



**PUBLIC DISCLOSURE**

January 7, 2019

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

FSNB, National Association  
Charter Number 14546

1420 Southwest Lee Boulevard  
Lawton, OK, 73501

Office of the Comptroller of the Currency

The Harvey Parkway Building  
301 NW 63rd Street, Suite 490  
Oklahoma City, OK 73116-7908

**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.**

**The Community Development Test is rated: Satisfactory.**

The primary factors supporting the ratings are summarized below:

- FSNB, National Association's (FSNB) loan-to-deposit (LTD) ratio is reasonable at 48 percent as of December 31, 2018 and averaged 43 percent over the evaluation period. The bank originates a high volume of low dollar consumer loans. Small dollar consumer loans are the primary need of the bank's low- and moderate-income (LMI) military and civilian customer base.
- FSNB originated a majority of its loans within the designated assessment areas (AAs). The in/out ratio is stronger when you consider the service members that are transient and not tied to any particular geography.
- The distribution of loans by borrower income reflects an excellent penetration to individuals with different incomes and exceeds the standard for satisfactory performance.
- Overall, the bank's distribution of loans by geography reflects a reasonable dispersion and meets the standard for satisfactory performance.
- FSNB's level of community development (CD) activities demonstrates adequate responsiveness to the AAs served. CD activities were focused on providing financial literacy training to LMI service members and civilians. Bank-wide, FSNB provided 1,396 hours of financial literacy training to 20,591 LMI persons. Additionally, FSNB's CD lending demonstrated adequate responsiveness in the AAs served generating \$33 million in CD loans during the evaluation period creating LMI jobs, revitalizing LMI areas, and providing affordable housing. Qualified investments totaling \$11.0 million reflected an adequate responsiveness by primarily providing affordable housing.

## 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 Family 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 Family Income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the Median Family 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 Family 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 Family 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 Family Income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

As of December 31, 2018, FSNB is a \$383 million dollar bank headquartered in Lawton, OK. FSNB is a subsidiary of JRMB II, which is a two-bank holding company also headquartered in Lawton, Oklahoma. FSNB's affiliate bank is City National Bank and Trust Co., located in Lawton, OK, with total assets of \$341 million dollars as of December 31, 2018. FSNB operates a main office, as well as 84 branch locations in nine states. FSNB operates five branches on military bases, 70 branches in Walmart stores, and 9 stand-alone branches. FSNB has six branches in Oklahoma, 37 branches in Tennessee, 14 branches in North Carolina, nine branches in Mississippi, four branches in Louisiana, six branches in Arkansas, three branches in Delaware, two branches in Texas, and three branches in Georgia.

FSNB started operations in 1946 on Fort Sill Army Post. Until 2000, FSNB existed only on military installations in Oklahoma, Delaware, South Carolina, Texas, and California. In 2000, FSNB opened its first branch inside a Walmart store in North Carolina. Since then, the majority of FSNB's growth has come through opening branches in Walmart stores in North Carolina, Tennessee, Louisiana, Mississippi, Arkansas and most recently Georgia.

FSNB's total assets have not changed significantly since the last CRA examination dated October 6, 2014. Since that time, FSNB has opened 11 branches and closed eight with the majority of the new branches located inside Walmart stores. Approximately 60 percent of the bank's customers are civilian and 40 percent are military. Civilian customers are primarily shoppers at Walmart stores. The majority of Walmart shoppers fall at or below the national Median Family Income limit of \$57.6 thousand.

The opportunity for HMDA, commercial, and small business loans is limited around military installations. Less than 1 percent of FSNB's customers are commercial customers. Housing or housing subsidies offered under the Basic Allowance for Housing (BAH) program are provided by the military to personnel. Consumer loans are the primary loan product required by FSNB's military customers.

All bank support and operations staff is centered in Lawton and Fort Sill. The bank's footprint is divided into regions with one regional manager over an average of four to five branches. Additionally three district managers provide oversight and mentoring over regional managers. FSNB branches are organized differently than traditional bank branches. In general, these branches have one manager and three to five retail bankers at any given time. There are no loan officers in any retail branches. Written or online loan applications are accepted at all branches and sent to the loan department in Oklahoma for processing. Most FSNB branches do not have drive-thru capabilities nor do they have safe deposit boxes.

FSNB operates 13 "Technology Branches" in Walmart stores. These branches utilize drive-thru technology to connect customers with customer service representatives in back rooms. These branches are very efficient and use very small spaces in Walmart stores that previously was insufficient hold a bank branch. Some branches operate in only 300 square feet. In 2013, FSNB was awarded the "Innovation Award" by Walmart for designing these efficient branches, thus increasing the number of Walmart stores where banking services could be offered.



FSNB offers a wide range of financial products and services tailored for LMI consumers. Deposit accounts are uniform at all branch locations and offer low fees, as low as \$5 minimum deposit to open and no credit check required to open a new account. Most accounts do not require a minimum balance during a statement period. FSNB serves customers who have been turned down for accounts at other banks. Nearly one-third of the population, in the states where FSNB has branches, is under-banked or unbanked (10.1 percent unbanked, 22.5 percent under-banked). FSNB offers those consumers a second chance at a bank account regardless of their banking history and offers accounts to people who have never had bank accounts before. To open a new account, FSNB requires only one valid picture ID and Matricula Consular cards are also accepted. FSNB does not conduct credit checks on new account customers. Customers are accepted even if they have bad credit, no credit, or a negative history with other financial reporting agencies.

### **FSNB Small Dollar Lending**

FSNB's business strategy is to develop loan products and services to meet the needs of military and LMI civilian customers. Typically, FSNB customers request small dollar unsecured loans or vehicle secured loans. FSNB offers unsecured loans as low as \$300 when other banks will not make loans lower than \$500-\$5,000. These small dollar "micro-loans" are a primary loan need for LMI individuals and provides an alternative to non-financial institution payday, title, or other predatory loans that often trap consumers into recurring debt. FSNB also offers low-rate military graduation loans, military permanent change of stations (PCS) loans, and military relocation loans.

FSNB also has flexible practices with regard to credit scores and underwriting. FSNB offers these types of loans regardless of geography. Applicants can apply at a branch, by phone, or online, making access to credit highly convenient. Although there is no financial educational requirements attached to these loans, FSNB offers financial education classes throughout their several AAs.

An analysis was done on loans \$5,000 and under made between January 1, 2015 and December 31, 2018. FSNB originated 10,879 loans less than \$5,000 during the evaluation period. The large majority of these loans are to LMI individuals, with the median borrower income of only \$24,000. The average loan size was \$1,449 and had a \$104 average monthly payment. These types of loans make it possible for individuals to correct past credit problems or start building credit, which is important for advancing their financial health.

<b>Small Dollar Loan Information</b>					
<b>Year</b>	<b>Dollar Volume</b>	<b># of Loans</b>	<b>Average Loan Size</b>	<b>Most Common Term</b>	<b>Average Monthly Payment</b>
2015	\$ 4,344,265	2,741	\$ 1,585	24	\$ 108
2016	\$ 3,930,362	2,584	\$ 1,521	24	\$ 105
2017	\$ 3,421,237	2,504	\$ 1,366	12	\$ 103
2018	\$ 4,040,099	3,050	\$ 1,324	12	\$ 98
<b>Total/Average</b>	<b>\$ 15,735,963</b>	<b>10,879</b>	<b>\$ 1,449</b>	<b>18</b>	<b>\$ 104</b>

FSNB also provides services to non-customers. Non-customers can cash checks at any FSNB branch for a fee that is usually lower than other check cashing businesses. This service specifically targets unbanked and under-banked consumers who are disproportionately from lower income households. On the FSNB website, financial education and fraud education is offered to both customers and non-customers.

FSNB branches offer extended hours, as well, to meet the needs of LMI individuals. Typically, branches inside Walmart stores are open until 6:00 pm or 7:00 pm Monday through Friday and until 4:00 pm on Saturdays. Branches on military bases inside Base and Post Exchange stores are open seven days a week and operate the same extended hours as the exchanges. Typically, every Walmart and stand-alone branch has an ATM outside of it that is accessible when the Walmart store is open, which is usually 24 hours a day. Military locations usually have ATM's throughout the base and accessibility depends on building hours. FSNB also offers telephone, online and mobile banking to offer greater access to customers.

Due to the employee structure of FSNB, with the highest bank officers in most AAs being hourly paid branch managers whose primary duties involve supervising bank tellers, opportunities for management staff to sit on boards or committees of CD groups and organizations across AAs is limited. Most board memberships are held in Lawton, which is where the majority of upper management is located. FSNB performs the majority of its CD service in the form of financial literacy education. FSNB provides financial literacy classes at LMI schools, transitional living centers, local housing authorities and various military groups. In addition to presenting financial literacy information, FSNB is highly involved in campaigns to reach out to under-banked and unbanked people.

As of December 31, 2018, FSNB reported total assets of \$383 million with tier one capital of \$58 million. Loans totaled \$151 million and represent 38 percent of total assets. Approximately 45 percent of the bank's loans are consumer loans. The table below illustrates the bank's distribution of loans by major loan types, as of December 31, 2018.

<b>LOAN CATEGORY</b>	<b>\$ (000)</b>	<b>%</b>
Residential Real Estate Loans	\$56,774	37.72%
Commercial Real Estate Loans	\$53,762	35.72%
Other Loans	\$12,291	8.17%
Consumer Loans	\$10,597	7.04%
Agriculture Loans	\$8,668	5.76%
Commercial and Retail Loans	\$8,414	5.59%
<b>Total</b>	<b>\$150,506</b>	<b>100.00%</b>

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. FSNB is involved in and provides support to meet the community's financial needs. The bank received an overall rating of "Satisfactory" at the last CRA evaluation dated October 6, 2014.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FSNB using the Intermediate Small Bank (ISB) procedures, which comprises the Lending Test and the Community Development Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The Community Development Test evaluates the bank's responsiveness to the identified needs in its AAs through CD lending, qualified investing, and services.

We commenced the 2018 review of FSNB on January 7, 2019. The review included an evaluation of the bank's performance of nine states in which it operates. The bank also operates in Memphis, TN-MS-AR Multi-State MSA, which also received a separate review. We did not evaluate the bank's performance in the state of Georgia. The three Walmart branches in the state of Georgia have only been open approximately six months and have not yet generated sufficient activity for a meaningful analysis.

The review focused on the bank's primary loan products, which are consumer loans. The bank has mostly consumers and does not have many commercial customers. Customers include U.S. military personnel at base locations and stationed throughout the world. The other branch locations are in Walmart stores and are typically consumers. As a result, the bank's CRA performance was based on lending to military customers and customers obtained through the Walmart branch locations. The analysis included a review of all unsecured consumer loans originated in 2015, 2016, 2017, and 2018.

The evaluation period for the Community Development Test covers the period since FSNB's last CRA evaluation dated October 6, 2014 through the start date of this evaluation December 31, 2018. We tested the CD loans, investments, and services submitted by management to ensure compliance with the regulatory definition for CD.

### Data Integrity

A Data Integrity review was conducted on June 18, 2018. The scope of this review included an assessment of CD loans, investments, and services submitted by management to ensure compliance with the regulatory definition for CD.

### Selection of Areas for Full-Scope Review

In each state and multi-state metropolitan area where the bank has an office, a sample of AAs within that state/multi-state metropolitan area was selected for full-scope and limited-scope reviews. This evaluation considers performance in all of FSNB's AAs. Each AA is reviewed according to interagency examination procedures under either full-scope or limited-scope procedures. Full-scope procedures require analysis of both quantitative and qualitative data, while limited-scope focus primarily on quantitative data with consideration of qualitative data generally limited to demographic and competitive comparators. Factors considered in selecting AAs for full-scope reviews are outlined in OCC guidance including the number of bank AAs in each state, the bank's lending, investment, and service needs and opportunities in each AA, the number of competing banks in each AA and the importance of the examined bank in serving each of those AAs, particularly when relatively few financial services providers operate in an AA; and the length of time since each AA was reviewed under full-scope procedures. Nonetheless, conclusions and ratings will reflect the bank's performance across all AAs. At least one full-scope

AA is assigned to each rated area to include eight states and the one multi-state MSA in which the bank has operations. The state of Georgia was not evaluated. Operations in Georgia were extremely limited at the time of this examination. The three Walmart branches in Georgia were opened in April, June, and August of 2018 and have not generated sufficient activity for a meaningful analysis.

Refer to the Appendix A: *Scope of Examination* for details regarding how the full and limited-scope areas were selected.

## **Ratings**

The bank's overall rating is a blend of the multi-state metropolitan area rating and state ratings. The bank's overall rating is based on consideration of performance in all FSNB's AAs. The rating for the state of Oklahoma carried the most weight since 65 percent of the bank's total deposits and 44 percent of the bank's total loans are from Oklahoma branches. The state of Texas carries the second most weight holding 10 percent of the bank's total deposits and 14 percent of the bank's total loans. North Carolina and Tennessee hold between 5 percent and 10 percent of the bank's total loans and deposits and influenced the overall rating proportionately. The states of Delaware and Mississippi both hold between one and 3 percent of the bank's total deposits. The Memphis Multi-State MSA holds 3 percent of the bank's deposits and less than 5 percent of the loans. The states of Arkansas and Louisiana did not significantly influence the overall rating as deposits in these states represent less than 1 percent of the bank's total deposits.

Refer to the "Scope" section under each state for details regarding how each AA was weighted in arriving at the respective ratings.

## **Other Performance Data – CD Investment**

In an attempt to reach a broader area, to include the nine states in which the bank has operations, FSNB made a \$1.0 million investment in Pharos Capital Partners G.P. III-A, LLC (Pharos). Pharos is a nationwide small business investment company (SBIC). This is a physician founded private-equity firm, which invests in growing healthcare companies that lower the total cost of care, improve patient outcomes, and expand access to care.

## **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 Criteria

### Loan-to-Deposit Ratio

FSNB's LTD ratio is reasonable and meets the standard for satisfactory performance. At December 31, 2018, the bank's LTD ratio was 48 percent, while the average ratio over the assessment period was 43 percent. The bank has improved this ratio during the evaluation period by, in part, originating CD loans and purchasing small business loans. The average was compared to the average of four peer banks that also have branches in Walmart stores or on military installations with total assets between \$85 million and \$1.9 billion. FSNB's average of 43 percent is reasonable compared to the average of the four comparable banks of 46 percent. These average LTD ratios are detailed in the following table.

LOAN-TO-DEPOSIT RATIOS		
Institution	Total Assets as of 12/31/18 (000's)	Average LTD Ratio
<b>FSNB, National Association</b>	<b>\$383,350</b>	<b>42.63%</b>
First National Bank Texas dba First Convenience Bank	\$1,874,272	43.95%
Bank of Pensacola	\$83,970	39.95%
Fort Hood National Bank	\$279,861	36.59%
The City National Bank and Trust Company of Lawton, OK	\$341,114	63.62%

### Lending in Assessment Area

FSNB's lending in their AAs meets the standard for satisfactory performance. A majority of the number and dollar amount of unsecured consumer loans were originated in the bank's AAs. As shown in the table below, 83 percent of the number of loans and 78 percent of the dollar amount of loans were originated in FSNB's AAs.

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		
	#	%	#	%		\$	%	\$	%	
Consumer (Unsecured)	7,978	83.20	1,611	16.80	9,589	11,616	78.08	3,261	21.92	14,877
<b>Total</b>	<b>7,978</b>	<b>83.20</b>	<b>1,611</b>	<b>16.80</b>	<b>9,589</b>	<b>11,616</b>	<b>78.08</b>	<b>3,261</b>	<b>21.92</b>	<b>14,877</b>

Source: 1/1/15-12/31/18 Bank Data

## Multistate Metropolitan Area Rating

### Memphis, TN-MS-AR-MSA:

**CRA rating for the Memphis TN-MS-AR MSA: Satisfactory.**

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

**The Community Development Test is rated: Satisfactory.**

- The bank's borrower distribution unsecured consumer loans reflects an excellent penetration to individuals of different income levels and exceeds the standard for satisfactory performance.
- The bank's geographic distribution of loans to LMI areas reflects an excellent dispersion and exceeds the standard for satisfactory performance.
- The bank's CD activities demonstrate adequate responsiveness to the CD needs of its AA. The bank made qualified investments totaling \$1.5 million and provided 30 hours of financial literacy training to LMI persons.

### Description of Institution's Operations in Memphis, TN-MS-AR Multi-state MSA

FSNB has 12 of its 84 branches in the Memphis TN-MS-AR Multi-State MSA, which represents 14 percent of the bank's branching network and 3 percent of their deposit base. The bank has deposits of \$9.7 million in the MSA. FSNB has a small presence in the Memphis Multi-State MSA and is ranked number 52 out of 54 institutions with a deposit market share of less than 1 percent.

Refer to the *Community Profiles* for the Memphis TN-MS-AR Multi-State MSA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

### Scope of Evaluation in Memphis, TN-MS-AR Multi-State MSA

The entire Memphis, TN-MS-AR Multi-State MSA was selected for a full-scope review. Loan products reviewed consist of unsecured consumer loans. The Memphis, TN-MS-AR Multi-State MSA accounts for approximately 3 percent of the bank's total deposits and 2 percent of total loans.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Memphis, TN-MS-AR Multi-State MSA**

### **LENDING TEST**

The bank's performance under the Lending Test in Memphis, TN-MS-AR Multi-State MSA is rated "Outstanding." FSNB's borrower distribution of loans to borrowers of different income levels was excellent. The geographic dispersion of loans to LMI areas was excellent for overall excellent performance.

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

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

#### **Memphis, TN-MS-AR Multi-State MSA AA**

Consumer unsecured lending in the Memphis, TN-MS-AR Multi-State MSA AA reflects excellent penetration among LMI individuals and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution is excellent with 93 percent of the bank's loans extended to LMI individuals. For 2017-2018, the borrower distribution is excellent with 95 percent of the bank's loans extended to LMI individuals.

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

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic dispersion of the bank's loan originations and purchases.

#### **Memphis, TN-MS-AR Multi-State MSA AA**

Consumer unsecured lending in the Memphis, TN-MS-AR Multi-State MSA AA reflects excellent dispersion among LMI geographies and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the dispersion to low-income tracts is reasonable and the dispersion to moderate-income tracts is excellent. For 2017-2018, the dispersion to low-income tracts is reasonable and the dispersion to moderate-income tracts is excellent.

#### **Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.



## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the Memphis, TN-MS-AR Multi-State MSA AA is rated "Satisfactory." FSNB's CD investment activities provided excellent responsiveness to AA needs, while CD services provided adequate responsiveness. FSNB did not originate any CD loans in the AA, but made a significant lending commitment to an affordable housing organization that serves the broader state of Mississippi.

### Number and Amount of Community Development Loans

While FSNB did not originate any CD loans in the Memphis, TN-MS-AR Multi-State MSA AA, the bank made a binding commitment to an organization that provides affordable housing throughout the state of Mississippi. FSNB made a commitment to participate in the statewide Mississippi Financial Institutions Housing Opportunity Pool (FIHOP). FIHOP provides opportunities for affordable housing funding in the Mississippi portion of the Multi-State MSA AA. Refer to the *Community Development Lending Test* section within the *State of Mississippi* for additional details.

