



## **PUBLIC DISCLOSURE**

August 17, 2020

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

First National Bank  
Charter Number 14328

801 North Railroad Avenue  
Arcadia, LA 71001

Office of the Comptroller of the Currency

1800 West Loop 281, Suite 306  
Longview, TX 75604

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 Community Reinvestment Act (CRA) Rating

**Institution's CRA Rating:** This institution is rated **Outstanding**

**The lending test is rated: Outstanding**

The major factors that support this rating include:

- The lending test rating is based on an excellent distribution of loans in low- and moderate-income (LMI) geographies, a reasonable distribution of lending among businesses of different sizes and borrowers of different income levels, a substantial majority of loans originated in the assessment areas (AA), and a loan-to-deposit (LTD) ratio that is more than reasonable.

### Loan-to-Deposit Ratio

Considering First National Bank's (institution) size, financial condition, and credit needs of its AA, the institution's LTD ratio is more than reasonable. The LTD ratio is calculated on an institution-wide basis. The average quarterly LTD ratio for the institution during the evaluation period was 94.04 percent. The quarterly average LTD ratio for similarly situated financial institutions during the same period was 69.81 percent.

### Lending in Assessment Area

A substantial majority of the institution's loans are inside its AAs. The institution originated and purchased 89.7 percent of its total loans inside the institution's AAs during the evaluation period. This analysis is performed at the institution level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	411	90.1	45	9.9	456	56,673	87.2	8,312	12.8	64,985
Small Business	16	80.0	4	20.0	20	1,656	50.7	1,613	49.3	3,269
<b>Total</b>	<b>427</b>	<b>89.7</b>	<b>49</b>	<b>10.3</b>	<b>476</b>	<b>58,329</b>	<b>85.5</b>	<b>9,925</b>	<b>14.5</b>	<b>68,254</b>

### Description of Institution

First National Bank is a single state institution originated in 1905, chartered in 1935, and serving the north central Louisiana area. The institution is structured as a subchapter S corporation, with official headquarters located at 1890 North Railroad Avenue, Arcadia, Louisiana and primary operations housed in Ruston, Louisiana. The institution is wholly owned by Louisiana Bancshares, Inc., a one-bank holding company also located in Arcadia. In addition to the main institution location in Arcadia, the institution operates seven full-service branches located in Farmerville (Union Parish); Ruston (three branches – Lincoln Parish); Monroe and West Monroe (Ouachita Parish); and a drive-thru branch in Arcadia

(Bienville Parish). The institution operates 14 automated teller machines (ATMs), including an ATM at each branch location.

The institution offers a variety of traditional loan and deposit products and financial services to retail and commercial customers. Deposit products and services include a deposit account with no minimum balance or monthly fee, direct deposit, overdraft transfer protection, and mobile and on-line banking. Commercial and residential real estate loans are the institution's primary business focus, with agricultural and consumer loans comprising a smaller portion of the loan portfolio. Additionally, all primary products are available throughout the institution's AAs.

The institution has two AAs, a non-metropolitan statistical area (MSA) AA and an MSA AA. The non-MSA AA includes Bienville, Claiborne, Jackson, and Lincoln Parishes. The MSA AA includes Ouachita and Union Parishes.

As of December 31, 2019, FNB had total assets of \$249 million, total loans of \$216 million, total deposits of \$220 million, and tier 1 capital of \$25 million. Total loans represent approximately 86.75 percent of total assets. FNB's loan portfolio is comprised of commercial real estate loans totaling \$116 million (53.84 percent of loans); residential real estate \$56 million (26.18 percent); commercial loans \$17 million (7.85 percent); consumer loans \$3 million (1.51 percent); agricultural loans \$22 million (10.42 percent); and all other loans \$439,000 (0.20 percent).

There are no legal or other factors impeding the institution's ability to meet its credit needs. The institution's CRA performance was most recently evaluated as of July 17, 2017, and the institution received an overall rating of "Satisfactory" under the small bank examination procedures.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The CRA performance of FNB was evaluated using small bank performance criteria for the period from January 1, 2017, through December 31, 2019. The evaluation focused on lending activity of commercial loans and residential real estate loans. These products are consistent with the institution's primary lending focus.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Financial institution qualifying activities will be considered in the subsequent evaluation.

