



PUBLIC DISCLOSURE

January 6, 2020

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank of Eastern Arkansas
Charter Number 13637

101 North Washington Street
Forrest City, AR 72335

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory

The Community Development test is rated: Satisfactory

The major factors that support this rating include:

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

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of its AAs, the bank's LTD ratio is reasonable. The bank's LTD ratio averaged 49.0 percent and ranged from 38.4 percent to 64.9 percent over the 12 quarters during this evaluation period.

The bank's LTD ratio compares favorably with other financial institutions of similar size, location, and product offerings. First National Bank of Eastern Arkansas (FNB EA) ranks second among three similarly situated banks. The average LTD ratios for the other two banks over the same 12 quarters are 56.8 percent and 41.1 percent. Competition from other financial institutions is above average. The bank's competitors include several local community banks and branches of large regional and nation-wide institutions.

Institution Name	Assets (as of 12/31/2018)	Average LTD Ratio
First National Bank of Eastern Arkansas	\$416,870	49.23%
Fidelity Bank	\$376,002	56.84%
Partners Bank	\$205,202	41.13%
Assessment Average	- - -	49.07%

Lending in Assessment Area

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

The bank originated and purchased 93.6 percent of its total loans by number and 93.2 percent of the total dollar volume inside the bank's AAs during the evaluation period. This analysis is performed at the

bank, rather than the AA, level.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	112	94.1	7	5.9	119	10,434	91.9	919	8.1	11,353
2017	98	97.0	3	3.0	101	7,529	95.9	319	4.1	7,848
2018	104	92.0	9	8.0	113	8,105	86.1	1,304	13.9	9,410
Subtotal	314	94.3	19	5.7	333	26,068	91.1	2,542	8.9	28,611
Small Business	18	90.0	2	10.0	20	1,220	92.8	95	7.2	1,315
Small Farm	19	95.0	1	5.0	20	3,032	99.3	20	0.7	3,052
Total	351	93.6	22	6.4	373	30,320	93.2	2,657	6.8	32,978
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0</i>										

Description of Institution

FNB EA is a \$416.9 million, multi-state financial institution headquartered in Forrest City, Arkansas. FNB EA is a subsidiary of a single-entity holding company, Bancshares of Eastern Arkansas, Incorporated (HC) located in Forrest City, Arkansas. The HC is \$44.8 million and was created to hold FNB EA. FNB EA was chartered in 1886. No mergers or acquisitions occurred within the evaluation period.

FNB EA has two AAs - one multi-state MSA consisting of the Memphis, TN – MS - AR multi-state MSA (Memphis MMSA) and one non-MSA AA (Arkansas non-MSA AA) in Arkansas consisting of seven counties: St. Francis County, Lee County, Cross County, Monroe County, Phillips County, Mississippi County, and Woodruff County. Per the June 30, 2018, FDIC market share reports, FNB EA does not maintain a majority of deposits within all their AAs. For the Arkansas non-MSA AA, FNB EA had 13 branches and 16.2 percent of deposits within those markets. Within the Memphis, TN – MS – AR MMSA, FNB EA had nominal deposit share at 0.1 percent of the market's deposits.

The bank operates 14 full-service banking centers in Arkansas and Memphis, Tennessee. The main branch is in Forrest City, AR, with other branches located throughout the eastern part of the state of Arkansas. The bank also has one branch in Memphis, Tennessee. The Memphis, Tennessee branch was converted into a full-service branch in June 2016. All branch locations offer drive-in banking and lobby hours on Monday through Friday. There are two stand-alone Automated Teller Machines (ATMs) in Forrest City (Forrest City Machine Works) and Wynne (Exxon Circle N).

Management's primary lending activity is real estate lending in all markets. Given the location of FNB EA branches in Arkansas, agricultural lending and small dollar personal lending are also key lending

activities. Business and residential lending are primary products within the Memphis MMSA.

As of December 31, 2018, net loans totaled \$207.5 million and represented 49.8 percent of total assets. The majority of loans are real estate secured loans, which totaled \$121.2 million and represented 58.4 percent of total loans. The remainder of the loan portfolio consists of \$41.2 million (19.8 percent of total loans) in agricultural loans, \$34.4 million (16.6 percent) in commercial loans, and \$8.00 million (3.8 percent) in loans to individuals. Tier 1 capital as of December 31, 2018, totaled \$41.9 million, representing 17.4 percent of adjusted average assets.

