



## **PUBLIC DISCLOSURE**

April 27, 2020

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

First National Bank of Fort Smith  
Charter Number: (Charter #1950)

602 Garrison Ave.  
Fort Smith, AR 72902

Office of the Comptroller of the Currency

Victory Building  
1401 West Capitol Ave.  
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 following table indicates the performance level of First National Bank of Fort Smith with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of Fort Smith Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the performance across all rating areas. The Fort Smith AR-OK multi-state metropolitan statistical area (MMSA) received greater emphasis, or weight. As discussed in the “Scope of Evaluation” sections, this area received greater weight when arriving at the overall test rating. Weaker performance in the state of Arkansas (AR) was considered in arriving at the overall Lending Test rating, as it was significant enough to impact the rating. A substantial majority of the bank’s loans are made in the institution’s assessment areas (AAs).
- The Investment Test rating is based on overall good performance in the Fort Smith-AR-OK MMSA rating area. First National Bank of Fort Smith’s (FNB FS) community development (CD) investment volume generally represented a significant level of qualified CD investments, when compared to allocated tier 1 capital in the respective full-scope AAs. FNB FS’s CD investments focused on credit and community economic development needs in the full-scope AAs. Investments were generally not innovative or complex.
- The Service Test rating is based on the performance across all ratings areas. The CD services primarily focused on community services targeted to low- and moderate-income individuals. The Fort Smith AR-OK MMSA received greater weight. The institution has the largest market share in this MMSA.

## Lending in Assessment Area

A substantial majority of the bank's loans are in its AAs.

The bank originated and purchased 81.6 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. Farm loans are not a primary product but were included in the table below for information purposes.

<b>Table D - 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										
2017	451	78.0	127	22.0	578	86,725	47.8	94,680	52.2	181,405
2018	362	81.3	83	18.7	445	79,054	57.1	59,462	42.9	138,516
2019	411	76.8	124	23.2	535	81,394	57.0	61,444	43.0	142,838
<b>Subtotal</b>	<b>1,224</b>	<b>78.6</b>	<b>334</b>	<b>21.4</b>	<b>1,558</b>	<b>247,173</b>	<b>53.4</b>	<b>215,586</b>	<b>46.6</b>	<b>462,759</b>
Small Business										
2017	633	88.9	79	11.1	712	82,778	83.8	16,045	16.2	98,823
2018	659	83.4	131	16.6	790	72,607	78.6	19,721	21.4	92,328
2019	664	83.1	135	16.9	799	77,205	81.0	18,138	19.0	95,343
<b>Subtotal</b>	<b>1,956</b>	<b>85.0</b>	<b>345</b>	<b>15.0</b>	<b>2,301</b>	<b>232,590</b>	<b>81.2</b>	<b>53,904</b>	<b>18.8</b>	<b>286,494</b>
Small Farm										
2017	54	68.4	25	31.6	79	2,608	59.5	1,776	40.5	4,384
2018	101	75.4	33	24.6	134	5,377	59.4	3,670	40.6	9,047
2019	80	70.2	34	29.8	114	4,522	63.2	2,628	36.8	7,150
<b>Subtotal</b>	<b>235</b>	<b>71.9</b>	<b>92</b>	<b>28.1</b>	<b>327</b>	<b>12,507</b>	<b>60.8</b>	<b>8,074</b>	<b>39.2</b>	<b>20,581</b>
<b>Total</b>	<b>3,415</b>	<b>81.6</b>	<b>771</b>	<b>18.4</b>	<b>4,186</b>	<b>492,270</b>	<b>63.9</b>	<b>277,564</b>	<b>36.1</b>	<b>769,834</b>
<i>Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data            Due to rounding, totals may not equal 100.0</i>										

## Description of Institution

First National Bank of Fort Smith (“FNB FS” or “bank”) chartered in 1872, and in 1989, First Bank Corporation formed to be the parent holding company. Affiliates include Citizens Bank and Trust in Van Buren (TA \$350MM), Brown-Hiller-Clark & Associates (an insurance company), and Realty Appraisals. The holding company merged former affiliate, National Bank of Sallisaw (TA \$111MM) into the bank in 2014. Activities of the affiliate bank and non-bank affiliates were not considered in the FNB FS CRA performance evaluation. Both the affiliate bank and the non-bank affiliates are relatively close in proximity to Fort Smith, Ark.

As of December 31, 2019, total assets were \$1.35 billion, of which \$983.4 million, or 72.6 percent, comprised of loans. Net total loans represent 72.6 percent of total assets and 84.0 percent of total deposits. Real estate loans are the bank’s primary lending product and include \$169.9 million, or 21.3 percent of total loans, in 1-4 family, residential real estate loans. Commercial loans are the bank’s secondary lending product and include \$124.9 million, or 71.69 percent of total loans, in small business loans.

FNB FS is the largest locally owned bank in Fort Smith. For the years of 2017 and 2018, the bank has three AAs – the Fort Smith AR-OK MMSA #22900; the Fayetteville-Springdale-Rogers AR MSA #22220; and the non-MSA AA consisting of Franklin County, Ark. In 2019, the United States Office of Management and Budget (OMB) added Franklin County, Ark. to the Fort Smith AR-OK MMSA. As such, for 2019, FNB FS has two AAs – the Fort Smith AR-OK MMSA and the Fayetteville-Springdale-Rogers AR MSA. For the years 2017 and 2018, examiners reviewed the non-MSA AA of Franklin County under limited scope. For rating purposes, the non-MSA AA and the Fayetteville-Springdale-Rogers MSA are combined into the state of Arkansas.

There were no legal or financial factors impeding the bank’s ability to help meet credit needs in its AAs during the evaluation period. FNB FS’s CRA performance was rated “Outstanding” in the last public evaluation dated January 30, 2017.

