



## **PUBLIC DISCLOSURE**

November 16, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank at St. James  
Charter Number 14296

202 1st Avenue South  
St. James, MN 56081

Office of the Comptroller of the Currency

222 South Ninth Street  
Suite 800  
Minneapolis, MN 55402-3393

**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 Outstanding.

### The Lending Test is rated: Outstanding

The major factors supporting this rating include:

- The distribution of home mortgage and consumer loans among borrowers of different income levels is excellent.
- A substantial majority of the bank's loan are inside its assessment area (AA).
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The bank did not receive any CRA related complaints during the evaluation period.

### Loan-to-Deposit Ratio

The First National Bank at St. James' (FNB St. James) LTD ratio is reasonable considering the bank's size, financial condition, and credit needs of the AA. The bank's LTD ratio averaged 74.95 percent over the 23 quarters since the previous CRA evaluation, with a low of 63.98 percent in March 2015 and a high of 89.48 percent in June 2019. The following table shows FNB St. James' LTD ratio compared to two similarly situated financial institutions. These institutions are similar in size and located in Watonwan County.

<b>Institution (Headquarters)</b>	<b>*Total Assets (\$000s)</b>	<b>**Average LTD Ratio (%)</b>
Odin State Bank (Odin, MN)	\$45,674	85.25
<b>The First National Bank at St. James (St. James, MN)</b>	<b>\$29,975</b>	<b>74.95</b>
Ormsby State Bank (Ormsby, MN)	\$26,825	49.27

*\*Source: Total assets are based on December 31, 2019, Call Report data*

*\*\*The average LTD ratio is from Call Report data from April 1, 2014, through December 31, 2019*

### Lending in Assessment Area

A substantial majority of FNB St. James' loans are inside its AA. The bank originated and purchased 92.5 percent of its total loans by number and 87 percent by dollar volume inside its AA during the evaluation period. To determine lending inside the AA, we analyzed samples of home mortgage and consumer loans originated between January 1, 2017, and December 31, 2019. Refer to the table on the following page to view lending inside and outside the bank's AA.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	19	95	1	5	20	890,592	87.7	125,100	12.3	1,015,692
Consumer	18	90	2	10	20	98,451	81.7	22,026	18.3	120,477
Total	37	92.5	3	7.5	40	989,043	87.0	147,126	13.0	1,136,169

*\*Source: Home mortgage and consumer loan samples*

## Description of Institution

FNB St. James is a \$30 million single-state, national bank headquartered in St. James, Minnesota (MN). FNB St. James is wholly owned by First National Agency at Saint James, Inc., also headquartered in St. James, MN. The bank did not have any merger or acquisition activity during the evaluation period, and does not operate any subsidiaries or affiliates.

FNB St. James operates one full-service branch and one non-deposit taking ATM, both located in St. James, MN. The bank did not open any branches or ATMs during the evaluation period. The bank only operates in the State of MN and the CRA rating area consists of the MN Non-MSA AA.

FNB St. James offers traditional products and services. The bank's primary lending focus is home mortgages, consumer loans, and agricultural loans, but also offers commercial loans. As of December 31, 2019, the loan portfolio totaled \$21.3 million, representing approximately 70.9 percent of total assets, and tier 1 capital totaled \$2.6 million. The loan portfolio was comprised of 70.3 percent home mortgage loans, 16.9 percent agriculture loans, 6.3 percent consumer loans, and 5.9 percent commercial loans based on total dollar amount outstanding.

There are no known legal, financial, or other factors impeding FNB St. James' ability to help meet its AA's credit needs. FNB St. James received an Outstanding rating in its previous CRA evaluation, dated May 19, 2014.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FNB St. James' CRA performance using small bank performance standards. The evaluation period for the LTD ratio analysis covered the quarters ending June 30, 2014, to December 31, 2019, and the complaint review covered May 20, 2014, to November 16, 2020. The evaluation period for the Lending Test is January 1, 2017, to December 31, 2019. We determined the bank's primary products by reviewing the number and dollar volume of loan originations and purchases during the evaluation period. The bank's primary products are home mortgage and consumer loans. Refer to the table on the following page to view loan originations and purchase by dollar volume and number volumes.

<b>Total Loan Originations by Product Type</b>		
	<b>Percentage by Number of Loans</b>	<b>Percentage by Dollar Volume</b>
Agriculture	18.7	37.0
Commercial	12.0	20.6
Consumer	41.1	9.0
Home Mortgage	28.2	33.4
<b>Total</b>	<b>100.0</b>	<b>100.0</b>

We reviewed the AA's financial, economic, and environmental factors to determine the bank's lending performance. We also contacted a community member with knowledge of the area's economic conditions and demographics to gather additional insight on lending needs in the AA.

With a December 31, 2019, evaluation period end date, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States is not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

### **Selection of Areas for Full-Scope Review**

FNB St. James has one AA, the MN Non-MSA AA. This AA was selected for a full-scope review and is evaluated under the State of Minnesota rating area. Refer to the "Scope" section under the State of Minnesota rating area and Appendix A-1 for additional information on the examination scope.

### **Ratings**

We evaluated lending performance using four performance criteria: the LTD ratio; lending in the AA; home mortgage and consumer lending to borrowers of different income levels; and responses to CRA-related complaints.

Consumer loans received more weight in the overall Lending Test rating as it serves as the largest loan portfolio segment by number of loans. Home mortgage loans received the second most weight. Agriculture and commercial loans were not selected for review in the AA. Refer to the "Scope" section under the State of Minnesota rating area and Appendix A-1, Scope of Examination, for additional information on the examination scope.

