



PUBLIC DISCLOSURE

July 23, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank in Fredonia
Charter Number 14370

730 Madison Street
Fredonia, KS 66736

Office of the Comptroller of the Currency
7101 College Boulevard, Suite 1600
Overland Park, KS 66210

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

The Lending Test is rated: Satisfactory

- The average loan-to-deposit (LTD) ratio since the previous examination is reasonable.
- A substantial majority of consumer loans originated during this evaluation period are within First National Bank in Fredonia's (FNB) assessment area (AA).
- Geographic distribution reflects excellent dispersion among consumers in different income tracts within the AA.
- Borrower distribution reflects reasonable dispersion among borrowers of different income levels.

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 metropolitan area/AA.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs 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. CTs 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 AA(s) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(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 refinances, 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 metropolitan/AA.

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 (MSA): 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 MSA 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 MA. 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 MA, the institution will receive a rating for the multi-state MA.

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.

Description of Institution

First National Bank in Fredonia (FNB) is a \$92 million single-state financial institution headquartered in Fredonia, Kansas. FNB operates one full-service branch and a 24-hour automated teller machine (ATM) in Wilson County, Kansas. First National Bancshares Corporation of Fredonia, the institution's holding company, owns 100 percent of FNB. No branches were opened or closed during the evaluation period. FNB has one non-MA AA that includes all of Wilson County, Kansas.

The institution offers basic deposit and loan products and services. As of March 31, 2018, FNB reported total loans of \$31.28 million, which represented 33.55 percent of average assets. The loan portfolio is diversified with residential, commercial, consumer, and agricultural lending products. The majority of the loan portfolio comprises residential mortgage and commercial lending, by dollar amount, at 30.40 percent and 23.24 percent, respectively. Consumer and agricultural lending activities also represent a significant amount of the loan portfolio at 21.57 percent and 16.72 percent. Tier 1 capital is \$15.56 million.

FNB has five competitors in the AA and has the highest percentage of market share, at 34.65 percent, based on the FDIC Deposit Market Share Report as of June 30, 2017. The closest competitors include The State Bank of Kansas, First Neodesha Bank, and Community National Bank and Trust that have market shares ranging from 17.72 percent to 22.88 percent. FNB is one of three local banks. The two competitor banks in Fredonia include The State Bank of Kansas and a branch of Community National Bank and Trust. The bank also has competitors from several larger surrounding towns, such as, Chanute, Neodesha, Independence, and Parsons.

There are no legal or financial impediments to FNB's ability to meet the credit needs of its AA. FNB received a "Satisfactory" rating under the Small Bank Performance Standards at the previous CRA evaluation dated June 17, 2013.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB's CRA performance under the small bank procedures. The evaluation period for this examination was January 1, 2015 through December 31, 2017. FNB's primary loan product is consumer loans with 78.27 percent by number and 38.48 percent by dollar in 2015-2016, and 76.43 percent by number and 37.16 percent by dollar in 2017.

Lending activity for 2017 is evaluated using 2015 ACS data, while lending activity in 2015-2016 is evaluated using 2010 U.S. Census data.

To assess FNB's performance, we randomly selected 27 consumer loans originated from 2015-2016 and 28 consumer loans originated in 2017. Within our review, we gave greater weight to FNB's performance in 2015-2016 than performance in 2017, since it includes two full years and the majority of the evaluation period.

Data Integrity

This evaluation was based on accurate data. FNB is not required to collect and maintain data on consumer loans. Therefore, we utilized a random sampling to obtain data on these loans, including income and geographic data.

Selection of Areas for Full-Scope Review

FNB has one assessment area, which received a full-scope review. Refer to Appendix A for additional information.

Ratings

FNB's overall rating is based primarily on those areas that received full-scope reviews.

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 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 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

LENDING TEST

FNB's performance under the lending test is rated satisfactory.