## Scope of the Evaluation

### Evaluation Period and Products Evaluated

This Performance Evaluation (PE) assesses the bank’s performance under the large bank Lending, Investment, and Service Tests. The evaluation period is January 1, 2017, through December 31, 2019. All products reviewed are bank wide. For the Lending Test, examiners analyzed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA), and small loans made to businesses and small loans to farms the bank reported under the CRA. The volume of farm loans is low and did not yield a meaningful analysis.

When evaluating the bank’s performance under the Lending Test, examiners placed greater weight on the bank’s performance in the Fort Smith AR-OK MMSA, as it represents the majority of the bank’s deposits at 88.0 percent of total deposits as of June 30, 2019.

Examiners evaluated CD lending investments including donations, retail services, and CD services. The evaluation period for CD loans, the Investment Test, and the Service Test is January 1, 2017, through

December 31, 2019. For purposes of analysis and discussion, CD loans and services and qualified investments are combined, but evaluated separately for each AA.

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

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), MMSA, or combined statistical area (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” section 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.

As of the review date, the bank has two AAs - one in the Fort Smith AR-OK MMSA and the other in the Fayetteville-Springdale-Rogers AR MSA. In 2017 and 2018, the bank had a third non-MSA AA consisting of Franklin County, Ark. OMB added Franklin County to the Fort Smith AR-OK MMSA in 2019. Examiners performed full scope reviews of the Fort Smith MMSA and the Fayetteville-Springdale-Rogers MSA and a limited scope review of the Arkansas non-MSA AA for 2017 and 2018. Refer to appendix A for additional information.

### **Ratings**

The bank’s overall rating is a blend of the state of Arkansas rating and the MMSA rating.

The Fort Smith AR-OK MMSA rating carried the greater weight in our conclusions because this area represented the bank’s most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2019, FNB FS deposits represented 88 percent of total deposits in this rating area. In addition, 71.4 percent of the bank’s branch locations are located in this MMSA.

The MMSA and state of Arkansas ratings are based on the bank’s performance in all of the bank’s AAs.

Refer to the “Scope” section under Fort Smith AR-OK MMSA rating section and the “State of Arkansas” 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 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

## Multistate Metropolitan Statistical Area Rating

### Fort Smith, AR-OK MMSA #22900

**CRA rating for the Fort Smith, AR-OK MMSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs;
- The bank exhibits a good geographic distribution of loans in the AA;
- The bank exhibits an adequate distribution of loan amounts individuals of different income levels and businesses of different sizes;
- The bank has made a relatively high level of CD loans;
- The bank has a significant level of qualified CD investments;
- The bank provides a relatively high level of CD services.

### Description of Institution's Operations in Fort Smith, AR-OK MMSA

FNB FS's largest AA is the Fort Smith AR-OK MMSA. The Fort Smith region has fifteen full-service locations with fifteen automated teller machines (ATMs) in addition to four offsite ATMs. Total deposits for the MMSA was \$1.03 billion. The main office and eight branches are in Fort Smith, Ark. There is one branch in each Charleston, Greenwood, and Lavaca, Ark. There are two branches in Oklahoma (Okla.) – one in Sallisaw and one in Roland. The AA consists of 44 census tracts (CTs) within Sebastian, Crawford, and Franklin County, Arkansas and Sequoyah County, Okla. The 44 CTs are comprised of 13 moderate income, 21 middle-income, and 10 upper-income. Five of the branch locations and one ATM are in the moderate income CTs with the remainder in middle and upper income CTs. As of June 30, 2019, there were 20 financial service providers with 109 banking offices in the Fort Smith MMSA. These banking offices are made up of several state-chartered banks and branches of non-local national banks. The five most significant competitors in the AA are Arvest Bank, BancorpSouth Bank, Citizens' Bank & Trust Co., Armstrong Bank, and Bank OZK. In total, these five competitors and FNB FS hold 74.8 percent of deposit market share, with FNB FS having the largest share at 22.7 percent.

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<sup>1</sup>This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB of Ft Smith - Ft Smith MMSA 2017</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)	47	0.0	29.8	48.9	21.3	0.0
Population by Geography	228,733	0.0	24.6	53.3	22.1	0.0
Housing Units by Geography	99,717	0.0	24.4	53.5	22.1	0.0
Owner-Occupied Units by Geography	58,225	0.0	16.7	58.2	25.1	0.0
Occupied Rental Units by Geography	29,712	0.0	38.0	42.5	19.5	0.0
Vacant Units by Geography	11,780	0.0	28.6	57.5	13.9	0.0
Businesses by Geography	10,480	0.0	27.7	45.6	26.7	0.0
Farms by Geography	284	0.0	14.1	58.1	27.8	0.0
Family Distribution by Income Level	60,105	22.7	17.4	18.4	41.4	0.0
Household Distribution by Income Level	87,937	25.0	15.7	16.7	42.6	0.0
Median Family Income MSA - 22900 Fort Smith, AR-OK MSA		\$48,075	Median Housing Value			\$108,115
			Median Gross Rent			\$626
			Families Below Poverty Level			17.8%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB of Ft Smith - Ft Smith MMSA 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)	44	0.0	29.5	47.7	22.7	0.0
Population by Geography	221,289	0.0	24.5	52.6	22.9	0.0
Housing Units by Geography	96,547	0.0	24.2	52.9	22.8	0.0
Owner-Occupied Units by Geography	56,122	0.0	16.2	57.8	26.0	0.0
Occupied Rental Units by Geography	28,951	0.0	38.2	41.8	20.0	0.0
Vacant Units by Geography	11,474	0.0	28.3	57.4	14.3	0.0
Businesses by Geography	11,553	0.0	26.7	46.0	27.3	0.0
Farms by Geography	344	0.0	15.4	56.7	27.9	0.0
Family Distribution by Income Level	58,342	22.5	17.3	18.3	41.9	0.0
Household Distribution by Income Level	85,073	24.7	15.6	16.7	43.1	0.0
Median Family Income MSA - 22900 Fort Smith, AR-OK MSA		\$48,258	Median Housing Value			\$109,681
			Median Gross Rent			\$626
			Families Below Poverty Level			17.7%
<i>Source: 2015 ACS Census 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>						

The Fort Smith AR-OK MMSA is comprised of the complete counties of Sebastian, Crawford, and Franklin in Arkansas and Sequoyah in Oklahoma. During 2018, OMB revised the geographical delineations. As a result, for 2019 and forward, LeFlore County, Okla. was removed and Franklin County, Ark. was added to the Fort Smith AR-OK MMSA. The AA meets the requirement of the regulation and does not arbitrarily exclude low-or moderate- income geographies.

