



PUBLIC DISCLOSURE

November 23, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Decatur County
24458

819 E Shotwell Street, Bainbridge, Georgia 39818

Office of the Comptroller of the Currency

3 Ravinia Drive Suite 1950, Atlanta, Georgia 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

Institution's CRA Rating: This institution is rated **Satisfactory**.

The lending test is rated: Satisfactory

The major factors that support this rating include:

- First National Bank of Decatur County's (FNBDC or the bank) level of lending, as reflected in its net loan to deposit (LTD) ratio, is considered reasonable.
- A majority of loans originated inside the assessment area (AA).
- FNBDC overall distribution of home mortgages and small business loans among borrowers of different income levels reflects reasonable penetration, given local AA competition and demographic characteristics of the AA.
- The bank exhibits reasonable geographic distribution of loans in the state of Georgia.
- There were no CRA-related complaints received by the Bank or the OCC during the evaluation period of July 1, 2017 through December 31, 2019.

Loan-to-Deposit Ratio

The bank's LTD is reasonable considering the bank's size, financial condition, and credit needs of the AA. Beginning with the quarter ending March 31, 2017 to December 31, 2019, the average LTD ratio for FNBDC was 79.30 percent. The bank's quarterly LTD ratio ranged from a high of 90.7 percent at June 30, 2018, to a low of 68.75 percent at December 31, 2017. The AA has 10 banks with a combined 14 branches. Many of the banks in the AA are much larger than FNBDC with respect to branch networks, total deposits, and asset size. The three closest banks in asset size, ranging from \$125.3 million to \$298.7 million, had a combined average LTD ratio of 94.55 percent. While the bank's average LTD is lower than similarly situated banks, it is a direct result of the fluctuation of public funds held at the bank.

Lending in Assessment Area

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

During the evaluation period, the bank originated 67.80 percent of its loans within our sample inside the bank's AAs. This analysis is performed at the bank, rather than the AA level.

| Lending Inside and Outside of the Assessment Area | | | | | | | | | | |
|---|-----------------|-------|---------|-------|---------|---------------------------------|-------|---------|-------|----------------|
| Loan Category | Number of Loans | | | | Total # | Dollar Amount of Loans \$(000s) | | | | Total \$(000s) |
| | Inside | | Outside | | | Inside | | Outside | | |
| | # | % | # | % | | \$ | % | \$ | % | |
| Home Mortgage | 40 | 68.97 | 18 | 31.03 | 58 | 3,197 | 48.87 | 3,345 | 51.13 | 6,542 |
| Small Business | 40 | 66.7 | 20 | 33.3 | 60 | 4,870 | 63.44 | 2,806 | 36.55 | 7,676 |
| Total | 80 | 67.80 | 38 | 32.20 | 118 | 8,067 | 56.74 | 6,151 | 43.26 | 14,218 |

Source: Randomly selected sample of 118 loans (58 home mortgage loans and 60 loans to small businesses) originated during the review period.

Description of Institution

First National Bank of Decatur County is a U.S. Department of the Treasury designated community development financial institution (CDFI). FNBDC is a wholly-owned subsidiary of Bainbridge Bancshares, a one-bank holding company. The main office, which operates as a full-service branch, is located in Bainbridge Georgia, approximately 40 miles northwest of Tallahassee, Florida. On August 23, 2016, the Office of the Comptroller of the Currency (OCC) approved a merger between Citizens Bank and FNBDC, which added an additional full-service branch in Cairo, Georgia. In addition to the merger, FNBDC opened a loan production office (LPO) in Destin, Florida on October 30, 2018. At December 31, 2019, FNBDC's assets totaled \$194.2 million, gross loans totaled \$133.1 million, or 69 percent of total assets, and tier 1 capital equaled \$17.1 million.

Loan and deposit product offerings are traditional. The bank currently offers home mortgage loans, automobile loans, lines of credit, personal loans, and construction and commercial loans. FNBDC offers deposit-taking ATMs at its two branch locations for customers to make inquiries and access their account balances, make deposits and withdraw funds. Deposit products offered by the bank include personal and business checking and savings, money market, and certificate of deposit accounts. Additionally, the bank offers remote deposit capture, on-line banking and mobile banking services for both deposit and loan transactions.