### Number and Amount of Qualified Investments

Investment performance in the Memphis, TN-MS-AR Multi-State MSA AA reflects excellent responsiveness to the AA's CD investment needs. FSNB's qualified CD investments totaled \$1.5 million.

During the evaluation period, FSNB's CD investments totaled \$1.5 million and included the purchase of seven CRA qualified mortgage-backed securities totaling \$1.0 million. FSNB had an outstanding balance of \$544,000 in prior period investments in two CRA qualified mortgage-backed securities. The bank also made four donations totaling \$2,750.

### Extent to Which the Bank Provides Community Development Services

FSNB has demonstrated adequate responsiveness to the CD service needs in the Memphis, TN-MS-AR Multi-State MSA AA.

FSNB has demonstrated adequate responsiveness to the CD service needs in the Memphis, TN-MS-AR Multi-State MSA AA. Thirty hours were devoted to CD service activities providing financial literacy education to disadvantaged veterans, unemployed or underemployed persons, and families in crisis. The bank reached approximately 248 LMI persons with their training. Bank staff also served as board members for the organization "*Bank On Memphis*." This organization assists the unbanked population of Memphis in setting up low or no cost bank accounts and provides financial literacy training.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels; however, nine of the 12 branches in the Memphis, TN-MS-AR Multi-State MSA AA are located in middle- or upper-CTs. All of FSNB's branches in the Multi-State MSA AA are located in Walmart stores with ATMs available 24/7. Refer to the *Description of the AA* and *Description of the Institution* sections of this Performance Evaluation for additional information on branch distribution and retail services.

**Responsiveness to Community Development Needs**

Overall, FSNB has demonstrated adequate responsiveness to the identified needs and opportunities throughout the Memphis Multi-State MSA AA. According to the CFPB, financial literacy education has been recognized as a critical need in the United States and particularly among servicemen. In the Multi-State MSA AA, the bank provided 30 hours of financial literacy training to 248 LMI individuals. The bank also devoted time to reach the unbanked and under-banked by offering various banking products. Additionally, FSNB made \$1.5 million in CD investments in the AA.

## State Rating

### State of Oklahoma

**CRA rating for Oklahoma: Satisfactory.**

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

**The Community Development Test is rated: Satisfactory.**

- FSNB's distribution of unsecured consumer loans to individuals of different income levels reflects an excellent penetration and exceeds the standard for satisfactory performance.
- The bank's geographic distribution of loans to LMI areas reflects a reasonable dispersion and meets the standard for satisfactory performance.
- The bank's level of CD activities is satisfactory. The bank generated a reasonable level of CD loans totaling \$14.3 million. The level of CD investments was reasonable totaling \$1.3 million. CD services also reflected adequate responsiveness with the bank providing 179 hours of financial education training.

### Description of Institution's Operations in Oklahoma

FSNB has six of its 84 branches in the state of Oklahoma, which represents 7 percent of the bank's branching network and 65 percent of their deposit base. The bank has deposits of \$203 million in the state. All Oklahoma branches are located within the Lawton, OK MSA, which is designated as a full-scope AA. FSNB has a moderate presence in the Lawton MSA and is ranked number five of 13 institutions with a deposit market share of 13 percent.

Refer to the *Community Profiles* for the state of Oklahoma in Appendix C for detailed demographics and other performance context information for this full-scope AA.

### Scope of Evaluation in Oklahoma

One full-scope AA was selected to review for the state of Oklahoma. The full-scope AA is the Lawton MSA. There are no limited-scope AAs in Oklahoma. The loan product reviewed was unsecured consumer loans. Considerable weight was given to performance in the state of Oklahoma compared to the other states as Oklahoma branches account for 65 percent of the bank's total deposits and 44 percent of the bank's total loans.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

### LENDING TEST

The bank's performance under the Lending Test in Oklahoma is rated "Outstanding." The bank's borrower distribution of loans to borrowers of different incomes was excellent. The geographic dispersion of loans was excellent for overall excellent performance.

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

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

#### **Lawton MSA AA**

Consumer unsecured lending in the Lawton MSA AA reflects excellent penetration among LMI individuals and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the penetration to LMI individuals is excellent with 49 percent of the bank's loans extend to low-income individuals compared to the 24 percent of low-income households in the AA. Seventeen percent of the bank's loans were extended to moderate-income individuals compared to the 16 percent of moderate-income households in the AA. For 2017-2018, the penetration to LMI individuals is excellent with 48 percent of the bank's loans extended to low-income individuals compared to the 24 percent of low-income households in the AA. Nineteen percent of the bank's loans were extended to moderate-income individuals compared to the 16 percent of moderate-income households in the AA.

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

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

#### **Lawton MSA AA**

Consumer unsecured lending in the Lawton MSA reflects reasonable dispersion among LMI geographies and meets the standard for satisfactory performance. For the time period of 2015-2016, the dispersion to low-income tracts is excellent with 6 percent of the bank's loans extended to borrowers located in low-income CTs compared to 5 percent of the households residing in low-income tracts. The dispersion to moderate-income tracts is good with 17 percent of the bank's loans extended to borrowers located in moderate-income CTs compared to 19 percent of the households residing in moderate-income CTs. For 2017-2018, the dispersion to low-income tracts is reasonable with 4 percent of the bank's loans to borrowers in low-income CTs compared to 6 percent of households residing in low-income tracts. Twenty percent of the bank's loans were extended to borrowers in moderate-income CTs compared to 23 percent of households that reside in moderate-income tracts.

### **Responses to Complaints**

FSNB has not received any complaints regarding its performance in helping to meet the credit needs within this AA during this evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in Oklahoma is rated "Satisfactory." The level of CD loans, investments, and services was adequate and responsive to the needs of the AA.

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

CD lending in the full-scope Lawton MSA AA reflects adequate responsiveness. During the evaluation period, FSNB originated nine CD loans totaling \$14.3 million. CD loans helped create and retain LMI jobs for local small businesses, provide affordable housing, revitalize and stabilize LMI areas and provide community services to LMI persons in the AA.

The bank originated four economic development loans to local small businesses that created or retained LMI jobs. Three loans totaling \$369 thousand were originated to revitalize or stabilize the Lawton downtown Tax Increment Financing (TIF) district. A loan totaling \$2.0 million was originated to provide affordable housing. A loan for \$2.9 million was originated to an organization that provides community services to LMI persons. Examples of CD loans are highlighted below:

- FSNB refinanced two loans totaling \$6.4 million on two retail strip centers in Lawton. The tenants consist of a variety of restaurants and small retail service businesses that employ predominantly LMI individuals. These loans helped to create and retain jobs in this AA.
- FSNB originated a loan totaling \$2.0 million to refinance a 68 unit apartment complex that provides affordable rents to LMI individuals in the area. A majority of the units are rented at rates that are below the HUD fair market rents for one or two bedroom apartments. Affordable rental units are a primary need in Lawton with the service members at Fort Sill Army Post, most of which are stationed there on a temporary basis.

### **Number and Amount of Qualified Investments**

Investment performance in the full-scope Lawton MSA AA reflects adequate responsiveness, with total investments of \$1.3 million. During the evaluation period, FSNB's investments included a CRA qualified mortgage-backed security for \$190,000, two prior period CRA qualified Municipal securities with an outstanding balance of \$238 thousand, and 22 donations totaling \$46 thousand.

FSNB also had an in kind donation that resulted from providing below market rents on a local warehouse that was converted into a training center for a large defense contractor. The in-kind donation, totaling \$875 thousand, is the difference between the market lease rate and the discounted lease rate over the duration of the contract. Further, trainees stimulated the local economy by eating at local restaurants, staying in hotels, and renting cars. It is estimated that the students spent approximately \$7.2 million annually in this LMI area in the city of Lawton.

**Extent to Which the Bank Provides Community Development Services**

FSNB provided an adequate level of CD services in the Lawton MSA AA. CD service activities are focused on providing financial literacy education to LMI individuals and serving on the board of non-profit organizations that provide social services to LMI individuals and families. Employee hours devoted to financial education in the Lawton MSA AA totaled 179 hours reaching 2,655 LMI attendees. Most of the financial education was provided to military assistance programs and to Goodwill of Southwestern Oklahoma. Financial education training was also provided to LMI attendees of a church and women's shelter. Additionally, bank staff served on the boards of two organizations focused on providing services to LMI persons.

FSNB's branches and retail services reflect adequate responsiveness to geographies and individuals of all income levels. FSNB operates six of its 84 branches in the Lawton MSA AA. Three branches are located on Fort Sill Army Post. Three stand-alone branches are located in the city of Lawton to better serve military personnel. One branch is located in a low-income CT and two are located in moderate-income CTs. Refer to the *Community Profiles* in Appendix C and the *Description of the Institution* section of this Performance Evaluation for additional information on branch distribution and retail services.

**Responsiveness to Community Development Needs**

Overall, FSNB has demonstrated adequate responsiveness to the identified needs and opportunities throughout the full-scope AA. According to the CFPB, financial literacy education has been widely recognized as a critical need in the United States. The CFPB annually publishes the *Financial Literacy Annual Report*, which goes into great detail about the need for financial literacy. The report highlights the need for high quality sources of unbiased financial information. The report also addresses the need for financial literacy training among service members. In the Lawton MSA AA, the bank provided 179 hours of financial literacy education reaching 2,655 LMI individuals. Also, the bank originated a reasonable level of CD loans in the AAs. Impactful CD loans included those that created and retained LMI jobs or that provided affordable LMI housing.

## State of Texas

### CRA rating for Texas: Satisfactory.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

- FSNB's distribution of loans by borrower income is excellent and exceeds the standard for satisfactory performance.
- The bank's geographic distribution of loans to LMI areas is reasonable and meets the standard for satisfactory performance.
- The bank's CD activities reflect an adequate responsiveness within its AA. CD service activities are centered in providing financial literacy training. FSNB provided excellent responsiveness with 403 hours of financial literacy training to 8,485 LMI individuals. FSNB did not originate any CD loans and qualified investments totaled \$4,620.

## Description of Institution's Operations in Texas

FSNB has two of 84 branches in the state of Texas, which represents 2 percent of the bank's branching network and 10 percent of their deposit base. One branch is located on SAFB, while the other branch is located off base. The bank has deposits of \$31 million in the state. All branches in the state are located within the Wichita Falls, TX MSA, which has been designated as a full-scope AA. FSNB has a small presence in the MSA and is ranked number 11 out of 15 institutions with a deposit market share of just over 1 percent.

Refer to the *Community Profiles* for the state of Texas in Appendix C for detailed demographics and other performance context information for the full-scope AA.

## Scope of Evaluation in Texas

One full-scope AA was selected to review for the state of Texas. The full-scope AA is the Wichita Falls MSA. There are no limited-scope AAs in Texas. The loan product reviewed was unsecured consumer loans. Texas holds 10 percent of the bank's total deposits and 14 percent of total loans and ranks second to Oklahoma for the most deposit and loan share.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

### LENDING TEST

The bank's performance under the Lending Test in Texas is rated "Outstanding." The bank's borrower distribution of loans to borrowers of different incomes was excellent. The geographic dispersion of loans was excellent for overall excellent performance.

**Lending to Borrowers of Different Incomes**

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

**Wichita Falls MSA AA**

Consumer unsecured lending in the Wichita Falls MSA AA reflects an excellent distribution among LMI individuals and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution is excellent with 39 percent of the bank's loans extended to low-income individuals compared to the 23 percent of low-income households in the AA. Twenty-six percent of the bank's loans were extended to moderate-income individuals compared to the 16 percent of households in the AA. For 2017-2018, the borrower distribution is also excellent with 60 percent of the loans extended to low-income individuals compared to the 24 percent of low-income households in the AA. Twenty-six percent of the loans were extended to moderate-income individuals compared to the 16 percent of moderate-income households in the AA.

**Geographic Distribution of Loans**

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

**Wichita Falls MSA AA**

Consumer unsecured lending in the Wichita Falls MSA AA reflects reasonable dispersion among LMI geographies and meets the standard for satisfactory performance. For the time period of 2015-2016, the geographic dispersion to low-income tracts is poor; however, only 2.8 percent of the households in the AA reside in low-income tracts making opportunities to lend in those tracts limited. The dispersion to moderate-income tracts is adequate. For 2017-2018, the dispersion to both LMI tracts is reasonable.

**Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the Wichita Falls MSA AA is rated "Satisfactory." FSNB did not originate any CD loans. CD Investment showed poor responsiveness, but CD service activities provided excellent responsiveness to the AA needs.



**Number and Amount of Community Development Loans**

CD lending performance in the full-scope Wichita Falls MSA AA reflects poor responsiveness. FSNB did not originate any loans in the AA. The Wichita Falls MSA AA accounts for 9.80 percent of the bank's total deposits.

**Number and Amount of Qualified Investments**

Investment performance in the Wichita Falls MSA AA reflects poor responsiveness. During the evaluation period, FSNB investments included five donations totaling \$4,620.

In an attempt to reach a broader nationwide area that would include FSNB's nine state footprint, FSNB made a \$1.0 million binding commitment to the Pharos SBIC fund. Refer to the *Scope of Examination* section of the Performance Evaluation for additional information regarding this investment.

**Extent to Which the Bank Provides Community Development Services**

CD service performance reflects an excellent responsiveness in the full-scope Wichita Falls MSA AA. CD services were centered in providing financial literacy education to service members and organizations primarily serving LMI students. Employee hours devoted to financial literacy training totaled 403 hours reaching 8,485 LMI persons. Bank staff served on the board of the Eastside Community Development Corporation, which operates in a moderate-income tract. Additionally, bank staff devoted 10 hours to assisting the North Texas Dream Center in securing an affordable housing program grant from the FHLB of Topeka.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels. FSNB operates two of its 84 branches in the Wichita Falls AA. One of the branches is located on Shepard Air Force Base and one branch is located in the City of Wichita Falls. Both of the branches are located in upper-income CTs but border low- and moderate-income CTs. Refer to the *Community Profiles* in Appendix C and the *Description of the Institution* section of this Performance Evaluation for additional information on branch distribution and retail services.

**Responsiveness to Community Development Needs**

Overall, FSNB has demonstrated adequate responsiveness to the identified needs and opportunities throughout the full-scope Wichita Falls MSA AA. According to the CFPB's *Financial Literacy Annual Reports*, financial literacy training has been widely recognized as a critical need across America. The CFPB report also discusses a critical need for financial literacy education among service members. During the evaluation period, FSNB provided 403 hours of financial literacy education to 8,485 LMI individuals. FSNB CD investments included donations of \$4,620. Refer to the *Community Profiles* in Appendix C for performance context issues regarding the limited opportunities in the Wichita Falls AA for CD activities.

## State of North Carolina

### **CRA rating for North Carolina: Outstanding.**

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

**The Community Development Test is rated: Outstanding.**

- FSNB's distribution of unsecured consumer loans to individuals of different income levels reflects an excellent penetration and exceeds the standard for satisfactory performance.
- The bank's distribution of loans by geography reflects excellent dispersion and exceeds the standard for satisfactory performance.
- The bank's level of CD activities is excellent. CD loan, investment and service levels were excellent with \$2.2 million in state-wide CD loans, \$1.7 million in state-wide investments and extensive service levels centered in financial education training.

## Description of Institution's Operations in North Carolina

FSNB has 12 Walmart branches and 2 standalone branches in the state of North Carolina. The state of North Carolina represents 17 percent of the bank's branching network and 9 percent of their deposit base. North Carolina holds \$28 million of the bank's total deposits. FSNB has a small presence in the state with less than 1 percent of the market share in each of its AAs within the state.

FSNB has six AAs within the state to include the Fayetteville MSA, Raleigh-Cary MSA, Richmond County Non-MSA, Jacksonville MSA, Wilmington MSA, and Charlotte MSA.

Refer to the *Community Profiles* for the state of North Carolina in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

## Scope of Evaluation in North Carolina

One full-scope AA was selected to review for the state of North Carolina. The full-scope AA is the Fayetteville MSA, which holds 5 percent of the bank's total deposits and 2 percent of total loans. Limited-scope AAs included the Raleigh-Cary MSA, Richmond County Non-MSA, Jacksonville MSA, Wilmington MSA, and the Charlotte MSA. The loan product reviewed was unsecured consumer loans. North Carolina accounts for 9 percent of the bank's total deposits and 7 percent of total loans.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA**

### **LENDING TEST**

The bank's performance under the Lending Test in North Carolina is rated "Outstanding." The bank's borrower distribution of loans to borrowers of different incomes and geographic distribution was excellent in the full-scope AA. Performance in limited-scope AAs was not inconsistent with the excellent performance in the full-scope AA for overall excellent performance.

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

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

#### **Fayetteville MSA AA**

Consumer unsecured lending in the Fayetteville MSA reflects excellent penetration among LMI individuals and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution is excellent with 63 percent of the bank's loans were extended to low-income individuals compared to the 23 percent of low-income households in the AA. Twenty-two percent of the bank's loans were extended to moderate-income individuals compared to 17 percent of the moderate-income households in the AA. For 2017-2018, the borrower distribution is excellent with 67 percent of the bank's loans were extended to low-income individuals compared to the 23 percent of low-income households in the AA. Twenty-one percent of the bank's loans were extended to moderate-income individuals compared to the 17 percent of households in the AA.

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

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

#### **Fayetteville MSA AA**

Consumer unsecured lending in the Fayetteville MSA AA reflects an excellent dispersion among LMI geographies and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the dispersion to both LMI tracts is excellent. For 2017-2018, the dispersion to both LMI tracts is excellent.

#### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, FSNB's performance under the Lending Test in the Raleigh-Cary MSA, Richmond County Non-MSA, Jacksonville MSA, Wilmington MSA and the Charlotte MSA is not inconsistent with FSNB's overall excellent performance under the Lending Test. Refer to Tables in Appendix C for the facts and data that support these conclusions.

## **Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in North Carolina is rated "Outstanding." FSNB generated an excellent level of CD loans, investments and services state-wide.

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

Loan performance in the state of North Carolina reflects adequate responsiveness. FSNB originated a total of \$2.2 million in CD qualified loans in the full-scope AA and three of the five limited-scope AAs. Two of the limited-scope AAs do not have any CD loans.

### **Conclusions for Areas Receiving Full-Scope Reviews**

CD lending in the full-scope Fayetteville MSA AA reflects adequate responsiveness. FSNB purchased two qualified SBA 504 loans totaling \$80 thousand. The Fayetteville MSA AA accounts for less than 5 percent of the bank's total deposits.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Performance in the limited-scope AAs is not inconsistent with or exceeds the performance in the full-scope AA. In the Raleigh-Cary MSA AA, the bank extended five loans totaling \$227 thousand. Two loans totaling \$100 thousand were to a Community Investment Corporation to build a low-income senior living facility. Three loans totaling \$127 thousand were purchased SBA 504 loans to businesses in the AA that contribute to economic development by creating and retaining LMI jobs. In the Jacksonville MSA AA, the bank originated a loan for \$334 thousand to refinance a strip center where the tenants employ LMI persons. In the Charlotte MSA AA, FSNB purchased a \$1.5 million SBA 504 loan that qualifies as an economic development loan. No CD loans were originated in the Richmond County Non-MSA AA and the Wilmington MSA AA. Combined, these limited-scope AAs hold less than 5 percent of the bank's total deposits.

