



**PUBLIC DISCLOSURE**

April 10, 2023

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First National Bank of Eastern Arkansas  
Charter Number 13637

101 North Washington Street  
Forrest City, AR 72335

Office of the Comptroller of the Currency

Victory Building  
1401 West Capitol Avenue, Suite 350  
Little Rock, AR 72201

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

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

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on a full scope review of the Memphis-Forrest City Combined Statistical Area (CSA) and the state of Arkansas non-Metropolitan Statistical Area (MSA) Assessment Area (AA).
- The loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of loans are originated inside the bank's AAs.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AAs.
- The bank exhibits a reasonable distribution of loans to individuals and businesses of different income levels and business and farms of different sizes, given the product lines offered by the bank.
- The Community Development (CD) Test rating is based on a full scope review of the Memphis-Forrest City CSA and the state of Arkansas non-MSA AA.
- CD activities, including loans, investments, and services, reflect adequate responsiveness to the credit and economic development needs of the bank's AAs.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable. The bank's LTD ratio averaged 55.3 percent and ranged from 46.0 percent to 66.4 percent over the 12 quarters during this evaluation period.

The bank's LTD ratio compares favorably with other financial institutions of similar size, location, and product offerings. First National Bank of Eastern Arkansas (FNBEA) ranks second among three similarly situated banks. The average LTD ratios for the other two banks over the same 12 quarters are 59.8 percent and 50.5 percent. Competition from other financial institutions is above average. The bank's competitors include several local community banks and branches of large regional and nationwide institutions.

<b>Institution Name</b>	<b>Assets \$000s (as of 12/31/2021)</b>	<b>Average LTD Ratio</b>
First National Bank of Eastern Arkansas	\$559,838	55.33%
Fidelity Bank	\$554,654	50.51%
Patriot Bank	\$474,952	59.83%
<b>Assessment Average</b>	- - -	<b>55.22%</b>

## Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment areas (AAs).

The bank originated and purchased 92.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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											
	2019	111	94.1	7	5.9	118	7,874	84.5	1,442	15.5	9,316
	2020	102	91.1	10	8.9	112	8,275	82.0	1,821	18.0	10,096
	2021	102	90.3	11	9.7	113	11,189	79.8	2,837	20.2	14,026
<b>Subtotal</b>		<b>315</b>	<b>91.8</b>	<b>28</b>	<b>8.2</b>	<b>343</b>	<b>27,338</b>	<b>81.8</b>	<b>6,100</b>	<b>18.2</b>	<b>33,439</b>
Small Business		56	93.3	4	6.6	60	4,264	96.4	161	3.6	4,425
Small Farm		59	98.3	1	1.6	60	3,455	78.8	930	21.2	4,385
<b>Total</b>		<b>430</b>	<b>92.9</b>	<b>33</b>	<b>7.1</b>	<b>463</b>	<b>35,057</b>	<b>83.0</b>	<b>7,191</b>	<b>17.0</b>	<b>42,248</b>

## Description of Institution

FNBEA is a \$542.8 million, multi-state financial institution headquartered in Forrest City, Arkansas. FNBEA is a subsidiary of a single entity holding company, Bancshares of Eastern Arkansas, Incorporated located in Forrest City, Arkansas. FNBEA was chartered in 1886. No mergers or acquisitions occurred within the evaluation period.

FNBEA has two AAs – the Memphis-Forrest City CSA and the Arkansas Non-MSA AA. The Memphis-Forrest City CSA includes select counties from the Memphis TN-MS-AR multi state MSA (Shelby, Desoto, and Crittenden Counties) and the Forrest City, Arkansas Micropolitan Statistical Area (Mississippi, Cross, Woodruff, Monroe, Lee, and Phillips Counties). The Arkansas Non-MSA AA in Arkansas consists of six counties: Mississippi County, Cross County, Woodruff County, Monroe County, Lee County, and Phillips County. These self-identified AAs are appropriate given the bank's branch network and lending strategy.

