



## **PUBLIC DISCLOSURE**

July 13, 2020

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

Pike National Bank  
Charter Number 20493

350 Rawls Drive  
McComb, MS 39648

Office of the Comptroller of the Currency

3838 North Causeway Blvd.  
Suite 2890  
Metairie, LA 70002

**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 major factors that support this rating include:

- A reasonable loan-to-deposit (LTD) ratio.
- Having a substantial majority of loans made inside the assessment area (AA).
- The geographic distribution of both home mortgage loans and small loans to business within moderate-income census tracts (CTs) is reasonable.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- Management addresses and responds to complaints in an appropriate manner.

### LTD Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The quarterly LTD ratio since the previous Community Reinvestment Act (CRA) Performance Evaluation (PE) averaged 70.66 percent, with a high of 78.18 percent in the 3rd quarter of 2017 and a low of 66.03 percent in the second quarter of 2019. We compared the bank's LTD ratio to similarly-situated banks (peer group banks) within or near the AA during the same period of time. The peer group bank's average LTD ratio was 76.54 percent with a high average ratio of 88.14 percent and a low average ratio of 61.62 percent.

Institution	Assets – As of December 31, 2018 (in thousands)	Average LTD
Pike National Bank	256,465	<b>70.66%</b>
First Bank	557,378	88.14%
Bank of Brookhaven	165,957	61.62%
Bank of Franklin	146,069	70.35%
Citizens Bank	425,412	86.05%

*Source: Call Reports*

### Lending in AA

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

Management originated 93.23 percent of its total loans by number and 94.66 percent of its total loans by dollar amount inside its AAs during the evaluation period.

<b>Lending Inside and Outside of the AA</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	63	92.65	5	7.35	68	4,765	91.92	419	8.08	5,184
Small Business	61	93.85	4	6.15	65	8,007	96.37	302	3.63	8,309
<b>Total</b>	124	93.23	9	6.77	133	12,772	94.66	721	5.34	13,493

*Sample of Bank loan trial*

## Description of Institution

Pike National Bank (PNB) is a \$258 million full-service, nationally-chartered community bank headquartered in McComb, Mississippi. Management currently operates with five branches and four full-service ATMs in AA, in an area located in the southwest portion of Mississippi, with its southern border located adjacent to the State of Louisiana. The AA includes the contiguous counties of Pike, Lincoln, and Walthall, with the main branch located in McComb, Mississippi, which is the largest city in Pike County. Two additional branches are also located in McComb, with the remaining two located in the city of Tylertown, Walthall County, and the city of Brookhaven, Lincoln County, Mississippi. Of those five branches, two (Tylertown and Brookhaven) are located in moderate-income CTs. No branches were open or closed during the review period.

The primary business focus is real estate and commercial lending, with real estate comprising the largest segment of the loan portfolio by dollar amount. A wide variety of loan products are offered to serve the diverse needs of its communities, including Small Business Administration, conventional, and farm mortgage products. There has been no change in focus regarding products since the previous CRA PE.

As illustrated in the table below, the bank's primary loan products include both small business and home mortgage lending.

<b>PNB's Loan Portfolio</b>		
<b>Loan Category</b>	<b>Dollars (000)</b>	<b>Percentage</b>
Commercial/Small Business	36,653	21.7
Mortgage	121,681	72.0
Consumer	9,812	5.8
Farm	852	0.5
<b>Total</b>	<b>168,998</b>	<b>100</b>

*Source: Call Report as of 12/31/2018*

Banking hours reasonably meet the community needs with lobby hours Monday through Friday and extended Friday hours and automated teller machines (ATM). Two branches (the main and Tylertown) additionally offer Saturday banking hours. The bank offers a wide range of deposit and loan products, and no significant differences exist between locations. There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AA. The previous CRA PE was evaluated on January 11, 2016 with an overall rating of "Satisfactory."

PNB was designated a Community Development Financial Institution (CDFI) by the U.S. Treasury Department in December 2015. This designation is given to organizations that provide financial

services in low-income communities and to people who lack access to financing. These institutions are eligible to apply for awards through a variety of programs offered by the CDFI Fund. These awards enable such institutions to finance a wide range of activities, including mortgage lending for first-time homebuyers, flexible underwriting for community facilities, and commercial loans for businesses in low-income areas.

## **Scope of the Evaluation**

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

The evaluation period for the lending test is January 1, 2017 through December 31, 2019. PNB is primarily a mortgage lender, but did make a considerable amount of commercial loans during the review period. Consequently, we analyzed both home mortgage loans and loans to small businesses for this PE.

As PNB is not a HMDA reporter, we selected a sample of 63 mortgage loans to analyze the bank's compliance with CRA rules and regulations. Additionally, the loans to small business sample included a review of 61 loans originated during the review period. Appendix D at the end of this PE contains the data used to conduct our analysis. We combined and analyzed 2017, 2018, and 2019 data.