### **Number and Amount of Qualified Investments**

Investment performance in the state of North Carolina reflects adequate responsiveness. FSNB's investments included 11 CRA qualified mortgage-backed securities totaling \$1.7 million and five donations totaling \$5,898.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Investment performance in the full-scope Fayetteville MSA AA reflects adequate responsiveness with total investments of \$423 thousand. FSNB invested in a CRA qualified mortgage-backed security totaling \$119 thousand and made one donation totaling \$100. There are three prior period CRA qualified mortgage-backed securities totaling \$304 thousand. The full-scope AA accounts for less than 5 percent of the bank's total deposits.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Overall performance in the limited-scope AAs is not inconsistent with or exceeds the performance in the full-scope AA. The limited-scope areas of Raleigh-Cary MSA, Jacksonville

MSA, Wilmington MSA, and Charlotte MSA combined for seven prior period CRA qualified mortgage-backed securities with an outstanding balance \$1.2 million and three donations totaling \$5,378. Investments in the limited-scope AAs totaled \$1.2 million. These limited-scope AAs account for less than 4 percent of the bank's total deposits.

There was one donation for \$420 made in the Richmond County Non-MSA AA. This limited-scope AA has only one Walmart branch that accounts for less than 1 percent of the bank's total deposits.

### **Extent to Which the Bank Provides Community Development Services**

FSNB's CD service activity reflects excellent responsiveness in both the state of North Carolina and in the full-scope Fayetteville MSA AA. Statewide, FSNB invested 179 hours providing financial literacy education to 1,673 LMI attendees.

FSNB offered numerous services to victims of Hurricane Florence. On September 14, 2018, Hurricane Florence made landfall in Wrightsville Beach, NC. FEMA designated the area as a Federal Major Disaster Area on the same day. All 14 branches located in North Carolina were impacted by the storm. Most branches were reopened within two days with reduced hours. In the days following, FSNB waived overdraft fees and made loan payment arrangements for customers as needed. The bank waived \$1,422 in overdraft fees. Additionally, the bank waived loan extension fees, application fees, and reduced rates for loan customers.

### **Conclusions for Areas Receiving Full-Scope Reviews**

In the full-scope Fayetteville MSA, the bank invested 110 hours of financial education to 1,092 LMI attendees. CD services were concentrated in providing financial literacy education to various organizations that provide social services to LMI individuals. Financial education was provided to tenants of low-income housing, "at risk" children, senior citizens, and elementary school children.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the banks level of CD services in the Raleigh-Cary MSA, Richmond County Non-MSA, Jacksonville MSA, Wilmington MSA, and Charlotte MSA is not inconsistent with its excellent performance in the full-scope Fayetteville MSA AA. On a combined basis, the bank provided 69 hours of financial literacy training to 581 LMI individuals in the limited-scope AAs. Training was primarily provided to low-income housing residents and LMI students.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels. FSNB operates five of its 84 branches in the full-scope Fayetteville MSA AA. Two of these branches are located in moderate-income CTs. Branches in the full-scope Fayetteville MSA AA operate in close proximity to Fort Bragg and Pope Army Airfield, which results in a significant amount of the customer base in Fayetteville being LMI military service members. Refer to the *Community Profiles* in Appendix C and the *Description of the Institution* section of this Performance Evaluation for additional information on branch distribution and retail services.

**Responsiveness to Community Development Needs**

Overall, FSNB demonstrated excellent responsiveness to the identified needs and opportunities throughout the full-scope AA. During the evaluation period, FSNB purchased or originated \$2.2 million in CD loans that supported small businesses, created LMI jobs and provided affordable senior housing. The bank provided 179 hours of financial literacy training to 1,673 LMI individuals. Financial literacy has been identified as a critical need. In addition, the bank made qualified investments totaling \$1.7 million state-wide.

## State of Tennessee

### CRA rating for Tennessee: Outstanding.

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

**The Community Development Test is rated: Outstanding.**

- FSNB's distribution of unsecured consumer loans to individuals of different income levels reflects an excellent penetration and exceeds the standard for satisfactory performance.
- The bank's distribution of loans by geography reflects excellent dispersion and exceeds the standard for satisfactory performance.
- The bank's CD lending performance demonstrates excellent responsiveness to the CD needs of its AA with the excellent level of qualified loans, investments and services in the state.

## Description of Institution's Operations in Tennessee

FSNB has 28 of 84 branches in the state of Tennessee, which represents 33 percent of the bank's branching network and 8 percent of their deposit base. The bank has deposits of \$24 million in the state. FSNB has a small presence in the state and has less than 1 percent of the market share in each of its AAs within the state.

FSNB has seven AAs in the state including the Nashville-Davidson-Murfreesboro-Franklin MSA, Knoxville MSA, Johnson City MSA, Jackson MSA, Clarksville MSA, Kingsport-Bristol MSA, and four contiguous non-MSA counties designated as one AA.

Refer to the *Community Profiles* for the state of Tennessee in Appendix C for detailed demographics and other performance context information for the full-scope AA.

## Scope of Evaluation in Tennessee

One full-scope AA was selected to review for the state of Tennessee. The full-scope AA is the Nashville MSA, which holds 3 percent of both the bank's total deposits and 5 percent of the bank's total loans. Limited-scope AAs include the Knoxville MSA, Johnson City MSA, Kingsport-Bristol MSA, Jackson MSA, Clarksville MSA, and the Tennessee Non-MSA. The loan product reviewed was unsecured consumer loans. Tennessee holds 8 percent of both the bank's total deposits and loans.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

### LENDING TEST

The bank's performance under the Lending Test in Tennessee is rated "Outstanding." The bank's borrower distribution of loans to borrowers of different incomes and geographic distribution was excellent in the full-scope AA. Performance in limited-scope AAs was not inconsistent with the excellent performance in the full-scope AA for overall excellent performance.

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

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

#### **Nashville MSA AA**

Consumer unsecured lending in the Nashville MSA reflects excellent penetration among LMI households and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution to both LMI individuals is excellent. In aggregate, 96 percent of the bank's loans were extended to LMI individuals. For 2017-2018, the borrower distribution is also excellent. In aggregate, 94 percent of the bank's loans were extended to LMI individuals.

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

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic dispersion of the bank's loan originations and purchases.

#### **Nashville MSA AA**

Consumer unsecured lending in the Nashville MSA reflects excellent dispersion among LMI geographies and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the dispersion to both LMI tracts is excellent with 49 percent of the bank's loans extended to borrowers located in LMI areas. For 2017-2018, the dispersion to both LMI tracts is excellent with 45 percent of the bank's loans extended to borrowers located in LMI areas.

#### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, FSNB's performance under the Lending Test in the Knoxville MSA, Johnson City MSA, Kingsport-Bristol MSA, Jackson MSA, Clarksville MSA, and Tennessee Non-MSA AA is not inconsistent with FSNB's overall excellent performance under the Lending Test. Refer to Tables in Appendix C for the facts and data that support these conclusions.

#### **Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.



## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in Tennessee is rated "Outstanding." FSNB generated an excellent level of CD loans, investments and services that were responsive to AA needs.

### Number and Amount of Community Development Loans

CD lending in the state of Tennessee reflects an excellent level of loans that are responsive to the AA needs. FSNB originated CD loans in the state of Tennessee that totaled \$2.9 million.

### Broader Statewide or Regional Area Community Development Loans

FSNB purchased one USDA Rural Development loan for \$998 thousand. The loan was to a small manufacturing company that directly impacted the bank's AAs by providing LMI jobs.

### Conclusions for Areas Receiving Full-Scope Reviews

CD lending in the Nashville MSA AA reflects excellent responsiveness. During the evaluation period, FSNB originated three CD loans totaling \$2.7 million. FSNB participated in one loan pool from Community Investment Corporation of the Carolinas (CICCAR) for \$210 thousand to finance a 48 unit low-income housing complex. The development received a federal low-income housing tax credit. The units provide affordable housing to households with incomes that are less than 60 percent of the family Median Family Income. FSNB also purchased two loans totaling \$2.5 million. One loan is a SBA 504 loan and one is a USDA Rural Development loan. Both loans provide funds to qualifying businesses that have a purpose of economic development. The Nashville MSA AA accounts for less than 4 percent of the bank's total deposits and performance in the AA is weighted accordingly.

### Conclusions for Areas Receiving Limited-Scope Reviews

The bank's performance in the Knoxville MSA, Johnson City MSA, Kingsport-Bristol MSA, Jackson MSA, Clarksville MSA, and Tennessee Non-MSA AA is weaker than the performance in the full-scope AA. In the Johnson City MSA, FSNB participated in one loan pool for \$200 thousand from Community Investment Corporation of the Carolinas (CICCAR) to finance the construction of a low-income senior living facility. The development received federal low-income housing tax credits. The units provide affordable housing to seniors that earn less than 60 percent of the median family income. The bank did not make any CD loans in the five other limited-scope AAs. Combined, these limited-scope AA hold 4 percent of the bank's total deposits.

### Number and Amount of Qualified Investments

Investment performance in the state of Tennessee reflects excellent responsiveness. FSNB total investments in the state of Tennessee is \$1.9 million.

In an attempt to reach a broader nationwide area that would include FSNB's nine state footprint, FSNB made a \$1.0 million binding commitment to the Pharos SBIC fund. Refer to the *Scope of Examination* section of the Performance Evaluation for additional information regarding this investment.

**Conclusions for Areas Receiving Full-Scope Reviews**

FSNB's performance in making qualified investments in the full-scope Nashville MSA AA reflects excellent responsiveness with total investments of \$1.3 million. FSNB made four donations totaling \$831 and invested in four CRA qualified mortgage-backed securities totaling \$982 thousand for the current period and two prior period CRA qualified mortgage-backed securities totaling \$361 thousand. The Nashville MSA AA accounts for less than 4 percent of the bank's total deposits.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Overall performance in the limited scope AAs is not inconsistent with the performance in the full-scope AA. The limited-scope areas of Knoxville MSA, Johnson City MSA, Kingsport-Bristol MSA, Jackson MSA, Clarksville MSA, and Tennessee Non-MSA AA combined for five donations totaling \$3,380 and six prior period CRA qualified mortgage-backed securities with an outstanding balance of \$537 thousand. Investments totaled \$541 thousand. Combined, these limited-scope AA hold 4 percent of the bank's total deposits.

**Extent to Which the Bank Provides Community Development Services**

FSNB's CD service activity reflects adequate responsiveness in the state of Tennessee and in the full-scope Nashville MSA AA. Statewide, FSNB invested 334 hours providing financial literacy education to 4,593 LMI attendees.

**Conclusions for Areas Receiving Full-Scope Reviews**

In the full-scope Nashville MSA AA, the bank provided 63 hours of financial education to 687 LMI attendees. Financial education was provided to schools, organizations assisting "at risk" children, housing authorities, ministries, homeless shelters, and transitional housing organizations. Additionally, bank staff served on the boards of the PENCIL Foundation/Tusculum Elementary School and the Nashville Alliance for Financial Independence. Both organizations provide financial literacy training and other services for low-income persons.

**Conclusions for Areas Receiving Limited-Scope Reviews**

The bank's performance in the Knoxville MSA AA, Johnson City MSA AA, Kingsport-Bristol MSA AA, Jackson MSA AA, Clarksville MSA AA, and the Tennessee Non-MSA AA is not inconsistent with or exceeds the performance in the full-scope AA. In each of the limited-scope areas, the bank provided financial literacy training. On a combined basis, FSNB provided 271 hours of financial literacy to 3,906 LMI individuals in these limited-scope AAs.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels. FSNB has six of 84 branches located in the Nashville MSA AA. All of FSNB's branches in the full-scope Nashville MSA AA are located in Walmart stores, except the Antioch stand-alone branch, which has a similar operating structure as the Walmart branches. Branches operate extended weekday hours and are open Saturdays. One branch is located in a low-income tract, and three branches are located in moderate-income tracts. ATMs are located just outside each branch and are available 24/7. Refer to the *Description of the AA* and *Description of the Institution* sections of the Performance Evaluation for additional information on branch distribution and retail services.

**Responsiveness to Community Development Needs**

Overall, FSNB demonstrated excellent responsiveness to the identified needs and opportunities throughout FSNB's AAs. Financial education has been recognized as a critical need in America and particularly among service members. Statewide, FSNB provided 334 hours of financial literacy training to 4,593 LMI individuals. In addition, excellent responsiveness was demonstrated with \$2.9 million and \$1.9 million in statewide CD loans and investments, respectively.

## State of Delaware

### CRA rating for Delaware: Satisfactory.

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

**The Community Development Test is rated: Satisfactory.**

- The bank's borrower distribution of loans reflects an excellent penetration among individuals of different income levels and exceeds the standard for satisfactory performance.
- The bank's geographic distribution of loans reflects excellent dispersion throughout the AA and exceeds the standard for satisfactory performance.
- Overall, the bank's CD performance reflects adequate responsiveness. CD loans reflected excellent responsiveness, while the level of CD investment and services reflected adequate responsiveness to AA needs.

## Description of Institution's Operations in Delaware

FSNB has three of 84 branches in the state of Delaware, which represents 4 percent of the bank's branching network and 3 percent of their deposit base. The bank has deposits of 10 million in the state. All branches are located within the Dover, DE MSA, which has been designated as a full-scope AA. FSNB has a small presence in the MSA and is ranked number 11 of 11 institutions with a deposit market share of less than 1 percent.

Refer to the *Community Profiles* for the state of Delaware in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## Scope of Evaluation in Delaware

One full-scope AA was selected to review for the state of Delaware. The full-scope AA is the Dover MSA. The loan product reviewed was unsecured consumer loans. The state of Delaware accounts for less than 3 percent of the bank's total deposits and 3 percent of total loans.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

### LENDING TEST

The bank's performance under the Lending Test in Delaware is rated "Outstanding." The bank's borrower distribution of loans to borrowers of different incomes was excellent. The geographic distribution of loans was excellent for overall excellent performance.

**Lending to Borrowers of Different Incomes**

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

**Dover Full-Scope MSA AA**

Consumer unsecured lending in the Dover MSA AA reflects excellent penetration among LMI households and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution is excellent with 57 percent of the bank's loans extended to low-income individuals and 29 percent extended to moderate-income individuals. For 2017-2018, the borrower distribution is excellent with 70 percent of the bank's loans extended to low-income individuals and 20 percent extended to moderate-income.

**Geographic Distribution of Loans**

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

**Dover Full-Scope MSA AA**

Consumer unsecured lending in the Dover MSA reflects excellent dispersion among LMI geographies and exceeds the standard for satisfactory performance. For the time period of 2015-2016, there were no low-income tracts. The dispersion to moderate-income tracts is excellent. For 2017-2018, there was a change in the tract composition within the AA with one tract designated as low-income. The bank had no penetration to this one low-income tract; however, only 1.6 percent of the households reside in this tract limiting the opportunity to lend in this area. Dispersion to moderate-income tracts is excellent.

**Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in Delaware is rated "Satisfactory." FSNB originated an excellent level of CD loans and generated an adequate level of CD investments and services.

**Number and Amount of Community Development Loans**

CD Loan performance in the full-scope Dover MSA AA reflects excellent responsiveness. FSNB extended two CD loans totaling \$1.6 million in the full-scope Dover MSA AA. FSNB participated in a loan for \$1.0 million that was through the CDFI of Delaware to build a JROTC charter school. The other loan was a purchased SBA 504 loan in the Dover MSA AA for \$631 thousand. This AA accounts for 3 percent of the bank's total deposits.

**Number and Amount of Qualified Investments**

Investment performance in the full-scope Dover MSA AA reflects adequate responsiveness with total investments of \$314 thousand. FSNB made one donation totaling \$100, invested in a CRA qualified mortgage-backed security totaling \$216 thousand, and a prior period CRA qualified mortgage-backed security with an outstanding balance of \$98 thousand.

**Extent to Which the Bank Provides Community Development Services**

FSNB has demonstrated adequate responsiveness to the needs in the Dover MSA AA. The bank has provided 114 hours of financial literacy education training to 843 LMI persons. Financial education training was provided to LMI individuals and children through various non-profit organizations, churches, schools, and low income housing authorities. Training was also provided to service members at the Dover Air Force Base.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels. FSNB operates three of its 84 branches in the Dover MSA AA. Two of the branches are located in Walmart stores and one branch is located on Dover Air Force Base. One of the branches is located in a moderate-income CT and the other two are located in middle-income CTs. There are 24 hour ATMs located at the Walmart branches and six ATMs located on the base with two ATMs available 24/7. Refer to the *Description of the AA* and *Description of the Institution* sections of the Performance Evaluation for additional information on branch distribution and retail services.

**Responsiveness to Community Development Needs**

Overall, FSNB has demonstrated adequate responsiveness to the identified needs and opportunities throughout the full-scope Dover MSA AA with an excellent level of CD loans and adequate levels of investments and services.

## State of Mississippi

### **CRA rating for Mississippi: Outstanding.**

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

**The Community Development Test is rated: Outstanding.**

- The bank's borrower distribution of loans reflects an excellent penetration among individuals of different income levels and exceeds the standard for satisfactory performance.
- The bank's geographic distribution of loans reflects excellent dispersion throughout the AA and exceeds the standard for satisfactory performance.
- Overall, the bank's CD activities demonstrate an excellent responsiveness to the CD needs of its AA with a high level of CD loans and investments and an adequate level of CD services. The bank extended a \$526 thousand CD loan and a \$1.0 million binding commitment to provide affordable multi-family housing. Qualified investments were high and totaled \$2.3 million. CD services were adequate and centered in providing financial literacy training to LMI persons.

## Description of Institution's Operations in Mississippi

FSNB has seven of 84 branches in the state of Mississippi, which represents 8 percent of the bank's branching network and less than 2 percent of the deposit base. The bank has deposits of \$5.0 million in the state. All branches in the state are located within the Jackson, MS MSA, which has been designated as a full-scope AA. FSNB has a small presence in the MSA and is ranked number 11 of 11 institutions with a deposit market share of less than 1 percent.

Refer to the *Community Profiles* for the state of Mississippi in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## Scope of Evaluation in Mississippi

One full-scope AA was selected for review in the state of Mississippi. The full-scope AA is the Jackson MSA, which holds under 2 percent of the bank's total deposits and less than 4 percent of total loans. The loan product reviewed was unsecured consumer loans. There are no limited-scope AAs in Mississippi.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

### LENDING TEST

The bank's performance under the Lending Test in Mississippi is rated "Outstanding." The bank's borrower distribution of loans to borrowers of different incomes was excellent. The geographic dispersion of loans was excellent for overall excellent performance.

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

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

#### **Jackson MSA AA**

Consumer unsecured lending in the Jackson MSA reflects excellent borrower distribution among LMI individuals and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution is excellent with 59 percent of the bank's loans to low-income individuals compared to the 25 percent low-income households in the AA. Thirty-three percent of the bank's loans were to moderate-income individuals compared to the 15 percent moderate-income households in the AA. For 2017-2018, the borrower distribution is excellent with 61 percent of the bank's loans to low-income individuals compared to the 25 percent low-income households in the AA. Twenty-eight percent of the bank's loans were extended to moderate-income individuals compared to 16 percent moderate-income households in the AA.