The bank operates 15 full-service banking centers in Arkansas and Tennessee. The main branch is in Forrest City, AR, with other branches located throughout the northeastern part of the state of Arkansas. The bank has two branches in Tennessee. The most recent branch addition is in Collierville, Tennessee, which opened in 2020 as a loan production office. It was then approved and converted to a full-service branch in April 2022. All branch locations offer drive-in banking and lobby hours on Monday through Friday. There are two stand-alone automated teller machines (ATMs) in Forrest City (Forrest City Machine Works) and Wynne (Exxon Circle N).

Management's primary lending activity is real estate lending in all markets. Given the location of FNBEA branches in Arkansas, agricultural lending and small dollar personal lending are also key lending activities. Business and residential lending are primary products within the Memphis-Forrest City CSA.

As of December 31, 2021, net loans totaled \$244.1 million and represented 45.0 percent of total assets. The majority of loans are real estate secured loans, which totaled \$162.9 million and represented 65.7 percent of total loans. The remainder of the loan portfolio consists of \$31.8 million (12.8 percent of total loans) in agricultural loans, \$42.0 million (16.9 percent) in commercial loans, and \$9.5 million (3.8 percent) in loans to individuals. Tier 1 capital as of December 31, 2021, totaled \$50.7 million, representing 9.2 percent of adjusted average assets.

No legal, financial, or other factors impeded the bank's ability to help meet the credit needs of its AA during the evaluation period. The bank received an overall rating of "**Satisfactory**" at the last CRA evaluation dated January 6, 2020.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

Examiners reviewed the bank's performance using the intermediate small bank examination procedures for CRA. The evaluation period was January 1, 2019, through December 31, 2021. For the years 2019 through 2021, examiners sampled business loans in the Memphis-Forrest City CSA and farm loans in the Arkansas Non-MSA AA. HMDA data gathered during the evaluation period was also evaluated during the period and reported within this PE.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one AA within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AA located within the same MSA, multistate metropolitan statistical area (MMSA), or CSA are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

In determining primary products, loans products were totaled from the call report and the top two categories were considered. Primary lending includes real estate lending and agriculture. In the Memphis-Forrest City CSA, business loans were reviewed given the bank's strategy within the Memphis market. In the Arkansas Non-MSA AA, farm loans were reviewed given the rural geography and primary industry in the area. Business and farm loans were given equal weight in overall ratings.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **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.

## Multistate Metropolitan Statistical Area Rating

### Memphis-Forrest City Combined Statistical Area

**CRA rating for Memphis-Forrest City CSA<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the CSA
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- CD lending reflects adequate responsiveness to the CD needs in the CSA.
- CD investments reflect adequate responsiveness to the CD needs in the CSA.
- CD services reflect adequate responsiveness to the CD needs in the CSA.

### Description of Institution's Operations in Memphis-Forrest City CSA

FNBEA operates 11 full-service branches and two ATMs within the Memphis-Forrest City CSA. There are nine branches in Arkansas – seven in St. Francis County and two in Crittenden County. There is one ATM located in Forrest City in St. Francis County. There are two branches in Shelby County, one in Memphis and one in Collierville, Tennessee. The two branches in Tennessee are located in upper-income census tracts (CTs) and surrounded by other upper and middle-income CTs. The primary business focus in the CSA is home mortgages, business loans, and agricultural loans. Given the bank's branch network and business strategy, the AA excludes the remaining counties in the Memphis Forrest City CSA; these include Fayette, Tunica, Marshall, Tipton, and Tate Counties.

Given their limited presence and overall size of the Memphis market within the Memphis-Forrest City CSA, FNBEA's market share is negligible. As of June 30, 2021, FNBEA's total deposit in the Memphis-Forrest City CSA were \$354.89 million or 0.93 percent of the total market. This ranks 18<sup>th</sup> out of 46 possible financial institutions in the CSA. Compared to the last evaluation period, FNBEA has increased their market share within the CSA. Major competitors in the CSA include: First Horizon Bank, Regions Bank, and Truist Bank.

The Memphis-Forrest City CSA consists of three counties in Arkansas, Mississippi, and Tennessee. As of the 2015 ACS US Census, the Memphis-Forrest City CSA consists of 280 CTs; 84 upper-income CTs, 59 middle-income CTs, 59 moderate-income CTs, 71 low-income CTs, and seven CTs with no income information available. This CSA is appropriate given the bank's branch locations and does not arbitrarily exclude any low- or moderate-incomes CTs.

