



PUBLIC DISCLOSURE

April 13, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Absecon
Charter Number 10823

106 New Jersey Avenue
Absecon, NJ 08201

Office of the Comptroller of the Currency

1150 Northbrook Drive
Suite 303
Trevese, PA 19053

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.

Table of Contents

Overall CRA Rating..... 1
Description of Institution..... 2
Scope of the Evaluation..... 3
Discriminatory or Other Illegal Credit Practices Review..... 3
State Rating..... 4
 State of New Jersey..... 4
Appendix A: Scope of Examination..... A-1
Appendix B: Summary of MMSA and State Ratings..... B-1
Appendix C: Definitions and Common Abbreviations..... C-1
Appendix D: Tables of Performance Data..... D-1

Overall CRA Rating

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

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The quarterly average loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, performance context, and the credit needs of the assessment area (AA).
- A majority of the bank's loans are originated in its AA.
- The geographic distribution of loans for 2017-2019 is reasonable given the strong competition in the AA.
- The distribution of loans for 2017-2019 reflects reasonable penetration among individuals of different income levels. The bank's record of lending to borrowers of different incomes meets the standard for satisfactory performance.
- The bank had no consumer complaints regarding its community reinvestment or fair lending performance.

Loan-to-Deposit Ratio

The First National Bank of Absecon's quarterly average loan-to-deposit (LTD) ratio is reasonable. The bank's quarterly average net loan-to-deposit ratio during the evaluation period was 43.50 percent. The ratio ranged from a quarterly low of 37.83 percent to a quarterly high of 55.06 percent during the period. Over the last 12 quarters, the LTD ratio has steadily increased. The quarterly average net LTD ratio for a custom peer group of four similarly sized and situated banks was 70.86 percent over the same period. The average LTD ratio for these institutions ranged from a quarterly low of 35.85 percent to a quarterly high of 92.71 percent during the period.

Lending in Assessment Area

A majority of the bank's home mortgage loans were made within the assessment area (AA). This meets the standard for satisfactory performance. During the evaluation period, the bank originated 70.6 percent of the number and 54.4 percent of the dollar amount of home mortgage loans inside the AA.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2017	19	100.0	0	0.0	19	1,551	100.0	0	0.0	1,551
2018	43	69.4	19	30.6	62	4,220	43.4	5,500	56.6	9,721
2019	39	62.9	23	37.1	62	6,894	57.3	5,130	42.7	12,024
Subtotal	101	70.6	42	29.4	143	12,665	54.4	10,630	45.6	23,296
Total	101	70.6	42	29.4	143	12,665	54.4	10,630	45.6	23,296

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

The First National Bank of Absecon (FNBA) is a \$147 million intrastate community bank founded in 1916. FNBA is headquartered in Absecon, NJ and is a wholly owned subsidiary of Absecon Bancorp, a one-bank holding company. FNBA has one subsidiary, Absecon Investment Corporation, which holds a portion of the Bank's investment securities. The last CRA examination occurred on April 4, 2016 and the institution was rated Satisfactory.

FNBA offers a full range of deposit and loan products. Deposit products include checking, savings, money market accounts, certificates of deposits, and individual retirement accounts. Loan products include residential mortgages, commercial loans, and consumer loans.

FNBA serves Atlantic County through its main office and three branches. The main office and all three branches have drive-in facilities. Each location is within the Atlantic City, New Jersey Metropolitan Statistical Area (MSA) #12100, and all branches are located in upper- or middle-income geographies. The three branch lobbies are open Monday through Thursday from 9:00AM to 4:00PM, Friday from 9:00AM to 5:00PM and on Saturday from 9:00AM until 12:00PM. The drive-ins are open Monday through Thursday from 8:30AM to 5:00PM, Friday from 8:30AM to 6:00PM and Saturday 9:00AM to 12:00PM. The main office lobby is open 9:00AM to 1:00PM Monday through Friday, and the drive-in is open Monday through Friday from 8:30AM to 1:00PM. The bank also offers on-line banking, telephone banking, mobile banking, and bill payment services. The bank does not have automated teller machines (ATMs). Competition in the AA is strong. Competitors include TD Bank, NA, OceanFirst Bank, NA, Bank of America, NA, Wells Fargo Bank, NA, and Branch Banking and Trust Company. ATMs are also widely available at other banks, food stores, retail stores, and convenience stores. No branches were opened or closed since the prior CRA performance evaluation (PE), and there were no mergers or acquisitions.

As of December 31, 2019, FNBA reported total deposits of \$129.3 million, total assets of \$146.9 million, and tier one leverage capital of \$16.4 million. As of the same date, FNBA reported net loans and leases of \$71 million or 48 percent of total assets. Table 1 provides a breakdown of the loan portfolio.