The LTD ratio is reasonable and management originated a substantial majority of loans within the AA. The overall borrower distribution of loans was reasonable and the overall geographic distribution of loans was excellent.

Loan-to-Deposit Ratio

FNB's quarterly average LTD ratio is reasonable at 35.90 percent, as external factors negatively affect the bank's ability to lend. We calculated FNB's quarterly average LTD ratio using information from the Call Reports from June 30, 2013 to March 31, 2018. The LTD ratio ranged between 33 percent and 41 percent. The quarterly average LTD ratio for similarly situated financial institutions for the same period is 59.88 percent with ratios ranging from 30.95 percent to 90.74 percent. By asset size, FNB ranked fourth out of seven similarly situated financial institutions. These financial institutions ranged from \$101.4 million to \$69.2 million in asset size, with an average asset size of \$88.4 million.

FNB has strong competition with limited loan demand due to a decreasing population. FNB competes with four other banks located within the AA. FNB is one of two financial institutions with only one location. All other institutions have multiple locations in other market areas, broadening their customer base and increasing lending opportunities. FNB focuses lending efforts within the AA. In addition, FNB's primary lending product is small-dollar consumer loans.

Lending in Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer	55	89%	7	11%	62	\$323,597	85%	\$55,410	15%	\$379,007

Source: 01/01/2015-12/31/17 Bank Data

FNB extended a substantial majority of its loans by number and dollar amount to consumers inside its AA. FNB lent 89 percent by number and 85 percent by dollar amount of its primary product, consumer loans, within the AA.

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

Refer to Table V in appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

FNB's overall distribution of consumer loan products to households of different incomes during the three-year evaluation period is reasonable.

While FNB had poor penetration to low-income households in 2015-2016 and 2017, examiners considered external factors as contributing to the bank's performance below the demographic comparators for low-income borrowers. Within the AA, 17 percent of households are below the poverty level in 2015-2016 and 16 percent of households are below the poverty level in 2017. Population within the AA is declining at a rate of 4% from 2015-2016 to 2017. Competition is strong in the AA, with a total of four competing institutions. Additional weighting was given to the results from the lending period of 2015-2016, as it includes two full years and the majority of the evaluation period.

Lending Period 2015-2016

Lending to low- and moderate-income households during 2015-2016 reflects reasonable penetration. Consumer loans in the AA reflect excellent penetration to moderate-income borrowers and poor penetration to low-income borrowers. As reflected in Table V, distribution of consumer loan products to low-income households is 25.9 percent compared to demographics of 27.1 percent. However, lending to moderate-income households significantly exceeds demographics.

Lending Period 2017

Borrower income distribution during 2017 reflects reasonable penetration. Consumer loans in the AA reflect excellent penetration to moderate-income borrowers and poor penetration to low-income borrowers. As reflected in Table V, distribution of consumer loan products to low-income households is 3.6 percent compared to demographics of 26.4 percent. However, lending to moderate-income households significantly exceeds demographics.

Geographic Distribution of Loans

Refer to Table U in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The distribution of consumer loans in low and moderate income tracts reflects excellent dispersion in 2015-2016 and 2017. In 2015-2016, the AA contains one CT designated as moderate-income. FNB's percentage of loans in the moderate-income tract is 59.3 percent, which significantly exceeds the demographic ratio of 32.5 percent. There are no low-income tracts in the AA.

In 2017, the AA had two CTs designed as moderate-income. FNB's percentage of loans in moderate-income tracts is 75 percent, which significantly exceeds the demographic ratio of 46.8 percent. There are no low-income tracts in the AA.

Responses to Complaints

FNB has not received any complaints during the evaluation period relating to its 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 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 loans): (1/01/15 to 12/31/17)	
Financial Institution	Products Reviewed	
First National Bank in Fredonia (FNB) Fredonia, KS	Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
All Census Tracts within Wilson County, KS.	Full-Scope	See Appendix B for additional information.