As part of the review, a community contact interview was conducted with a non-profit organization that serves the Memphis region entrepreneur ecosystem. According to the contact, better access to capital is needed, especially within the minority community. Additionally, the contact indicated banks could

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<sup>1</sup> [This rating reflects performance within the MMSA. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.]

adjust underwriting to accommodate minority entrepreneurs and could be more direct with their investments to non-profits that are working in LMI communities. The contact indicated a perception that banks are typically not interested in start-ups as many early-stage businesses often do not have the ability repay debt within the first five years of operations and many entrepreneurs do not have the ability to get traditional funding from local banks. The contact indicated an opportunity to increase microlending to early-stage businesses.

<b>Table A – Demographic Information</b>						
<b>Metropolitan Statistical Area: Memphis-Forrest City CSA</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)	280	25.4	21.1	21.1	30.0	2.5
Population by Geography	1,183,446	18.6	20.3	21.5	39.0	0.6
Housing Units by Geography	497,519	21.0	20.2	21.1	37.3	0.4
Owner-Occupied Units by Geography	258,796	11.5	16.8	22.2	49.4	0.2
Occupied Rental Units by Geography	176,216	28.9	24.1	20.7	25.8	0.4
Vacant Units by Geography	62,507	38.3	23.2	17.8	19.5	1.2
Businesses by Geography	81,003	12.5	15.7	20.9	49.8	1.0
Farms by Geography	1,885	7.6	14.9	24.8	51.9	0.8
Family Distribution by Income Level	283,136	24.7	15.6	17.1	42.5	0.0
Household Distribution by Income Level	435,012	25.6	15.5	16.5	42.4	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$58,214	Median Housing Value			\$133,191
Median Family Income Non-MSAs - AR		\$45,047	Median Gross Rent			\$864
			Families Below Poverty Level			15.3%
<i>Source: 2015 ACS and 2020 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>						

## Scope of Evaluation in Memphis-Forrest City CSA

Examiners identified one AA receiving a full scope review in the Memphis-Forrest City CSA. The Memphis-Forrest City CSA AA is a combination of three counties in the Memphis MSA and St. Francis County in Arkansas. For the purposes of this evaluation, the Arkansas Non-MSA AA was reviewed separately. Examiners identified home mortgages and small business loans as products for assessment in the Memphis-Forrest City CSA AA based on overall product dollar volume listed on the call report. Examiners weighted business loans in the CSA equally to farm loans in the non-MSA AA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MEMPHIS-FORREST CITY CSA

### LENDING TEST

The bank's performance under the Lending Test in the Memphis-Forrest City CSA is rated Satisfactory.



Based on a full scope review, the bank's performance in the Memphis-Forrest City CSA is reasonable.

### **Distribution of Loans by Income Level of the Geography**

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

#### ***Home Mortgage Loans***

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

The geographic distribution of home mortgages by income level of the geography is good. The percentage of home mortgages in low-income CTs is somewhat lower than the percentage of owner-occupied housing units in the AA but exceeds the aggregate lending in the AA. The percentage of home mortgages in moderate-income CTs is near to the percentage of owner-occupied housing units in the AA but exceeds the aggregate lending in the AA.

#### ***Small Loans to Businesses***

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

The geographic distribution of small loans to business by income geography in the Memphis-Forrest City CSA is adequate. The number of bank loans to small businesses located in low-income CTs is significantly lower than the percentage of businesses and aggregate lending in the AA. The number of loans to small businesses located in moderate-income CTs is near the percentage of businesses and aggregate lending in the AA. The number of loans to small businesses located in middle-income CTs exceeds the percentage of businesses and 64.0 percent of the loans to middle-income CTs were originated in distressed or underserved areas.

#### ***Lending Gap Analysis***

No lending gaps were identified during the review. See distribution of lending by income level of geography section for lending analysis performed.

