



## PUBLIC DISCLOSURE

August 31, 2020

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Clinton National Bank  
Charter Number 994

235 6th Avenue South  
Clinton, IA 52732

Office of the Comptroller of the Currency

Omaha Field Office  
13710 FNB Parkway  
Suite 110  
Omaha, NE 68154

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 **Outstanding**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Outstanding.**

The major factors that support this rating include:

- The Clinton National Bank's (CNB) loan-to-deposit ratio (LTD) is reasonable when considering the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A majority of the bank's originations are made inside the bank's AA.
- CNB's distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.
- CNB's geographic distribution of loans to census tracts (CTs) of different incomes levels is reasonable.
- Community development (CD) activities represent excellent responsiveness to the AA needs and opportunities.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. CNB's quarterly average LTD is 76 percent for the quarters from June 1, 2017 through December 31, 2019. The ratio ranged from a quarterly low of 70 percent to a quarterly high of 85 percent.

CNB's average LTD is comparable to the average LTD of other community banks operating in CNB's AA. The average quarterly LTD for competitor banks is 82 percent for the evaluation period. The ratio ranged from an average quarterly low of 58 percent to a quarterly high of 101 percent.

### Lending in Assessment Area

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

The bank originated and purchased 70 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<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		
	#	%	#	%		\$	%	\$	%	
Small Business	14	70	6	30	20	2,982,162	82	637,083	18	3,619,245
Consumer	14	70	6	30	20	123,482	58	90,663	42	214,145
Total	28	70	12	30	40	3,105,644	81	727,746	19	3,833,390

Source: Bank Data

## Description of Institution

CNB is a financial institution headquartered in Clinton, Iowa. CNB has total assets of \$375.9 million and tier one capital of \$50.4 million as of December 31, 2019. The institution is wholly owned by WJ Young & Co., a one-bank holding company. As of December 31, 2019, WJ Young & Co. had total assets of \$54.5 million.

CNB is single-state financial institution with nine branches in the Clinton/Jackson County AA. All branches have lobby and drive-up facilities and automated teller machines (ATMs). CNB has 21 ATMs located throughout the AA, with multiple locations in Clinton, Iowa. The main branch and headquarters are in a moderate-income CT.

CNB did not merge with or acquire any banking institutions during the evaluation period.

CNB's primary business focus is consistent with the traditional community bank model. CNB offers a full range of credit products within its AA, including commercial, agricultural, home mortgage, and consumer loans. As of December 31, 2019, CNB's loan portfolio consisted of 47 percent commercial loans, 33 percent agricultural loans, 17 percent residential real estate loans, and three percent consumer loans. CNB sells a reasonable volume of loans to both the secondary market and other financial institutions.

In addition to lending products, the bank offers a range of retail deposit products including free checking and savings accounts as well as checking accounts with minimum balance requirements.

There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AAs. CNB received an Outstanding rating in its last Performance Evaluation dated July 10, 2017.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

CNB was evaluated under the Intermediate Small Bank CRA examination procedures, which include a Lending Test and a CD Test for the State of Iowa. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the bank's record of responding to the CD needs of its AAs through CD lending and providing qualified investments, donations, and services. The evaluation period for this Performance Evaluation is from June 1, 2017 to December 31, 2019.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the COVID-19 pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent CRA evaluation, as appropriate.

The Lending Test covers CNB's performance over the evaluation period. The Lending Test evaluated business and consumer loans originated during the evaluation period, as these loan types were determined to be the primary loan products originated by CNB during the evaluation period. The following table summarizes the percentage of loan originations by loan type over the evaluation period.

<b>Loan Originations</b>		
<b>Loan Type</b>	<b>% by Number</b>	<b>% by Dollar</b>
Business Loans	20	37
Agricultural Loans	15	41
Consumer	49	5
HMDA	16	18

*Source: Bank-provided loan origination reports; 2017-2019*

For the CD Test, we reviewed all CD loans, investments, donations, and services over the evaluation period submitted by CNB management to ensure they met the regulatory definition of CD. We excluded some items submitted for consideration as they did not meet the definition or purpose of CD.

### **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 AAs 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 based on the bank's one AA, which consists of Clinton County and Jackson County, Iowa.

### **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

## State Rating

### State of Iowa

**CRA rating for the State of Iowa:** Outstanding

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Outstanding

The major factors that support this rating include:

- The distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.
- The geographic distribution of loans to CTs of different incomes levels is reasonable.
- Community development (CD) activities represent excellent responsiveness to the AA needs and opportunities.

### Description of Institution's Operations in Iowa

#### Clinton/Jackson AA

CNB operates in one AA in the State of Iowa. The AA includes 11 CTs in Clinton County and one CT in Jackson County, Iowa.