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

Refer to Table U in Appendix D for the facts and data used to evaluate the geographic dispersion of the bank's loan originations and purchases.

#### **Jackson MSA**

Consumer unsecured lending in the Jackson MSA reflects excellent dispersion among LMI geographies and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the dispersion to LMI tracts is excellent as the percentage of bank loans to LMI tracts exceeded the percentage of households residing in those tracts. For 2017-2018, the dispersion to both LMI tracts is excellent as the percentage of bank loans to LMI tracts exceeded the percentage of households residing in these tracts.

#### **Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.



## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in Mississippi is rated "Outstanding." FSNB originated an excellent level of CD activities that were responsive to AA needs.

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

FSNB performance in the State of Mississippi, including full-scope Jackson MSA AA indicates excellent responsiveness to CD lending needs in the AA. FSNB originated a CD loan in the Jackson MSA AA and made commitments to a non-profit organization that provides financing to multi-family housing projects throughout the state of Mississippi.

FSNB performance in the full-scope Jackson MSA AA indicates excellent responsiveness to CD lending needs. FSNB originated a \$526 thousand CD loan to purchase a multi-family rental property providing affordable housing to LMI persons in the Jackson MSA AA. The Jackson MSA AA accounts for less than 2 percent of the bank's total deposits.

### **Broader Statewide or Regional Area Community Development Loan**

FSNB has a lending commitment to the *Financial Institutions Housing Opportunity Pool* (FIHOP), a non-profit organization that was created by the Mississippi Home Corporation. FIHOP's mission is to provide permanent financing to developers of affordable multi-family housing in Mississippi and to facilitate the usage of low-income housing tax credits (LIHTC). The non-profit has closed in excess of \$19.0 million and has an additional \$1.9 million in commitments outstanding. FSNB made a three year \$1.0 million binding commitment to FIHOP in 2014, of which \$108 thousand was advanced during the current evaluation period on a LIHTC apartment complex project. In 2017, FSNB renewed its \$1.0 million commitment to the FIHOP. The bank has advanced \$39 thousand, representing its pro-rata share of another LIHTC apartment project, which leaves \$961 thousand committed and unfunded under the \$1.0 million commitment.

### **Number and Amount of Qualified Investments**

Investment performance in the full-scope Jackson MSA AA reflects an excellent responsiveness. FSNB investments totaled \$2.3 million and included a CRA qualified municipal bond purchase of \$1.3 million, a prior period CRA qualified municipal bond with an outstanding balance of \$991 thousand, and six donations for \$1,250.

**Extent to Which the Bank Provides Community Development Services**

FSNB demonstrated adequate responsiveness in providing CD services in the Jackson MSA AA. FSNB provided 39 hours of financial literacy education training to 436 LMI individuals. Financial education training was provided to elementary and high school students and to vocational students attending a training center. A bank officer serves on the board of an organization that provides affordable housing through the LIHTC Program.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels. FSNB operates seven of its 84 branches in the Jackson MSA AA. Six of the branches are located in Walmart stores and one branch is a stand-alone. One branch is located in a low-income CT. ATMs are located at all of the locations and are available 24 hours a day. Refer to the *Community Profiles* in Appendix C and the *Description of the Institution* section of this Performance Evaluation for additional information on branch distribution and retail services.

**Responsiveness to Community Development Needs**

Overall, FSNB has demonstrated excellent responsiveness to the identified needs and opportunities throughout the state of Mississippi by addressing critical needs like financial literacy training and funding for affordable housing.

## State of Louisiana

### CRA rating for Louisiana: Outstanding.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

- The bank's borrower distribution of loans reflects an excellent penetration among individuals of different income levels and exceeds the standard for satisfactory performance.
- The bank's geographic distribution of loans reflects excellent dispersion throughout the AA and exceeds the standard for satisfactory performance.
- Overall, the bank's CD activities demonstrate an excellent responsiveness. FSNB originated CD loans totaling \$9.7 million in the Shreveport MSA AA. Qualified investments totaled \$397 thousand and CD services were centered in providing financial literacy training to LMI persons.

## Description of Institution's Operations in Louisiana

FSNB has four of 84 branches in the state of Louisiana, which represents 5 percent of the bank's branching network and less than 1 percent of their deposit base. The bank has deposits of \$2 million in the state. All branches in the state of Louisiana are located in the Shreveport, LA MSA, which has been designated as a full-scope AA. FSNB has a small presence in the state and is ranked number 23 out of 24 institutions with a deposit market share of less than 1 percent.

Refer to the *Community Profiles* for the state of Louisiana in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## Scope of Evaluation in Louisiana

One full-scope AA was selected for review in the state of Louisiana. The full-scope AA is the Shreveport MSA, which holds less than 2 percent of the bank's total deposits and 16 percent of total loans. The loan product reviewed was unsecured consumer loans. There are no limited-scope AAs in Louisiana.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

### LENDING TEST

The bank's performance under the Lending Test in Louisiana is rated "Outstanding." The bank's borrower distribution of loans to borrowers of different incomes was excellent. The geographic distribution of loans was excellent for overall excellent performance.

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

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

#### **Shreveport MSA AA**

Consumer unsecured lending in the Shreveport MSA reflects excellent penetration among LMI households and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution is excellent with 50 percent of the bank's loans extended to low-income individuals compared to the 26 percent of low-income households in the AA. Thirty-four percent of the bank's loans were extended to moderate-income individuals compared to the 16 percent of moderate-income households in the AA. For 2017-2018, the borrower distribution is excellent with 61 percent of the bank's loans extended to low-income individuals compared to the 26 percent of low-income households in the AA. Twenty-five percent of the bank's loans were extended to moderate-income individuals compared to the 16 percent of moderate-income households in the AA.

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

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

#### **Shreveport MSA AA**

Consumer unsecured lending in the Shreveport MSA reflects excellent dispersion among LMI geographies and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the dispersion to LMI tracts is excellent. For 2017-2018, the dispersion to LMI tracts is excellent.

#### **Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in Louisiana is rated "Outstanding." The level of CD loans, investment and services is excellent and responsive to the needs of the AA.

### Number and Amount of Community Development Loans

FSNB performance in the full-scope Shreveport MSA AA indicates excellent responsiveness to the CD needs of the AA. FSNB originated five CD loans totaling \$9.7 million in the full-scope AA. FSNB originated a \$1.1 million loan to finance a 21-unit townhome complex located in a moderate-income CT next to the Barksdale Air Force Base in Bossier City, LA. The complex is affordable housing designed to meet the needs of LMI residents and service members in the area. Two loans totaling \$4.3 million were to small businesses that employ predominantly LMI individuals. These loans helped to create and retain jobs in this AA. Two additional CD loans totaling \$4.3 million were for a retail center that houses medical related tenants. These medical tenants serve the persons in the adjacent federally designated medically underserved area. The Shreveport MSA AA accounts for less than 1 percent of the bank's total deposits.

### Number and Amount of Qualified Investments

Investment performance in the full-scope Shreveport MSA AA also indicates adequate responsiveness to the AA needs. FSNB investments totaled \$391 thousand and included three prior period CRA qualified mortgage-backed securities totaling \$383 thousand and two donations totaling \$7,735.

### Extent to Which the Bank Provides Community Development Services

FSNB has provided an adequate level of CD service activity in the full-scope Shreveport MSA AA. FSNB provided 73 hours of financial literacy education training to 1,462 LMI individuals. Financial literacy training was provided to LMI children through elementary schools where a majority of students were eligible for the free or reduced lunch programs. Bank staff also provided financial literacy training to LMI individuals through Goodwill and served on the board of "Bank On Shreveport". This organization assists the unbanked population of Shreveport in setting up low or no cost bank accounts and provides financial literacy training.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels. FSNB operates four of its 84 branches in the Shreveport-Bossier City MSA AA. Three of the branches are located in Walmart stores and one branch is a stand-alone located in Shreveport. One branch is located in a moderate-income tract. ATMs are located outside the Walmart and stand-alone branches and are available 24 hours a day. Refer to the *Description of the AA* and *Description of the Institution* sections of the Performance Evaluation for additional information on branch distribution and retail services.

### Responsiveness to Community Development Needs

Overall, FSNB has demonstrated excellent responsiveness to the identified needs and opportunities throughout the full-scope MSA AA with a significant level of CD activities within its AA.

## State of Arkansas

### CRA rating for Arkansas: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

- The bank's borrower distribution of loans reflects an excellent penetration among individuals of different income levels and exceeds the standard for satisfactory performance.
- The bank's geographic distribution of loans reflects adequate dispersion throughout the AA and meets the standard for satisfactory performance.
- The bank's level of CD activities is reasonable. FSNB generated a reasonable level of CD loans totaling \$489 thousand and investments totaling \$521 thousand. CD service activities were centered in providing financial literacy to LMI persons.

## Description of Institution's Operations in Arkansas

FSNB has five of 84 branches in the state of Arkansas, which represents 6 percent of the bank's branching network and less than 1 percent of their deposit base. The bank has deposits of \$1.5 million in the state. FSNB has a small presence in Arkansas and is ranked last in each of its AAs in the state with less than 1 percent of the deposit market share.

FSNB has three AAs in the state of Arkansas including the Little Rock MSA, Pine Bluff MSA, and Pope County Non-MSA.

Refer to the *Community Profiles* for the state of Arkansas in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## Scope of Evaluation in Arkansas

One full-scope AA was selected for review in the state of Arkansas. The full-scope AA is the Little Rock MSA, which holds less than 1 percent of the bank's total deposits and loans. The loan product reviewed was unsecured consumer loans. Limited-scope AAs areas in Arkansas include the Pine Bluff MSA and Pope County Non-MSA. Combined, these limited-scope AAs account for less than 1 percent of the bank's deposits and approximately 3 percent of the bank's loans.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

### LENDING TEST

The bank's performance under the Lending Test in Arkansas is rated "Satisfactory." The bank's borrower distribution of loans to borrowers of different incomes is excellent in the full-scope AA, while the distribution among different geographies in the full-scope AA is reasonable for overall reasonable performance. Performance in limited-scope AAs was stronger than the reasonable performance in the full-scope AA. More weight was given to the full-scope AA for overall reasonable performance.

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

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

#### **Little Rock MSA AA**

Consumer unsecured lending in the Little Rock MSA AA reflects excellent penetration among LMI households and exceeds the standard for satisfactory performance. For the time period of 2015-2016, the borrower distribution is excellent with 95 percent of the bank's loans extended to LMI individuals. For 2017-2018, the borrower distribution is excellent with 94 percent of the bank's loans extended to LMI individuals.

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

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

#### **Little Rock MSA AA**

Consumer unsecured lending in the Little Rock MSA reflects reasonable dispersion among LMI geographies and meets the standard for satisfactory performance. For the time period of 2015-2016, the dispersion to low-income tracts is reasonable and the dispersion to moderate-income tracts is poor. For 2017-2018, the dispersion to low-income tracts is very poor with no penetration. However, only 4.4 percent of the households in the AA reside in the low-income tracts making opportunities to lend to low-income areas limited. The geographic dispersion to moderate-income tracts is reasonable.

#### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, FSNB's performance under the Lending Test in the Pine Bluff MSA and Pope County Non-MSA is stronger than FSNB's overall satisfactory performance under the Lending Test. Refer to Tables in Appendix C for the facts and data that support these conclusions.

#### **Responses to Complaints**

FSNB has not received any complaints about its performance in helping to meet the credit needs within this AA during this evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the CD Test in Arkansas is rated "Satisfactory". FSNB originated a CD loan, qualified investments and CD services that were responsive to AA needs for an overall adequate performance.

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

Loan performance in the State of Arkansas reflects adequate responsiveness. FSNB had one CD loan for \$489 thousand. The total deposit share for the three AAs is less than a half of percent.

### **Conclusions for Areas Receiving Full-Scope Reviews**

FSNB has one SBA 504 loan for \$489 thousand that qualifies as CD loan in the Little Rock MSA AA and reflects excellent responsiveness.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

FSNB's performance in the Pine Bluff MSA and Pope County Non-MSA limited-scope AAs is weaker than the performance in the full-scope AA. FSNB did not originate any CD loans in either limited-scope AA.

### **Number and Amount of Qualified Investments**

Investment performance in the state of Arkansas reflects adequate responsiveness. FSNB's investments included a CRA qualified mortgage-backed security for \$518 thousand and seven donations totaling \$2,650 for a total of \$521 thousand in state-wide investments. The total deposit share for the three AAs is less than a half of percent.

### **Conclusions for Areas Receiving Full-Scope Reviews**

In light of the very small percentage of FSNB deposits held in the Little Rock MSA AA, investment performance in this MSA AA indicates excellent responsiveness. FSNB had a prior period CRA qualified mortgage-backed security with a balance of \$518 thousand and made four donations totaling \$1,300.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Performance in the limited-scope Pine Bluff MSA AA is not inconsistent with the performance in the full-scope AA. In the limited-scope Pine Bluff MSA AA, the bank made one donation for \$250. In the Pope County Non-MSA AA, FSNB made two donations totaling \$1,100.

### **Extent to Which the Bank Provides Community Development Services**

FSNB's CD service activity reflects adequate responsiveness in both the state of Arkansas and in the full-scope Little Rock MSA AA. Statewide, FSNB invested 46 hours providing financial education to 196 LMI attendees. Bank staff also serve on the boards of various financial organizations that provide services to LMI individuals.



**Conclusions for Areas Receiving Full-Scope Reviews**

FSNB's level of CD service activities in the full-scope Little Rock MSA AA reflects adequate responsiveness to the AA needs. FSNB provided 33 hours of CD services to 147 LMI individuals. Financial education training was provided to children at various events and adults in the Conway Wage Program, which provides free job readiness training skills in the low-income tract. A bank officer also serves on the board of the Conway Wage Program.

FSNB's branches and retail services are reasonably accessible to geographies and individuals of all income levels. FSNB operates three of its 84 branches in the Little Rock MSA AA. All three branches are located in Walmart stores. FSNB does not have any locations in LMI; however, branches are located in upper- and middle-income tracts bordering moderate-income tracts. ATM's are located at the branches and are available 24 hours a day. Refer to the *Description of the AA* and *Description of the Institution* sections of the Performance Evaluation for additional information on branch distribution and retail services.

**Conclusions for Areas Receiving Limited-Scope Reviews**

The bank's performance in the two limited-scope AAs is not inconsistent with the full-scope AA. In the Pope County Non-MSA AA, the bank reports 13 hours of financial literacy training reaching 49 LMI persons and board membership with two organizations serving LMI persons. No hours of financial literacy training were provided in the Pine Bluff AA; however, bank staff served on the board of the Pine Bluff Wage Program during the evaluation period. The bank made efforts to participate in other CD service activities in the Pine Bluff AA; however, financial literacy and other opportunities are limited in the AA.

**Responsiveness to Community Development Needs**

Overall, FSNB has demonstrated adequate responsiveness to the identified needs and opportunities throughout the full-scope AA. The bank provided a reasonable level of CD loans, investments and services throughout the state.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test: 01/01/15 to 12/31/18 Community Development Test: 10/6/14 to 1/7/19				
<b>Financial Institution</b>			<b>Products Reviewed</b>		
FNSB, National Association Lawton, OK			Unsecured Consumer Loans		
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>			
City National Bank Lawton, OK	Common Ownership	None			
<b>List of Assessment Areas and Type of Examination</b>					
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>			
<b>Assessment Area</b>	<b>Full/Limited Scope</b>	<b># of Branches</b>	<b>Net Loans as of 12/31/18</b>	<b>% of Total Bank Loans</b>	<b>% of Total Bank Deposits</b>
<b>Multi-State</b>					
Memphis TN-MS-AR MSA	Full	12	\$2,819,937	2.07%	3.11%
<b>Oklahoma</b>					
Lawton MSA	Full	6	\$60,008,824	44.12%	64.86%
<b>Texas</b>					
Wichita Falls MSA	Full	2	\$19,126,119	14.06%	9.80%
<b>North Carolina</b>					
Fayetteville MSA	Full	5	\$3,188,410	2.34%	4.64%
Raleigh-Cary MSA	Limited	3	\$1,589,127	1.17%	1.24%
Richmond County Non-MSA	Limited	1	\$574,628	0.42%	0.36%
Jacksonville MSA	Limited	2	\$2,456,818	1.81%	0.91%
Wilmington MSA	Limited	2	\$761,892	0.56%	1.39%
Charlotte MSA	Limited	1	\$931,762	0.69%	0.25%

<b>Tennessee</b>					
Nashville-Davidson-Murfreesboro-Franklin MSA	Full	12	\$6,119,153	4.50%	3.46%
Johnson City MSA	Limited	3	\$465,672	0.34%	0.63%
Kingsport-Bristol MSA	Limited	2	\$468,803	0.34%	0.35%
Jackson MSA	Limited	1	\$320,430	0.24%	0.21%
Clarksville MSA	Limited	1	\$245,196	0.18%	0.26%
Knoxville MSA	Limited	5	\$1,167,685	0.86%	1.05%
McMinn, Warren, Putnam, Cumberland Non-MSA Counties	Limited	4	\$1,802,247	1.33%	1.64%
<b>Delaware</b>					
Dover MSA	Full	3	\$3,796,302	2.79%	3.10%
<b>Mississippi</b>					
Jackson MSA	Full	7	\$4,761,587	3.50%	1.64%
<b>Louisiana</b>					
Shreveport MSA	Full	4	\$21,257,414	15.63%	0.61%
<b>Arkansas</b>					
Little Rock MSA	Full	3	\$522,834	0.34%	0.17%
Pine Bluff MSA	Limited	1	\$3,184,193	2.34%	0.14%
Pope County Non-MSA	Limited	1	\$429,150	0.32%	0.17%

Note: Georgia, with three branches, was not included in the review of the bank's CRA performance.

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

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FSNB RATINGS SUMMARY			
Overall Bank:	Lending Test Rating	Community Development Test Rating	Overall Bank/State/Multistate Rating
FSNB, NA	Satisfactory	Satisfactory	Satisfactory
Multistate Metropolitan Area or State:			
Memphis, TN-MS-AR MSA	Outstanding	Satisfactory	Satisfactory
Oklahoma	Outstanding	Satisfactory	Satisfactory
Texas	Outstanding	Satisfactory	Satisfactory
North Carolina	Outstanding	Outstanding	Outstanding
Tennessee	Outstanding	Outstanding	Outstanding
Delaware	Outstanding	Satisfactory	Satisfactory
Mississippi	Outstanding	Outstanding	Outstanding
Louisiana	Outstanding	Outstanding	Outstanding
Arkansas	Satisfactory	Satisfactory	Satisfactory

## Appendix C: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2015 2016 Memphis Multi-State MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	314	19.1	23.6	27.7	27.7	1.9
Population by Geography	1,324,829	13.1	23.2	28.0	35.3	0.4
Housing Units by Geography	549,616	15.2	24.1	27.9	32.8	0.0
Owner-Occupied Units by Geography	313,288	7.9	19.8	29.1	43.2	0.0
Occupied Rental Units by Geography	166,403	23.9	29.3	27.6	19.2	0.0
Vacant Units by Geography	69,925	27.4	30.7	23.0	18.9	0.0
Businesses by Geography	68,179	9.6	20.7	25.7	43.2	0.8
Farms by Geography	2,060	5.8	23.2	32.5	38.3	0.3
Family Distribution by Income Level	326,751	24.2	16.1	17.8	41.9	0.0
Household Distribution by Income Level	479,691	24.9	15.7	17.0	42.5	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$56,100	Median Housing Value			\$136,859
			Median Gross Rent			\$771
			Families Below Poverty Level			14.5%

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.)