### **Distribution of Loans by Income Level of the Borrower**

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

#### ***Home Mortgage Loans***

Refer to Table P in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgages by income level of the borrower is poor. The percentage of home mortgages made to low-income borrowers is lower than the percentage of low-income families in the

AA but exceeds the aggregate lending in the AA. The percentage of home mortgages made to moderate-income borrowers is lower than the percentage of moderate-income families in the AA and aggregate lending in the AA.

### ***Small Loans to Businesses***

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s originations and purchases of small loans to businesses.

The distribution of loans to business by income level of the borrower in the Memphis-Forrest City CSA is excellent. The number of bank loans to small businesses with revenues less than \$1 million is near the percentage of businesses with revenues less than \$1 million and exceeds the aggregate lending in the AA. The level of bank loans to businesses with revenues not available is elevated as PPP loans were included in the analysis. PPP loans did not require income verification.

### **Responses to Complaints**

FNBEA has an appropriate and adequate process for receiving, responding, and tracking CRA-related customer complaints. There were no CRA related complaints made during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the Community Development Test in the Memphis-Forrest City CSA is rated Satisfactory.

Based on a full scope the review, the bank exhibits adequate responsiveness to community development needs in the MMSA through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

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

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Memphis-Forrest City CSA	267	60.82%	\$8,657	65.04%
Arkansas Non-MSA AA	172	39.18%	\$4,654	34.96%
<b>Total</b>	<b>439</b>	<b>100%</b>	<b>\$13,311</b>	<b>100%</b>

The bank's level of CD lending demonstrates adequate responsiveness to the CD needs within the Memphis-Forrest City CSA. During the evaluation period, the bank originated or renewed 267 CD loans totaling \$8.65 million. The CD loans made in the Memphis-Forrest City CSA were mostly concentrated in Paycheck Protection Program (PPP) loans.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Memphis-Forrest City CSA	2	\$570	102	\$1,208	104	38.4%	\$1,778	5.9%	-	-
Arkansas Non-MSA AA	3	\$570	63	\$1,661	66	24.4%	\$2,231	7.4%	-	-
Statewide/Regional	27	\$6,452	74	\$19,567	101	37.3%	\$26,019	86.6%	-	-
<b>Total</b>	<b>32</b>	<b>\$7,592</b>	<b>239</b>	<b>\$22,436</b>	<b>271</b>	<b>100%</b>	<b>\$30,028</b>	<b>100%</b>	-	-

\* Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

The bank's qualified investments are concentrated in statewide and regional investments as there is a lot of competition within the AA to buy local investments. These qualified investments serve the AA and their CD needs. The bank's investments included six Arkansas school bonds in schools with 50 percent or more students qualifying for free and reduced lunches.

During the evaluation period, the bank made 98 donations in the Memphis-Forrest City CSA that amounted to \$68,654 to organizations that benefit LMI individuals.

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

The bank provides an adequate level of CD services within its AA. Bank employees provide financial expertise and knowledge to three local non-profits focused on CD activities. For example, a bank employee serves as a board member for the Marion School District Foundation Board. This organization raises money to support the school.

## State Rating

### State of Arkansas

**CRA rating for the State of Arkansas<sup>2</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution throughout the non-MSA AA.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and farms of different sizes.
- CD lending reflects adequate responsiveness to the CD needs in the non-MSA AA.
- CD investments reflect adequate responsiveness to the CD needs the non-MSA AA.
- CD services reflect adequate responsiveness to the CD needs in the non-MSA AA.

### Description of Institution's Operations in Arkansas

FNBEA operates four full-service branches in the Arkansas Non-MSA AA. There is one branch in Mississippi, Cross, Monroe, and Lee Counties. Management did not open any new branches in the non-MSA AA during the evaluation period. The primary business focus within the non-MSA AA is home mortgages and agricultural loans.

Given the bank's long history in the northeastern region of Arkansas, FNBEA has a larger market share in the non-MSA AA than in the Memphis-Forrest City CSA. As on June 30, 2021, total deposits in the Arkansas non-MSA AA totaled \$135.45 million, or 6.54 percent of the total market share. The bank ranks sixth out of 16 possible financial institutions. Major competitors in the AA include: Southern Bancorp, Farmers Bank and Trust Company, and Partners Bank.