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

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

PNB operates in one AA in the State of Mississippi and consequently, that AA received a full-scope review.

### **Ratings**

The rating is a blend of both mortgage and small business lending, with those products being weighted equally.

## **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 PE.

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 PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

## State Rating

### State of Mississippi

**CRA rating for the State of Mississippi:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The geographic distribution of both home mortgage loans and small loans to business within moderate-income CTs is reasonable.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- Management addresses and responds to complaints in an appropriate manner.

### Description of Institution's Operations in Mississippi

PNB operates with five branches in south central Mississippi. The branches are located in the cities of Brookhaven, Tylertown, and McComb, with the main branch and two additional branches located in McComb. The Tylertown and Brookhaven branches are located in moderate-income CTs. The AA is comprised of 17 CTs, including 5 moderate-income, 11 middle-income, and 1 upper-income CT. There are no low-income CTs in the AA. The AA meets regulatory requirements and does not arbitrarily exclude any low- or moderate-income areas.

The Federal Financial Institutions Examination Council's (FFIEC) updated 2015 median family income for the AA was \$43,897. Low-income is defined as less than 50 percent of the median family income. Moderate-income is defined as 50 percent to less than 80 percent of the median family income. Middle-income is defined as 80 percent to 119 percent of the median family income. Upper-income is defined as income of 120 percent and over the median family income. The table below depicts income categories:

Income Categories – Mississippi AA			
Low	Moderate	Middle	Upper
<\$21,947	\$21,948 to \$35,116	\$35,117 to \$52,675	≥\$52,676

Low-income families earning a median family income less than \$21,947 represented 25.69 percent of families in the AA, while moderate-income families comprised 16.18 percent of the AA population. According to 2015 ACS US census data, 26.49 percent of households in the AA earned wages below the property level. In addition to these borrower lending constraints, opportunities for residential lending remain limited within the 11 moderate-income CTs in the AA. Of the 10,148 housing units within the 11 moderate-income CTs, approximately 33 percent of the units are occupied rental units with an average gross monthly rent of \$562 and another 20.22 percent are vacant.

Based on 2019 business demographic data, there were 5,445 non-farm businesses in the AA. Of these, 4,518 (82.98 percent) of the businesses had revenues of less than \$1 million, 231 (4.24 percent) had revenues greater than \$1 million, and 696 (12.78 percent) did not report revenue information. The economy of the AA is mixed, with services and retail being the major economic drivers. Major employers in the AA include Sanderson Farms, Inc. (poultry processing/agriculture), Walmart Distribution Center (retail distribution), Southwest Mississippi Regional Medical Center (medical services), and Coca-Cola Bottling. As of September 2019, the unemployment rate of the AA (according to the Bureau of Labor Statistics) was 6.5 percent, which is slightly higher than the Mississippi state average of 5.4 percent.

Competition among financial institutions in the AA is not a barrier to lending for PNB. According to the most recent Deposit Market Share Report, PNB ranked third out of 11 deposit institutions, with approximately \$210 million in deposits within the AA and a market share of 12.99 percent. The remaining two institutions with stronger market share command 47.5 percent of the market share and consequently, PNB is in a strong position to fulfill loan demand in the AA.

In conjunction with this PE, we conducted an interview with a community leader in the AA. The primary credit need in the community was identified as affordable housing. According to this contact, local banks have been active in helping meet the credit needs of the AA.

Table A below illustrates select demographic data from the AA:

<b>Table A – Demographic Information of the AA</b>						
<b>PNB 2019</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	17	0.0	29.4	64.7	5.9	0.0
Population by Geography	89,818	0.0	24.4	70.9	4.7	0.0
Housing Units by Geography	40,316	0.0	25.2	70.5	4.3	0.0
Owner-Occupied Units by Geography	24,411	0.0	19.4	75.0	5.6	0.0
Occupied Rental Units by Geography	9,112	0.0	36.8	61.6	1.6	0.0
Vacant Units by Geography	6,793	0.0	30.2	66.4	3.4	0.0
Businesses by Geography	5,445	0.0	23.1	72.9	3.9	0.0
Farms by Geography	267	0.0	15.7	77.9	6.4	0.0
Family Distribution by Income Level	22,824	25.7	16.8	17.7	39.8	0.0
Household Distribution by Income Level	33,523	27.5	14.6	16.0	41.8	0.0
Median Family Income Non-MSAs - MS		\$43,897	Median Housing Value			\$87,822
			Median Gross Rent			\$628
			Families Below Poverty Level			22.5%
<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 Mississippi

PNB operates in one AA within the State of Mississippi, and that AA received a full-scope review. There are no limited-scope areas. Both mortgage and loans to small businesses were weighted equally.

## LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

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

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State of Mississippi.