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2017 2018 Memphis Multi-State MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	314	22.6	21.7	24.5	28.7	2.5
Population by Geography	1,340,336	16.5	21.2	25.1	36.7	0.5
Housing Units by Geography	561,186	18.8	21.3	24.6	35.0	0.3
Owner-Occupied Units by Geography	302,866	10.0	17.9	26.9	45.1	0.1
Occupied Rental Units by Geography	189,200	27.1	24.8	22.8	24.9	0.4
Vacant Units by Geography	69,120	34.4	26.5	19.5	18.6	1.1
Businesses by Geography	70,653	12.4	17.8	24.4	44.4	1.0
Farms by Geography	2,125	6.3	20.1	34.0	39.1	0.6
Family Distribution by Income Level	325,821	24.7	15.8	17.5	42.0	0.0
Household Distribution by Income Level	492,066	25.6	15.5	16.5	42.4	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$58,186	Median Housing Value			\$133,443
			Median Gross Rent			\$855
			Families Below Poverty Level			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.)

FSNB has designated the Memphis TN-MS-AR Multi-State MSA as an AA. This is FSNB's only Multi-State AA. The AA consists of one Arkansas County, four Mississippi counties and three Tennessee counties all in their entireties: Crittenden, AR; Desoto, Marshall, Tate, Tunica, MS; Fayette, Shelby, and Tipton, TN. FSNB has seven branches in Shelby County, two branches in Desoto County, and one branch in each of Fayette and Tipton and Crittenden Counties. From 2006 to 2012, FSNB only had branches in Tennessee counties in the Memphis TN-MS-AR Multi-State MSA. In 2012, FSNB expanded to Mississippi and currently has two branches there. FSNB opened another branch in Shelby County in 2016 and one branch in the Arkansas portion of the Multi-State MSA in late 2018. Based on 2015-2106 demographic information from the 2010 US Census, the MSA has 314 CTs: 60 low-income CTs (19 percent), 74 moderate-income CTs (24 percent), 87 middle-income CTs (28 percent), 87 upper-income CTs (28 percent), and six unclassified income tracts (2 percent). Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates 12 of its 84 branches in this AA. All FSNB branches in the Memphis TN-MS-AR Multi-State MSA are located in Walmart stores. ATM's are located just outside the branches and are available 24/7. FSNB entered the Memphis market in 2006 and has expanded operations since that time. The bank has opened two branches in the Memphis MSA during this evaluation period. One branch opened in late 2016 and one branch opened in 2018. One branch is located in a moderate-income CT bordering a low-income CT, five branches are located in middle-income CTs with two bordering a moderate-income CT and four branches are located in upper-income CTs with two bordering moderate-income CTs. The MSA had several CT income levels trend downward and shift at least one level during the evaluation period. FSNB did not close any branches in this area during the evaluation period.

FSNB has a very small presence in the Memphis Multi-State MSA. The AA is a very competitive market with 54 FDIC-insured institutions operating within the Memphis Multi-State MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 52<sup>nd</sup> out of 54 banks in terms of deposits market share with 0.03 percent of the market. Deposits in the Memphis MSA account for 3.11 percent of all FSNB's deposits.

In 2013, PictureMe portrait studios within Walmart stores were closed abruptly. These studios usually occupied limited space in Walmart of only 300 square feet. This has traditionally been too small to accommodate a branch. Recognizing an opportunity to fill this vacant space and create an innovative solution to provide banking products and services to LMI, FSNB opened its first 'virtual branch' in Jackson, MS in April 2013. In 2014, FSNB opened two 'Technology Branches' in the Memphis Multi-State AA. These full-service branches utilize drive-thru banking technology to maximize the 300 square feet of space. Four kiosks are set up and linked to a back-room customer service representative by telephone handsets and video monitors. Customers can make deposits, withdrawals and conduct any business as in a traditional branch. Paperwork and funds are sent from the kiosks to the back room via a vacuum tube. Additionally, there is space for a new account representative at the front of the branch to assist customers if necessary. These "Technology Branches" use limited resources very efficiently allowing FSNB to offer banking services where other banks were unwilling or unable to provide services.

We reviewed one community contact in the TN-MS-AR Multi-State MSA. The entity's focus is to recruit new businesses and retain existing ones in the AA. The primary need in the area is affordable housing. While the LMI population has decreased, there is still a need for new

affordable housing projects and improvements to existing affordable housing. The contact also noted that a significant portion of the AA is rural and has a need for small business and small farm loans. Financial institutions in the AA were noted to be actively involved in the local community.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Lawton MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	34	8.8	26.5	41.2	20.6	2.9
Population by Geography	130,291	7.6	20.2	45.4	26.7	0.1
Housing Units by Geography	52,519	5.5	20.6	47.3	26.6	0.0
Owner-Occupied Units by Geography	27,502	2.7	10.5	50.8	36.0	0.0
Occupied Rental Units by Geography	18,697	8.1	32.0	43.9	15.9	0.0
Vacant Units by Geography	6,320	9.6	30.9	42.2	17.3	0.0
Businesses by Geography	5,604	15.0	20.6	40.8	23.1	0.5
Farms by Geography	322	2.8	5.6	52.2	39.4	0.0
Family Distribution by Income Level	31,959	21.9	17.6	21.3	39.3	0.0
Household Distribution by Income Level	46,199	23.8	16.0	18.7	41.5	0.0
Median Family Income MSA - 30020 Lawton, OK MSA		\$50,410	Median Housing Value			\$100,386
			Median Gross Rent			\$655
			Families Below Poverty Level			13.8%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Lawton MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	34	8.8	29.4	38.2	20.6	2.9
Population by Geography	131,643	6.1	22.7	43.8	27.3	0.1
Housing Units by Geography	54,500	6.6	24.0	41.8	27.6	0.0
Owner-Occupied Units by Geography	25,725	3.9	15.6	43.2	37.2	0.0
Occupied Rental Units by Geography	19,944	9.6	32.1	40.0	18.2	0.0
Vacant Units by Geography	8,831	7.7	30.0	41.9	20.5	0.0
Businesses by Geography	5,709	5.2	35.5	34.7	24.5	0.1
Farms by Geography	310	1.3	11.9	36.5	50.3	0.0
Family Distribution by Income Level	30,017	22.6	18.1	18.7	40.7	0.0
Household Distribution by Income Level	45,669	23.8	16.3	17.8	42.1	0.0
Median Family Income MSA - 30020 Lawton, OK MSA		\$57,051	Median Housing Value			\$108,669
			Median Gross Rent			\$767
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS Census and 2017 D&amp;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>						



FSNB has designated the Lawton, OK MSA as an AA. The AA consists of two counties in their entirety: Comanche and Cotton. Based on 2015-2016 demographic information from the 2010 US Census, the MSA has 34 CTs: three low-income CTs (9 percent), nine moderate-income CTs (26 percent), 14 middle-income CTs (41 percent), seven upper-income CTs (21 percent), and one unclassified CT (3 percent). Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates six of its 84 branches in this AA. Three branches are located on Fort Sill Army Post. The original main bank, which was opened in 1946, was closed in 2015 during the evaluation period. Other on-base branches were opened in 1984, 1995 and 1997. Two on-base branches are located inside the Post Exchange and the Army Welcome Center. The remaining on-base branch is a stand-alone branch. All of these branches are located in middle-income CTs but border moderate-income CTs and a low-income CT. To better serve the military personnel in the city of Lawton, FSNB opened three branches off Fort Sill in 2002, 2008 and 2012. The three branches in Lawton are stand-alone branches. One is located in a low-income CT, and two are in moderate-income CTs. From 2015 to 2017, all branches in Lawton experienced FFIEC CT income level changes, three from low to moderate or moderate to middle, and two from middle to moderate and moderate to low.

FSNB remains primarily a military bank in the Lawton, OK MSA. The bank's off base operations in Lawton and the state of Oklahoma are limited to avoid competition with City National Bank and Trust, which is under common ownership.

Fort Sill serves as the Army's training base for field artillery, air defense artillery and electronic warfare. Approximately 300,000 soldiers attend basic training at Fort Sill annually. Up until 2017, FSNB personnel would brief new recruits as they entered Fort Sill for Basic Training. Recruits who did not have a bank account had to open one with either FSNB or the credit union in order to accept their direct deposit. Since 2017, FSNB personnel no longer attend these briefings but new recruits may open an account with FSNB at the start of their Basic Training.

The opportunity for HMDA, commercial, and other loans is very limited around military installations. These loans do not represent the primary credit need to members of the military. Housing or housing subsidies are provided by the military to personnel. FSNB's customer base in this area is primarily young enlisted soldiers whose income is in the LMI category.

FSNB has a moderate presence in the Lawton, OK MSA. The AA is a competitive market with 13 FDIC-insured institutions operating within the Lawton, OK MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 5<sup>th</sup> out of 13 in terms of deposits market share with 13.41 percent of the market. The City National Bank and Trust Company and Liberty National Bank have the greatest market shares with 18.30 percent and 16.69 percent, respectively. Deposits in the Lawton, OK MSA account for 65 percent of all FSNB deposits.

Since Fort Sill is primarily a training base for Army service members, soldiers are not typically stationed at Fort Sill for an extended period. After a brief training period, recruits are sent to their next duty station to continue serving our country. When an account is opened at a branch, that account is always attributed to the originating branch. However, due to the transient nature of military service, many accounts and deposits attributed to the Lawton, OK AA belong to customers who do not live in the AA. Furthermore, many loans that are attributed to the Lawton

AA are to customers that do not live in the Lawton area but rather in their next duty station. Additionally, FSNB banks multiple government accounts in this AA.

The population of the Lawton, OK MSA increased slightly between the 2000 and 2010 censuses. The Lawton MSA gained an additional county during the evaluation period, adding Cotton County. This increased the CTs by two, and increased the population count. The population was estimated to be 130,291 as of the 2010 census and was estimated to be 114,996 as of the 2000 census.

According to the Bureau of Labor Statistics, the unemployment rate in the Lawton, OK MSA has been lower than the national rates. From 2013 to 2017, the MSA unemployment rate decreased from 5.3 percent to 4.1 percent while the national rate went from 7.4 percent to 4.4 percent for the same period. The FFIEC MSA 2015 Median Family Income was \$56,700 and the FFIEC 2017 Median Family Income was \$61,000. The unbanked population in Oklahoma is 11.0 percent and 26.4 percent of the population is underbanked.

Fort Sill is the area's largest employer followed by Goodyear Tire & Rubber Co., Lawton Public Schools and Comanche County Memorial Hospital. The mining, logging and construction industry saw a 6.3 percent increase, and financial activities saw a 4.5 percent increase. Other important industries are the professional and business services, leisure, and hospitality.

We interviewed one community contact during this review. Information was also used from another contact that was recently interviewed in the Lawton MSA.

The Fort Sill Army Post Bank Liaison was contacted, who is responsible for handling all matters between the two on-post banks and the military command. The contact was very complimentary of the two financial institutions located on the post. The contact stated that both FSNB and the credit union participate when CD opportunities present themselves. The Bank Liaison also stated that a primary need for the military is financial literacy education. Fort Sill Army Post is an onboarding site for new soldiers. Most of these recruits have no prior banking experience and are unfamiliar with how to open an account, balance a checkbook, budget or apply for a loan. He stated that both banks on-post, but particularly FSNB, provide financial literacy training to military personnel. Additionally, the contact stated that the institutions on-post offer low fees and competitive rates compared to other financial institutions off-post. He stated that overdraft fees at FSNB are lower than other local financial institutions and overdraft fees are something he monitors on a monthly basis as Bank Liaison Officer.

The other contact was associated with an entity that is primarily engaged in credit counseling, servicing the central and western areas of Oklahoma. Historically, this agency has assisted thousands of families in resolving delinquent mortgages through free housing counseling. Additionally, this agency assisted Oklahomans with repaying over half a billion in credit card debt through their Debt Management Plan. The contact stressed that the 20 percent down payment needed to purchase a home is a barrier for many consumers. Banks should allow some flexibility especially if the borrower has completed financial education classes. The contact mentioned an increase in high interest loans (payday lenders) being targeted to military, tribal, and the general population. There is a need for consumer loans at a reasonable rate. There is a continued need for bank involvement with financial education and creation of credit builder type programs.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Wichita Falls TX MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	43	4.7	25.6	39.5	27.9	2.3
Population by Geography	151,306	2.5	19.4	43.6	34.4	0.0
Housing Units by Geography	64,591	2.9	17.9	43.6	35.7	0.0
Owner-Occupied Units by Geography	37,704	1.9	13.0	45.6	39.5	0.0
Occupied Rental Units by Geography	18,711	4.7	24.5	37.0	33.8	0.0
Vacant Units by Geography	8,176	3.0	25.3	49.7	22.0	0.0
Businesses by Geography	8,412	3.9	22.9	33.6	39.5	0.1
Farms by Geography	431	1.4	8.8	44.1	45.7	0.0
Family Distribution by Income Level	37,851	19.7	17.3	22.8	40.2	0.0
Household Distribution by Income Level	56,415	23.0	16.3	19.8	40.9	0.0
Median Family Income MSA - 48660 Wichita Falls, TX MSA		\$53,417	Median Housing Value			\$91,049
			Median Gross Rent			\$694
			Families Below Poverty Level			11.3%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Wichita Fall TX MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	43	9.3	27.9	30.2	30.2	2.3
Population by Geography	151,215	5.4	21.2	35.1	38.3	0.0
Housing Units by Geography	65,162	6.1	23.5	34.5	35.9	0.0
Owner-Occupied Units by Geography	35,703	5.0	19.6	36.8	38.7	0.0
Occupied Rental Units by Geography	19,734	7.4	28.8	26.9	37.0	0.0
Vacant Units by Geography	9,725	7.8	27.3	41.6	23.3	0.0
Businesses by Geography	8,491	4.0	29.9	25.8	40.2	0.1
Farms by Geography	422	2.1	12.3	48.1	37.4	0.0
Family Distribution by Income Level	36,174	21.5	16.8	20.5	41.3	0.0
Household Distribution by Income Level	55,437	23.8	16.3	18.3	41.6	0.0
Median Family Income MSA - 48660 Wichita Falls, TX MSA		\$57,690	Median Housing Value			\$95,990
			Median Gross Rent			\$758
			Families Below Poverty Level			12.3%
<i>Source: 2015 ACS Census and 2017 D&amp;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>						

FSNB has designated the Wichita Falls, TX MSA as an AA. The AA consists of three counties in their entireties: Archer, Clay and Wichita. Based on 2015-2016 demographic information from the 2010 US Census, the MSA has 43 CTs: two low-income CTs (5 percent), 11 moderate-income CTs (26 percent), 17 middle-income CTs (40 percent), 12 upper-income CTs (28 percent), and one unclassified CT (2 percent). Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates two of its 84 branches in this AA. FSNB operates one branch on Sheppard Air Force Base (SAFB) inside the Base Exchange. There was a stand-alone branch that was opened in 1988, but it was closed during the evaluation period. The Base Exchange branch was opened in 1995. The SAFB branch is located in an upper-income CT that borders a low-income CT. However, the majority of military service members are considered LMI. The Base Exchange branch operates seven days a week to offer more convenient access to military customers, most of which are LMI. There is an ATM located outside each branch available 24 hours a day. There are five additional ATM's located throughout SAFB in various buildings and businesses.

FSNB maintained a presence only on SAFB until 2012. To better serve the military personnel in the city of Wichita Falls, FSNB opened one branch off SAFB in September 2012. This branch is located near major shopping centers in the city of Wichita Falls. While this branch is located in an upper-income CT, it does border more than one moderate-income CT. This branch allowed more convenient access for military service members when they are shopping. FSNB did not open any branches in this AA during the evaluation period, but one branch was closed in 2015.

Despite efforts to invest and lend in Wichita Falls, FSNB has been unable to secure CD loans and investments. The opportunity for CD activities is very limited in the Wichita Falls AA. During 2015, the bank's compliance officer worked closely with an organization based in Wichita Falls who applied for the FHLB Affordable Housing Program Grant. The compliance officer spent many hours working to assist the organization in their application process. Ultimately, the grant was not approved and the organization was unable to fund their project. The bank's investment broker has been unable to procure any CRA qualified mortgage-backed securities despite his best efforts to do so.

FSNB's customer base in this area is primarily young enlisted Airmen whose income is in the LMI category or retired military who have limited lending needs. These customers do not have a need for commercial loans.

Additionally, the perception continues in Wichita Falls that FSNB serves only military customers. Approximately 20 percent of deposits attributed to the Wichita Falls area are held by individuals who no longer reside in the state of Texas. This is largely due to military service members moving because of duty station assignments. FSNB instead focuses on CD services for military service members. FSNB will continue to search for CD activities.

Due to the perception that FSNB only serves military customers and only been available to the public for a short time, it is difficult to generate loans. The opportunity for HMDA, commercial, and other loans is very limited around military installations. These loans do not represent the primary credit need to members of the military. Housing or housing subsidies are provided by the military to personnel. FSNB's customer base in this area is primarily young enlisted Airmen whose income is in the LMI category.

FSNB has a very small presence in the Wichita Falls, TX MSA. The AA is a competitive market with 15 FDIC-insured institutions operating within the Wichita Falls, TX MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 11<sup>th</sup> out of 15 in terms of deposits market share with 1.12 percent of the market. FSNB was ranked 11<sup>th</sup> out of 15<sup>th</sup> with respect to number of branches in the MSA. Deposits in the Wichita Falls, TX MSA account for 9.8 percent of all FSNB deposits.

The population of the Wichita Falls, TX MSA decreased slightly between the 2000 and 2010 censuses. The population was estimated to be 151,306 as of the 2010 census and was estimated to be 151,524 the 2000 census. According to the Bureau of Labor Statistics, the unemployment rate in the Wichita Falls, TX MSA has been lower than the national rates. From 2013 to 2017, the MSA unemployment rate fell from 5.0 percent to 3.3 percent while the national rate fell from 7.4 percent to 4.4 percent for the same period. The 2015 FFIEC MSA Median Family Income for the Wichita Falls, TX MSA was \$59,300 and the 2017 FFIEC MSA Median Family Income was \$62,900. The unbanked population for the state of Texas was 9.4 percent and 23.7 percent of the population is considered underbanked.