FNBDC has designated Decatur and Grady counties as its AA and is the only rating area for this evaluation. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- or moderate-income census tracts (CTs). There are no financial conditions, legal constraints, or other factors hindering the bank's ability to help meet the credit needs of its AA. The prior CRA Performance Evaluation, dated June 27, 2015, resulted in a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The performance evaluation is an assessment of FNBDC's CRA performance utilizing the Small Bank CRA procedures. The assessment determines the bank's record of meeting the credit needs of its AA through lending activities, by evaluating the distribution of primary loan products among geographies and borrower characteristics. The evaluation period for lending activities covers the bank's performance from January 1, 2017 through December 31, 2019.

To determine the bank's primary lending products, we assessed the composition of FNBDC's loan originations during the evaluation period. Two primary products were identified for assessment under both the geographic and borrower distribution of lending tests: home mortgage and small business loans. Home mortgage and small business loans represented approximately 19 and 37 percent, respectively, of all loans originated by dollar amount during the review period. To determine the reasonableness of lending within the bank's assessment area, we selected a random sample of home mortgage loans (58 total) and loans to small businesses (60 total). From this sample, we identified 30 loans for each product type (60 total) that originated in the assessment area to assess the borrower and geographic distribution.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

The CRA requires an institution to define its AA in which it will be evaluated. FNBDC AA consists of Decatur and Grady County, both in Georgia. Examiners conducted a full-scope review of the Decatur / Grady County AA. There are no limited-scope areas. *For more information regarding the scope of this examination, see Appendix A: Scope of Evaluation.*

Ratings

The bank's overall rating is for the State of Georgia. Home mortgage and small business loans were the bank's primary loan products reviewed for the evaluation. The products were weighed equally in arriving at overall conclusions.

The state rating is based on performance in the bank's AA. Refer to the "Scope" section under the state section for details regarding how the state rating was determined for the evaluation.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Georgia

CRA rating for the State of Georgia: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of home mortgage loans reflects reasonable distribution throughout the AA.
- Home mortgage lending to borrowers of different income levels in the AA shows a reasonable distribution.
- The geographic distribution of small business loans reflects reasonable distribution across different income levels throughout the AA.
- The distribution of small business loans to borrowers of different sizes is reasonable.

Description of Institution's Operations in Georgia

FNBDK is a small community bank located in Bainbridge Georgia. The bank operates two full-service locations, the main office in Bainbridge, Georgia, and a branch in Cairo, Georgia. Bainbridge is the county seat of Decatur County and Cairo is the county seat of Grady County. FNBDK offers a variety of traditional deposit and loan products. In addition to FNB, there are nine other FDIC-insured financial institutions with 12 branch locations throughout the AA. At June 30, 2019, FNBDK ranked 3rd with total deposits of \$147.6 million, representing a 16.8 percent market share. Competition is very strong for lending and deposits from small community, large community and regional banks. Leading competitors in the market are Regions Bank, Bank OZK, Ameris Bank, United National Bank and First Port City Bank.

Based on 2015 American Community Survey (ACS) data, the AA has a population of 52,621. The AA includes 13 CTs by income level, which is comprised of three moderate, nine middle, and one upper-income CT. There are no low-income CTs in the bank's AA. All nine of the middle-income CTs in the AA are distressed due to poverty. Approximately 28 percent of the families in the AA are low-income, with another 17 percent at the moderate-income level. At December 2019, the Georgia Department of Labor reported the unemployment rate for the Southwest Georgia Region, which includes both Decatur and Grady County, was 3.4 percent.

The evaluation considers the input from one community contact with a social organization. The individual noted a need for checking and savings accounts, as well as consumer installment loans. The interviewee indicated there were several projects ongoing in the area and banks were typically helpful.