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

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

The bank's geographic distribution of home mortgage loans is considered reasonable as the bank's lending is on par with aggregate lending, but lower than the demographic comparator in the moderate-income CTs. There are no low-income CTs in the AA.

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

Refer to Table Q in the State of Mississippi 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.

PNB's geographic distribution of small loans to business is considered reasonable. The small loans to businesses are only slightly less than both aggregate data and the demographic comparator. There are no low-income CTs in the AA.

### **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 of different sizes, given the product lines offered by PNB.

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

Refer to Table P in the State of Mississippi 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.

PNB's distribution of home mortgage loans to low-income borrowers is considered reasonable. The percentage of bank loans to low-income borrowers is only slightly lower than aggregate, while both bank and aggregate lending is significantly lower than the demographic comparator. Home mortgage lending to moderate-income borrowers is likewise considered reasonable. While the percentage of bank loans is slightly more than aggregate, both bank lending and aggregate is less than the demographic comparator.

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

Refer to Table R in the State of Mississippi section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses in the AA is considered excellent. The bank's percentage of loans significantly exceed the percentage of businesses in the AA, as well as aggregate lending and therefore is considered excellent.

### **Responses to Complaints**

A limited number of complaints were received by management during the review period, and management addressed and responded to those complaints in a noteworthy manner.

# Appendix A: Scope of Examination

The following table identifies the time period covered in this PE, affiliate activities that were reviewed, and loan products considered. The table also reflects the Metropolitan Statistical Areas (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 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Home mortgage and small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of AAs and Type of Examination</b>		
<b>Rating and AAs</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State: Mississippi</b>	<b>Full-Scope</b>	<b>None</b>

## Appendix B: Summary of State Ratings

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RATINGS – PNB	
	Lending Test Rating
Overall Bank:	Satisfactory
Mississippi:	Satisfactory

## 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/AA.

**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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. CTs 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.

**CRA:** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income 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 CT delineated by the United States Bureau of the Census in the most recent decennial census.

**HMDA:** The statute that requires certain mortgage lenders that conduct business or have banking offices in a 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 CT with a median family income that is less than 50 percent.

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

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

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

**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 CD.

**Rating Area:** A rated area is a state or multi-state MSA. 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 MSA, the institution will receive a rating for the multi-state MSA.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the 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 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. 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 FDIC and are available as of June 30 of each year. Tables without data are not included in this PE.

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

- Table O. AA Distribution of Home Mortgage Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. AA 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. AA 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 AA.
- Table R. AA 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.

<b>Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2017-19</b>	
AA	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
PNB	63	4,765	100	1,445	0.0	0.0	0.0	19.4	15.9	15.9	75.0	68.3	74.4	5.6	15.9	9.7	0.0	--	0.0		
<b>Total</b>	<b>63</b>	<b>4,765</b>	<b>100</b>	<b>1,445</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>19.4</b>	<b>15.9</b>	<b>15.9</b>	<b>75.0</b>	<b>68.3</b>	<b>74.4</b>	<b>5.6</b>	<b>15.9</b>	<b>9.7</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017-19</b>	
AA	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		
PNB	63	4,765	100	1,445	25.7	3.2	4.3	16.8	11.1	10.5	17.7	31.8	17.7	39.8	53.9	43.5	0.0	--	24.0		
<b>Total</b>	<b>63</b>	<b>4,765</b>	<b>100</b>	<b>1,445</b>	<b>25.7</b>	<b>3.2</b>	<b>4.3</b>	<b>16.8</b>	<b>11.1</b>	<b>10.5</b>	<b>17.7</b>	<b>31.8</b>	<b>17.7</b>	<b>39.8</b>	<b>53.9</b>	<b>43.5</b>	<b>0.0</b>	<b>--</b>	<b>24.0</b>		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-19</b>	
AA	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
PNB	61	8,007	100	1,176	0.0	0.0	0.0	23.1	18.1	22.0	72.9	81.9	73.6	3.9	0.0	4.3	0.0	--	0.0	
<b>Total</b>	<b>61</b>	<b>8,007</b>	<b>100</b>	<b>1,176</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>23.1</b>	<b>18.1</b>	<b>22.0</b>	<b>72.9</b>	<b>81.9</b>	<b>73.6</b>	<b>3.9</b>	<b>0.0</b>	<b>4.3</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.*

<b>Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues</b>													<b>2017-19</b>	
AA	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			
PNB	61	8,007	100	1,176	83.0	90.16	43.5	4.2	9.84	12.8	--			
<b>Total</b>	<b>61</b>	<b>8,007</b>	<b>100</b>	<b>1,176</b>	<b>83.0</b>	<b>90.16</b>	<b>43.5</b>	<b>4.2</b>	<b>9.84</b>	<b>12.8</b>	<b>--</b>			

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.*