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

In each state where the institution has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, institution delineated AAs located within the same MSA, multistate MSA (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, institution 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 institution's overall rating is a blend of the state ratings, and where applicable, multistate ratings. FNB has two AAs and two primary products that received equal consideration.

The MMSA rating and state ratings are based on performance in all financial institutions' 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, financial institution) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the financial institution, or in any AA by an affiliate whose loans have been considered as part of the financial institution'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 this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Louisiana

#### CRA rating for the State of Louisiana<sup>1</sup>: Outstanding

#### The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans represents an excellent distribution among LMI geographies,
- The borrower distribution of loans represents a reasonable distribution to borrowers of different incomes and businesses of different sizes,
- The institution's LTD ratio is more than reasonable, and
- A substantial majority of loan originations are within the institution's AA.

#### Description of Institution's Operations in Louisiana

The institution operates only in the State of Louisiana, with eight branches and 14 ATMs throughout north central Louisiana. There are two AAs which are the Monroe MSA AA and a non-MSA AA as described in the "Description of Institution." Both AAs will receive full-scope reviews. While the institution's primary focus is commercial and residential real estate loans, representing 80 percent of total loans as of December 31, 2019, the institution offers a variety of loan and deposit products to meet the needs of the community.

Of the institution's two AAs, the non-MSA AA had 72.0 percent of the institution's deposits and the Monroe MSA AA had 28.1 percent of deposits. The institution ranks fifth in deposits for the non-MSA AA with 7.3 percent and 14th in the Monroe MSA AA with 1.7 percent of total deposits. The institution's competitors consist of community institutions, regional institutions, state-chartered institutions, and several national institutions.

A community contact was made for each of the institution's two AAs. The contact for the Monroe MSA AA indicated that access to home mortgage loans as well as the rehabilitation of older homes are two of the biggest credit needs in the community. The contact also noted while larger national and regional financial institutions have been working closely with them, they have not worked with FNB as of yet. For the non-MSA AA, the contact stated the biggest credit need within the LMI community is the ability for residents to obtain checking accounts. The contact further stated that the institution has been a great corporate partner in the community, assisting with financial education classes on how to improve credit, and how to purchase homes, amongst doing other things within the community.

The following tables depict the demographic information for the full-scope AAs.

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

**Monroe MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Monroe MSA</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)	46	23.9	10.9	30.4	32.6	2.2
Population by Geography	178,302	17.6	13.9	28.0	40.5	0.0
Housing Units by Geography	77,223	16.9	11.1	30.0	42.1	0.0
Owner-Occupied Units by Geography	41,255	10.4	9.8	30.2	49.6	0.0
Occupied Rental Units by Geography	24,952	25.7	13.2	25.5	35.6	0.0
Vacant Units by Geography	11,016	21.0	11.2	39.2	28.6	0.0
Businesses by Geography	17,278	19.1	11.2	24.3	45.2	0.2
Farms by Geography	436	6.7	6.9	35.1	51.1	0.2
Family Distribution by Income Level	43,456	25.6	16.0	15.8	42.6	0.0
Household Distribution by Income Level	66,207	26.6	14.4	15.3	43.7	0.0
Median Family Income MSA - 33740		\$48,173	Median Housing Value			\$112,644
			Median Gross Rent			\$667
			Families Below Poverty Level			19.8%
<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>						