No legal, financial, or other factors impeded the bank's ability to help meet the credit needs of its AA during the evaluation period. The bank received an overall rating of **"Satisfactory"** at the last CRA evaluation dated April 4, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Examiners reviewed the bank's performance using the intermediate small bank examination procedures for CRA. The evaluation period was January 1, 2016, through December 31, 2018. For the years of 2016 through 2018, examiners sampled business loans in the Memphis MMSA and farm loans in the Arkansas non-MSA AA. HMDA data gathered from January 1, 2016, to December 31, 2018, was evaluated and reported within this PE.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate 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 for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state of Arkansas and Memphis MMSA ratings.

Due to management opening a branch in the Memphis MMSA during 2016, business loans from years 2017 and 2018 were weighted more heavily for the lending test. In determining primary products, loan products were totaled from the call report and the top two categories considered. In the Memphis MMSA, business loans were the second product for review, and farm loans were a primary product in the non-MSA Arkansas AA. Business and farm loans were given equal weight in overall ratings.

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

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

State Rating

State of Arkansas

CRA rating for the State of Arkansas¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the AA.
- The distribution of loans based on business income is reasonable.
- CD lending reflects adequate responsiveness to the CD needs in the non-MSA AA.
- CD investments reflect excellent responsiveness to the CD needs the non-MSA AA.
- CD services reflect adequate responsiveness to the CD needs in the non-MSA AA.

Description of Institution's Operations in Arkansas

FNB EA operates 11 full-service branches and two ATMs in the state of Arkansas non-MSA AA. Management did not open any new branches in this AA during the evaluation period. The primary business focus within the state of Arkansas non-MSA AA is loans to individuals, small and medium farms and businesses, commercial real estate, and retail loans.

Given the bank's long history in the eastern region of Arkansas, the vast majority (94.3 percent) of total deposits are from the Arkansas non-MSA AA. As of June 30, 2018, total deposits in the state of Arkansas non-MSA AA totaled \$329.6 million, or 16.2 percent of the market share. The bank ranks second of 17 possible financial institutions. Major competitors in the AA include: Southern Bancorp, Bank of Wynne, and Farmers Bank and Trust. These competitors have roughly the same business focus within the AA.

The Arkansas non-MSA AA consists of seven contingent counties across the eastern part of Arkansas. As of the 2015 American Community Survey (ACS), the AA consisted of 39 census tracts (CTs) with a total population of 134 thousand people. 2015 data shows one low-income CT; 17 moderate-income CTs; 19 middle-income CTs; and two upper-income CTs. All CTs had income information available. The Arkansas non-MSA AA is appropriate given the bank's branch system; includes only whole CTs; and does not arbitrarily exclude any low- or moderate-income CTs. In determining the overall geographic distribution of lending by income level, we omitted the 22 loans deemed outside the AAs and added three loans to reach a sample size of at least 20 loans for each loan category assessed during the period. As evidenced in table A, population demographics indicate that lending to low-and moderate-income borrowers in the Arkansas non-MSA AA may not be plausible for FNB EA. Income demographics indicate that 21.3 percent of households within the Arkansas non-MSA AA are below the poverty line and 37.3 percent of households receive social security assistance. Within the population, 2.1 percent on units

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

in low-income CTs are renter occupied, compared to the 0.8 percent that are owner occupied. Age demographics indicate that 13.9 percent of the population is over the age of 65. As such, borrowers in these demographics may not seek home mortgages and may choose to rent instead. Additionally, individuals may not qualify for home mortgages with FNB EA and thus lending to the demographic would be adversely affected.

Examiners contacted one economic development consultant in the AA to better understand the general credit, demographic, and community development needs. The contact stated that Forrest City is primarily a low-income/low-skill workforce with an average household income of \$32,300 as of 2017. Historically, the community experienced higher unemployment with an unemployment rate consistently 1-2 percent above the state of Arkansas average. As a result, the Arkansas non-MSA AA has a higher-level of families below the poverty line at 21.3 percent compared to the state of Arkansas average of roughly 18.0 percent. Major commercial sectors in the town are hotels, grocery stores, transportation, and packaging. The contact indicated the biggest need in Forrest City and surrounding areas is small business lending. There is a severe lack of businesses and restaurants in the community, which continues to impact other economic areas such as housing. Financial institutions are reasonably involved in CD activities within Forrest City. No indication of preferred financial institutions was made during the discussion. Additional programs in the community to meet credit needs include state and city-wide initiatives for industrial improvement and construction projects. Additional financing assistance is available through the city to all buildings and projects located within a New Market Tax Credit Zone.

