



PUBLIC DISCLOSURE

October 16, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Wakefield
Charter Number: 11305

400 Sunday Lake Street
Wakefield, MI 49968

Office of the Comptroller of the Currency

High Pointe on Mayfair
1200 North Mayfair Road
Suite 200
Wauwatosa, WI 53226-3282

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 major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A substantial majority of the bank's loans are inside its AA.
- The borrower distribution of home mortgage loans within the AA reflects excellent distribution among borrowers of different incomes. The borrower distribution of consumer loans within the AA reflects reasonable distribution among borrowers of different incomes.
- The geographic distribution of home mortgage and consumer loans reflect reasonable distribution among borrowers of different geographies.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

The bank's quarterly LTD ratio averaged 40.38 percent over the 12 quarters from March 31, 2019, to December 30, 2021. The bank ranks sixth in a peer group that includes five other similarly situated banks with peer bank average LTD ratios ranging from 57.99 percent to 73.12 percent in the specified period. The other banks in this peer group have total assets ranging from \$84 million to \$1 billion.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated 93.3 percent of its total loans by number and 90.3 percent of its total loans by dollar amount inside the bank's AA 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. See the table below for additional detail.

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										
2019-2021	57	95.0	3	5.0	60	2,343	90.7	240	9.3	2,583
Consumer										
2019-2021	55	91.7	5	8.3	60	1,163	89.5	137	10.5	1,300
Total	112	93.3	8	6.7	120	3,506	90.3	377	9.7	3,883

Source: 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%.

Description of Institution

The First National Bank of Wakefield (FNB Wakefield) is a single-state bank headquartered in Wakefield, Michigan. As of December 31, 2021, FNB Wakefield has \$62.1 million in total assets, a loan portfolio of \$20.5 million, and tier 1 capital of \$5.0 million. The bank is wholly owned by Wakefield Bancorporation, Inc., a single bank holding company. The bank operates one full-service branch located in Bessemer, Michigan. The main office and branch are both located in a middle-income census tract (CT) within the bank's single AA. The bank operates 17 non-deposit taking Automated Teller Machines (ATMs), with 15 ATMs located in the bank's AA. There are also two ATMs located in Hurley, Wisconsin, both in a moderate-income CT.

No corporate mergers, acquisitions, branch openings, or branch closings occurred since the last CRA evaluation.

The bank's business strategy is to serve the credit and depository needs of its local community. The bank offers non-complex deposit and lending products and services.

There are no legal or financial impediments limiting the bank's ability to meet the credit needs of the AA. FNB Wakefield's last CRA evaluation was dated September 25, 2019. Using Small Bank procedures, the bank received a Satisfactory rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB Wakefield's performance using the Small Bank procedures. The Lending Test assesses the bank's record of meeting the credit needs of its AA through lending activities during the evaluation period of January 1, 2019, through December 31, 2021. We reviewed data for the bank's primary loan products, including residential loans and consumer loans, to evaluate the bank's lending performance.

To assess lending, we used data from bank reports and a random sample of loans for each primary loan product originated or purchased in the bank's AA. Our lending analysis used the most recent available demographic and aggregate peer lending data. There is no aggregate data for consumer lending.

The federal banking agencies are now updating decennial census data every five years, beginning with the Census Bureau's 2015 American Community Survey (ACS). This change was implemented in order to provide more current and accurate demographic data. During the current evaluation period, FNB Wakefield's AA was not affected by this change, and the lending data from 2019 through 2021 received the same analysis based on the 2015 ACS. Data is discussed in the applicable narrative sections of this evaluation.

Selection of Areas for Full-Scope Review

Given the bank has one AA, we reviewed this non-MSA AA using full-scope procedures.

Ratings

The bank's overall rating is based entirely on its performance in this single AA.