Community credit needs in the full-scope AA were determined by reviewing recent housing and demographic information and holding discussions with a community contact from an organization that provides services in the Fort Smith AR-OK MMSA. The community contact was from an organization that provides services and information to both governments and the public. The contact stated the area is well served for financial services and available to all residents. The most critical need identified from this contact was associated with the need for financial institutions to provide consumer lending. In addition, the supply of affordable and secure housing is a need for the communities.

**Scope of Evaluation in Fort Smith, AR-OK MMSA**

The Fort Smith AR-OK MMSA was selected for full-scope review.

Refer to the table in appendix A for a list of all AAs under review.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Fort Smith, AR-OK MMSA**

Based on a full-scope review, the bank’s performance in the Fort Smith AR-OK MMSA is good.

**LENDING TEST**

The bank’s performance under the Lending Test in the Fort Smith AR-OK MMSA is rated High Satisfactory.

**Lending Activity**

Lending levels reflect good responsiveness to MMSA credit needs.

<b>Number of Loans</b>					
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>
Fort Smith AR-OK MMSA	652	1,399	149	27	2,227

<b>Dollar Volume of Loans</b>					
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>
Fort Smith AR-OK MMSA	\$115,914	\$139,957	\$11,969	\$8,330	\$276,170

The bank's overall lending activity is good. The bank's lending activities demonstrate good geographic distribution and adequate income distribution. Lending activity is enhanced by market share. The bank is a leader in lending among competing institutions, as demonstrated by a strong market share. Based on the Federal Deposit Insurance Corporation (FDIC) deposit market share data as of June 30, 2019, FNB FS ranks first among 20 financial institutions in the AA with 22.7 percent market share of deposits.

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

The bank exhibits a good geographic distribution of loans in the AA.

Notably, there are no low-income CTs in the Fort Smith MMSA.

#### ***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 bank's geographic distribution of home mortgage loans during the evaluation period is excellent. In both 2017-2018 and 2019, the percentage of mortgage loans in moderate-income tracts exceeded both the percentage of owner-occupied units and aggregate lending.

#### ***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 bank's geographic distribution of small loans to businesses during the evaluation period is good. In both 2017-2018 and 2019, the percentage of business loans in moderate-income tracts is near to both the percentage of businesses and aggregate lending.

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

We did not identify any lending gaps in the geographic distribution of loans.

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

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes.

#### ***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 institution's home mortgage loan originations and purchases.

The bank's borrower distribution of home mortgage loans during the evaluation period is adequate. For 2017-2018, the percentage of home mortgage loans to low-income borrowers is lower than the percentage of low-income families. In the same period, the percentage of home mortgage loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families. Notably, approximately 21 percent of households in the AA live below the poverty line. Low- to moderate-income households make up 58.6 percent of households in moderate-income geographies, and more specifically, 34.5 percent of these households live below the poverty line. Additionally, 46.4 percent of households within these geographies are renter occupied. Adequate lending performance is supported by the limited mortgage lending opportunities in the geographies. Notably, the bank's percentage of home mortgage lending to low-income borrowers in 2017-2018 is near to the percentage of aggregate lending. Adequate lending performance is enhanced by good market share.

In 2019, the percentage of home mortgage loans to low-income borrowers is lower than the percentage of low-income families and somewhat lower than the percentage of aggregate lending. In the same period, the percentage of home mortgage loans is near the percentage of moderate-income families and exceeded the percentage of aggregate lending. Limited lending opportunities can explain limited lending to low-income borrowers.

### ***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 institution's originations and purchases of small loans to businesses.

The bank's borrower distribution of small loans to businesses during the evaluation period is adequate. In both 2017-2018 and 2019, the percentage of small loans to small businesses, or businesses with gross annual revenue of less than \$1 million, is somewhat lower than the percentage of small businesses. A significant volume of businesses, 15 percent, did not report revenue. Further, 33 and 48 percent of bank loans to businesses in 2017-2018 and 2019, respectively, were to businesses that did not report revenue. The bank's percentage of lending exceeds the percentage of aggregate lending, indicating good market share.

### **Community Development Lending**

The institution made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multi-family loans that also qualify as CD loans.

FNB FS originated an outstanding level of CD loans in the Fort Smith AR-OK MMSA. FNB FS originated 27 CD loans totaling \$8.3 million. CD loan volume represents 5.6 percent of allocated tier 1 capital. Key lending in the MMSA includes loans for essential community needs as well as affordable housing for low- to moderate-income individuals. Specifically, the bank originated several loans during the evaluation period to help finance the purchase of multi-family housing properties and lots for future development.

- The bank originated two CD loans for \$60 thousand each to non-profit entities whose purpose is to provide community services. One loan funded the purchase of a van, and the other loan funded the purchase of a building. The borrowers' services target low- to moderate-income individuals.

- The bank originated 18 letters of credit totaling \$1.8 million with the Fort Smith Housing Authority to help build houses for low-to-moderate income individuals.

**Product Innovation and Flexibility**

The institution makes limited use of innovative and/or flexible lending practices to serve AA credit needs.