Arkansas non-MSA AA

Assessment Area: Arkansas Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	2.6	43.6	48.7	5.1	0.0
Population by Geography	134,729	1.3	41.2	51.5	6.0	0.0
Housing Units by Geography	62,124	1.6	42.9	50.3	5.2	0.0
Owner-Occupied Units by Geography	29,632	0.8	36.3	55.8	7.2	0.0
Occupied Rental Units by Geography	21,872	2.1	49.7	44.2	4.0	0.0
Vacant Units by Geography	10,620	3.2	47.4	47.4	2.1	0.0
Businesses by Geography	5,537	3.3	43.2	45.3	8.2	0.0
Farms by Geography	1,037	0.8	32.5	57.8	9.0	0.0
Family Distribution by Income Level	33,504	26.8	18.8	17.7	36.6	0.0
Household Distribution by Income Level	51,504	29.7	15.8	17.0	37.5	0.0
Median Family Income Non-MSAs - AR	\$45,060	Median Housing Value				\$70,159
		Median Gross Rent				\$580
		Families Below Poverty Level				21.3%

*Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.*

Scope of Evaluation in Arkansas

Examiners identified one AA receiving a full scope review in the state of Arkansas – the non-MSA AA. The Arkansas non-MSA AA is a combination of all contiguous counties in the state that are outside of the Memphis MMSA. For purposes of this evaluation, the Memphis MMSA was reviewed separately. Examiners identified home mortgages and farm loans as products for assessment in the Arkansas non-MSA AA based on overall product dollar volume listed on the call report. Examiners weighted farm loans in the non-MSA AA equally to business loans in the Memphis MMSA for overall rating purposes.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

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

Based on a full-scope exam for the Arkansas non-MSA AA, the bank's lending performance in the state of Arkansas is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state of Arkansas.

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 dispersion of home mortgage loans by income category for the assessment period in the state of Arkansas is good. In 2016, the Arkansas non-MSA AA did not contain any low-income CTs. The percentage of home mortgage loans in moderate-income CTs exceeded both the percentage of owner-occupied housing units and aggregate lending to moderate-income CTs in the same year.

Census map changes resulted in one CT changing from moderate-income to low-income as of 2017. In 2017-18, the percentage of home mortgage loans in low-income CTs was significantly lower than the percentage of owner-occupied housing units. For the same time, the percentage of home mortgage loans in moderate-income CTs exceeded both the percentage of owner-occupied housing units and aggregate lending to moderate-income CTs.

Small Loans to Farms

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

The geographic distribution of loans to farms by income category for the assessment period in the state of Arkansas is good. In 2016, the percentage of bank loans to small farms located in moderate-income CTs exceeded both the percentage of farms and aggregate lending to moderate-income CTs. In 2017-18, the

percentage of bank loans to small farms located in low-income CTs was significantly lower than the percentage of farms. Given limited farm presence (<1 percent) within the one low-income tract, meaningful analysis could not be performed. In the same time, the percentage of bank loans to small farms located in moderate-income CTs met the percentage of farms and exceeded aggregate lending to moderate-income CTs.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of loans for home mortgages by income level of the borrower for the assessment period in the state of Arkansas is adequate. In 2016, home mortgage lending to low-income borrowers was lower than the percentage of low-income borrowers and exceeded aggregate lending to these borrowers. In the same year, home mortgage lending to moderate-income borrowers was lower than the percentage of moderate-income borrowers. Given the information mentioned in the performance context section, lending to low- and moderate-income borrowers reflects adequate performance.

Performance was similar in the following years. In 2017-18, home mortgage lending to LMI borrowers was lower than the percentage of these borrowers. Considering the performance context, lending to LMI borrowers reflects adequate performance.

Small Loans to Farms

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

The distribution of loans to farms by income level of the borrower for the assessment period in the state of Arkansas is adequate. In both 2016 and 2017-18, the percentage of loans to farms with gross annual revenue (GAR) of less than \$1 million was somewhat lower than the percentage of identified small farms and exceeded aggregate lending in both periods.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

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

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

Number and Amount of CD Loans

The level of qualified CD loans in the state of Arkansas non-MSA AA reflects adequate responsiveness to the CD needs of the community. In total, the bank originated or renewed 34 CD loans in the AA totaling \$3.4 million during the evaluation period. Notable CD loans in the AA included loans for multi-family housing properties for LMI individuals and lending for the renovation of current rental properties in underserved CTs. Additional lending activity included loans for essential community needs such as police vehicles and garbage and street cleaning services.