**Non-MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: First NB Non-MSA</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)	22	4.5	27.3	40.9	27.3	0.0
Population by Geography	83,494	4.7	23.9	37.6	33.7	0.0
Housing Units by Geography	38,167	4.3	25.0	38.9	31.8	0.0
Owner-Occupied Units by Geography	19,013	1.8	19.2	41.9	37.1	0.0
Occupied Rental Units by Geography	12,373	9.0	31.4	32.0	27.7	0.0
Vacant Units by Geography	6,781	2.8	29.5	43.0	24.7	0.0
Businesses by Geography	6,761	3.1	23.6	32.6	40.7	0.0
Farms by Geography	217	2.3	11.1	42.4	44.2	0.0
Family Distribution by Income Level	19,633	26.5	15.0	15.3	43.3	0.0
Household Distribution by Income Level	31,386	28.8	14.6	14.2	42.4	0.0
Median Family Income Non-MSAs - LA		\$46,614	Median Housing Value			\$96,003
			Median Gross Rent			\$612
			Families Below Poverty Level			21.5%
<i>Source: 2015 ACS and 2019 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Scope of Evaluation in Louisiana**

The evaluation period for the review is January 1, 2017, through December 31, 2019. The examiners performed full-scope reviews on both AAs.

## **LENDING TEST**

The institution's performance under the lending test in Louisiana is rated Satisfactory.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the institution's performance in the Monroe MSA and non-MSA is good.

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

The institution exhibits excellent geographic distribution of loans in the State of Louisiana.

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

Refer to Table O in the State of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the institution's home mortgage loan originations and purchases.

##### **Monroe MSA**

The geographic distribution of home mortgage loans in the AA is excellent. The institution's lending in LMI geographies exceeded both the percentage of owner-occupied housing units as well as the aggregate lending in the AA.

##### **Non-MSA**

The geographic distribution of home mortgage loans in the AA is excellent. The institution's lending in LMI geographies exceeded both the percentage of owner-occupied housing units as well as the aggregate lending in the AA.

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

Refer to Table Q in the State of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the institution's originations and purchases of small loans to businesses.

##### **Monroe MSA**

The geographic distribution of business loans in the AA is reasonable. The institution's business lending in low-income geographies exceeded both the percentage of businesses as well as the aggregate lending in the AA. Lending in the moderate-income geographies was below both the percentage of businesses and the aggregate lending in the AA.



Non-MSA

The geographic distribution of business loans in the AA is excellent. The institution's business lending in low-income geographies exceeded both the percentage of businesses as well as the aggregate lending in the AA. Lending in the moderate-income geographies was below the percentage of businesses but significantly exceeded the aggregate lending in the AA.

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

The institution exhibits reasonable distribution of loans to 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 Louisiana 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.

Monroe MSA

The borrower distribution of home mortgage loans in the AA reflects a reasonable distribution among LMI individuals. The institution's lending to low- and moderate-income individuals was significantly lower than the percentage of families in the low- and moderate-income geographies but exceeded the aggregate lending in those areas. Lending in the moderate-income geographies was lower than both the percentage of families and the aggregate lending in the area. The poverty level of the AA is almost 19 percent and the median housing value is over \$112,000 which makes qualifying for a mortgage difficult for LMI individuals.

Non-MSA

The borrower distribution of home mortgage loans in the AA reflects a reasonable distribution among LMI individuals. The institution's lending to low-income individuals was significantly lower than the percentage of families in the low-income geographies and slightly below the aggregate lending in those areas. Lending in the moderate-income geographies was lower than the percentage of families and near to the aggregate lending in the area. The poverty level of the AA is over 21 percent and the median housing value is over \$96,000 which makes qualifying for a mortgage difficult for LMI individuals.

***Small Loans to Businesses***

Refer to Table R in the State of Louisiana 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.

Monroe MSA

The borrower distribution of business loans in the AA is reasonable. The institution's lending to businesses with revenues less than or equal to \$1 million was below the percentage of businesses identified as having revenues less than or equal to \$1 million but exceeded the aggregate lending for those businesses.

Non-MSA

The borrower distribution of business loans in the AA is reasonable. The institution's business lending to businesses with revenues less than or equal to \$1 million was below the percentage of businesses identified as having revenues less than or equal to \$1 million but exceeded the aggregate lending for those businesses.