SAFB's presence in Wichita Falls means the governmental industry is the largest industry in the MSA. Other important industries are educational and health services and the retail trade. Other major employers are Wichita Falls Independent School District, United Regional Healthcare and Midwestern State University. Industry sectors seeing an increase in growth include financial activities with 4.0 percent, leisure and hospitality with 3.1 percent and manufacturing at 2.1 percent.

Two community contacts were evaluated in the Wichita Falls MSA. The contacts included entities primarily engaged in affordable housing, first time homebuyers programs, and revitalization. Community contacts expressed a continued need for affordable housing, job-training skills, and lending for LMI individuals. One contact expressed a need for the banks to continue making donations and grants. There are opportunities in the AA for banks to get involved with affordable housing solutions.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Fayetteville MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	77	5.2	15.6	50.6	22.1	6.5
Population by Geography	366,383	2.5	14.0	53.8	28.7	1.0
Housing Units by Geography	150,444	3.0	14.9	54.7	27.4	0.0
Owner-Occupied Units by Geography	78,816	1.4	10.1	55.4	33.1	0.0
Occupied Rental Units by Geography	52,727	5.0	21.9	52.7	20.4	0.0
Vacant Units by Geography	18,901	4.4	15.4	57.2	22.8	0.1
Businesses by Geography	18,188	8.5	9.8	49.9	31.7	0.1
Farms by Geography	539	2.4	11.9	52.5	33.2	0.0
Family Distribution by Income Level	90,936	21.5	17.9	18.9	41.6	0.0
Household Distribution by Income Level	131,543	22.8	17.0	18.7	41.5	0.0
Median Family Income MSA - 22180 Fayetteville, NC MSA		\$50,347	Median Housing Value			\$117,327
			Median Gross Rent			\$777
			Families Below Poverty Level			14.0%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Fayetteville MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	77	7.8	26.0	53.2	13.0	6.5
Population by Geography	375,678	1.5	19.1	60.4	19.0	1.0
Housing Units by Geography	161,648	0.7	19.0	63.1	17.2	0.0
Owner-Occupied Units by Geography	75,727	0.4	13.5	61.9	24.2	0.0
Occupied Rental Units by Geography	63,906	1.0	24.7	64.3	10.0	0.0
Vacant Units by Geography	22,015	0.6	21.4	63.8	14.2	0.0
Businesses by Geography	18,370	1.9	21.7	56.3	20.1	0.3
Farms by Geography	539	0.2	16.1	59.2	24.5	0.0
Family Distribution by Income Level	92,857	21.7	17.7	19.5	41.1	0.0
Household Distribution by Income Level	139,633	22.7	17.1	18.4	41.8	0.0
Median Family Income MSA - 22180 Fayetteville, NC MSA		\$51,775	Median Housing Value			\$128,641
			Median Gross Rent			\$870
			Families Below Poverty Level			14.6%
<i>Source: 2015 ACS Census and 2017 D&amp;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>						

FSNB has designated the Fayetteville, NC MSA as an AA. The AA consists of two counties in their entireties: Cumberland and Hoke. All FSNB branches in this AA are located in Cumberland County. Based on 2015-2016 demographic information from the 2010 US Census, the MSA has 77 CTs: four moderate-income CTs (5 percent), 12 moderate-income CTs (16 percent), 39 middle-income CTs (51 percent), 17 upper-income CTs (22 percent), and five unclassified CTs (6 percent). Two FSNB branches are located in moderate-income CTs, two branches are located in middle-income CTs, and one branch is located in an upper-income CT. Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates five of its 84 branches in this AA. Four FSNB branches are located in area Walmart stores, and one is a stand-alone branch. The stand-alone branch operates under a similar structure as the branches inside Walmart stores. All Fayetteville MSA branches operate extended weekday hours and Saturdays to offer easier access to all customers. The stand-alone branch also has a drive-thru available. ATM's are located just outside the Walmart branches and are available 24/7.

FSNB entered the Fayetteville, NC MSA in 2001 with one branch opening that year. Two branches opened in 2002, as well as, 2004 and 2008. One branch was closed during the evaluation period. This was a stand-alone branch located in a middle-income CT. No branches were opened during the evaluation period.

FSNB has a very small presence in the Fayetteville, NC MSA. The AA is a competitive market with 35 FDIC-insured institutions operating within the Fayetteville, NC MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 34<sup>th</sup> out of 35 in terms of deposit market share with 0.01 percent of the market. Deposits in the Fayetteville, NC MSA account for 4.64 percent of all FSNB deposits.

FSNB branches in Fayetteville operate in close proximity to Fort Bragg and Pope Army Airfield. The location of these military installations in relation to FSNB branches leads to a significant portion of the customer base in Fayetteville being military service members. However, according to 32 CFR Part 230.4, only one bank and one credit union are allowed to operate at any time on a military installation. FSNB does not have any branches on the military bases in the Fayetteville AA. The opportunity for HMDA, commercial, and other loans is very limited around military installations. These loans do not represent the primary credit need to members of the military. Housing or housing subsidies are provided by the military to personnel.

The population of the Fayetteville, NC MSA increased between the 2000 and 2010 censuses. The population was estimated to be 366,383 as of the 2010 census. This is an 8.8 percent increase from 2000. The FFIEC 2015 MSA Median family income for the Fayetteville, NC MSA was \$54,300. The 2017 FFIEC MSA Median Family Income was \$52,800. The unbanked population for the state of North Carolina is 7.7 percent and 20.6 percent of the population is underbanked.

According to the Bureau of Labor Statistics, the unemployment rate in the Fayetteville, NC MSA has continued to remain higher than the national rates. From 2013 to 2017, the MSA rate fell from 9.1 percent to 5.9 percent, while the national rate fell from 7.4 percent to 4.4 percent for the same period. The fastest growing industries for the MSA area are mining, logging and

construction, showing a 4.4 percent increase. Financial activities reported a 2.6 percent increase and manufacturing reported an increase of 1.3 percent.

The Fayetteville, NC MSA is heavily reliant on the area military bases. The governmental industry leads the local economy with Fort Bragg being the leading employer. Other large employers include the Cape Fear Valley Health System and Goodyear Tire Co. While government is the top industry in the MSA area, education, health, leisure, and hospitality are other leading industries.

We reviewed one community contact in the Fayetteville MSA. The organization contacted assists municipalities and county governments with grant writing, developing consolidated plans, conducting needs assessments, and applying for state grants. They also work with cities to help coordinate economic development/revitalization and community development initiatives. Additionally, they provide “on call” services by attending meetings to provide technical assistance.

The contact indicated that there is a continued need for small business loans. The contact stated that the banks appear more risk adverse, require more collateral, and have stricter underwriting criteria. The contact does not work with financial institutions and, therefore, was unable to comment on the level of their participation in the community.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Nashville TN MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	380	8.4	21.6	42.1	26.8	1.1
Population by Geography	1,670,890	6.8	20.9	42.8	29.2	0.3
Housing Units by Geography	687,243	7.2	22.4	43.1	27.3	0.0
Owner-Occupied Units by Geography	431,054	3.3	17.3	46.4	33.1	0.0
Occupied Rental Units by Geography	197,819	14.5	31.2	37.2	17.0	0.0
Vacant Units by Geography	58,370	11.2	30.3	38.8	19.8	0.0
Businesses by Geography	111,154	7.2	20.6	34.9	36.5	0.9
Farms by Geography	3,223	2.4	19.7	50.3	27.3	0.3
Family Distribution by Income Level	418,377	20.5	18.0	21.4	40.1	0.0
Household Distribution by Income Level	628,873	22.9	16.6	19.0	41.4	0.0
Median Family Income MSA - 34980 Nashville MSA		\$62,315	Median Housing Value			\$185,774
			Median Gross Rent			\$772
			Families Below Poverty Level			9.6%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Nashville TN MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	380	8.9	26.1	37.9	25.8	1.3
Population by Geography	1,761,848	6.9	25.8	39.4	27.9	0.3
Housing Units by Geography	723,182	7.1	26.7	39.4	26.8	0.1
Owner-Occupied Units by Geography	436,486	3.4	20.6	42.9	33.1	0.1
Occupied Rental Units by Geography	228,395	13.2	36.6	33.5	16.7	0.0
Vacant Units by Geography	58,301	11.1	34.1	35.8	19.0	0.1
Businesses by Geography	115,498	7.6	23.2	31.3	37.0	0.9
Farms by Geography	3,237	3.5	22.8	45.4	28.3	0.7
Family Distribution by Income Level	438,865	20.9	17.8	20.4	40.9	0.0
Household Distribution by Income Level	664,881	23	16.9	18.2	41.9	0.0
Median Family Income MSA - 34980 Nashville, TN MSA		\$66,404	Median Housing Value			\$197,140
			Median Gross Rent			\$887
			Families Below Poverty Level			10.1%
<i>Source: 2015 U.S. Census and 2017 D&amp;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>						

FSNB has designated the Nashville-Davidson-Murfreesboro-Franklin, TN MSA as an AA. Based on 2015-2016 demographic information from the 2010 US Census, the MSA is comprised of 14 counties in their entirety: Cannon, Cheatham, Davidson, Dickson, Hickman, Macon, Maury, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson and Wilson. The MSA contains 380 CTs: 32 low-income CTs (8 percent), 82 moderate-income CTs (22 percent), 160 middle-income CTs (42 percent), 102 upper-income CTs (27 percent), and four unclassified CTs (1 percent). The bank operates 12 of its 86 branches (13.95 percent) in this AA. Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB branches are located in six of the 14 counties: Davidson, Robertson, Rutherford, Sumner, Williamson and Wilson counties. One branch is located in a low-income CT, three branches are in moderate-income CTs, five in middle-income CTs and three in upper-income CTs. Four of the branches in middle- and upper-income CTs are bordered by LMI CTs. One of the branches in an upper-income CT borders moderate-income CTs. Two tracts with branch locations had their income level designations changed during 2015-2017. FSNB did not open or close any branches in the AA during the evaluation period.

FSNB has a very small presence in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA. The AA is a very competitive market with 64 FDIC-insured institutions operating within the Nashville-Davidson-Murfreesboro-Franklin, TN MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 61<sup>st</sup> out of 64 in terms of deposits market share with 0.02 percent of the market. FSNB was ranked 14<sup>th</sup> out of 64 with respect to number of branches in the MSA. Deposits in the Nashville-Davidson-Murfreesboro-Franklin MSA account for 3.39 percent of all FSNB deposits.

All FSNB branches in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA are located in Walmart stores with the exception of the Antioch stand-alone branch, which has a similar operating structure as the Walmart branches. Branches operate extended weekday hours and Saturdays to offer easier access to all customers. ATM's are located just outside each branch and are available 24/7. FSNB entered the Nashville market in 2006 with three branch openings that year, five branches in 2007, one in 2008, two in 2009 and the latest opened in February 2010.

The Nashville MSA is located in central Tennessee. Based on the 2010 census, the MSA population was 1,670,890. Counties within the Nashville MSA vary widely in their income characteristics. The 2016 Median Family Income ranges from a low of \$34,098 in Macon County to a high of \$100,140 in Williamson County. 2015 FFIEC MSA Median Family Income for Nashville-Davidson-Murfreesboro-Franklin MSA was \$66,404 and the 2017 FFIEC MSA Median Family Income was \$67,500. The unbanked population for the state of Tennessee was 10.8 percent and 19.2 percent of the population was considered underbanked.

According to the Bureau of Labor Statistics, employment conditions in the Nashville area have been steadily improving over the evaluation period. Unemployment rates have dropped from 5.1 percent in 2013 to 2.4 percent in 2017, below the Tennessee average of 3.3 percent for 2017 and well below the nation-wide rate of 4.4 percent for 2017.

Major industries in the Nashville-Davidson-Murfreesboro-Franklin MSA include Educational and Health Services, Professional and Business Services and Government. Vanderbilt University

Medical Center combined with Vanderbilt University is the largest employer in the area, followed by Nissan of North America, which has its corporate headquarters in Williamson County, and HCA Healthcare. Fast growing industry sectors include leisure and hospitality reporting an increase in growth of 5.7 percent, and professional business and services at 4.4 percent.

We reviewed one community contact in the Nashville MSA AA. The contact is a community development entity focused on serving the residents of the city of Murfreesboro. The contact focuses their activities on affordable housing and economic development. The contact noted that the local economy was strong overall; however, the housing market is greatly limited for LMI individuals. One of the primary credit needs of the area was noted to be mortgages for LMI and first-time homebuyers. Other needs included financial literacy and first-time homebuyer education.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Dover MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	32	0.0	15.6	68.8	15.6	0.0
Population by Geography	162,310	0.0	12.2	73.7	14.1	0.0
Housing Units by Geography	63,563	0.0	12.5	73.7	13.8	0.0
Owner-Occupied Units by Geography	41,836	0.0	9.2	75.3	15.5	0.0
Occupied Rental Units by Geography	15,560	0.0	20.0	70.9	9.2	0.0
Vacant Units by Geography	6,167	0.0	16.1	70.4	13.5	0.0
Businesses by Geography	9,325	0.0	21.2	64.5	14.3	0.0
Farms by Geography	575	0.0	8.3	77.2	14.4	0.0
Family Distribution by Income Level	40,711	18.7	18.4	23.3	39.6	0.0
Household Distribution by Income Level	57,396	22.6	17.1	20.3	40.0	0.0
Median Family Income MSA - 20100 Dover, DE MSA		\$60,949	Median Housing Value			\$204,861
			Median Gross Rent			\$917
			Families Below Poverty Level			9.3%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Dover MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	32	3.1	18.8	65.6	12.5	0.0
Population by Geography	169,509	1.3	15.3	69.0	14.4	0.0
Housing Units by Geography	67,315	1.6	16.0	68.7	13.8	0.0
Owner-Occupied Units by Geography	42,185	0.7	11.5	72.6	15.2	0.0
Occupied Rental Units by Geography	18,386	3.5	26.7	59.2	10.7	0.0
Vacant Units by Geography	6,744	1.5	14.6	70.2	13.7	0.0
Businesses by Geography	9,771	8.8	15.3	64.0	11.9	0.0
Farms by Geography	586	0.9	10.1	81.4	7.7	0.0
Family Distribution by Income Level	42,277	21.6	16.6	21.7	40.1	0.0
Household Distribution by Income Level	60,571	23.2	17.0	18.7	41.1	0.0
Median Family Income MSA - 20100 Dover, DE MSA		\$64,252	Median Housing Value			\$197,071
			Median Gross Rent			\$998
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS Census and 2017 D&amp;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>						

FSNB has designated the Dover, DE MSA as an AA. The AA consists of the entirety of Kent County. Based on 2015-2016 demographic information from the 2010 US Census, the MSA has 33 CTs: five moderate-income CTs (15 percent), 22 middle-income CTs (67 percent), five upper-income CTs (15 percent), and one unclassified CT (3 percent). There are no low-income CTs in the MSA. Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates three of its 84 branches in this AA. Two FSNB branches are located in area Walmart stores, while the third branch is located on Dover Air Force Base in the Base Exchange. Two branches are located in middle-income CTs and one branch is located in a moderate-income CT. Two CTs with branch locations changed income designations during the evaluation period. FSNB did not open or close any branches in the Dover, DE MSA area during the evaluation period.

FSNB entered the Dover, DE market in 1996 with branches opening on Dover Air Force Base. Dover operations were expanded to Walmart stores in 2011. Walmart branches operate extended weekday hours and Saturdays to offer easier access to all customers. ATM's are located just outside the Walmart branches and are available 24/7. The Base Exchange branch is open during the Exchange's operating hours including Saturdays and Sundays. There are six ATM's located on DAFB with two ATM's available 24/7.

The opportunity for HMDA, commercial, and other loans is very limited around military installations. These loans do not represent the primary credit need to members of the military. Housing or housing subsidies are provided by the military to personnel. FSNB's customer base in this area is primarily young enlisted Airmen whose income is in the LMI category.

FSNB has a very small presence in the Dover, DE MSA. The AA is a competitive market with 11 FDIC-insured institutions operating within the Dover, DE MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 11<sup>th</sup> out of 11 in terms of deposits market share with 0.44 percent of the market. FSNB was ranked 7<sup>th</sup> out of 12 with respect to number of branches in the MSA. Deposits in the Dover, DE MSA account for 3.19 percent of all FSNB deposits.

Dover Air Force Base (DAFB) is home to two Airlift Wings of the United States Air Force. One Wing is active duty while the other Wing is a Reserve component. DAFB directly and indirectly supplies approximately 10,000 jobs in the Dover area including 3,200 active duty personnel, 1,800 reserve personnel and 1,100 civilian employees. DAFB estimates the economic impact at \$466 million per year including salaries, retiree pay, local contracts and local area expenditures.

The population of the Dover, DE MSA increased between the 2000 and 2010 censuses. The population was estimated to be 162,310 as of the 2010 census. This is a 28 percent increase from 2000. The 2015 MSA Median Family Income for the Dover, DE MSA was \$66,100 and the 2017 MSA Median Family Income was \$70,400. The unbanked population is 4.8 percent and the underbanked population is 15.4 percent across Delaware.

The governmental industry leads the local economy. Both the state of Delaware and the Kent County governmental agencies are located in Dover. Educational and health services and the

retail trade are also important industries in the Dover area. The MSA's largest employers are the state of Delaware and the Federal Department of Defense.

According to the Bureau of Labor Statistics, the unemployment rate in the Dover, DE MSA decreased from 6.1 percent in 2013 to 4.2 percent in 2017, putting Dover just under the national rate of 4.4 percent. Employment growth was strong in the professional and business services. This industry is one of the fastest growing industries in the MSA reporting an increase in growth of 3.9 percent with education and health close at 3.7 percent.