Number and Amount of Qualified Investments

Qualified Community Development Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
State of Arkansas non-MSA	8	1,612	9	2,003	17	85.0%	3,615	82.5%	-	-
Memphis MMSA***	-	-	3	765	3	15.0%	765	17.5%	-	-
Total	8	1,612	12	2,768	20	100.0%	4,380	100.0%	-	-

* 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.

*** Note that a full-service branch was not in Memphis, TN until June 2016. Therefore, no prior investments were made in the Memphis MMSA.

FNB EA demonstrated excellent responsiveness to CD needs through qualified investment activities within the state of Arkansas non-MSA AA during the evaluation period. During the evaluation period, FNB EA purchased nine school district municipal investments totaling \$2.0 million and benefiting schools within the AA. Additionally, eight prior period purchases had outstanding balances totaling \$1.6 million. These 17 investments were school bonds to fund schools with a student population receiving free or reduced lunch of 50.0 percent or more. In addition to the qualifying activities made within the Arkansas non-MSA AA, FNB EA purchased significant additional qualifying investments in the broader statewide/regional area. During the evaluation period, FNB EA purchased an additional 75 school bonds totaling \$19.4 million and providing funding to schools with a student population receiving free or reduced lunch of 50.0 percent or more.

Extent to Which the Bank Provides CD Services

The level of qualified CD services provided by bank employees within the Arkansas non-MSA AA indicates adequate responsiveness to the CD needs of the community. Nine bank officers and employees serve in leadership positions in organizations that provide community services to LMI individuals or support economic development within the AA. Examples of such services include:

- Motlow State Community College Foundation – A bank employee serves as a board member for this non-profit organization that serves to offer scholarships, support programs, and maintain facilities that allow LMI students an opportunity to pursue advanced careers.
- Great River Economic Development Foundation– A bank employee serves as a board member for this organization, which was established specifically to enhance the economic development efforts within Mississippi County, a part of the Arkansas non-MSA AA. Mississippi County historically has a poverty rate higher than state average and income less than state average. As of 2017 household income totaled \$36,417 while the counties poverty rate was equal to 25.6 percent. Comparatively, the state of Arkansas household income and poverty rate in 2017 equaled \$47,062 and 18.1 percent respectively.

Multistate Metropolitan Statistical Area Rating

Memphis MMSA

CRA rating for the Memphis MMSA²: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the MMSA.
- The distribution of loans based on business income is reasonable.
- CD lending reflects adequate responsiveness to the CD needs in the MMSA.
- CD investments reflect adequate responsiveness to the CD needs in the MMSA.
- CD services reflect poor responsiveness to the CD needs in the MMSA. needs of the bank in the MSA.

Description of Institution's Operations in Memphis MMSA

FNB EA operates three full-service branches within the Memphis MMSA. There are two branches in Arkansas – one in Earle and one in Marion, and both were operating prior to the current evaluation period. There is one branch located in Memphis, Tennessee. This location opened in 2015 as a loan production office and transitioned to a full-service branch with a focus on commercial real estate lending in 2016. As such, the number of loans to small businesses located in low- or moderate-income CTs did not meet the threshold for meaningful analysis during 2016. FNB EA has a presence in only one CT in Tennessee, limiting their reach. The Memphis, Tennessee branch is in an upper income tract surrounding by other upper- and middle-income tracts. As such, it is difficult to lend in low-income tracts without a presence. Similarly, limited consumer housing lending in the Memphis MMSA does not reflect poor lending performance during the period. Additionally, 67.6 percent of home mortgage loans in 2017-2018 were made to individuals whose income could not be determined, resulting in an understatement of borrower income level served.

Given their recent entry into the market and the overall size of the Memphis MMSA, FNB EA's deposit market share is negligible. As of June 30, 2018, FNB EA's total deposits in the Memphis MMSA were \$19.8 million, or 0.1 percent of the market. This ranks 49th of 54 possible financial institutions in the MMSA. Memphis MMSA deposits represent six percent of total bank deposits. The Memphis MMSA is highly competitive for loans and deposits. Major competitors in this MMSA include: Fidelity Bank, First Community Bank of Eastern Arkansas, and Evolve Bank. All these competitors are primarily located in Crittenden County, Arkansas. As the bank expands its presence in the Memphis MMSA, more competitors within Tennessee are expected to emerge.