**INVESTMENT TEST**

The institution’s performance under the Investment Test in the Fort Smith AR-OK MMSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Fort Smith AR-OK MMSA is good.

The institution has a significant level of qualified CD investments and grants. The bank is occasionally in a leadership position, particularly those that are not routinely provided by private investors

The institution exhibits good responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

**Number and Amount of Qualified Investments**

<b>Qualified Investments</b>										
<b>Assessment Area</b>	<b>Prior Period*</b>		<b>Current Period</b>		<b>Total</b>				<b>Unfunded Commitments**</b>	
	<b>#</b>	<b>\$(000’s)</b>	<b>#</b>	<b>\$(000’s)</b>	<b>#</b>	<b>% of Total #</b>	<b>\$(000’s)</b>	<b>% of Total \$</b>	<b>#</b>	<b>\$(000’s)</b>
Fort Smith AR-OK MMSA	0	0	30	\$3,884	30	43%	\$3,884	58%	0	0

\* 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 bank has ample opportunity to make qualified CD investments in the MMSA. A qualified investment for the purposes of this evaluation is a lawful investment, or cash donation that has CD as its primary purpose. Based on these identified opportunities, the bank’s level of CD investments in this AA is good. The institution has a significant level of qualified CD investments and grants.

Qualified investments in the MMSA during the evaluation period total \$3.9 million and consist of equity investments and cash donations. There are no outstanding prior period investment balances. The amount of the bank’s total investments represents 2.6 percent of allocated tier 1 capital.

Of the \$3.9 million in qualified investments, \$1.1 million consists of qualified grants and donations to CD organizations. These organizations are involved in providing community services for low- or moderate-income individuals or revitalization of the economy and local small businesses. The bank exhibited adequate responsiveness to the critical needs of the AA. The institution does not use innovative and/or complex investments to support CD initiatives in the MMSA.

## SERVICE TEST

The institution's performance under the Service Test in the Fort Smith AR-OK MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Fort Smith AR-OK MMSA is excellent.

### Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AAs.

<b>Distribution of Branch Delivery System</b>											
<b>Assessment Area</b>	<b>Deposits</b> % of Rated Area Deposits in AA	<b>Branches</b>						<b>Population</b>			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
<b>Full-Scope</b>											
Fort Smith AR-OK MMSA	88.08	15	71.42	0.00	53.33	26.6	20.0	0.00	24.59	53.28	22.12

According to the FDIC Market Share report as of June 30, 2019, FNB FS's deposits from the Fort Smith AR-OK MMSA total approximately \$1.03 billion. This represents 88.1 percent of the bank's total deposit balances as of the same date.

<b>Distribution of Branch Openings/Closings</b>						
<b>Assessment Area</b>	<b>Branch Openings/Closings</b>					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Fort Smith AR-OK MMSA	1	0	-	+1	-	-

The institution's opening and closing of branches improved the accessibility of its delivery systems, particularly in low- to moderate-income geographies and/or individuals.

During the preceding CRA evaluation period, the bank closed one branch and opened two branches. Such activities have not had an impact on their ability to provide accessibility of its delivery systems, particularly in low- to moderate-income geographies and/or to low- to moderate-income individuals.

Services, including business hours, where appropriate, are tailored to the convenience and needs of the various portions of the AA, particularly low- and moderate-income geographies and/or individuals.

FNB FS's retail banking system, including the quantity, quality, and accessibility of services, is appropriate. The primary delivery system for its retail banking services is the branch network. Banking hours are adjusted according to local banking needs. Most branches open at either 7:00 am or 8:00 am and close at 6:00 pm. Saturday banking is available at some locations from 9:00 am to 2:00 pm. Loan and deposit products are available at all branch locations and are tailored to meet the needs of the community. All of the bank's ATMs and telephone banking services provide 24-hour service. ATMs and other banking services are available in English as well as Spanish.

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

The bank's performance under the Service Test in the Fort Smith AR-OK MMSA is rated "High Satisfactory".

### **Community Development Services**

The institution is a leader in providing CD services.

The bank's provision of CD services in the Fort Smith AR-OK MMSA is excellent. The bank donated a total of 5,000 hours to provide leadership and/or services to 63 non-profit entities that provide services to low- to moderate-income individuals. Additionally, the bank provided leadership to a non-profit entity whose purpose is to revitalize and/or stabilize low- to moderate-income areas. Additional CD services the bank provides to this AA and the state of Arkansas are discussed in the "State of Arkansas CD Services" section below.

## State Rating

### State of Arkansas

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

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- The bank exhibits an adequate geographic distribution of loans in the state of Arkansas;
- The bank exhibits a poor distribution of loan amounts to individuals of different income levels and businesses of different sizes;
- The bank originated a relatively high level of CD loans;
- The bank has an adequate level of qualified CD investments;
- The bank provides an adequate level of CD services.

### Description of Institution's Operations in Arkansas

FNB FS also operates in the state of Arkansas through the Fayetteville-Springdale-Rogers MSA AA in 2017 – 2018 and 2019 and the non-MSA Franklin County in 2017 – 2018.

#### Fayetteville – Springdale – Rogers MSA AA

The bank has six full-service branch locations with five ATMs in the Fayetteville-Springdale-Rogers MSA. As of June 30, 2019, total deposits in the MSA were \$138.9 million. The bank has two locations in Rogers and one each in Lowell, Centerton, Fayetteville and Bentonville. The AA has 51 CTs in Benton and Washington counties. The 51 CTs split with one low-income CT; nine moderate income CTs; 23 middle income CTs; and 18 upper income CTs. Most of the bank's branch locations are in middle- and upper-income CTs. One branch in Rogers is in a low-income CT. Competition within the MSA AA is strong. As of June 30, 2019, there were 33 financial service providers with 196 branches in the Fayetteville-Springdale-Rogers MSA. These banking offices are made up of several state-chartered banks and branches of non-local national banks. Additionally, there are numerous finance companies, credit unions, and mortgage companies within the AA. The five largest competitors in the AA are: Arvest Bank, First Security Bank, Bank of America, Legacy National Bank, and Signature Bank. In total, these five competitors hold 66.8 percent of deposit market share, with FNB FS having only 1.3 percent of the market share and ranking 18<sup>th</sup> out of the 33.