We reviewed a community contact in the Dover MSA. The contact is an entity that specializes in supporting small businesses, micro-enterprises, non-profit organizations, and affordable housing developers in the state of Delaware. The organization's goal is to provide creative opportunities for access to capital for small businesses, developers of affordable housing, and community organizations. The contact stressed a need for small business technical assistance, small business loans, job creation, wealth preservation, and a continued need for affordable housing. There are opportunities for banks to participate in short term lending programs.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Jackson MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	129	16.3	20.2	38.0	25.6	0.0
Population by Geography	567,122	11.1	17.6	43.3	28.0	0.0
Housing Units by Geography	229,887	11.3	18.2	42.6	27.9	0.0
Owner-Occupied Units by Geography	138,681	5.9	15.3	44.8	34.1	0.0
Occupied Rental Units by Geography	65,260	20.0	20.9	40.3	18.8	0.0
Vacant Units by Geography	25,946	18.5	27.0	37.2	17.3	0.0
Businesses by Geography	39,193	11.4	13.8	40.7	34.1	0.0
Farms by Geography	1,244	4.0	14.8	48.2	33.0	0.0
Family Distribution by Income Level	139,589	23.7	16.3	18.1	41.9	0.0
Household Distribution by Income Level	203,941	25.5	15.5	16.6	42.5	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		\$54,643	Median Housing Value			\$122,105
			Median Gross Rent			\$742
			Families Below Poverty Level			14.2%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Jackson MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	129	14.0	31.8	27.1	26.4	0.8
Population by Geography	577,070	9.9	26.8	31.7	30.7	0.8
Housing Units by Geography	236,284	10.1	28.2	31.7	30.0	0.0
Owner-Occupied Units by Geography	139,744	5.1	22.8	33.6	38.5	0.0
Occupied Rental Units by Geography	67,986	16.9	34.4	30.6	18.1	0.0
Vacant Units by Geography	28,554	17.9	39.8	25.4	16.9	0.1
Businesses by Geography	40,376	7.6	26.3	29.8	36.3	0.1
Farms by Geography	1,256	2.6	19.0	39.2	39.2	0.0
Family Distribution by Income Level	143,161	23.5	17.0	17.6	41.9	0.0
Household Distribution by Income Level	207,730	25.5	15.3	16.3	42.9	0.0
Median Family Income MSA - 27140 Jackson, MS MSA		\$56,700	Median Housing Value			\$128,836
			Median Gross Rent			\$795
			Families Below Poverty Level			15.0%
<i>Source: 2015 ACS Census and 2017 D&amp;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>						

FSNB has designated the Jackson, MS MSA as an AA. The AA consists of six counties in their entirety: Copiah, Hinds, Madison, Rankin, Simpson, and Yazoo counties. Based on 2015-2016 demographic information from the 2010 US Census, the MSA has 129 CTs: 21 low-income CTs (16 percent), 26 moderate-income CTs (20 percent), 49 middle-income CTs (38 percent), and 33 upper-income CTs (26 percent). Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates seven of its 84 branches in this AA. Six FSNB branches are located in Walmart stores, four of which are "Technology Branches." One branch is a stand-alone branch and operates under a similar structure as the branches located in Walmart stores. The stand-alone branch also has drive-thru banking services available. ATM's are located just outside the branches and available 24/7.

FSNB entered the Jackson, MS market in 2012. FSNB opened two branches during the evaluation period. Four branches are located in upper-income CTs, two branches are located in middle-income CTs and one branch is located in a low-income CT. All branches remained in the same CT income level for the evaluation period. FSNB did not close any branches in this area during the evaluation period.

FSNB has a very small presence in the Jackson, MS MSA. The AA is a very competitive market with 28 FDIC-insured institutions operating within the Jackson, MS MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 26<sup>th</sup> out of 28 in terms of deposits market share with 0.04 percent of the market. Deposits in the Jackson, MS MSA account for 1.64 percent of all FSNB deposits.

The Jackson, MS MSA is located in the western portion of the state near the Louisiana border. The population, according to the 2010 census was 539,057. The population in the Jackson, MS MSA increased between the 2000 and 2010 census by 8.4 percent. FFIEC 2015 MSA Median Family Income for the Jackson, MS MSA is \$58,400 and the 2017 FFIEC MSA Median Family Income rose to \$60,700. The unbanked population for Mississippi is 12.6 percent and 25.5 percent of the population are underbanked.

Jackson is the state capital of Mississippi and its largest city. The government employs the largest portion of residents. Other leading industries in the region include educational and health services and professional and business services. The state of Mississippi is the single largest employer followed by the University of Mississippi Medical Center and the United States Government. The leisure and hospitality industry had the largest increase in growth, increasing by 3.1 percent, followed by manufacturing at 3 percent.

According to the Bureau of Labor Statistics, the unemployment rate has steadily decreased between 2013 and 2017. In 2013, the unemployment rate for the Jackson, MS MSA was 6.4 percent and improved to 4.0 percent in 2017. This rate is slightly better than the national unemployment rate of 7.4 percent decreasing to 4.4 percent for the same period.

We reviewed one community contact in the Jackson MSA AA. The contact interviewed was an economic and community development agency that works to recruit new businesses to the state and expand existing ones in the state. The contact noted that economic conditions in the Jackson MSA AA are improving, particularly in the suburbs surrounding Jackson. While banks in the



Jackson MSA AA were noted to be responsive to the community needs, the contact felt that there are additional opportunities for bank participation in the Jackson MSA AA. Financial literacy and credit counseling continues to be a need in the area, particularly for small business owners and entrepreneurs.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Shreveport MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	104	12.5	26.0	37.5	23.1	1.0
Population by Geography	439,811	7.3	23.3	40.7	28.7	0.0
Housing Units by Geography	191,117	7.5	23.9	41.3	27.3	0.0
Owner-Occupied Units by Geography	109,802	4.1	18.2	42.7	34.9	0.0
Occupied Rental Units by Geography	57,363	11.5	32.8	38.3	17.4	0.0
Vacant Units by Geography	23,952	13.2	28.5	42.1	16.1	0.0
Businesses by Geography	44,296	11.0	23.5	36.5	28.9	0.1
Farms by Geography	842	3.4	16.5	44.3	35.7	0.0
Family Distribution by Income Level	108,668	23.7	16.4	18.6	41.3	0.0
Household Distribution by Income Level	167,165	25.8	15.6	16.1	42.5	0.0
Median Family Income MSA - 43340 Shreveport-Bossier City, LA MSA		\$52,063	Median Housing Value			\$108,824
			Median Gross Rent			\$661
			Families Below Poverty Level			14.3%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Shreveport MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	104	15.4	26.0	30.8	26.9	1.0
Population by Geography	445,727	11.5	20.6	32.6	35.3	0.0
Housing Units by Geography	197,198	11.1	21.6	33.2	34.1	0.0
Owner-Occupied Units by Geography	109,479	7.0	15.8	34.5	42.8	0.0
Occupied Rental Units by Geography	61,646	16.8	30.5	29.7	23.0	0.0
Vacant Units by Geography	26,073	14.6	25.4	36.1	23.8	0.0
Businesses by Geography	44,999	14.9	23.3	28.3	33.4	0.1
Farms by Geography	910	5.9	15.5	34.2	44.4	0.0
Family Distribution by Income Level	109,564	24.9	15.7	16.9	42.5	0.0
Household Distribution by Income Level	171,125	25.7	15.7	15.6	43.0	0.0
Median Family Income MSA - 43340 Shreveport-Bossier City, LA MSA		\$56,158	Median Housing Value			\$124,705
			Median Gross Rent			\$772
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS Census and 2017 D&amp;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>						

FSNB has designated the Shreveport-Bossier City, LA MSA as an AA. Based on 2015-2016 demographic information from the 2010 US Census, the MSA consists of four parishes in their entirety: Bossier, Caddo, DeSoto and Webster. FSNB branches are located in Caddo and Bossier parishes. The MSA has 104 CTs: 13 low-income CTs (13 percent), 27 moderate-income CTs (26 percent), 39 middle-income CTs (38 percent), 24 upper-income CTs (23 percent), and one unclassified income CT (1 percent). Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates four of its 84 branches in this AA. FSNB has not been in the Shreveport MSA for long. Five branches were opened in 2012 and one branch was opened in 2014. Two branches were closed during the evaluation period. Three branches are located in Walmart stores and one branch is a stand-alone branch. The stand-alone branch operates under a similar structure as the branches inside Walmart stores. ATM's are located outside the Walmart and stand-alone branches and are available 24 hours a day. One branch is located in a moderate-income CT, one branch is located in a middle-income CT and two branches are located in upper-income CTs.

FSNB has a very small presence in the Shreveport-Bossier City, LA MSA AA. The AA is a competitive market with 24 FDIC-insured institutions operating within the MSA. Based on the FDIC market share report dated June 30, 2018, FSNB was ranked 23<sup>rd</sup> of 24 financial institutions in terms of deposits market share with 0.02 percent of the market. FSNB was ranked 12<sup>th</sup> of 26 with respect to number of branches in the MSA. Deposits in the Shreveport-Bossier City, LA AA account for 0.61 percent of all FSNB deposits.

According to the Bureau of Labor Statistics, the MSA's unemployment rate decreased from 2013 to 2017. The unemployment rate in 2013 was 5.8 percent and 4.3 percent in 2017. These rates are trending with the national unemployment rate of 7.4 percent in 2013 and 4.4 percent in 2017. The population in the Shreveport-Bossier City MSA increased from 378,965 according to the 2000 census to 398,604 according to the 2010 census, an increase of 6.0 percent. The FFIEC 2015 MSA Median Family Income was \$57,700. The 2017 FFIEC MSA Median Family Income was \$53,700. The unbanked population in the state of Louisiana is 14.0 percent and 23.8 percent of the population is underbanked.

The governmental industry dominates the MSA's economy. The largest employer in the MSA is Barksdale Air Force Base. The city of Shreveport is also another large government employer. Caddo Parish Public Schools is the second largest employer in the MSA, followed by Willis-Knighton Medical center. Governmental, educational, health services, leisure, and hospitality industries are important industries. Louisiana has always had industries tied to natural resources, and the mining and logging industries have seen a large increase in growth with 13 percent. Other sectors experiencing growth include financial activities and construction.

We reviewed a community contact in the Shreveport MSA AA. The contact interviewed was associated with an economic development organization dedicated to marketing local businesses and tourism. Industries they have focused on in the past include film production, energy innovation, digital technology, higher education, cyber research, and Air Force Base Global Strike. The contact noted that area's economic condition has been good as it has not experienced the same slumps as the rest of the country. The contact was not especially

knowledgeable regarding the efforts of local financial institutions regarding community development.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2015 2016 Little Rock MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	164	6.7	23.8	47.0	22.0	0.6
Population by Geography	699,757	5.0	20.6	47.4	27.0	0.0
Housing Units by Geography	301,038	5.5	21.8	47.0	25.8	0.0
Owner-Occupied Units by Geography	177,812	2.8	17.5	50.8	29.0	0.0
Occupied Rental Units by Geography	92,228	9.6	27.2	40.9	22.4	0.0
Vacant Units by Geography	30,998	8.7	30.6	43.2	17.4	0.0
Businesses by Geography	44,755	4.6	25.0	40.8	29.6	0.0
Farms by Geography	1,497	2.1	21.8	49.0	27.1	0.0
Family Distribution by Income Level	180,045	21.4	17.9	20.5	40.2	0.0
Household Distribution by Income Level	270,040	23.8	16.3	18.2	41.8	0.0
Median Family Income MSA - 30780 Little Rock, AR MSA		\$58,911	Median Housing Value			\$135,687
			Median Gross Rent			\$704
			Families Below Poverty Level			10.7%
<i>Source: 2010 U.S. Census and 2016 D&amp;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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2017 2018 Little Rock MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	164	6.7	23.8	39.0	29.3	1.2
Population by Geography	722,684	4.5	20.3	41.5	33.2	0.4
Housing Units by Geography	315,726	5.0	21.4	40.6	32.5	0.5
Owner-Occupied Units by Geography	179,340	2.4	17.1	43.8	36.4	0.3
Occupied Rental Units by Geography	97,018	8.0	26.8	36.1	28.3	0.7
Vacant Units by Geography	39,368	9.3	27.5	36.8	25.5	0.8
Businesses by Geography	45,895	4.9	21.0	33.3	40.7	0.2
Farms by Geography	1,564	1.7	17.7	45.1	35.4	0.1
Family Distribution by Income Level	179,095	21.3	17.6	19.9	41.2	0.0
Household Distribution by Income Level	276,358	24.1	16.2	18.1	41.6	0.0
Median Family Income MSA - 30780 Little Rock, AR MSA		\$61,339	Median Housing Value			\$144,158
			Median Gross Rent			\$765
			Families Below Poverty Level			10.4%
<i>Source: 2015 ACS Census and 2017 D&amp;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>						

FSNB has designated the Little Rock-North Little Rock-Conway, AR MSA as an AA. Based on 2015-2016 demographic information, the AA consists of six counties in their entirety: Faulkner, Grant, Lonoke, Perry, Pulaski and Saline. Based on 2015-2016 demographic information from the 2010 US Census, the MSA has 164 CTs: 11 low-income CTs (7 percent), 39 moderate-income CTs (24 percent), 77 middle-income CTs (47 percent), 36 upper-income CTs (22 percent), and one unclassified CT (1 percent). Refer to the 2017-2018 demographic information table, which is based on the updated 2015 ACS survey.

FSNB operates three of its 84 branches in this AA. All FSNB branches in the Little Rock-North Little Rock-Conway, AR MSA are located in Walmart stores. One branch is a virtual branch. ATM's are located just outside the branches and are available 24/7. FSNB entered the Little Rock, AR market in 2013 with two branches opening that year. The third branch was opened in September of 2018. One branch is located in an upper-income CT that borders two moderate-income level CTs and the other two branches are located in middle-income CTs bordering moderate-income CTs. FSNB opened a branch in North Conway in September of 2016. FSNB did not close any branches in this area during the evaluation period.

FSNB branches are located in the cities of Conway (Faulkner County) and Benton (Saline County), which are northwest and southwest of Little Rock, respectively. Conway and Benton are both approximately 30 miles from the center of Little Rock. The cities of Conway and Benton are considered suburbs of Little Rock.

FSNB has a very small presence in the Little Rock-North Little Rock-Conway, AR MSA. The AA is a very competitive market with 33 FDIC-insured institutions operating within the Little Rock-North Little Rock-Conway, AR MSA. Based on the FDIC market share report dated June 30, 2018, FSNB ranked 33<sup>rd</sup> out of 33 in terms of deposits market share with 0.00 percent of the market. Deposits in the Little Rock-North Little Rock-Conway, AR MSA account for 0.17 percent of all FSNB deposits.

The Little Rock-North Little Rock-Conway, AR MSA is located in central Arkansas. The MSA population, according to the 2010 census, was 699,757. FFIEC 2015 MSA Median Family Income for the Little Rock-North Little Rock-Conway, AR MSA is \$61,339. The 2017 FFIEC MSA Median Family Income was \$62,100. The unbanked population in the state of Arkansas is 9.7 percent and 22.6 percent of the population is underbanked.

Little Rock is the state capital of Arkansas and its largest city. Thus, the government employs the largest portion of residents. Other leading industries in the region include educational, health services, professional, business services. Little Rock's largest employer is the state of Arkansas. Faulkner County's largest employer, is Acxiom Corporation, a data and technology service provider, followed by the University of Central Arkansas. Saline County's largest employer is the Bryant Public School System followed by the state of Arkansas.

According to the Bureau of Labor Statistics, the unemployment rate has decreased between 2013 and 2017. In 2013, the unemployment rate for the Little Rock-North Little Rock-Conway, AR MSA was 6.5 percent and improved to just 3.9 percent in 2017. This rate is similar to the national unemployment rate of 7.9 percent decreasing to 4.8 percent for the same period. The mining, logging and construction industries reported employment growth over the examination period, while the information industry continues to shrink.

We reviewed one community contact in the Little Rock MSA AA. The entity contacted conducts economic development activities in the AA. Activities are focused on attracting new businesses and jobs to the area and expanding existing ones. The contact noted that the local economy had been doing well overall. The greatest credit need in the area was affordable housing. Recent developments have focused on middle- and upper-income families, which has limited opportunities for LMI homebuyers. Financial institutions in the area were noted to be very responsive to the needs of the community.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

- Table 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 MA/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 originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition,



the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table 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 Geography** - 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 U: Memphis, TN-MS-AR Multi-State MSA Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
2015 2016 Memphis, TN- MS-AR Multi- State MSA	467	587	100	13.4	11.0	23.1	27.4	28.6	38.3	34.9	23.3	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table U: Memphis, TN-MS-AR Multi-State MSA Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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	
2017 2018 Memphis, TN- MS-AR Multi- State MSA	572	585	100	16.6	14.7	20.5	26.4	25.3	38.3	37.3	20.5	0.2	0.1	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table U: Oklahoma-Lawton MSA Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
2015 2016 Lawton MSA	937	2,282	100	4.9	6.0	19.2	16.5	48.0	48.2	27.9	29.1	0.0	0.2	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table U: Oklahoma-Lawton MSA Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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	
2017 2018 Lawton MSA	650	1,532	100	6.4	4.4	22.8	20.2	41.8	46.3	28.9	29.1	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>														

**Table U: Texas-Wichita Falls MSA Distribution of Consumer Loans by Income Category of the Geography 2015-16**

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
2015 2016 Wichita Falls MSA	99	229	100	2.8	1.0	16.8	11.1	42.7	53.6	37.6	34.3	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: Texas-Wichita Falls MSA Distribution of Consumer Loans by Income Category of the Geography 2017-18**

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
2017 2018 Wichita Falls MSA	91	167	100	5.8	5.5	22.8	21.9	33.3	45.1	38.1	27.5	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

<b>Table U: North Carolina-Fayetteville MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2015-16</b>	
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	
2015 2016 Fayetteville MSA	548	868	100	2.8	4.2	14.8	15.5	54.3	58.2	28.0	22.1	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table U: North Carolina-Fayetteville MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017-18</b>	
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	
2017 2018 Fayetteville MSA	456	594	100	0.7	2.4	18.6	21.5	63.0	56.4	17.7	19.7	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

Table U: North Carolina-Raleigh-Cary Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
2015 2016 Raleigh-Cary MSA	143	240	100	5.7	18.2	28.1	37.0	36.1	40.6	30.1	4.2	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table U: North Carolina-Raleigh-Cary Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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	
2017 2018 Raleigh-Cary MSA	140	206	100	5.9	10.7	29.2	49.3	33.5	35.7	31.4	4.3	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>														

**Table U: North Carolina-Richmond Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

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
2015 2016 Richmond County Non-MSA	26	34	100	9.5	11.5	38.3	61.5	46.2	23.1	6.0	3.9	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: North Carolina-Richmond Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

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
2017 2018 Richmond County Non-MSA	35	25	100	0.0	0.0	74.8	80.0	16.5	2.9	8.7	17.1	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

**Table U: North Carolina-Jacksonville Distribution of Consumer Loans by Income Category of the Geography 2015-16**

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
2015 2016 Jacksonville MSA	107	171	100	0.0	0.0	8.9	15.0	66.2	61.7	24.8	21.5	0.1	1.9

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

**Table U: North Carolina-Jacksonville Distribution of Consumer Loans by Income Category of the Geography 2017-18**

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
2017 2018 Jacksonville MSA	64	97	100	0.0	0.0	11.5	15.6	72.3	67.2	16.2	14.1	0.0	3.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0



Table U: North Carolina-Wilmington Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
2015 2016 Wilmington MSA	132	187	100	7.7	11.4	16.3	26.5	45.4	53.0	30.5	9.1	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

Table U: North Carolina-Wilmington Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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	
2017 2018 Wilmington MSA	115	158	100	13.0	14.8	16.1	33.0	40.3	41.7	30.5	10.4	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table U: North Carolina-Charlotte MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2015-16</b>	
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	
2015 2016 Charlotte MSA	62	78	100	6.9	7.7	22.5	0.0	37.0	80.7	33.5	11.6	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>														

<b>Table U: North Carolina-Charlotte MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017-18</b>	
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	
2017 2018 Charlotte MSA	44	47	100	7.6	16.0	26.4	16.0	31.8	68.0	34.2	0.0	0.1	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>														

**Table U: Tennessee-Nashville MSA Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

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
2015 2016 Nashville MSA	450	642	100	6.8	15.6	21.7	32.7	43.5	35.1	28.0	16.6	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: Tennessee-Nashville MSA Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

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
2017 2018 Nashville MSA	373	485	100	6.7	13.1	26.1	31.6	39.7	42.6	27.4	12.6	0.1	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