Appendix B: Community Profiles for Full-Scope Areas

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	50.0	50.0	0.0	0.0
Population by Geography	9,061	0.0	46.8	53.2	0.0	0.0
Housing Units by Geography	4,663	0.0	48.7	51.3	0.0	0.0
Owner-Occupied Units by Geography	2,808	0.0	46.6	53.4	0.0	0.0
Occupied Rental Units by Geography	961	0.0	47.6	52.4	0.0	0.0
Vacant Units by Geography	894	0.0	56.8	43.2	0.0	0.0
Businesses by Geography	498	0.0	50.6	49.4	0.0	0.0
Farms by Geography	92	0.0	56.5	43.5	0.0	0.0
Family Distribution by Income Level	2,496	22.5	21.5	25.9	30.1	0.0
Household Distribution by Income Level	3,769	26.4	17.6	19.5	36.5	0.0
Median Family Income Non-MSAs - KS	\$56,877	Median Housing Value				\$60,048
		Median Gross Rent				\$584
		Families Below Poverty Level				11.9%
<i>Source: 2015 ACS Census and 2017 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>						

FNB's AA includes all of Wilson County, Kansas. The county is not in a MSA. In 2015 and 2016, the AA consisted of three middle-income CTs and one moderate-income CT. Three of the four CTs in Wilson County are designated rural and underserved areas. The 2015 U.S. Census resulted in a middle-income CT being reclassified as moderate income. In addition, two CTs in the AA are designated as underserved based on 2015 U.S. Census data.

Census data shows a decline in the Wilson County population from 9,409 in 2015 and 2016 to 9,061 in 2017. In addition, the number of households declined from 3,872 in 2015 and 2016 to 3,769 in 2017.

The FFIEC Census Demographic data reported the median income range of \$36,932 - \$47,969 for the four CTs within FNB's AA. The demographic data shows 11.9 percent of families in the AA report income below the poverty level.

FNB operates one main office location that includes an ATM within the AA. The main office is located in Fredonia, KS.

Primary industries within the AA are agriculture, healthcare, education, and manufacturing. Major employers include LMI Aerospace, TCI Fabrications, RK Steel, Fredonia Regional Hospital, and the school districts. The 2017 unemployment rate in the AA was 3.9 percent, compared to the state of Kansas unemployment rate of 3.5 percent and national unemployment rate of 4.1 percent.

Competition within the AA is strong with a total of five institutions located in Wilson County. According to the Federal Deposit Insurance Corporation's most recent deposit market share report dated June 30, 2017, FNB has the largest market share of 34.65 percent. FNB and The State Bank of Kansas are the only institutions that operate only one location. The other three institutions have multiple locations outside the AA. Other competitors include First Neodesha Bank, Community National Bank & Trust, and Equity Bank. Due to strong competition in the AA, FNB has found more demand for consumer loans.

Examiners considered two community contacts within the AA. The contacts were business professionals and one served the city. The contacts indicated the primary need in the AA are lending for higher quality 1-4 family homes. Both contacts stated that all the local banks are active in the community, but specifically mentioned FNB's strong support in lending and donating to the area.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate MAs 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/AA. Deposit data is compiled by the FDIC and are available as of June 30th 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 U. Assessment Area Distribution of Consumer 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 households throughout those geographies.
- 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/AA.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Wilson County 2015-2016	27	\$116,890	100%	27.1%	25.9%	16.6%	33.3%	20.7%	18.5%	35.6%	22.2%	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														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Wilson County 2017	28	\$206,707	100%	26.4%	3.6%	17.6%	42.9%	19.5%	17.9%	36.5%	35.7%	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														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015-2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Wilson County 2015-2016	27	\$116,890	100%	0.0%	0.0	32.5%	59.3%	67.5%	40.7%	0.0	0.0	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														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Wilson County 2017	28	\$206,707	100%	0.0	0.0	46.8%	75%	53.2%	25%	0.0	0.0	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														