**Table 1:
Loan Portfolio Summary by Loan Product December 31, 2019**

Loan Category	\$ Amount (millions)	% of Outstanding Loans
Non-Farm/Non-Residential	\$20,525	28.52%
Residential Real Estate	\$43,129	59.92%
Commercial & Industrial	\$6,991	9.71%
Multifamily Loans	\$555	0.77%
Consumer Loans	\$259	0.36%
Other Loans	\$3	0.00%
Agriculture & Farmland Loans	\$516	0.72%
TOTAL	\$71,978	100%

Source: December 31, 2019 Call Report

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNBA under the Small Bank examination procedures, which consists of a lending test. The lending test evaluates the bank's record of helping to meet the credit needs of its AA through its lending activities. The bank's primary loan product is residential mortgages. This evaluation considers FNBA's HMDA-reportable loans (home purchase, home improvement, and home refinance) for the calendar years 2017, 2018, and 2019. Our analysis took into consideration the economic, financial, and environmental factors that impact the bank's CRA performance.

In order to ensure that FNBA's public lending information was accurate and reliable, we performed a data integrity examination during the fourth quarter of 2019. During the data integrity examination, we evaluated FNBA's processes to ensure the accuracy of collected Home Mortgage Disclosure Act (HMDA) data and tested a sample of FNBA's HMDA-reportable loans. Specifically, we tested the accuracy of HMDA loan data by comparing it against FNBA's loan file documentation. The data integrity examination revealed that FNBA's publicly available HMDA loan data could be relied upon for the purposes of this CRA PE.

Selection of Areas for Full-Scope Review

FNBA has one AA that includes all census tracts (CT) in the Atlantic City-Hammonton, NJ MSA #12100. There are 70 census tracts (CTs) in the AA, including 9 low income CTs and 16 moderate income CTs. The AA changed since the last PE due to the bank's expansion of lending activity throughout the county. Atlantic County is located in the southeastern portion of the state of New Jersey. The AA also includes the Naval Air Transportation Experimental Center, Atlantic City International Airport, and rural portions of the New Jersey Pinelands. FNBA's AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The examination covers a single evaluation period. Effective September 14, 2018, the Office of Management and Budget (OMB) issued an update on the delineations of regional statistical areas (MSAs, MDs, CSAs) across certain areas of the country. Our analysis indicates the FNBA's AA were not impacted by these updates, and therefore a separate analysis involving the 2019 OMB update is not necessary. The information in our borrower distribution and geographic distribution analysis for 2017, 2018, and 2019 are based on 2015 American Community Survey (ACS) data.

Ratings

The bank's overall rating is based on the full scope review described above. The only applicable performance test is the lending test.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of New Jersey

CRA rating for the State of New Jersey: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The quarterly average loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, performance context, and the credit needs of the assessment area (AA).
- A majority of the bank's loans are originated in its AA.
- The geographic distribution of loans for 2017-2019 is reasonable given the strong competition in the AA.
- The distribution of loans for 2017-2019 reflects reasonable penetration among individuals of different income levels. The bank's record of lending to borrowers of different incomes meets the standard for satisfactory performance.
- The bank had no consumer complaints regarding its community reinvestment or fair lending performance.

Atlantic County Assessment Area

Table A - Demographic Information of the Assessment Area

Assessment Area: FNBA AA 2019

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	70	12.9	22.9	30.0	31.4	2.9
Population by Geography	275,376	9.9	21.5	35.0	32.8	0.8
Housing Units by Geography	127,435	11.0	20.5	33.9	33.5	1.1
Owner-Occupied Units by Geography	68,194	3.4	16.3	39.3	40.1	1.0
Occupied Rental Units by Geography	33,624	25.3	31.3	25.7	16.7	1.0
Vacant Units by Geography	25,617	12.7	17.4	30.4	38.0	1.5
Businesses by Geography	18,314	10.5	17.8	33.1	37.7	0.8
Farms by Geography	571	1.4	11.4	41.0	45.4	0.9
Family Distribution by Income Level	68,395	22.8	17.0	18.5	41.7	0.0
Household Distribution by Income Level	101,818	24.8	15.8	17.4	42.0	0.0
Median Family Income MSA - 12100 Atlantic City-Hammonton, NJ MSA		\$66,523	Median Housing Value			\$241,428
			Median Gross Rent			\$1,017
			Families Below Poverty Level			12.1%

Source: 2015 ACS and 2019 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.

Of the 70 tracts, 12.9 percent are low-income geographies, 22.9 percent are moderate-income geographies, 30.0 percent are middle-income geographies, 31.4 percent are upper-income geographies, and 2.9 percent are geographies with unknown income levels. The 2015 American Community Survey (ACS) reported that the total population of the AA was 275,376. Within the AA, there are 68,395 families and 101,818 households. The median household cost is \$241,428. There are 127,435 housing units, of which, 53.5 are owner-occupied, 26.4 percent are renter-occupied, and 20.1 percent are vacant.

Approximately 3.4 percent of owner-occupied housing is located in low-income geographies, 16.3 percent is located in moderate-income geographies, 39.3 percent is located in middle-income geographies, 40.1 percent is located in upper-income geographies, and 1.0 percent is located in geographies with unknown income levels. The low-income geographies are located a substantial distance away from the bank and are physically separated from the remainder of the AA by a waterway.