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



Examiners assessed community credit needs in the Fayetteville-Springdale-Rogers MSA AA by reviewing recent housing and demographic information. Examiners also discussed community credit needs with a community contact from an organization that provides services in the Fayetteville-Springdale-Rogers MSA. The organization provides local governments and citizens a regional forum to identify issues and opportunities and provide leadership in planning and implementing programs to improve the quality of life in their district. The contact stated that area banks do a good job working with the community. The area's needs include business loans for startup companies and affordable housing for those receiving public assistance income.

## Fayetteville-Springdale-Rogers MSA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB of Ft Smith – Fayetteville MSA 2017</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)	51	2.0	15.7	45.1	37.3	0.0
Population by Geography	267,165	1.4	20.5	40.7	37.3	0.0
Housing Units by Geography	106,244	1.5	18.0	42.6	37.9	0.0
Owner-Occupied Units by Geography	61,174	0.7	14.3	41.3	43.7	0.0
Occupied Rental Units by Geography	34,532	3.1	26.1	43.4	27.4	0.0
Vacant Units by Geography	10,538	1.3	12.6	47.6	38.5	0.0
Businesses by Geography	14,535	1.9	16.3	42.9	38.9	0.0
Farms by Geography	421	2.6	11.9	42.0	43.5	0.0
Family Distribution by Income Level	69,508	18.2	18.4	20.4	43.0	0.0
Household Distribution by Income Level	95,706	18.5	16.3	19.2	46.0	0.0
Median Family Income MSA - 22220 Fayetteville-Springdale-Rogers, AR-MO MSA		\$60,032	Median Housing Value			\$160,398
			Median Gross Rent			\$786
			Families Below Poverty Level			10.2%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB of Ft Smith – Fayetteville 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)	51	2.0	17.6	45.1	35.3	0.0
Population by Geography	267,165	1.4	21.8	41.3	35.5	0.0
Housing Units by Geography	106,244	1.5	19.2	43.4	35.8	0.0
Owner-Occupied Units by Geography	61,174	0.7	15.3	43.2	40.8	0.0
Occupied Rental Units by Geography	34,532	3.1	28.0	42.2	26.7	0.0
Vacant Units by Geography	10,538	1.3	13.5	48.6	36.7	0.0
Businesses by Geography	17,226	1.8	16.6	42.5	39.2	0.0
Farms by Geography	483	2.5	15.5	42.2	39.8	0.0
Family Distribution by Income Level	69,508	18.2	18.4	20.4	43.0	0.0
Household Distribution by Income Level	95,706	18.5	16.3	19.2	46.0	0.0
Median Family Income MSA - 22220 Fayetteville-Springdale-Rogers, AR MSA		\$60,876	Median Housing Value			\$160,398
			Median Gross Rent			\$786
			Families Below Poverty Level			10.2%
<i>Source: 2015 ACS Census 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 Arkansas

Examiners selected the Fayetteville-Springdale-Rogers MSA AA for a full-scope review. Examiners reviewed the non-MSA AA of Franklin County in 2017-2018 under limited scope. Refer to the table in appendix A for a list of all AAs reviewed.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Arkansas

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA is good.

## Lending Activity

Lending levels reflect poor responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Fayetteville MSA	547	496	2	77	1,122	87%	-
Franklin County non-MSA AA	20	38	10	0	158	13%	-

\*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Fayetteville MSA	\$127,926	\$90,151	\$39	\$43,910	\$262,026	99%	1%
Franklin County non-MSA AA	\$2,871	\$651	\$691	\$0	\$3,522	1%	<1%

\*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

The bank's overall lending activity in the Fayetteville-Springdale-Rogers MSA AA is poor. The bank's lending activities demonstrate adequate geographic distribution and poor income distribution. The Northwest Arkansas area is a very competitive market. There are more than 30 institutions in the Fayetteville-Springdale-Rogers MSA, and one institution holds almost half of the deposit market share. Based on FDIC deposit market share data as of June 30, 2019, FNB FS ranks 18th among 33 financial institutions in the AA with approximately \$139 million or 1.3 percent market share of deposits. Heightened competition and FNB FS's relatively small market presence results in low market penetration, which resulted in overall poor performance.

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

The bank exhibits an adequate geographic distribution of loans in the Fayetteville-Springdale-Rogers MSA AA.

Notably, the Fayetteville-Springdale-Rogers MSA contains only one low-income CT during the evaluation period. There were eight moderate-income CTs in 2017-2018, and OMB added one moderate-income CT to the MSA in 2019.

### *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 bank's geographic distribution of home mortgage loans during the evaluation period was adequate. In 2017-2018, the percentage of home mortgage loans in low-income tracts exceeded both the percentage of owner-occupied units and aggregate lending. In the same period, the percentage of loans in moderate-income tracts was lower than the percentage of owner-occupied units and somewhat lower than aggregate lending. There is more opportunity to lend in middle- and upper-income CTs as the vast majority (80+

percent) of geographies within the MSA are middle- and upper-income tracts. Additionally, FNB FS's market share is limited, which further limits lending opportunities compared to competing institutions.

In 2019, the percentage of loans in low-income tracts was near to the percentage of owner-occupied units and met aggregate lending. In the same period, the percentage of loans in moderate-income tracts was somewhat lower than the percentage of owner-occupied units but was near to aggregate lending. Home mortgage loans in moderate-income geographies increased due to the addition of one moderate-income CT in 2019.