### **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) in determining a national bank's 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 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 Minnesota

**CRA rating for the State of Minnesota:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors supporting this rating include:

- The distribution of home mortgages and consumer loans to borrowers of varying income levels is excellent.
- The bank did not receive any CRA related complaints during the evaluation period.

### Description of Institution's Operations in Minnesota

#### MN Non-MSA AA

FNB St. James' AA consists of the entire Watonwan County in MN. The AA is a non-MSA and consists of three census tracts (CTs). During the evaluation period, all three CTs were middle income.

Competition in the AA is moderate. The June 30, 2019, FDIC Deposit Market Share Report indicated there were seven financial institutions with ten branches operating in the area. FNB St. James ranked fifth with a 6.4 percent deposit market share. The other top institutions were Pioneer Bank, Odin State Bank, Citizens Bank Minnesota, and Triumph State Bank. These four institutions combined to capture an 84.7 percent deposit market share.

The economy is heavily tied to agriculture and agricultural-related businesses. Major employers include Smithfield Farms (meatpacking), the school district, and the Mayo Healthcare system. At year-end 2019, the unemployment rate was four percent, which was slightly more than MN's 3.5 percent unemployment rate.

We contacted a community member and reviewed two recently completed contact reports for the area. The contacts included two non-profit organization employees and a local elected official. The community is an aging population, though diverse with a large Hispanic population. The housing stock is limited and aging. The largest credit need is small dollar loans to cover the gap between wages and the cost of living. Per capita income in Watonwan County ranks 75<sup>th</sup> of 87 counties in MN. The contacts noted area financial institutions have a positive perception, with a reputation for being flexible and working with customers. Bank staff is active in the community, including the Economic Development Authority.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB St James MN Non MSA 2019</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)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	11,054	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	5,033	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,308	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,142	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	583	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	709	0.0	0.0	100.0	0.0	0.0
Farms by Geography	160	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,903	18.5	16.6	29.3	35.7	0.0
Household Distribution by Income Level	4,450	21.5	16.3	23.3	38.9	0.0
Median Family Income Non-MSAs - MN		\$63,045	Median Housing Value			\$91,562
2019 FFIEC Updated MN Non-MSA Median Family Income		\$68,800	Median Gross Rent			\$570
Households Below Poverty Level		11.17%	Families Below Poverty Level			6.1%
<i>Source: 2015 ACS and 2019 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 Minnesota

We completed a full-scope review of the MN Non-MSA AA.

Of the bank's reported loans in the MN Non-MSA AA during the evaluation period, 41 percent are consumer loans and 28 percent are home mortgage by number of loans. Combined, these loans represent approximately 42 percent of loans by dollar volume. The remaining 31 percent are commercial and agriculture loans, which are not considered in this evaluation. Within this AA, we placed the greatest weight on consumer loans followed by home mortgage loans.

Refer to Appendix A-1 for additional details on the scope of the evaluation in the MN Non-MSA AA.

## LENDING TEST

The bank's performance under the Lending Test in the State of MN is rated Outstanding.

## Distribution of Loans by Income Level of the Geography

The geographic distribution of loans did not provide a meaningful analysis, as the entire AA consists of middle-income census tracts.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels.

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

Refer to Table P in Appendix D-2 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 mortgage loans is excellent. FNB St. James' percentage of home mortgage loans to low and moderate-income (LMI) borrowers significantly exceeded the percentage of LMI families and aggregate lending data.

### ***Consumer Loans***

Refer to Table V in Appendix D-2 for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Consumer lending reflects excellent distribution among borrowers of different income levels. FNB St. James' percentage of consumer loans to low-income borrowers significantly exceeded the percentage of low-income households. The bank's percentage of consumer loans to moderate-income borrowers is slightly below the percentage of moderate-income households.

## **Responses to Complaints**

FNB St. James did not receive any CRA-related complaints during the evaluation period.

# 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 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”.

<b>Time Period Reviewed:</b>	01/01/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Home Mortgage, Consumer Loans	
<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>Minnesota</b>		
MN Non-MSA AA	Full-Scope	The AA includes all census tracts from Watonwan County located in Minnesota. The county is comprised of three middle-income tracts.

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS—The First National Bank at St. James</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
The First National Bank at St. James	Outstanding
<b>State:</b>	
<b>Minnesota</b>	Outstanding

## 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.) (peer):** 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 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 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.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-19</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		
MN Non-MSA	20	935,592	100.0	205	18.5	30.0	10.2	16.6	40.0	19.5	29.3	20.0	21.0	35.7	10.0	27.3	0.0	0.0	22.0		
<b>Total</b>	<b>20</b>	<b>935,592</b>	<b>100.0</b>	<b>205</b>	<b>18.5</b>	<b>30.0</b>	<b>10.2</b>	<b>16.6</b>	<b>40.0</b>	<b>19.5</b>	<b>29.3</b>	<b>20.0</b>	<b>21.0</b>	<b>35.7</b>	<b>10.0</b>	<b>27.3</b>	<b>0.0</b>	<b>0.0</b>	<b>22.0</b>		

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

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>														<b>2017-19</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
MN Non-MSA	20	129,930	100.0	21.5	60.0	16.3	10.0	23.3	15.0	38.9	10.0	0.0	5.0		
<b>Total</b>	<b>20</b>	<b>129,930</b>	<b>100.0</b>	<b>21.5</b>	<b>60.0</b>	<b>16.3</b>	<b>10.0</b>	<b>23.3</b>	<b>15.0</b>	<b>38.9</b>	<b>10.0</b>	<b>0.0</b>	<b>5.0</b>		

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