The 2019 median family income for the Atlantic City-Hammonton, NJ MSA was \$66,523. Approximately 22.8 percent of the families are low-income, 17.0 percent are moderate-income, 18.5 percent are middle-income, and 41.7 percent are upper-income. Approximately 12.1 percent of families are below the poverty level. The unemployment rate across Atlantic County in 2019 was 5.0 percent, exceeding the 3.7 percent unemployment rate for the State of New Jersey.

Competition in the AA is strong and includes local community banks and branches of larger regional and national banks. According to the FDIC Deposit Market Share Report as of June 30, 2019, FNBA is ranked 9th out of 12 institutions in the AA with a market deposit share of 2.32 percent of total deposits. The primary competitors within the AA are: TD Bank, NA (8 branches, 22.85 percent market share), OceanFirst Bank, NA (11 branches, 22.04 percent market share), Bank of America, NA (8 branches, 15.84 percent market share), Wells Fargo Bank, NA (9 branches, 13.23 percent market share), and Branch Banking and Trust Company (3 branches, 7.53 percent market share).

According to 2018 Peer Mortgage Data, FNBA had a 0.52 percent loan market share, and ranked 45th among 408 lending institutions in the AA. FNBA's major competitors for mortgage lending in the AA are: Wells Fargo Bank NA, ranked 1st with a 7.79 percent market share; Bank of America NA, ranked 2nd with a 5.46 percent market share; Caliber Home Loan LLC, ranked 3rd with a 5.11 percent market share, and TD Bank NA ranked 4th with a 5.09 percent market share.

Economic conditions remain depressed with higher levels of unemployment than the state average. According to Moody's Analytics, Atlantic City-Hammonton employment has moved sideways over the past year following a hiring spree from two casino openings in 2018. Employment in the leisure/hospitality industry has trended lower since the second quarter of 2019 and now stands below prior year levels. The healthcare industry is adding positions at a slower pace than the state average. Major employers are Borgata Hotel Casino & Spa, Hotel at Bally's Atlantic City, the Federal Aviation Administration, and Shore Medical Center. Major employment sectors are gaming, tourism, federal employment, and health care.

During this examination, we interviewed a local community organization whose primary purpose is economic development. The contact indicated that the County continues to struggle economically, with high unemployment levels and an overall high cost of living. The contact also indicated that there are insufficient levels of low to moderate income housing in the County.

LENDING TEST

The bank's performance under the Lending Test in New Jersey is rated Satisfactory

Conclusions for New Jersey Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Atlantic County AA is Satisfactory.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

The geographic distribution of loans in the AA reflects reasonable dispersion. The bank did not originate any mortgage loans in low-income geographies. Opportunities to make loans in low-income geographies are limited. These geographies are located a substantial distance away from the bank and are physically separated from the remainder of the AA by a waterway. The percentage of home mortgage loans in moderate-income geographies is reasonable given the strong competition in the AA. Approximately 16.3 percent of owner-occupied housing units were located in moderate income CTs and FNBA originated 7.9 percent of home mortgage loans within these CTs. Refer to Table O in the state of

New Jersey section of appendix D for the data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

The distribution of loans for 2017-2019 reflects reasonable penetration among individuals of different income levels. The bank's record of lending to borrowers of different incomes meets the standard for satisfactory performance. Our analysis takes into consideration the lack of affordability for a low-income family to purchase a home. The average median housing value in this AA was \$241,428. According the FFIEC, adjusted median family income was \$66,523. A low-income family earned less than \$33,300 annually and a moderate-income family earned less than \$52,218. Additionally, 12.1 percent of households in the AA were below the poverty level. Because this lack of affordability limits the opportunity for home purchase, we placed more emphasis on the bank's performance with moderate-income families. The percentage of home mortgage loans in moderate-income geographies is near to the percentage of moderate-income families. Refer to Table P in the state of New Jersey section of appendix D for the data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Responses to Complaints

The bank did not receive any CRA or Fair Lending related consumer complaints since the last CRA examination.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Absecon Investment Corporation	Owned subsidiary	N/A – not included in Exam
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of New Jersey		
Absecon AA	Full-scope	<i>AA includes all of Atlantic County, NJ – total of 70 CTs.</i>

Appendix B: Summary of MMSA and State Ratings

RATINGS	
First National Bank of Absecon	
Overall Bank:	Lending Test Rating
First National Bank of Absecon	Satisfactory
MMSA or State:	
New Jersey	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
FNBA AA 2019	101	12,665	100.0	7,617	3.4	0.0	2.1	16.3	7.9	14.0	39.3	39.6	38.1	40.1	51.5	44.5	1.0	1.0	1.3
Total	101	12,665	100.0	7,617	3.4	0.0	2.1	16.3	7.9	14.0	39.3	39.6	38.1	40.1	51.5	44.5	1.0	1.0	1.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-19**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FNBA AA 2019	101	12,665	123.2	7,617	22.8	5.0	4.6	17.0	13.9	16.5	18.5	15.8	18.8	41.7	50.5	40.1	0.0	14.9	20.0
Total	101	12,665	123.2	7,617	22.8	5.0	4.6	17.0	13.9	16.5	18.5	15.8	18.8	41.7	50.5	40.1	0.0	14.9	20.0

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0