CNB is a full service commercial bank offering small business, agricultural, home mortgage, and consumer loans in their local community. CNB operates nine branches within the Clinton/Jackson County AA. All branches have lobby, drive-up facilities and ATMs. CNB has 21 ATMs throughout the AA with multiple locations within Clinton, Iowa. The main branch and headquarters are located in a moderate-income CT.

CNB reported \$302 million of deposits in the Clinton/Jackson AA as of June 30, 2019, which represented 100 percent of CNB deposits. According to FDIC market share information, CNB ranked first in deposit market share in the AA with a market share of 19 percent. Competition is strong with 10 other financial institutions in the market area. The primary competitors are community banks.

The AA is not located within an MSA. The AA consists of three moderate-income CTs, seven middle-income CTs, and two upper-income CTs. Demographic data from 2019 reported approximately 13 thousand families and 20 thousand households. Twenty percent of families were low-income, 17 percent were moderate-income, 20 percent were middle-income, and 42 percent were upper income. The median family income in the AA is \$61,681. The AA has 13.3 percent of households below the poverty level. Primary businesses within the AA are services, agricultural, and retail trade. The unemployment rate in the AA in December 2019 was 3.1 percent, compared to the national unemployment rate of 3.5 percent.

We relied on two community contacts with the Iowa State University Extension Offices. One contact is in Dubuque, Iowa, and was contacted on March 22, 2018; the other is in Iowa City, Iowa, and was conducted on August 3, 2020. The contacts stated economic conditions have remained stable overall,

but they are noticing a heightened challenge for the agricultural sectors due to depressed commodity prices and lower demand. Small businesses are performing well with readily available money for development and funding. The housing sector continues to grow in larger urban developments. There has been a growth in construction and development, but the supply of housing and affordable housing is low. The contacts stated all banks have worked hard to meet the needs of consumers and businesses. The contacts mentioned the area continues to experience a highly competitive banking environment with more institutions moving into the local areas.

The following table provides information on the demographic composition of the Clinton/Jackson County AA during the evaluation period.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Clinton/Jackson County</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)	12	0.0	25.0	58.3	16.7	0.0
Population by Geography	47,931	0.0	20.9	57.6	21.5	0.0
Housing Units by Geography	21,806	0.0	22.5	56.9	20.6	0.0
Owner-Occupied Units by Geography	14,661	0.0	17.6	60.0	22.4	0.0
Occupied Rental Units by Geography	5,435	0.0	31.6	50.6	17.6	0.0
Vacant Units by Geography	1,710	0.0	35.3	50.6	14.1	0.0
Businesses by Geography	3,131	0.0	17.6	50.6	31.8	0.0
Farms by Geography	410	0.0	2.7	81.0	16.3	0.0
Family Distribution by Income Level	12,841	20.4	17.3	20.2	42.2	0.0
Household Distribution by Income Level	20,096	25.3	15.2	17.0	42.5	0.0
Median Family Income non-MSAs - IA		\$61,681	Median Housing Value			\$111,774
			Median Gross Rent			\$612
			Households Below Poverty Level			13.3
<i>Source: 2015 ACS Census and 2019 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Iowa

The bank operates in one AA. The AA is Clinton/Jackson County, which is located in eastern Iowa. The AA includes the geographies where the bank has offices. This AA received a full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA

### LENDING TEST

The bank's performance under the Lending Test in Iowa is rated satisfactory.



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

Based on a full-scope review, the bank's lending performance in the state of Iowa is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the state. There are no low-income CTs and three moderate-income CTs within the AA.

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

The geographic distribution of business loans originated in the AA is reasonable. Within the AA, 15.0 percent of CNB's business loans were made to businesses in moderate-income CTs. The bank's level of lending to moderate-income CTs within the AA is comparable to the demographic data, which shows that 17.6 percent of businesses within the AA are in moderate-income CTs.

Refer to Table Q in the state of Iowa 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.

#### ***Consumer Loans***

The geographic distribution of consumer loans originated in the AA is reasonable. Within the AA, 17.5 percent of CNB's consumer loans were made to consumers in moderate-income CTs. The bank's level of lending to moderate-income CTs within the AA is comparable to the demographic data, which shows that 21.4 percent of households within the AA are in moderate-income CTs. Bank management stated the moderate-income CTs in the Clinton, IA downtown area creates a significant amount of competition for consumer lending products, which limits the bank's lending opportunities for moderate-income borrowers.