Decatur / Grady AA

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Non-MSA AA 2019 | | | | | | |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 13 | 0.0 | 23.1 | 69.2 | 7.7 | 0.0 |
| Population by Geography | 52,621 | 0.0 | 22.8 | 72.8 | 4.4 | 0.0 |
| Housing Units by Geography | 22,854 | 0.0 | 22.7 | 72.4 | 4.9 | 0.0 |
| Owner-Occupied Units by Geography | 11,663 | 0.0 | 19.9 | 74.3 | 5.7 | 0.0 |
| Occupied Rental Units by Geography | 8,221 | 0.0 | 26.0 | 71.5 | 2.5 | 0.0 |
| Vacant Units by Geography | 2,970 | 0.0 | 24.5 | 67.0 | 8.5 | 0.0 |
| Businesses by Geography | 3,199 | 0.0 | 22.7 | 73.1 | 4.2 | 0.0 |
| Farms by Geography | 306 | 0.0 | 20.3 | 71.2 | 8.5 | 0.0 |
| Family Distribution by Income Level | 13,458 | 27.8 | 16.7 | 20.6 | 34.9 | 0.0 |
| Household Distribution by Income Level | 19,884 | 29.9 | 16.1 | 16.6 | 37.4 | 0.0 |
| Median Family Income Non-MSAs – GA | | \$45,886 | Median Housing Value | | | \$118,364 |
| | | | Median Gross Rent | | | \$662 |
| | | | Families Below Poverty Level | | | 23.2% |
| <i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Scope of Evaluation in Georgia

FNBDC designates Decatur and Grady Counties as its AA, given the counties are contiguous and are not located in a metropolitan area, we combined the continues for the purpose of this review.

Refer to the table in Appendix A: Scope of Examination for additional information on the AA.

LENDING TEST

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

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank's performance in the combined Decatur and Grady County AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

Home Mortgage Loans

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

Overall, the geographic distribution of loans during the evaluation period reflects reasonable dispersion in the middle-income tracts located within FNBDC's AA. The level of home mortgage lending was compared to the aggregate peer mortgage data. A sample of 30 home mortgage loans indicated FNBDC originated 16.7 percent of loans within the moderate-income CTs; however, FNBDC originated 83.33 percent of residential loans within middle-income tracts compared to 70.7 percent of aggregate lending within the AA. The bank's AA consists of nine middle-income tracts that are classified as distressed middle-income geographies; therefore, loans originated in the middle-income CTs were given significant weight in assessing the bank's geographic distribution. FNBDC continues to offer home mortgages, which positively affects the bank's lending in the AA.

Loans to Small Business

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

During the 2017-2019 review period, the geographic distribution of loans to small businesses reflects reasonable distribution within the bank's AA. Approximately 23 percent of small businesses within the AA are located in moderate CTs. The bank originated 30 percent of the small business loans sampled within those CTs. Additionally, 67 percent of the sample reviewed was originated in distressed middle-income CTs.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank within the state.

Home Mortgage Loans

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

FNBDC's overall distribution of lending among borrowers of different income levels reflects reasonable penetration, given local AA competition and demographic characteristics of the AA. The percentage of home mortgage lending to both low-and moderate-income borrowers during the evaluation period falls within a reasonable range compared to peer, when considering performance context. The AA has a high percentage of families, 23.3 percent, living below the poverty level. Home mortgage loans made to moderate-income borrowers exceeded the ratio of moderate-income families and the aggregate lending percentage. Within the AA, 16.7 percent of families reported moderate income while 20 percent of the sampled mortgage loans were made to moderate income borrowers.

Loans to Small Businesses

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

During the 2017-2019 analysis period, the distribution of the bank's small loans to businesses by revenue was reasonable. Eighty-four percent of businesses reported total revenues less than \$1 million. Eighty-six percent of the sample reviewed were to businesses with annual revenues of less than \$1 million, which compares favorably with aggregate lending by all lenders at 49.9 percent.

Responses to Complaints

During the evaluation period, neither FNBDC nor the OCC Customer Assistance Group received any complaints related to the bank's CRA performance.