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 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 Michigan

CRA rating for the State of Michigan: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The borrower distribution of home mortgage loans within the AA reflects excellent distribution among borrowers of different incomes. The borrower distribution of consumer loans within the AA reflects reasonable distribution among borrowers of different incomes.
- The geographic distribution of home mortgage and consumer loans reflect reasonable distribution among borrowers of different geographies.
- There were no CRA-related complaints during the evaluation period.

Description of Institution's Operations in Michigan

The bank has one AA located in the state of Michigan. The AA includes all of Gogebic County and one CT in Ontonagon County. The AA does not lie in a metropolitan statistical area (MSA) and is contiguous. According to the Census Bureau's 2015 ACS, the AA includes zero low-income CTs, one moderate-income CT, seven middle-income CTs, and zero upper-income CTs. Based on the FFIEC's 2021 List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies, all of the middle-income CTs are designated distressed and/or underserved. The six middle-income CTs in Gogebic County are designated as Underserved Middle-Income Nonmetropolitan CTs due to remote rural location. The middle-income CT in Ontonagon County is designated as Distressed and Underserved due to population loss and remote rural location. The FFIEC's 2020 and 2019 Lists of Distressed or Underserved Nonmetropolitan Middle-Income Geographies also designated the middle-income CT in Ontonagon County as Distressed due to unemployment. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

There is strong competition in the area from several other financial institutions. The bank ranks fourth for deposit market share when compared to the five other financial institutions in the AA. The bank's deposit market share was 13.58 percent. Other competing financial institutions had deposit market shares ranging from 5.16 percent (the Miners State Bank) to 34.73 percent (Gogebic Range Bank).

The bank received positive consideration for its response to the COVID-19 pandemic in 2020 through the origination of SBA Paycheck Protection Program (PPP) loans. These loans helped stabilize small businesses and communities in the AA. The bank originated 26 PPP loans totaling \$622 thousand in 2020, and 26 PPP loans totaling \$528 thousand in 2021.

Employment and Economic Factors

According to an Upper Peninsula Labor Market Study by InvestUP, the largest occupational category in Gogebic County is office and administration, followed by food preparation and serving related

occupations, sales occupations, and production occupations. The city of Ironwood employed the largest number of residents in 2019, followed by Bessemer, and then Wakefield. In September 2019, a large foundry headquartered in Wisconsin opened a new facility in Ironwood, Michigan. In May 2021, Kwik Trip announced plans to open their first location in the Upper Peninsula in Ironwood. In June 2021, Kwik Trip announced plans for a second location in Bessemer. Both locations are open at this time. Major employers in the AA include Aspirus Health Care, Gogebic Community College, and Ironwood Plastics.

The unemployment rate as of December 2021 was 4.4 percent for Gogebic County and 6.1 percent for Ontonagon County. The unemployment rate for the State of Michigan was 4.6 percent during the same period.

Community Contact

We spoke with a community contact from a local business organization that serves the area. The contact indicated the outlook of the area is generally favorable. Retail expansion has led to significant investment in the community and improvements in physical infrastructure. Area needs include affordable housing and small business lending. Overall, the needs of the community are being met by local financial institutions.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	12.5	87.5	0.0	0.0
Population by Geography	17,656	0.0	12.4	87.6	0.0	0.0
Housing Units by Geography	12,673	0.0	11.4	88.6	0.0	0.0
Owner-Occupied Units by Geography	6,057	0.0	13.4	86.6	0.0	0.0
Occupied Rental Units by Geography	1,571	0.0	18.7	81.3	0.0	0.0
Vacant Units by Geography	5,045	0.0	6.7	93.3	0.0	0.0
Businesses by Geography	1,013	0.0	14.7	85.3	0.0	0.0
Farms by Geography	40	0.0	12.5	87.5	0.0	0.0
Family Distribution by Income Level	4,397	21.9	19.3	25.9	33.0	0.0
Household Distribution by Income Level	7,628	29.7	18.5	18.7	33.1	0.0
Median Family Income Non-MSAs - MI	\$53,628		Median Housing Value			\$83,904
			Median Gross Rent			\$513
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Michigan

The Michigan state rating is based on the results of the full scope review of the non-MSA AA.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the non-MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State given strong competition in the AA and FNB Wakefield's distance (relative to peer) to the moderate-income CT.