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

Refer to table Q 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 businesses.

The bank's geographic distribution of small loans to businesses during the evaluation period was adequate. In 2017-2018, the percentage of business loans in low-income tracts was near to the percentage of businesses and exceeded aggregate lending. In the same period, the percentage of business loans in moderate-income tracts was lower than the percentage of both businesses and aggregate lending. Given the strong competition in the MSA and FNB FS's limited presence, small businesses may choose institutions with a wider community presence. In 2019, the percentage of business loans in low-income tracts exceeded both the percentage of businesses and aggregate lending. In the same period, the percentage of business loans in moderate-income tracts was lower than the percentage of both businesses and aggregate lending.

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

Examiners did not identify any lending gaps in the geographic distribution of loans.

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

The bank exhibits a poor distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

### ***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 bank's borrower distribution of home mortgage loans during the evaluation period is poor. For 2017-2018, the percentage of home mortgage loans to low-income borrowers is lower than the percentage of low-income families. In the same period, the percentage of home mortgage loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families. The high level of poverty within the MSA limits mortgage lending opportunities. Approximately 12 percent of households in the MSA live below the poverty line. Additionally, heightened lending competition and FNB FS's small market share further reduce the already limited lending opportunity pool.

In 2019, the percentage of home mortgage loans to low-income borrowers was lower than the percentage of low-income families. Although the bank's lending is less than the percentage of low-income families, the bank's performance increased year-over-year to meet the percentage of aggregate lending for 2019. In

the same period, the percentage of home mortgage loans to moderate-income borrowers is lower than the percentage of moderate-income families.

***Small Loans to Businesses***

Refer to table R in the “State of Arkansas” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The bank’s borrower distribution of small loans to businesses during the evaluation period was adequate. In both 2017-2018 and 2019, the percentage of small loans to small businesses was lower than the percentage of businesses. At 13 percent, a significant volume of businesses did not report revenue during the evaluation period. Further, 34 and 41 percent of bank loans to businesses in 2017-2018 and 2019, respectively, were to non-reporting businesses. Although bank lending did not meet the percentage of businesses, the percentage of business loans was near to the percentage of aggregate lending in both 2017-2018 and 2019.

## **Conclusions for Area(s) Receiving a Limited Scope Review**

Examiners reviewed the non-MSA AA of Franklin County under limited scope for the period of 2017-2018. This AA is included in the Fort Smith AR-OK MMSA performance review for 2019.

Based on a limited-scope review, the bank's lending performance in the Franklin County non-MSA AA is consistent with the bank's overall performance. In 2017-2018, the Franklin County non-MSA AA included no low- or moderate-income CTs. As such, examiners cannot perform meaningful analysis on the geographic distribution of home mortgage or business loans. The bank's borrower distribution of home mortgage loans was adequate, and the borrower distribution of small loans to businesses was excellent. The Franklin County non-MSA AA is particularly small, consisting of only one CT, and approximately 66 percent of households in the geography are middle- to upper-income.

### **Community Development Lending**

The institution made a relatively high level of CD loans in the Fayetteville-Springdale-Rogers MSA AA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multi-family loans that also qualify as CD loans.

FNB FS originated an outstanding level of CD loans in the Fayetteville-Springdale-Rogers-MSA AA. FNB FS originated 41 CD loans totaling \$24.7 million in the Fayetteville-Springdale-Rogers-MSA AA. CD loan volume equals 16.5 percent of allocated tier 1 capital. CD loans were responsive to identified community needs. All 41 of the originated CD loans had affordable housing as the purpose and total \$24.7 million, representing 100 percent of CD lending in the MSA. These CD loans were not innovative or complex.

### **Product Innovation and Flexibility**

The institution makes no use of innovative and/or flexible lending practices to serve AA credit needs.

## **INVESTMENT TEST**

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

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

Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA AA is adequate. Deposit balances from the Fayetteville-Springdale-Rogers MSA AA represent 11.9 percent of the bank's overall deposit balances.

The institution has a good level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

<b>Qualified Investments</b>										
<b>Assessment Area</b>	<b>Prior Period*</b>		<b>Current Period</b>		<b>Total</b>				<b>Unfunded Commitments**</b>	
	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>\$(000's)</b>	<b>#</b>	<b>% of Total #</b>	<b>\$(000's)</b>	<b>% of Total \$</b>	<b>#</b>	<b>\$(000's)</b>
Fayetteville-Springdale-Rogers MSA AA	11	\$2,491	19	\$21	30	43%	\$2,511	38%	0	0
Franklin County non-MSA AA	1	\$250	8	\$15	9	14%	\$265	4%	0	0

\* 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.

Qualified investments in the Fayetteville-Springdale-Rogers-MSA AA during the evaluation period total \$2.5 million, consisting of equity investments and cash donations. During the evaluation period, the outstanding prior period investments were approximately \$2.5 million. Investments made in prior periods continue to have a positive impact on the AA. The bank's total investment amount represented 1.6 percent of allocated tier 1 capital.

The bank exhibited adequate responsiveness to the critical needs of the Fayetteville-Springdale-Rogers-MSA AA. Of the \$2.5 million in qualified investments, \$21 thousand consists of qualified grants and donations to CD organizations. These organizations are involved in providing community services for low- or moderate-income individuals. The investments also support CD services targeted to low- and moderate-income individuals in the Fayetteville-Springdale-Rogers-MSA. The institution does not use innovative and/or complex investments to support CD initiatives in the Fayetteville-Springdale-Rogers-MSA.

