



PUBLIC DISCLOSURE

September 14, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Farmers National Bank of Griggsville
14466

112 West Quincy Street
Griggsville, Illinois 62340

Office of the Comptroller of the Currency
Peoria Field Office
211 Fulton Street
Suite 604
Peoria, Illinois 61602

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 following major factors support this rating .

- The Lending Test rating is based on the State of Illinois.
- The borrower distribution reflects reasonable distribution.
- A majority of the bank's loans are originated or purchased inside its assessment area (AA).
- The loan-to-deposit (LTD) ratio is more than reasonable.

Loan-to-Deposit Ratio

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

The quarterly average LTD was 90.9 percent for the period of April 1, 2016, through June 30, 2020. Farmers National Bank of Griggsville (FNBG or bank) had a quarterly low of 84.9 percent, and a quarterly high of 96.5 percent. The bank had a higher average LTD ratio than the prior CRA evaluation of 78.6 percent.

FNBG ranked first among four similarly situated banks serving its AA. The similarly situated banks, which range in asset size from \$103 million to \$285 million, are FDIC insured community financial institutions that compete with FNBG for deposits in the AA. The quarterly average for similarly situated banks over the same period ranged from 78.4 percent to 85.3 percent. The LTD ratio is calculated on a bank-wide basis.

Lending in Assessment Area

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

The bank originated and purchased 87.5 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

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	19	95.0	1	5.0	20	2,168	91.7	195	8.3	2,363
Small Farm	16	80.0	4	20.0	20	3,097	78.7	840	21.3	3,936
Total	35	87.5	5	12.5	40	5,265	83.6	1,035	16.4	6,299

Source: Random sample of farm and home mortgage loans from January 1, 2017 through December 31, 2019.

Description of Institution

FNBG is an intrastate financial institution headquartered in Griggsville, Illinois, near Interstate 72 and the Illinois River, with assets of \$104 million at June 30, 2020.

Farmers NB is a wholly owned subsidiary of Griggsville Bancshares Inc., a one-bank holding company with assets of \$104 million, at June 30, 2020. Griggsville Bancshares Inc. does not negatively affect the bank's ability to meet the credit needs of the community.

The bank has three locations, including the main office, and five automated teller machines (ATMs). The branches offer drive-thru services in addition to offering business hours on Saturday. FNBG has an agreement with a local convenience store in Griggsville, which allows bank customers to utilize their on-site ATM at no cost to FNBG customers. There were no branch closures or openings during the evaluation period.

FNBG's lending strategy is largely focused on agricultural lending products, but they also offer business, residential, and consumer loan products in order to best serve their community. Deposit offerings include checking and savings with additional services including debit cards, bill pay, as well as access through online banking platforms. Internet and telephone banking are also available to the bank's customers. Refer to the bank's public file for a listing of services.

Agriculture lending represents the largest portfolio at \$47.0 million or 57.3 percent of the loan portfolio, followed by residential at \$17.4 million or 21.2 percent of the loan portfolio, commercial at \$11.1 million or 13.5 percent of the loan portfolio, and consumer at \$6.2 million or 7.5 percent of the loan portfolio, per Call report data as of June 30, 2020. The bank originated or purchased over 2,400 loans totaling \$138.5 million from January 1, 2017, through December 31, 2019, per bank data. The bank does sell loans into the secondary market.

FNBG held a net loans and leases to total assets of 77.7 percent and a tier 1 leverage capital ratio of 10.8 percent at June 30, 2020.

The CRA evaluation has one rating area for the AA in Illinois. The AA includes all of Brown and Pike Counties, both non-metropolitan statistical areas. Please refer to the public file for more information.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AA.

The previous CRA rating was satisfactory as determined using OCC Small Bank procedures and detailed in the CRA Performance Evaluation dated April 18, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNBG under the Small Bank criterion, which includes a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period is from the previous CRA Evaluation date of April 18, 2016, through September 14, 2020.

The Lending Test evaluated loans originated or purchased from January 1, 2017, through December 31, 2019. Performance conclusions are based on 2015 American Community Survey Census data. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies around the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

The primary loan products for the evaluation were determined to be farm and home mortgage loans, due to the strategic focus of the bank. These two products accounted for 36.7 percent of loans, by number, and 76.8 percent of loans, by dollar volume, from January 1, 2017, through December 31, 2019. Performance conclusion for primary products are based on loan samples, not total originations and purchases, and are considered in context as the bank is not a HMDA or CRA reporter.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (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 ratings, and where applicable, multistate ratings.

FNBG’s one AA, Griggsville, is located within the State of Illinois. The Griggsville AA received a full-scope review. See Appendix A for more information.

The MMSA rating and state ratings 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Illinois

CRA rating for the State of Illinois¹: Satisfactory

The Lending Test is rated: Satisfactory

The following major factors support this rating.

- The distribution of loans to farms of different sizes is reasonable.
- Home mortgage loans exhibit reasonable borrower distribution.
- FNBG did not receive any complaints about its performance in helping to meet the credit needs of its AA during the evaluation period.