The Memphis MMSA consists of three counties in Arkansas, Mississippi, and Tennessee. As of the 2015 ACS, the Memphis MMSA consisted of 274 CTs with a population of 1.2 million people. 2015 data shows 70 low-income CTs; 57 moderate-income CTs; 56 middle-income CTs; 84 upper-income CTs; and seven CTs with no income information available. This MMSA is appropriate given the bank's branch system includes only whole CTs and does not arbitrarily exclude any low- or moderate-income CTs.

Examiners interviewed one community contact from the Tennessee Small Business Development Center (TSBDC) in conjunction with another bank examination conducted in the Memphis MMSA. TSBDC serves to provide a network of certified professional business counselors that provide management and technical expertise through counseling and training seminars covering sales and marketing strategies. Funding for the TSBDC is provided through federal grants and local and state government activities. The contact stated that the local economy is showing moderate growth with most jobs being of low pay. The area has come out of recession in recent years through the help of small business growth and moderate housing rent. The retail business sector experienced the most growth, primarily within the food services industry. Even with recent growth in the market, there continues to be several low-income areas in Memphis, specifically in the Whitehaven area. The contact indicated local banks were meeting the credit needs of the area, including small business loans and home mortgages. The contact mentioned that while most banks are willing to lend to small businesses, they often direct business owners to development centers for assistance in business planning and financial reporting education. Often, bankers do not work directly with businesses on improving their credit profile.

Memphis MMSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: 32820 Memphis TN-MS-AR MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	274	25.5	20.8	20.4	30.7	2.6
Population by Geography	1,156,101	18.7	20.0	20.7	40.0	0.6
Housing Units by Geography	486,604	21.2	19.9	20.4	38.1	0.4
Owner-Occupied Units by Geography	253,549	11.6	16.4	21.5	50.4	0.2
Occupied Rental Units by Geography	172,033	29.1	23.8	20.3	26.4	0.4
Vacant Units by Geography	61,022	38.5	23.7	16.7	20.0	1.2
Businesses by Geography	63,879	13.3	16.1	21.4	48.1	1.1
Farms by Geography	1,490	8.8	14.3	23.7	52.4	0.8
Family Distribution by Income Level	277,222	24.7	15.5	17.1	42.7	0.0
Household Distribution by Income Level	425,582	25.6	15.4	16.4	42.6	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		\$58,186	Median Housing Value			\$134,763
			Median Gross Rent			\$870
			Families Below Poverty Level			15.2%

Source: 2015 ACS Census and 2018 D&B Data
Due to rounding, totals may not equal 100.0
(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Memphis MMSA

Examiners identified one MSA receiving a full-scope review – the Memphis MMSA. The Memphis MMSA consists of all counties in the MMSA. Loan products assessed in the area, home mortgages and businesses, were determined by their overall loan dollar volume per the call report.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MEMPHIS MMSA

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the Memphis MMSA.

Home Mortgage Loans

Refer to Table O in the "Memphis 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 dispersion of home mortgage loans by income category for the assessment period in the Memphis MMSA is excellent. In 2016, the percentage of home mortgage loans in both low- and moderate-income CTs exceeded both the percentage of owner-occupied housing units and aggregate lending to these CTs. The bank performed similarly in the following years. In 2017-18, the percentage of home mortgage loans in both low- and moderate-income CTs exceeded both the percentage of owner-occupied housing units and aggregate lending to these CTs.

Small Loans to Businesses

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

The geographic distribution of loans to businesses by income category in the Memphis MMSA is adequate. The number of bank loans to small businesses located in low- or moderate-income CTs did not meet the threshold for meaningful analysis for 2016. In 2017-18, the percentage of bank loans to small businesses located in low-income CTs was significantly lower than the percentage of businesses. In the same time, the percentage of bank loans to small businesses located in moderate-income CTs exceeded both the percentage of businesses and aggregate lending to moderate-income CTs.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The dispersion of loans for home mortgages by income level of the borrower in the Memphis MMSA is adequate in consideration of the performance context. In 2016, FNB EA did not originate or purchase home mortgage loans to low- or moderate-income borrowers within the Memphis MMSA. In 2017-18, the bank did not originate or purchase home mortgage loans to low-income borrowers. In the same time, lending to moderate-income borrowers was lower than the percentage of moderate-income borrowers.

