100	3,254	18.9	0.0	3.0	16.3	10.0	14.2	19.1	20.0	19.1	45.8	70.0	48.4	0.0	0.0	15.2
Total	20	1,318	100	3,254	18.9	0.0	3.0	16.3	10.0	14.2	19.1	20.0	19.1	45.8	70.0	48.4	0.0	0.0	15.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2015-16

	Tota	l Consumer I	Loans	Low-Income	Borrowers	Moderate- Borrov		Middle-Income	Borrowers	Upper-Income	Borrowers	Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB AA	40	\$552	100	21.1	15.0	14.9	25.0	17.3	15.0	46.8	45.0	0.0	0.0
Total	40	\$552	100	21.1	15.0	14.9	25.0	17.3	15.0	46.8	45.0	0.0	0.0

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0; \$ in '000s

## Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2017

	Tota	l Consumer	Loans	Low-Income	Borrowers	Moderate- Borrov		Middle-Income	Borrowers	Upper-Income	Borrowers	Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB AA	20	136	100	21.3	17.7	14.9	29.4	16.0	17.7	47.7	35.3	0.0	0.0
Total	20	136	100	21.3	17.7	14.9	29.4	16.0	17.7	47.7	35.3	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data. Due to rounding, totals may not equal 100.0; \$ in '000s