Description of Institution's Operations in Illinois

FNBG has three locations, including the main office, and five ATMs. The branches offer drive-thru services in addition to offering business hours on Saturday. FNBG has an agreement with a local convenience store in Griggsville, which allows FNBG customers to utilize their ATM at no cost to the customer.

The Griggsville AA consists of seven census tracts (CTs). There are no low- or moderate-income CTs in the AA, which is consistent with the previous CRA Evaluation as of April 18, 2016. The geographies are all middle-income tracts with one upper-income tract. FNBG's AA meets the requirements of the regulation and does not arbitrarily exclude any low- or moderate-income areas. See Appendix A for description of the bank's AA.

Competition in the market is high due to the number of financial institutions competing for loans and deposits in areas with small population centers. FNBG held a 12.7 percent deposit market share in the two counties comprising the assessment area, and ranked fifth of 11 FDIC insured financial institutions competing for \$621.5 million in deposits as of June 30, 2019. The top four financial institutions held a combined deposit market share of 66.6 percent, at June 30, 2019.

The local economic condition for the assessment area is stable. Overall, annualized unemployment for both Pike and Brown Counties improved throughout the evaluation period. Pike County had unemployment rates of 4.5 percent in 2017, 4.7 percent in 2018, and 4.3 in 2019, while Brown County's unemployment rates were 2.9 percent in 2017, 2.6 percent in 2018, and 2.4 percent in 2019. Brown County's annualized unemployment rates are all below the State of Illinois annualized unemployment, while Pike County's annualized unemployment was above in two of the three years in our evaluation period. The state annualized rates were 4.9 percent in 2017, 4.3 percent in 2018, and 4.0 percent in 2019.

We contacted one individual from the City of Pittsfield who is familiar with Pike County. The contact described the City of Pittsfield in general as an area needing improvement financially for infrastructure

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

purposes. The housing market is currently doing well, as buyers are paying a premium due to low rates coupled with high demand and low supply. The contact had no negative perceptions of the bank and stated FNBG serves the community well.

Griggsville AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Griggsville AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	85.7	14.3	0.0
Population by Geography	23,003	0.0	0.0	87.1	12.9	0.0
Housing Units by Geography	10,395	0.0	0.0	86.7	13.3	0.0
Owner-Occupied Units by Geography	6,759	0.0	0.0	86.7	13.3	0.0
Occupied Rental Units by Geography	2,058	0.0	0.0	86.4	13.6	0.0
Vacant Units by Geography	1,578	0.0	0.0	86.8	13.2	0.0
Businesses by Geography	1,087	0.0	0.0	93.7	6.3	0.0
Farms by Geography	218	0.0	0.0	86.7	13.3	0.0
Family Distribution by Income Level	5,643	19.9	22.1	20.9	37.0	0.0
Household Distribution by Income Level	8,817	24.5	19.0	18.8	37.7	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$79,173
			Median Gross Rent			\$514
			Families Below Poverty Level			8.9%
<i>Source: 2015 ACS and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Illinois

The Illinois rating area contains one AA and received a full scope review.

LENDING TEST

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

Conclusions for (Area/Areas) Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Griggsville AA is good.

Distribution of Loans by Income Level of the Geography

The analysis did not result in meaningful analysis, as there were no low- or moderate-income geographies in 2017, 2018, or 2019.

Distribution of Loans by Income Level of the Borrower

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.

Home Mortgage Loans

Refer to Table P in the State of Illinois 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 home mortgage loans reflects reasonable distribution, given the performance context.

The proportion of lending to low-income families is weaker than the percentage of low-income families in the assessment area and weaker than the aggregate distribution. The proportion of lending to moderate-income families significantly exceeded the percentage of moderate-income families in the area and was significantly stronger than the aggregate distribution.

Small Loans to Farms

Refer to Table T in the State of Illinois 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 small loans to small farms reflects reasonable distribution. The proportion of lending to small loans to small farms was near to the percentage of small farms in the assessment area and exceeded the aggregate distribution.

We did not identify any conspicuous gaps in the bank's lending performance.

Responses to Complaints

FNBG did not receive any complaints about its performance in helping to meet the credit needs of its AA during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	Lending Test: January 1, 2017 to December 31, 2019	
Bank Products Reviewed:	Home Mortgage and Small Farm	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
State of Illinois		
Illinois NonMSA	Full-Scope	All of Brown and Pike Counties

Appendix B: Summary of MMSA and State Ratings

RATINGS	(BANK NAME)
Overall Bank:	Lending Test Rating
First National Bank of Griggsville	Satisfactory
MMSA or State:	
State of Illinois	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table 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 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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-19		
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		
Griggsville AA	20	2,328	100	183	19.9	0.0	8.2	22.1	40.0	21.3	20.9	25.0	21.9	37.0	35.0	24.0	0.0	0.0	24.6		
Total	20	2,328	100	183	19.9	0.0	8.2	22.1	40.0	21.3	20.9	25.0	21.9	37.0	35.0	24.0	0.0	0.0	24.6		

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19	
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	
Griggsville AA	20	3,169	100	162	98.6	95.0	65.4	0.9	5.0	0.5	0.0	
Total	20	3,169	100	162	98.6	95.0	65.4	0.9	5.0	0.5	0.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*