**Responses to Complaints**

The institution did not receive any CRA-related complaints during the evaluation period.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope”, and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2017 – 12/31/2019	
<b>Institution Products Reviewed:</b>	Home Mortgage Small Business	
<b>Affiliate</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
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</b>		
None		
<b>Louisiana</b>		
Monroe MSA	Full-scope	Home Mortgage and Small Business
Non-MSA	Full-scope	Home Mortgage and Small Business

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		First National Bank
Overall Institution:		Lending Test Rating
First National Bank		Outstanding
MMSA or State:		
Louisiana		Outstanding

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and, therefore, is an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders (Home Mortgage Disclosure Act 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:** 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:** Affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI 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 LMI geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate an institution's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the institution, and to take this record into account when evaluating certain corporate applications filed by the institution.

**Consumer Loan:** A loan 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 an MSA 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/AA.

**Median Family Income:** 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 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 (MSA):** 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 MSA 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 rating area is a state or MMSA. For a financial institution with domestic branches in only one state, the financial institution's CRA rating would be the state rating. If a financial institution maintains domestic branches in more than one state, the financial institution will receive a rating for each state in which those branches are located. If a financial institution maintains domestic branches in two or more states within a MMSA, the financial institution will receive a rating for the MMSA.

**Small Loan to Business:** 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 to Farm:** A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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 MMSA, if applicable, are presented in one set of tables. References to the “institution” include activities of any affiliates that the institution 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/AA. Deposit data are compiled by the Federal Deposit Insurance Corporation and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this Performance Evaluation.

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 institution 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 institution to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. 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 institution 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 institution loan data to aggregate data from geographic areas larger than the institution’s AA.
- 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 institution 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 institution 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 institution's AA.

- 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 \$500,000) originated and purchased by the institution 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 institution 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 institution to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2017-2019</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Monroe MSA	199	24,528	48.4	10.4	13.1	5.0	9.8	11.6	5.5	30.2	43.7	28.3	49.6	31.7	61.2	0.0	0.0	0.0	
Non-MSA	212	32,146	51.6	1.8	9.0	1.6	19.2	19.3	12.7	41.9	25.9	33.8	37.1	45.8	52.0	0.0	0.0	0.0	
<b>Total</b>	411	56,673	100.0	7.7	10.9	4.0	12.8	15.6	7.5	33.9	34.6	29.8	45.7	38.9	58.7	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2017 - 01/01/2019 Bank Data, “—” data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																	<b>2017-2019</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Monroe MSA	199	24,528	48.4	25.6	4.5	3.1	16.0	3.5	10.7	15.8	6.0	16.4	42.6	30.2	45.1	0.0	55.8	24.8	
Non-MSA	212	32,146	51.6	26.5	1.9	2.0	15.0	7.1	9.6	15.3	8.5	14.2	43.3	40.1	56.0	0.0	42.5	18.2	
<b>Total</b>	411	56,673	100.0	25.9	3.2	2.8	15.7	5.4	10.4	15.6	7.3	15.8	42.8	35.3	48.0	0.0	48.9	23.0	

*Source: 2015 ACS Census; 01/01/2017 - 01/01/2019 Bank Data, “—” data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																<b>2017-2019</b>		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Monroe MSA	20	1,500	50	19.1	20.0	19.8	11.2	5.0	11.7	24.3	25.0	25.4	45.2	50.0	42.9	0.2	0.0	0.2
Non-MSA	20	1,825	50	3.1	5.0	1.3	23.6	20.0	12.8	32.6	25.0	27.2	40.7	50.0	58.6	0.0	0.0	0.0
<b>Total</b>	40		100	14.6	12.5	14.9	14.7	12.5	12.0	26.6	25.0	25.9	44.0	50.0	47.0	0.1		0.2

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017-2019</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Monroe MSA	20	1,500	50.0	4,176	87.0	80.0	32.0	4.3	20.0	8.7	0.0	
Non-MSA	20	1,825	50.0	1,489	86.0	70.0	26.7	3.8	30.0	10.2	0.0	
<b>Total</b>	40	3,325	100.0	5,665	86.7	75.0	30.6	4.2	25.0	9.1	0.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0*