The Arkansas non-MSA AA consists of six counties in the northeastern region of the state, surrounding St. Francis County. Per the 2015 ACS US Census, the AA consists of 33 CTs; two upper-income CTs, 15 middle-income CTs, 15 moderate-income CTs, and 1 low-income CT. All CTs had income information available. Given that there is only one low-income CT in the non-MSA AA, the opportunity to lend in those low-income area is very limited. The Arkansas non-MSA AA is appropriate given the bank's branch locations and does not arbitrarily exclude LMI CTs.

As part of the review, a community contact interview was conducted with a non-profit organization that works to establish endowment funds, build assets, and award grants to help meet community needs in Mississippi County. According to the contact, affordable housing is a primary need in the county. With

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<sup>2</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

the growing steel industry, jobs are increasing, but there is a lack of affordable housing for new residents. Therefore, rental housing is in strong demand. The waiting list for affordable housing includes over 40 applicants. The contact discussed that the northern half of the county is in need of housing rehabilitation while the southern half of the county is in need of housing development. Homelessness is also a minor. The local economic opportunity commission has a homeownership initiative, but housing development is difficult given that a majority of the community is centered in agriculture. Additionally, staff mentioned the overall need for economic development in the county as many residents drive to other areas for shopping, including grocery and retail stores, and medical services. There is opportunity for banks to become more engaged in community develop and provide access to credit for farms, small business, and affordable housing, including housing rehabilitation and renovation projects.

## Arkansas Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Arkansas Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	33	3.0	45.5	45.5	6.1	0.0
Population by Geography	107,384	1.7	43.9	47.0	7.5	0.0
Housing Units by Geography	51,209	2.0	45.3	46.4	6.3	0.0
Owner-Occupied Units by Geography	24,385	0.9	38.4	52.0	8.7	0.0
Occupied Rental Units by Geography	17,689	2.6	52.1	40.4	5.0	0.0
Vacant Units by Geography	9,135	3.7	50.7	43.2	2.4	0.0
Businesses by Geography	4,647	4.1	45.0	40.4	10.6	0.0
Farms by Geography	851	0.8	33.1	55.0	11.0	0.0
Family Distribution by Income Level	27,590	26.8	18.6	17.7	37.0	0.0
Household Distribution by Income Level	42,074	29.7	15.7	16.6	38.0	0.0
Median Family Income Non-MSAs - AR		\$45,047	Median Housing Value			\$71,659
			Median Gross Rent			\$579
			Families Below Poverty Level			21.5%

Source: 2015 ACS and 2020 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.

## Scope of Evaluation in Arkansas

Examiners identified one AA receiving a full scope review in the state of Arkansas. The non-MSA AA includes all non-MSA counties within the bank's geographic footprint. For the purposes of this evaluation, the Memphis-Forrest City CSA was reviewed separately. Examiners identified home mortgages and small farm loans as products for assessment in the Arkansas non-MSA AA based on overall product dollar volume listed on the call report. Examiners weighted farm loans in the non-MSA AA equally to business loans in the CSA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS**

### **LENDING TEST**

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

#### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full scope review, the bank's lending performance in the state of Arkansas is reasonable.

#### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the state.

##### ***Home Mortgage Loans***

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

The geographic distribution of home mortgages by income level of the geography in the Arkansas non-MSA AA is excellent. The bank did not originate any home mortgages in low-income CTs; however, there is only one low-income CT in the AA. The percentage of owner-occupied housing units and aggregate lending in low-income CTs in the AA is very low. The percentage of home mortgages in moderate-incomes CTs exceeds the percentage of owner-occupied housing units and the aggregate lending in the AA.

##### ***Small Loans to Farms***

Refer to Table S in the state of Arkansas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

The geographic distribution of loans to business by income level of the geography in the Arkansas Non-MSA AA is excellent. The bank did not originate any small farm loans during the assessment period in low-income CTs; however, the percentage of small farms and aggregate lending in the AA is very low. There is only one low-income CT in the area. The number of loans to small farms located in moderate-income CTs exceeds the percentage of small farms and aggregate lending in the AA. The number of loans to small farms located in middle-income CTs is near the percentage of farms and aggregate lending in the AA and 96.9 percent of the loans in middle-income CTs were originated in distressed or underserved areas.