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

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

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

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

The distribution of loans to businesses of different sizes is reasonable. Within the AA, 80 percent of CNB's commercial loans by number were made to businesses with gross annual revenues of \$1 million or less, which is comparable to demographic data of 81.5 percent. CNB significantly exceeds the aggregate CRA data, which indicates that 54.7 percent of small loans to businesses were to businesses with gross annual revenues of \$1 million or less.

Refer to Table R in the state of Iowa 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.

### **Consumer Loans**

The borrower distribution of consumer loans reflects excellent distribution across income categories. CNB exceeds the levels for consumer lending in both low-income and moderate-income borrowers in the AA. Thirty percent of CNB's consumer loans by number were made to low-income borrowers, which exceeds demographic data at 25.3 percent. Loans by number to moderate-income borrowers totaled 20.0 percent, exceeding demographic data of 15.2 percent.

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

### **Responses to Complaints**

CNB did not receive any complaints related to CRA performance during the evaluation period.

### **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Iowa is rated Outstanding.

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

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state 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 AA.

### **Number and Amount of Community Development Loans**

Refer to the Community Development Loans table below for facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$ (000's)	% of Total \$
Clinton/Jackson County	16	100.0	5,608	100.0

Management originated 16 CD loans totaling \$5.6 million in the Clinton/Jackson County AA during the evaluation period. This represents 11.1 percent of tier 1 capital as of December 31, 2019. Eight loans totaling \$1.3 million met the economic development needs in the AA by funding a start-up business and providing loans that helped create, retain or improve jobs for (LMI) individuals. Three loans totaling \$1.5 million met the revitalization and stabilization needs of the area by funding redevelopment and renovation of businesses that allowed them to remain in the area. A \$25 thousand line of credit was made to an organization to assist in providing affordable housing for LMI individuals. The bank also provided four loans totaling \$2.6 million that provided community services to LMI individuals in the bank's AA.

### Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, sets forth the information and data used to evaluate the bank’s level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Clinton/Jackson County	--	--	31	\$104	31	100.0	\$104	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.

CNB made 31 qualified donations totaling \$104 thousand during the evaluation period. Donations primarily supported organizations that provide community services to assist LMI individuals, such as programs for emergency housing assistance, domestic violence shelter, food banks, and childcare.

### Extent to Which the Bank Provides Community Development Services

CNB employees provided 1,565 hours of qualified CD service to 24 different organizations conducted by 24 different employees over the evaluation period. Three bank employees participate in the Federal Home Loan Bank’s down payment assistance grant program for low income borrowers and assisted 24 participants in obtaining grants of up to \$7,500. Examples of service hours include the following:

- Teaching financial education classes to LMI individuals, students, and communities.
- Serving as a board member for an organization that provides childcare targeted to children of low-income individuals and families.
- Serving as board and committee members for organizations that promotes affordable housing to LMI individuals and communities in the bank’s AA.

## 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>	06/01/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Small business and consumer loans	
<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>
Clinton/Jackson County	Full-scope	The AA includes partial counties including 11 CTs in Clinton County and one CT in Jackson County.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		Clinton National Bank	
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>CD Test Rating</b>	<b>Overall Bank/State/Multistate Rating</b>
Clinton National Bank	Satisfactory	Outstanding	Outstanding
State: Iowa	Satisfactory	Outstanding	Outstanding

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## 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 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

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table 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 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.

<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
Clinton/Jackson County	20	3,705	100	0.0	0.0	0.0	17.6	15.0	12.3	50.6	80.0	50.4	31.8	5.0	37.3	0.0	0.0	0.0
<i>Source: 2019 D&amp;B Data; 06/01/2017 - 12/31/2019 Bank Data            Due to rounding, totals may not equal 100.0</i>																		

<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	
Clinton/Jackson County	20	3,706	100	415	81.5	80.0	54.7	5.2	20.0	13.3	0	
<i>Source: 2019 D&amp;B Data; 06/01/2017 - 12/31/2019 Bank Data.            Due to rounding, totals may not equal 100.0</i>												

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>												<b>2017-2019</b>	
<b>Assessment Area:</b>	<b>Total Consumer 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>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Clinton/Jackson County	40	482	100	0.0	0.0	21.4	17.5	57.5	75.0	21.1	7.5	0.0	

*Source: 2015 U.S. Census; 06/01/2017 - 12/31/2019 Bank Data.  
Due to rounding, totals may not equal 100.0*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2017-2019</b>	
<b>Assessment Area:</b>	<b>Total Consumer 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>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Clinton/Jackson	20	178	100	25.3	30.0	15.2	20.0	17.0	25.0	42.5	25.0	0	0

*Source: 2015 U.S. Census; 06/01/2017 - 12/31/2019 Bank Data  
Due to rounding, totals may not equal 100.0*