### **Conclusions for Area(s) Receiving a Limited Scope Review**

Based on a limited scope review, the bank's performance under the Investment Test in the non-MSA AA of Franklin County is weaker than the bank's overall satisfactory performance. This assessment did not negatively impact the Investment Test rating as the non-MSA AA represents only 10 percent of the bank's deposit base. Current period investments number two and total \$265 thousand, and the donations total \$15 thousand. One prior period investment has an outstanding balance and continues to benefit the AA. All three investments are through Diamond State Ventures.

### **SERVICE TEST**

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

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

Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA AA is adequate. Examiners weighted the bank's performance in the Fort Smith AR-OK MMSA more heavily due to the large deposit base and increased availability of community services in the MMSA.

### **Retail Banking Services**

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

<b>Distribution of Branch Delivery System</b>											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
<b>Full-Scope</b>											
Fayetteville-Springdale-Rogers MSA	11.87	6	28.57	0.00	0.00	50.00	50.00	1.44	20.52	40.73	37.31

According to the FDIC Market Share report as of June 30, 2019, FNB FS has approximately \$138.9 thousand in deposits from the Fayetteville-Springdale-Rogers MSA AA. This volume of deposits represents approximately 11.9 percent of total bank deposit balances as of the same date.



Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Fayetteville-Springdale-Rogers MSA	0	0	0	0	0	0
Franklin County non-MSA AA	0	0	0	0	0	0

The bank has not opened or closed any branches within the Fayetteville-Springdale-Rogers-MSA AA during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the AA, particularly low- and moderate-income geographies and/or individuals. Alternative delivery systems include ATM/debit/point of sale services, telephone and internet banking services, and bank by mail services. The bank offers traditional deposit and lending services to meet the needs of the community.

### Community Development Services

The institution provides a relatively high level of CD services.

FNB FS is a leader in providing CD services and demonstrates reasonable responsiveness to meeting the needs of the community. During this evaluation period, FNB FS employees provided financial services, including financial literacy classes, and participated in leadership roles in numerous CD organizations. Some specific examples are as follows:

- **Dollars & Sense** - Fifty-five of the services were attributed to the Dollars & Sense program during the years 2017, 2018, and 2019. The program consists of teaching lifelong financial literacy skills for saving money and setting financial goals. The bank taught financial literacy to students at 32 local schools and opened over 2,600 savings accounts under this program. As part of the program, the bank opens savings accounts for the students and deposits \$5 into each student's savings account.
- **Children of Centerton** - The bank actively participates in this program that provides clothing, food, and other necessities for low- to moderate-income families in the Centerton area, which is in the Fayetteville-Springdale-Rogers MSA AA.
- **Single Parent Scholarship Fund**- Bank staff provide financial expertise to the organization through service on the investment committee. The program funds scholarships for assistance to low- to moderate-income single parents in the MSA.

During the evaluation period, bank representatives served as board or finance committee members to 70 qualified CD organizations. Examples of these services include:

- Serving on the executive board, loan committee, or as an alternate board member for a development corporation that provides revitalization and/or stabilization of low- to moderate-income areas.
- Serving on the Arkansas Fair Housing Commission. The Arkansas Fair Housing Commission provides housing support to benefit low- to moderate-income persons.
- Serving as a board member for an organization that provides medical assistance to low- to moderate-income individuals.

### **Conclusions for Area(s) Receiving a Limited Scope Review**

Based on a limited scope review, the bank's performance under the Service Test in the Franklin County non-MSA AA is consistent with the bank's overall performance. Bank staff members provided over 300 volunteer hours of financial expertise as board members for a local non-profit organization.

## 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>	January 1, 2017 – December 31, 2019	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Citizens Bank and Trust	Common Control	None
Brown-Hiller-Clark & Associates	Common Control	None
Realty Appraisals, Inc.	Common Control	None
<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(s)</b>		
Fort Smith, AR-OK MMSA	Full Scope	Includes Franklin County for 2019
<b>State</b>		
Arkansas	Full Scope	<ul style="list-style-type: none"> <li>For 2019, consists of Fayetteville-Springdale-Rogers MSA</li> <li>For 2017-2018, consists of Fayetteville-Springdale-Rogers MSA and non-MSA AA of Franklin County</li> </ul>

## Appendix B: Summary of MMSA and State Ratings

<b>RATINGS First National Bank of Fort Smith</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
<b>MMSA or State:</b>				
Fort Smith AR-OK MMSA	Outstanding	High Satisfactory	Outstanding	Outstanding
Arkansas	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## 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/AA.

**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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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/AA.

**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.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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 loans are treated the same 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/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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. 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.

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
– Fayetteville MSA	372	92,677	45.8	12,822	0.7	1.1	0.6	14.3	6.2	11.5	41.3	31.2	35.8	43.7	61.6	52.1	0.0	0.0	0.0
–Franklin County non-MSA AA	20	2,871	2.5	173	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Ft Smith AR OK MMSA	421	70,232	51.8	5,743	0.0	0.0	0.0	16.7	23.8	15.5	58.2	46.3	56.5	25.1	29.9	28.0	0.0	0.0	0.0
<b>Total</b>	<b>813</b>	<b>165,779</b>	<b>100.0</b>	<b>18,738</b>	<b>0.4</b>	<b>0.5</b>	<b>0.4</b>	<b>15.2</b>	<b>15.1</b>	<b>12.6</b>	<b>50.4</b>	<b>40.7</b>	<b>42.7</b>	<b>34.0</b>	<b>43.7</b>	<b>44.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2019**

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
Fayetteville MSA	175	35,249	43.1	12,822	0.7	0.6	0.6	15.3	9.7	11.5	43.2	32.6	35.8	40.8	57.1	52.1	0.0	0.0	0.0
Ft Smith AR OK MMSA	231	45,682	56.9	5,628	0.0	0.0	0.0	16.2	19.0	15.2	57.8	45.0	56.3	26.0	35.9	28.6	0.0	0.0	0.0
<b>Total</b>	<b>406</b>	<b>80,931</b>	<b>100.0</b>	<b>18,450</b>	<b>0.4</b>	<b>0.2</b>	<b>0.4</b>	<b>15.7</b>	<b>15.0</b>	<b>12.6</b>	<b>50.2</b>	<b>39.7</b>	<b>42.0</b>	<b>33.7</b>	<b>45.1</b>	<b>45.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** 2017-18