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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

| | | |
|--|--|--|
| Time Period Reviewed: | January 1, 2017 – December 31, 2019 | |
| Bank Products Reviewed: First National Bank of Decatur County | Home mortgage and small business loans | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| NA | NA | NA |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| Non-MSA | | |
| Decatur and Grady Counties | Full-scope | <i>All geographies in Decatur and Grady Counties, GA</i> |
| | | |
| State: Georgia | | |
| Decatur and Grady Counties | Full-scope | <i>All geographies in Decatur and Grady Counties, GA</i> |
| | | |
| | | |
| | | |

Appendix B: Summary of MMSA and State Ratings

| RATINGS | First National Bank of Decatur County |
|----------------|---------------------------------------|
| Overall Bank: | Lending Test Rating |
| Satisfactory | Satisfactory |
| State: Georgia | Satisfactory |

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

| Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography | | | | | | | | | | | | | | | | | | | | 2017-19 | |
|--|---------------------------|--------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | | | |
| | # | \$ | % of Total | Overall Market | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | % of Owner-Occupied Housing Units | % Bank Loans | Aggregate | | |
| Non-MSA AA 2019 | 30 | 2,145 | 100.0 | 786 | 0.0 | 0.0 | 0.0 | 19.9 | 16.7 | 23.4 | 74.3 | 83.33 | 70.7 | 5.7 | 0.0 | 5.9 | 0.0 | 0.0 | 0.0 | | |
| Total | 30 | 2,145 | 100.0 | 786 | 0.0 | 0.0 | 0.0 | 19.9 | 16.7 | 23.4 | 74.3 | 83.33 | 70.7 | 5.7 | 0.0 | 5.9 | 0.0 | 0.0 | 0.0 | | |

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data
Due to rounding, totals may not equal 100.0%*

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | | 2017-19 | |
|--|---------------------------|--------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|----------------|--|
| Assessment Area: | Total Home Mortgage Loans | | | | Low-Income Borrowers | | | Moderate-Income Borrowers | | | Middle-Income Borrowers | | | Upper-Income Borrowers | | | Not Available-Income Borrowers | | | | |
| | # | \$ | % of Total | Overall Market | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | % Families | % Bank Loans | Aggregate | | |
| Non-MSA AA 2019 | 30 | 2,145 | 100.0 | 786 | 27.8 | 3.3 | 5.0 | 16.7 | 20.0 | 12.7 | 20.6 | 20.0 | 20.7 | 34.9 | 43.3 | 38.8 | 0.0 | 13.3 | 22.8 | | |
| Total | 30 | 2,145 | 100.0 | 786 | 27.8 | 3.3 | 5.0 | 16.7 | 20.0 | 12.7 | 20.6 | 20.0 | 20.7 | 34.9 | 43.3 | 38.8 | 0.0 | 13.3 | 22.8 | | |

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data
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 2017-19

| Assessment Area: | Total Loans to Small Businesses | | | | Low-Income Tracts | | | Moderate-Income Tracts | | | Middle-Income Tracts | | | Upper-Income Tracts | | | Not Available-Income Tracts | | |
|------------------|---------------------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|------------|-----------------------------|--------------|------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | Aggregate |
| Non-MSA AA 2019 | 30 | 3,955 | 100.0 | 755 | 0.0 | 0.0 | 0.0 | 22.7 | 30.0 | 21.5 | 73.1 | 66.7 | 73.5 | 4.2 | 3.3 | 5.0 | 0.0 | 0.0 | 0.0 |
| Total | 30 | 3,955 | 100.0 | 755 | 0.0 | 0.0 | 0.0 | 22.7 | 30.0 | 21.5 | 73.1 | 66.7 | 73.5 | 4.2 | 3.3 | 5.0 | 0.0 | 0.0 | 0.0 |

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-19

| Assessment Area: | Total Loans to Small Businesses | | | | Businesses with Revenues <= 1MM | | | Businesses with Revenues > 1MM | | Businesses with Revenues Not Available | |
|------------------|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|
| | # | \$ | % of Total | Overall Market | % Businesses | % Bank Loans | Aggregate | % Businesses | % Bank Loans | % Businesses | % Bank Loans |
| Non-MSA AA 2019 | 30 | 3,955 | 100.0 | 755 | 83.6 | 86.7 | 49.9 | 4.5 | 13.3 | 11.9 | 0.0 |
| Total | 30 | 3,955 | 100.0 | 755 | 83.6 | 86.7 | 49.9 | 4.5 | 13.3 | 11.9 | 0.0 |

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data
 Due to rounding, totals may not equal 100.0%