##### ***Lending Gap Analysis***

No lending gaps were identified during the review. See distribution of lending by income level of geography section for lending analysis performed.

## **Distribution of Loans by Income Level of the Borrower**

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

### ***Home Mortgage Loans***

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

The distribution of home mortgages by income level of the borrower in the Arkansas non-MSA AA is poor. The percentage of home mortgages made to low-income borrowers is lower than the percentage of families and is somewhat lower than the aggregate lending in the AA. The percentage of home mortgages made to moderate-income borrowers is lower than the percentage of families and is somewhat lower than the aggregate lending in the AA.

### ***Small Loans to Farms***

Refer to Table T in the state of Arkansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of loans to farms by income level of the borrower in the Arkansas Non-MSA AA is good. The number of bank loans to small farms with revenues less than \$1 million is near the percentage of businesses and exceeds the aggregate lending in the AA.

## **Responses to Complaints**

FNBEA has an appropriate and adequate process for receiving, responding, and tracking CRA-related customer complaints. There were no CRA related complaints made during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Arkansas is rated Satisfactory.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

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

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Memphis-Forrest City CSA	267	60.82%	\$8,657	65.04%
Arkansas Non-MSA AA	172	39.18%	\$4,654	34.96%
<b>Total</b>	<b>439</b>	<b>100%</b>	<b>\$13,311</b>	<b>100%</b>

The bank's level of CD lending demonstrates adequate responsiveness to the CD needs within the Arkansas non-MSA AA. During the evaluation period, the bank originated or renewed 172 CD loans totaling \$4.7 million. The CD loans made in the Arkansas non-MSA were mostly concentrated in PPP loans.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Memphis-Forrest City CSA	2	\$570	102	\$1,208	104	38.4%	\$1,778	5.9%	-	-
Arkansas Non-MSA AA	3	\$570	63	\$1,661	66	24.4%	\$2,231	7.4%	-	-
Statewide/Regional	27	\$6,452	74	\$19,567	101	37.3%	\$26,019	86.6%	-	-
<b>Total</b>	<b>32</b>	<b>\$7,592</b>	<b>239</b>	<b>\$22,436</b>	<b>271</b>	<b>100%</b>	<b>\$30,028</b>	<b>100%</b>	<b>-</b>	<b>-</b>

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

The bank's qualified investments are concentrated in statewide and regional investment opportunities. These qualified investments serve the AAs and its CD needs. The bank's investments included six Arkansas school bonds in schools with 50 percent or more students qualifying for free and reduced lunches.

During the evaluation period, the bank made 57 donations in the Arkansas Non-MSA that amounted to \$17,556 to organizations that benefit LMI individuals.

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



The bank provides an adequate level of CD services within its AA. Bank employees provide financial expertise and knowledge to nine local non-profits focused on CD activities. For example, a bank employee serves as a board member for the Great River Economic Development Foundation which was specifically established to enhance the economic development efforts within Mississippi County.

## Appendix A: Scope of Examination

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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 MSA(s) and non-MSA(s) 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>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and small farm loans Community development loans, qualified investments, and community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSA</b>		
Memphis-Forrest City CSA	Full Scope	This CSA consists of all CTs in Shelby, Desoto, Crittenden, and St. Francis Counties.
<b>State</b>		
Arkansas Non-MSA AA	Full Scope	All counties are located within the state of Arkansas. The non-MSA AA includes all CTs in Cross, Lee, Mississippi, Monroe, Phillips, and Woodruff Counties.

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS</b>			
<b>FIRST NATIONAL BANK OF EASTERN ARKANSAS</b>			
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>CD Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
First National Bank of Eastern Arkansas	Satisfactory	Satisfactory	Satisfactory
<b>MMSA and State:</b>			
Memphis-Forrest City CSA	Satisfactory	Satisfactory	Satisfactory
Arkansas non-MSA AA	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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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

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### 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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.