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
FNB of Ft Smith - Fayetteville 2017	372	92,677	45.8	12,822	18.2	4.3	6.4	18.4	10.2	14.9	20.4	14.0	18.3	43.0	48.4	42.7	0.0	23.1	17.7
FNB of Ft Smith - Franklin 2017	20	2,871	5.5	173	17.5	0.0	6.9	13.8	25.0	12.7	19.3	15.0	14.5	49.3	55.0	47.4	0.0	5.0	18.5
FNB of Ft Smith - Ft Smith 2017	421	70,232	51.8	5,743	22.7	4.3	5.2	17.4	10.7	13.7	18.4	18.5	20.4	41.4	46.3	38.3	0.0	20.2	22.4
<b>Total</b>	<b>813</b>	<b>165,779</b>	<b>100.0</b>	<b>18,738</b>	<b>20.2</b>	<b>4.2</b>	<b>6.0</b>	<b>17.9</b>	<b>10.8</b>	<b>14.5</b>	<b>19.5</b>	<b>16.4</b>	<b>18.9</b>	<b>42.4</b>	<b>47.5</b>	<b>41.4</b>	<b>0.0</b>	<b>21.2</b>	<b>19.1</b>

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2019**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FNB of Ft Smith - Fayetteville 2019	175	35,249	43.1	12,822	18.2	6.3	6.4	18.4	8.0	14.9	20.4	13.7	18.3	43.0	51.4	42.7	0.0	20.6	17.7
FNB of Ft Smith - Ft Smith 2019	231	45,682	56.9	5,628	22.5	3.0	5.2	17.3	14.3	13.7	18.3	19.0	20.0	41.9	45.0	38.9	0.0	18.6	22.2
<b>Total</b>	<b>406</b>	<b>80,931</b>	<b>100.0</b>	<b>18,450</b>	<b>20.1</b>	<b>4.4</b>	<b>6.0</b>	<b>17.9</b>	<b>11.6</b>	<b>14.5</b>	<b>19.5</b>	<b>16.7</b>	<b>18.8</b>	<b>42.5</b>	<b>47.8</b>	<b>41.5</b>	<b>0.0</b>	<b>19.5</b>	<b>19.1</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-18**

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
FNB of Ft Smith – Fayetteville 2017	347	59,159	52.7	4,791	1.9	1.7	1.6	16.3	6.6	14.7	42.9	46.7	41.4	38.9	45.0	42.3	0.0	0.0	0.0
FNB of Ft Smith - Franklin 2017	38	651	2.9	94	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
FNB of Ft Smith - Ft Smith 2017	907	95,575	70.2	3,336	0.0	0.0	0.0	27.7	25.6	27.8	45.6	42.1	46.9	26.7	32.3	25.3	0.0	0.0	0.0
<b>Total</b>	<b>1,292</b>	<b>155,385</b>	<b>196.1</b>	<b>8,221</b>	<b>1.1</b>	<b>0.5</b>	<b>0.9</b>	<b>20.9</b>	<b>19.7</b>	<b>19.8</b>	<b>44.5</b>	<b>45.0</b>	<b>44.3</b>	<b>33.5</b>	<b>34.8</b>	<b>34.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2019**

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
FNB of Ft Smith - Fayetteville 2019	149	31,002	23.2	4,791	1.8	2.0	1.6	16.6	4.7	14.7	42.5	43.0	41.4	39.2	50.3	42.3	0.0	0.0	0.0
FNB of Ft Smith – Ft Smith 2019	492	44,382	76.8	3,303	0.0	0.0	0.0	26.7	25.8	27.9	46.0	48.2	46.5	27.3	26.0	25.6	0.0	0.0	0.0
<b>Total</b>	<b>641</b>	<b>75,384</b>	<b>100.0</b>	<b>8,094</b>	<b>1.1</b>	<b>0.5</b>	<b>1.0</b>	<b>20.7</b>	<b>20.9</b>	<b>20.1</b>	<b>43.9</b>	<b>47.0</b>	<b>43.5</b>	<b>34.4</b>	<b>31.7</b>	<b>35.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0



**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017-18**

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
FNB of Ft Smith – Fayetteville 2017	347	59,159	26.9	4,791	80.7	38.0	45.7	5.7	28.0	13.6	34.0
FNB of Ft Smith - Franklin 2017	38	651	3.3	94	77.6	78.9	45.7	6.5	4.5	15.9	18.4
FNB of Ft Smith - Ft Smith 2017	907	95,575	70.2	3,336	76.3	47.6	40.1	8.1	19.1	15.7	33.3
<b>Total</b>	<b>1,292</b>	<b>155,385</b>	<b>100.0</b>	<b>8,221</b>	<b>78.8</b>	<b>46.0</b>	<b>43.4</b>	<b>6.7</b>	<b>21.0</b>	<b>14.5</b>	<b>33.1</b>

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2019**

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
FNB of Ft Smith – Fayetteville 2019	149	31,002	23.2	4,791	83.0	38.9	45.7	4.8	20.1	12.1	40.9
FNB of Ft Smith - Ft Smith 2019	492	44,382	76.8	3,303	78.5	41.9	40.3	7.1	10.2	14.4	48.0
<b>Total</b>	<b>641</b>	<b>75,384</b>	<b>100.0</b>	<b>8,094</b>	<b>81.2</b>	<b>41.2</b>	<b>43.5</b>	<b>5.7</b>	<b>12.5</b>	<b>13.0</b>	<b>46.3</b>

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*