Small Loans to Businesses

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

The distribution of loans to businesses by income level of the borrower for the assessment period in the Memphis MMSA is good. For 2016, the number of bank loans to small business located in low or moderate-income CTs did not meet the threshold for meaningful analysis. The low volume of lending is attributed to management entering this market in late-2016 with a lending focus on CRE loans. In 2017-18, the percentage of loans to businesses with GAR of less than \$1 million was near the percentage of identified small businesses and exceeded aggregate lending during the period.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The bank’s performance under the CD Test in the Memphis MMSA is rated Satisfactory.

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

Number and Amount of CD Loans

The level of qualified CD loans in the Memphis MMSA reflects adequate responsiveness to the needs of the community. The bank originated or renewed 15 CD loans totaling \$862 thousand during the evaluation period. Key lending in the Memphis MMSA includes loans for essential community needs as well as housing for LMI individuals. Specifically, several loans were made during the period to help in financing the purchase of multi-family housing properties and rental properties. Management also originated multiple CD loans for the purchase of city maintenance vehicles within the Memphis MMSA during the evaluation period.

Number and Amount of Qualified Investments

Qualified Community Development Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
State of Arkansas non-MSA	8	1,612	9	2,003	17	85.0%	3,615	82.5%	-	-
Memphis MSA***	-	-	3	765	3	15.0%	765	17.5%	-	-
Total	8	1,612	12	2,768	20	100.00%	4,380	100.0%	-	-

* 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.

*** Note that a full-service branch was not in Memphis, TN until June 2016. Therefore, no prior investments were made in the Memphis MMSA.

Given the bank's limited market share in the Memphis MMSA, FNB EA demonstrated adequate responsiveness to CD needs through qualified investment activities. FNB EA purchased three school bond investments, totaling \$765 thousand, that benefitted schools in the Memphis MMSA during the evaluation period. These three school bonds provided funding to schools with 50.0 percent or more of the student population receiving free or reduced lunch.

Extent to Which the Bank Provides CD Services

FNB EA demonstrated poor responsiveness to CD needs within the Memphis MMSA through CD services. One bank employee serves in a leadership position for two organizations that provide community services to support economic development within the Memphis MMSA. Notably, this employee instructs a financial literacy class at the Marion school district, which has more than 50.0 percent of its students receiving free or reduced lunch.

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 MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	Lending Test and Community Development Test – January 1, 2016 through December 31, 2018	
Bank Products Reviewed:	Home Mortgage Loans in all AA’s, Small Business in the Memphis MMSA, and Small Farm Loans in the Arkansas non-MSA AA; Community Development Loans, Investments, and Services in each of the AA’s	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Memphis MMSA	Full-Scope	This MMSA consists of all 33 CTs in DeSoto County, MS; all 221 CTs in Shelby County, TN; and all 20 CTs in Crittenden County, AR
Arkansas		
Arkansas non-MSA AA	Full-Scope	All counties are located in the state of Arkansas. The non-MSA AA includes Cross County, Lee County, Mississippi County, Monroe County, Phillips County, St. Francis County, and Woodruff County.

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank of Eastern Arkansas			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Eastern Arkansas	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
State of Arkansas	Satisfactory	Satisfactory	Satisfactory
Memphis TN-MS-AR-MMSA	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight 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/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																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Memphis MMSA	40	5,698	35.7	33,240	9.1	10.0	2.5	17.2	55.0	7.4	26.2	12.5	22.5	47.5	22.5	67.6	0.0	0.0	0.0	
Arkansas non-MSA AA	72	4,736	64.3	1,864	0.0	0.0	0.0	24.4	26.4	14.6	59.7	68.1	55.2	15.9	5.6	30.2	0.0	0.0	0.0	
Total	112	10,434	100.0	35,104	8.1	3.6	2.3	17.9	36.6	7.8	29.8	48.2	24.2	44.1	11.6	65.6	0.0	0.0	0.0	

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Memphis MMSA	34	4,813	16.8	32,520	11.6	23.5	4.0	16.4	8.8	10.0	21.5	44.1	20.9	50.4	23.5	65.1	0.2	0.0	0.0	
Arkansas non-MSA AA	168	10,821	83.2	1,557	0.8	0.0	0.6	36.3	38.1	26.8	55.8	59.5	60.4	7.2	2.4	12.1	0.0	0.0	0.0	
Total	202	15,634	100.0	34,077	10.5	4.0	3.9	18.5	33.2	10.8	25.1	56.9	22.7	45.9	5.9	62.7	0.1	0.0	0.0	