- 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. The table also presents aggregate peer data for the years the data is available. Because aggregate 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 (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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 in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>	
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		
Memphis-Forrest City CSA	200	18,465	63.5	52,138	11.5	9.0	4.2	16.8	14.0	9.3	22.2	61.0	19.6	49.4	16.0	67.0	0.2	0.0	0.0		
Arkansas Non-MSA AA	115	8,873	36.5	1,664	0.9	0.0	0.3	38.4	67.0	28.2	52.0	23.5	50.5	8.7	9.6	21.0	0.0	0.0	0.0		
<b>Total</b>	<b>315</b>	<b>27,338</b>	<b>100.0</b>	<b>53,802</b>	<b>10.6</b>	<b>5.7</b>	<b>4.0</b>	<b>18.6</b>	<b>33.3</b>	<b>9.9</b>	<b>24.8</b>	<b>47.3</b>	<b>20.5</b>	<b>45.9</b>	<b>13.7</b>	<b>65.6</b>	<b>0.1</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2019-21</b>	
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		
Memphis-Forrest City CSA	200	18,465	63.5	52,138	24.7	3.5	3.4	15.6	2.5	11.3	17.1	6.5	17.6	42.5	41.0	43.4	0.0	46.5	24.3		
Arkansas Non-MSA AA	115	8,873	36.5	1,664	26.8	3.5	4.5	18.6	8.7	11.8	17.7	6.1	17.5	37.0	60.0	37.4	0.0	21.7	28.8		
<b>Total</b>	<b>315</b>	<b>27,338</b>	<b>100.0</b>	<b>53,802</b>	<b>24.9</b>	<b>3.5</b>	<b>3.4</b>	<b>15.9</b>	<b>4.8</b>	<b>11.4</b>	<b>17.2</b>	<b>6.3</b>	<b>17.6</b>	<b>42.0</b>	<b>47.9</b>	<b>43.2</b>	<b>0.0</b>	<b>37.5</b>	<b>24.4</b>		

Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2019-21</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Memphis-Forrest City CSA	60	7,794	100.0	27,918	12.5	1.0	12.0	15.7	15.3	15.7	20.9	32.3	20.7	49.8	51.3	50.6	1.0	0.0	0.9	
<b>Total</b>	<b>60</b>	<b>7,794</b>	<b>100.0</b>	<b>27,918</b>	<b>12.5</b>	<b>1.0</b>	<b>12.0</b>	<b>15.7</b>	<b>15.3</b>	<b>15.7</b>	<b>20.9</b>	<b>32.3</b>	<b>20.7</b>	<b>49.8</b>	<b>51.3</b>	<b>50.6</b>	<b>1.0</b>	<b>0.0</b>	<b>0.9</b>	

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2019-21</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Memphis-Forrest City CSA	60	7,794	100.0	27,918	83.3	68.3	39.0	5.3	5.0	11.5	26.7		
<b>Total</b>	<b>60</b>	<b>7,794</b>	<b>100.0</b>	<b>27,918</b>	<b>83.3</b>	<b>68.3</b>	<b>39.0</b>	<b>5.3</b>	<b>5.0</b>	<b>11.5</b>	<b>26.7</b>		

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2019-21</b>		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Arkansas Non-MSA AA	60	12,770	100.0	548	0.8	0.0	0.7	33.1	46.7	35.8	55.0	53.3	55.5	11.0	0.0	8.0	0.0	0.0	0.0		
<b>Total</b>	<b>60</b>	<b>12,770</b>	<b>100.0</b>	<b>548</b>	<b>0.8</b>	<b>0.0</b>	<b>0.7</b>	<b>33.1</b>	<b>46.7</b>	<b>35.8</b>	<b>55.0</b>	<b>53.3</b>	<b>55.5</b>	<b>11.0</b>	<b>0.0</b>	<b>8.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2019-21</b>	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans		
Arkansas Non-MSA AA	60	12,770	100.0	548	94.4	80.0	32.8	4.5	11.7	1.2	8.3		
<b>Total</b>	<b>60</b>	<b>12,770</b>	<b>100.0</b>	<b>548</b>	<b>94.4</b>	<b>80.0</b>	<b>32.8</b>	<b>4.5</b>	<b>11.7</b>	<b>1.2</b>	<b>8.3</b>		

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.