Home Mortgage Loans

Refer to table O in the state of Michigan 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 mortgage loans reflects reasonable distribution among borrowers of different geographies. There are no low-income CTs located in the AA. Based on our random sample, the bank originated 3.3 percent of home mortgage loans in moderate-income geographies. This is below both the demographic data, which shows 13.4 percent of owner-occupied housing units are in moderate income geographies, and aggregate peer lending data of 9.2 percent of home mortgage loans originated in moderate-income geographies.

Consumer Loans

Refer to table U in the state of Michigan section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans reflects reasonable distribution among borrowers of different geographies. There are no low-income CTs located in the AA. Based on our random sample, the bank originated 5.0 percent of consumer loans in moderate-income geographies. This is below the demographic data, which shows 11.4 percent of households are in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to table P in the state of Michigan 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 borrower distribution of home mortgage loans within the AA reflects excellent distribution among borrowers of different incomes. Based on our random sample, the bank originated 33.3 percent of its home mortgages to low-income borrowers. This percentage is higher than both the demographic data,

which shows 21.9 percent of families in the AA are low-income, and aggregate peer lending data of 9.0 percent originated to low-income borrowers. The bank originated 30.0 percent of its home mortgages to moderate-income borrowers. This percentage is higher than both the demographic data, which shows 19.3 percent of families in the AA are moderate-income, and aggregate peer lending data of 18.7 percent originated to moderate-income borrowers.

Consumer Loans

Refer to table V in the state of Michigan section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans within the AA reflects reasonable distribution among borrowers of different incomes. Based on our random sample, the bank originated 8.3 percent of loans in the AA to low-income borrowers, which is below the 29.7 percent of households in the AA that are low-income. The bank originated 20.0 percent of loans in the AA to moderate-income borrowers, which is above the 18.5 percent of households in the AA that are moderate-income.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practices during this evaluation.

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:	01/01/19 to 12/31/21	
Bank Products Reviewed:	Home mortgage, consumer loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Michigan	Full-scope	County of Gogebic, Partial County of Ontonagon

Appendix B: Summary of MMSA and State Ratings

RATINGS: The First National Bank of Wakefield	
Overall Bank:	Lending Test Rating
The First National Bank of Wakefield	Satisfactory
State:	
Michigan	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 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.

- 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	% 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			
Non-MSA	60	2,348	100.0	0.0	0.0	0.0	13.4	3.3	9.2	86.6	96.7	90.8	0.0	0.0	0.0	0.0	0.0	0.0			
Total	60	2,348	100.0	0.0	0.0	0.0	13.4	3.3	9.2	86.6	96.7	90.8	0.0	0.0	0.0	0.0	0.0	0.0			

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2021		
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers					
	#	\$	% of Total	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
Non-MSA	60	2,348	100.0	21.9	33.3	9.0	19.3	30.0	18.7	25.9	21.7	19.8	33.0	15.0	44.3	0.0	0.0	8.3			
Total	60	2,348	100.0	21.9	33.3	9.0	19.3	30.0	18.7	25.9	21.7	19.8	33.0	15.0	44.3	0.0	0.0	8.3			

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2019-2021

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	60	1,064	100.0	0.0	0.0	11.4	5.0	88.6	95.0	0.0	0.0	0.0	0.0
Total	60	1,064	100.0	0.0	0.0	11.4	5.0	88.6	95.0	0.0	0.0	0.0	0.0

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2019-2021

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
Non-MSA	60	1,064	100.0	29.7	8.3	18.5	20.0	18.7	16.7	33.1	55.0	0.0	0.0
Total	60	1,064	100.0	29.7	8.3	18.5	20.0	18.7	16.7	33.1	55.0	0.0	0.0

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