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.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2016

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Memphis MMSA	40	5,698	35.7	33,240	24.1	0.0	3.4	15.9	0.0	12.1	17.2	7.5	16.6	42.7	10.0	40.4	0.0	82.5	27.4
Arkansas non-MSA AA	72	4,736	64.3	1,864	26.8	6.9	4.9	17.9	4.2	11.3	18.4	5.6	17.3	36.9	65.3	42.3	0.0	18.1	24.2
Total	112	10,434	100.0	35,104	24.4	4.5	3.5	16.2	2.7	12.1	17.4	6.3	16.7	42.0	45.5	40.5	0.0	41.1	27.2

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 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
Memphis MMSA	34	4,813	34.7	32,520	24.7	0.0	4.4	15.5	5.9	13.2	17.1	8.8	19.0	42.7	17.6	42.7	0.0	67.6	20.7
Arkansas non-MSA AA	168	10,821	83.2	1,557	26.8	4.8	5.1	18.8	7.7	13.0	17.7	13.7	16.0	36.6	51.2	41.8	0.0	22.6	24.1
Total	202	15,634	100.0	34,077	24.9	4.0	4.4	15.9	7.4	13.2	17.2	12.9	18.9	42.0	45.5	42.6	0.0	30.2	20.8

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Memphis MMSA	40	\$4,715	100.0	16,178	13.3	2.5	10.6	16.1	22.5	15.9	21.4	20.0	19.2	48.1	55.0	52.9	1.1	0.0	1.3
Arkansas non-MSA AA	--	--	--	1,360	3.3	--	3.5	43.2	--	39.1	45.3	--	49.0	8.2	--	8.3	0.0	--	0.0
Total	40	\$4,715	100.0	17,538	12.5	2.5	10.1	18.2	22.5	17.7	23.3	20.0	21.5	44.9	55.0	49.5	1.1	0.0	1.2

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

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Memphis MMSA	40	\$4,715	100.0	16,178	79.8	70.0	46.9	6.9	5.0	13.4	25.0
Arkansas non-MSA AA	--	--	--	1,360	72.6	--	29.6	5.6	--	21.8	--
Total	40	\$4,715	100.0	17,538	79.2	70.0	45.5	6.8	5.0	14.0	25.0

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

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Memphis MMSA	--	--	--	147	8.3	--	12.2	14.6	--	10.9	25.4	--	27.9	51.3	--	49.0	0.4	--	0.0
Arkansas non-MSA AA	20	\$2,325	--	302	0.0	0.0	0.0	19.2	40.0	16.2	69.3	55.0	70.2	11.5	5.0	13.6	0.0	0.0	0.0
Total	20	\$2,325	--	449	4.5	0.0	4.0	16.7	40.0	14.5	45.1	55.0	56.3	33.4	5.0	25.2	0.2	0.0	0.0

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Memphis MMSA	--	--	--	136	8.8	--	2.2	14.3	--	8.1	23.7	--	44.1	52.4	--	45.6	0.8	--	0.0
Arkansas non-MSA AA	40	\$6,352	100.0	434	0.8	0.0	0.5	32.5	32.5	28.1	57.8	32.5	58.3	9.0	7.5	13.1	0.0	0.0	0.0
Total	40	\$6,352	100.0	570	5.5	0.0	0.9	21.8	32.5	23.3	37.7	32.5	54.9	34.6	7.5	20.9	0.5	0.0	0.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Memphis MMSA	--	--	--	147	93.0	--	34.0	3.9	--	3.0	--	
Arkansas non-MSA AA	20	\$2,325	100.0	302	95.7	70.0	22.8	3.4	10.0	0.9	20.0	
Total	20	\$2,325	100.0	449	94.3	70.0	26.5	3.7	10.0	2.1	20.0	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Memphis MMSA	--	--	--	136	93.6	--	44.1	4.0	--	2.5	--	
Arkansas non-MSA AA	40	\$6,352	100.0	434	95.0	67.5	18.2	4.0	12.5	1.1	20.0	
Total	40	\$6,342	100.0	570	94.1	67.5	24.4	4.0	12.5	1.9	20.0	

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