<b>Table U: Tennessee-Knoxville MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2015-16</b>	
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	
2015 2016 Knoxville MSA	103	152	100	5.1	11.7	22.3	26.2	49.2	52.4	23.3	9.7	0.1	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table U: Tennessee-Knoxville MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017-18</b>	
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	
2017 2018 Knoxville MSA	88	124	100	4.6	6.8	23.8	29.5	47.1	58.0	24.4	5.7	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

**Table U: Tennessee-Johnson City MSA Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

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
2015 2016 Johnson City MSA	84	115	100	1.3	0.0	27.3	31.0	44.8	41.6	26.6	27.4	0.0	100

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.  
Due to rounding, totals may not equal 100.0*

**Table U: Tennessee-Johnson City MSA Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

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
2017 2018 Johnson City MSA	59	58	100	0.0	0.0	26.4	32.2	52.6	44.1	21.0	23.7	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

**Table U: Tennessee-Kingsport-Bristol MSA Distribution of Consumer Loans by Income Category of the Geography 2015-16**

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
2015 2016 Kingsport-Bristol MSA	49	44	100	1.5	0.0	20.2	44.9	51.3	28.6	27.0	26.5	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: Tennessee-Kingsport-Bristol MSA Distribution of Consumer Loans by Income Category of the Geography 2017-18**

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
2017 2018 Kingsport-Bristol MSA	56	42	100	0.0	0.0	21.9	42.9	56.4	39.3	21.7	17.8	0.0	0.0%

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0

**Table U: Tennessee-Jackson, TN MSA Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

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
2015 2016 Jackson MSA	27	29	100	8.8	11.1	16.4	33.3	53.5	26.0	21.4	29.6	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: Tennessee-Jackson, TN MSA Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

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
2017 2018 Jackson MSA	36	37	100	5.4	2.8	23.8	27.8	43.4	44.4	26.3	25.0	1.1	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

Table U: Tennessee-Clarksville, TN MSA Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
2015 2016 Clarksville MSA	41	66	100	1.3	0.0	7.3	7.3	64.8	70.7	26.7	21.9	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: Tennessee-Clarksville, TN MSA Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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	
2017 2018 Clarksville MSA	34	39	100	1.4	0.00	14.8	29.4	60.2	60.0	22.8	17.6	0.7	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0														



**Table U: Tennessee-Non MSA Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

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
2015 2016 Tennessee Non-MSA	127	160	100	0.0	0.0	18.2	32.3	60.3	53.5	21.5	14.2	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 U: Tennessee-Non MSA Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

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
2017 2018 Tennessee Non-MSA	89	113	100	0.0	0.0	20.9	36.0	60.4	54.0	18.	10.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

Table U: Delaware-Dover MSA Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
2015 2016 Dover MSA	72	131	100	0.0	0.0	12.1	12.5	74.1	76.4	13.8	11.1	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: Delaware-Dover MSA Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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	
2017 2018 Dover MSA	70	84	100	1.6	0.0	16.1	22.9	68.5	67.1	13.8	10.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0														

<b>Table U: Mississippi-Jackson MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2015-16</b>	
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	
2015 2016 Jackson MSA	261	284	100	10.4	15.3	17.1	21.8	43.3	41.0	29.2	21.9	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table U: Mississippi-Jackson MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017-18</b>	
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	
2017 2018 Jackson MSA	335	323	100	9.0	20.6	26.6	26.3	32.6	37.9	31.8	15.2	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

**Table U: Louisiana-Shreveport-Bossier City MSA Distribution of Consumer Loans by Income Category of the Geography 2015-16**

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
2015 2016 Shreveport MSA	170	205	100	6.7	7.7	23.2	28.8	41.2	40.0	28.9	23.5	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: Louisiana-Shreveport-Bossier City MSA Distribution of Consumer Loans by Income Category of the Geography 2017-18**

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
2017 2018 Shreveport MSA	96	114	100	10.5	13.5	21.0	28.1	32.8	38.5	35.7	19.9	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

<b>Table U: Arkansas-Little Rock-North Little Rock-Conway MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2015-16</b>	
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	
2015 2016 Little Rock MSA	62	78	100	5.1	4.7	20.8	8.0	47.4	67.7	26.7	19.6	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table U: Arkansas-Little Rock-North Little Rock-Conway MSA Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017-18</b>	
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	
2017 2018 Little Rock MSA	69	79	100	4.4	0.0	20.5	14.5	41.1	63.8	33.5	21.7	0.4	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

Table U: Arkansas-Pine Bluff MSA Distribution of Consumer Loans by Income Category of the Geography													2015-16	
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	
2015 2016 Pine Bluff MSA	17	13	100	2.8	17.7	28.7	41.2	40.2	35.3	28.3	5.8	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

Table U: Arkansas-Pine Bluff MSA Distribution of Consumer Loans by Income Category of the Geography													2017-18	
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	
2017 2018 Pine Bluff MSA	27	27	100	2.6	0.0	18.2	51.9	62.1	37.0	17.1	11.1	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.                      Due to rounding, totals may not equal 100.0</i>														

**Table U: Arkansas-Pope County Non-MSA Distribution of Consumer Loans by Income Category of the Geography 2015-16**

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
2015 2016 Pope County Non-MSA	20	24	100	0.0	0.0	11.1	25.0	51.4	50.0	37.4	25.	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: Arkansas-Pope County Non-MSA Distribution of Consumer Loans by Income Category of the Geography 2017-18**

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
2017 2018 Pope County Non-MSA	29	28	100	0.0	0.0	4.9	13.8	50.7	62.1	44.5	24.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

**Table V: Memphis, TN-MS-AR Multi-State MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Memphis, TN- MS-AR MSA	467	587	100	24.9	71.3	15.7	21.8	17.0	6.4	42.5	0.4	0.0	0.0
<b>Total</b>	467	587	100	24.9	71.3	15.7	21.8	17.0	6.4	42.5	0.4	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: Memphis, TN-MS-AR Multi-State MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Memphis, TN- MS-AR MSA	572	585	100	25.6	69.9	15.5	25.0	16.5	4.9	42.4	0.2	0.0	0.00
<b>Total</b>	572	585	100	25.6	69.9	15.5	25.0	16.5	4.9	42.4	0.2	0.0	0.00

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0



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
2015 2016 Lawton MSA	937	2,282	100	23.8	48.7	16.0	17.0	18.7	19.5	41.5	14.8	0.0	0.0
<b>Total</b>	937	2,282	100	23.8	48.7	16.0	17.0	18.7	19.5	41.5	14.8	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*

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
2017 2018 Lawton MSA	650	1,532	100	23.8	48.3	16.3	19.4	17.8	20.2	42.1	12.1	0.0	0.0
<b>Total</b>	650	1,532	100	23.8	48.3	16.3	19.4	17.8	20.2	42.1	12.1	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

**Table V: Texas-Wichita Falls MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Wichita Falls MSA	99	229	100	23.0	39.4	16.3	26.3	19.8	21.2	40.9	13.1	0.0	0.0
<b>Total</b>	99	229	100	23.0	39.4	16.3	26.3	19.8	21.2	40.9	13.1	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: Texas-Wichita Falls MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Wichita Falls MSA	91	167	100%	23.8%	60.4%	16.3%	26.4%	18.3%	8.8%	41.6%	4.4%	0.0%	0.0%
<b>Total</b>	91	167	100	23.8	60.4	16.3	26.4	18.3	8.8	41.6	4.4	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

Table V: North Carolina-Fayetteville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower													2015-16	
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	
2015 2016 Fayetteville MSA	344	428	100	22.8	62.8	17.0	21.5	18.7	10.0	41.5	5.7	0.0	100	
<b>Total</b>	344	428	100	22.8	62.8	17.0	21.5	18.7	10.0	41.5	5.7	0.0	100	

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.  
Due to rounding, totals may not equal 100.0*

Table V: North Carolina-Fayetteville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower													2017-18	
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	
2017 2018 Fayetteville MSA	456	594	100	22.7	66.7	17.1	21.3	18.4	8.5	41.8	3.5	0.0	0.0	
<b>Total</b>	456	594	100	22.7	66.7	17.1	21.3	18.4	8.5	41.8	3.5	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

**Table V: North Carolina-Raleigh-Cary MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Raleigh-Cary MSA	143	240	100	22.8	84.6	17.4	11.9	18.1	2.8	41.7	0.7	0.0	0.0
<b>Total</b>	143	240	100	22.8	84.6	17.4	11.9	18.1	2.8	41.7	0.7	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: North Carolina-Raleigh-Cary MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Raleigh-Cary MSA	140	206	100	23.1	85.0	17.2	11.4	17.8	3.6	41.9	0.0	0.0	0.0
<b>Total</b>	140	206	100	23.1	85.0	17.2	11.4	17.8	3.6	41.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

**Table V: North Carolina-Richmond Non-MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Richmond County Non-MSA	26	34	100	31.2	57.7	17.8	30.8	17.0	11.5	34.1	0.0	0.0	0.0
<b>Total</b>	26	34	100	31.2	57.7	17.8	30.8	17.0	11.5	34.1	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 V: North Carolina-Richmond Non-MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Richmond County Non-MSA	35	25	100	30.6	65.7	16.9	25.7	17.3	8.6	35.2	0.0	0.0	0.0
<b>Total</b>	35	25	100	30.6	62.9	16.9	25.7	17.3	11.4	35.2	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

**Table V: North Carolina-Jacksonville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Jacksonville MSA	107	171	100	20.0	66.6	18.2	24.2	21.1	8.3	40.6	0.9	0.0	0.0
<b>Total</b>	107	171	100	20.0	66.6	18.2	24.2	21.1	8.3	40.6	0.9	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: North Carolina-Jacksonville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Jacksonville MSA	64	97	100	21.1	57.8	17.6	34..4	21.6	7.8	39.7	0.0	0.0	0.0%
<b>Total</b>	64	97	100	21.1	57.8	17.6	34..4	21.6	7.8	39.7	0.0	0.0	0.0%

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

**Table V: North Carolina-Wilmington MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Wilmington MSA	132	187	100	24.5	75.8	15.7	20.5	17.8	3.0	41.9	0.7	0.0	0.0
<b>Total</b>	132	187	100	24.5	75.8	15.7	20.5	17.8	3.0	41.9	0.7	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: North Carolina-Wilmington MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Wilmington MSA	115	158	100	25.1	87.0%	15.5%	10.4%	17.5%	2.6%	41.9%	0.0%	0.0%	0.0%
<b>Total</b>	115	158	100%	25.1	87.0	15.5	10.4	17.5	2.6	41.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

**Table V: North Carolina-Charlotte MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Charlotte MSA	26	32	100	22.7	96.2	16.1	0.0	18.7	3.8	42.4	0.0	0.0	0.0
<b>Total</b>	26	32	100	22.7	96.2	16.1	0.0	18.7	3.8	42.4	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 V: North Carolina-Charlotte MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Charlotte MSA	44	47	100	23.3	84.1	16.2	13.6	17.5	2.3	43.0	0.0	0.0	0.0
<b>Total</b>	44	47	100	23.3	84.1	16.2	13.6	17.5	2.3	43.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0



**Table V: Tennessee-Nashville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

Lawton MSA:	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
2015 2016 Nashville MSA	450	642	100	22.9	70.0	16.6	26.0	19.0	3.1	41.4	0.9	0.0	100
<b>Total</b>	450	642	100	22.9	70.0	16.6	26.0	19.0	3.1	41.4	0.9	0.0	100

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

**Table V: Tennessee-Nashville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Nashville MSA	373	485	100	23.0	70.0	16.9	24.1	18.2	5.9	41.9	0.0	0.0	0.0
<b>Total</b>	373	485	100	23.0	70.0	16.9	24.1	18.2	5.9	41.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0

**Table V: Tennessee-Knoxville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Knoxville MSA	103	152	100	24.6	69.9	16.1	24.3	17.5	4.9	41.7	0.9	0.0	0.0
<b>Total</b>	103	152	100	24.6	69.9	16.1	24.3	17.5	4.9	41.7	0.9	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: Tennessee-Knoxville MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Knoxville MSA	88	124	100	24.6	72.7	16.1	20.5	17.5	5.7	41.7	1.1	0.0	0.0
<b>Total</b>	88	124	100	24.6	72.7	16.1	20.5	17.5	5.7	41.7	1.1	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

**Table V: Tennessee-Johnson City MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Johnson City MSA	84	115	100	25.6	75.0	15.2	21.4	17.2	1.2	42.0	2.4	0.0	0.0
<b>Total</b>	84	115	100	25.6	75.0	15.2	21.4	17.2	1.2	42.0	2.4	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: Tennessee-Johnson City MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Johnson City MSA	59	58	100	25.4	83.0	15.5	17.0	17.1	0.0	41.9	0.0	0.0	0.0
<b>Total</b>	59	58	100	25.4	83.0	15.5	17.0	17.1	0.0	41.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

Table V: Tennessee-Kingsport-Bristol MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower													2015-16	
Lawton MSA:	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	
2015 2016 Kingsport-Bristol MSA	49	44	100	24.1	79.6	15.6	10.2	17.3	8.2	43.0	2.0	0.0	0.0	
<b>Total</b>	49	44	100	24.1	79.6	15.6	10.2	17.3	8.2	43.0	2.0	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 V: Tennessee-Kingsport-Bristol MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower													2017-18	
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	
2017 2018 Kingsport-Bristol MSA	56	42	100	23.6	73.2	16.9	19.6	17.1	7.2	42.5	0.0	0.0	0.0	
<b>Total</b>	56	42	100	23.6	73.2	16.9	19.6	17.1	7.2	42.5	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

Table V: Tennessee-Jackson MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower													2015-16	
Lawton MSA:	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	
2015 2016 Jackson MSA	27	29	100	25.4	59.3	14.7	33.3	17.6	3.7	42.3	3.7	0.0	0.0	
<b>Total</b>	27	29	100	25.4	59.3	14.7	33.3	17.6	3.7	42.3	3.7	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: Tennessee-Jackson MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower													2017-18	
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	
2017 2018 Jackson MSA	36	37	100	24.9	61.1	15.7	27.8	16.5	8.3	43.0	2.8	0.0	0.0	
<b>Total</b>	36	37	100	24.9	61.1	15.7	27.8	16.5	8.3	43.0	2.8	0.0	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

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
2015 2016 Clarksville MSA	41	66	100	20.4	61.0	15.3	12.2	18.7	14.6	45.5	12.2	0.0	0.0
<b>Total</b>	41	66	100	20.4	61.0	15.3	12.2	18.7	14.6	45.5	12.2	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*

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
2017 2018 Clarksville MSA	34	39	100	19.7	70.6	15.5	23.5	19.8	0.0	45.0	5.9	0.0	0.0
<b>Total</b>	34	39	100	19.7	70.6	15.5	23.5	19.8	0.0	45.0	5.9	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

**Table V: Tennessee-Non-MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Tennessee Non-MSA	127	160	100	24.6	54.3	15.8	32.3	17.3	10.2	42.2	3.2	0.0	0.0
<b>Total</b>	127	160	100	24.6	54.3	15.8	32.3	17.3	10.2	42.2	3.2	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: Tennessee-Non-MSA MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Tennessee Non-MSA	89	113	100	24.7	55.0	15.9	36.0	17.1	4.5	42.3	4.5	0.0	0.0
<b>Total</b>	89	113	100	24.7	55.0	15.9	36.0	17.1	4.5	42.3	4.5	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0

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
2015 2016 Dover MSA	72	131	100	22.6	57.0	17.1	29.1	20.3	9.8	40.0	4.1	0.0	0.0
<b>Total</b>	72	131	100	22.6	57.0	17.1	29.1	20.3	9.8	40.0	4.1	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*

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
2017 2018 Dover MSA	70	84	100	23.2	70.0	17.0	20.0	18.7	8.6	41.1	1.4	0.0	0.0
<b>Total</b>	70	84	100	23.2	70.0	17.0	20.0	18.7	8.6	41.1	1.4	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*



**Table V: Mississippi-Jackson MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Jackson MSA	261	284	100	25.5	72.8	15.5	20.7	16.6	4.9	42.5	1.6	0.0	0.0
<b>Total</b>	261	284	100	25.5	72.8	15.5	20.7	16.6	4.9	42.5	1.6	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: Mississippi-Jackson MSA Distribution of Consumer Loans by Income Category of the Borrower 2017-18**

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
2015 2016 Jackson MSA	335	323	100	25.5	78.5	15.3	16.4	16.3	4.2	42.9	0.9	0.0	0.0
<b>Total</b>	335	323	100	25.5	78.5	15.3	16.4	16.3	4.2	42.9	0.9	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
 Due to rounding, totals may not equal 100.0

**Table V: Louisiana-Shreveport MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Shreveport MSA	170	205	100	25.8	50.0	15.6	34.1	16.1	11.2	42.5	4.7	0.0	0.0
<b>Total</b>	170	205	100	25.8	50.0	15.6	34.1	16.1	11.2	42.5	4.7	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: Louisiana-Shreveport MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Shreveport MSA	96	114	100	25.7	61.4	15.7	25.0	15.6	7.3	43.0	6.3	0.0	0.0
<b>Total</b>	96	114	100	25.7	61.4	15.7	25.0	15.6	7.3	43.0	6.3	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0

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
2015 2016 Little Rock MSA	62	78	100	23.8	79.0	16.3	16.1	18.2	3.2	41.8	1.6	0.0	0.0
<b>Total</b>	62	78	100	23.8	79.0	16.3	16.1	18.2	3.2	41.8	1.6	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*

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
2017 2018 Little Rock MSA	69	79	100	24.1	81.2	16.2	13.0	18.1	2.9	41.6	2.9	0.0	0.0
<b>Total</b>	69	79	100	24.1	81.2	16.2	13.0	18.1	2.9	41.6	2.9	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

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
2015 2016 Pine Bluff MSA	17	13	100	26.4	88.3	14.4	11.7	17.4	0.0	41.7	0.0	0.0	0.0
<b>Total</b>	17	13	100	26.4	88.3	14.4	11.7	17.4	0.0	41.7	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*

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
2017 2018 Pine Bluff MSA	27	27	100	26.4	40.7	15.5	33.3	15.6	22.2	42.5	3.8	0.0	0.0
<b>Total</b>	27	27	100	26.4	40.7	15.5	33.3	15.6	22.2	42.5	3.8	0.0	0.0

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0*

**Table V: Arkansas-Pope County Non-MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2015-16**

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
2015 2016 Pope County Non-MSA	20	24	100	19.3	65.0	14.5	15.0	17.2	10.0	48.9	5.0	0.0	5.0
<b>Total</b>	20	24	100	19.3	65.0	14.5	15.0	17.2	10.0	48.9	5.0	0.0	5.0

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

**Table V: Arkansas- Pope County Non-MSA MSA Distribution of Unsecured Consumer Loans by Income Category of the Borrower 2017-18**

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
2017 2018 Pope County Non-MSA	29	28	100	20.4	62.1	14.6	24.1	17.9	13.8	47.2	0.0	0.0	0.0
<b>Total</b>	29	28	100	20.4	62.1	14.6	24.1	17.9	13.8	47.2	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data.  
Due to rounding, totals may not equal 100.0