

**INTERMEDIATE SMALL BANK** 

# **PUBLIC DISCLOSURE**

April 17, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Fairfield National Bank Charter Number 6609

220 East Main Street Fairfield, Illinois 62837

Office of the Comptroller of the Currency

10200 Forest Green Boulevard Suite 501 Louisville, Kentucky 40223

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: Outstanding.

#### The lending test is rated: Satisfactory

## The community development test rating: Outstanding

The major factors that support these ratings include:

- The lending test rating is based on a more than reasonable loan-to-deposit (LTD) ratio.
- A majority of The Fairfield National Bank's (FNB or bank) loans were originated within its assessment area (AA).
- FNB had a reasonable geographic dispersion of lending by income of the geography.
- FNB had an excellent distribution of lending among farms and businesses of different sizes and borrowers of different incomes.
- The community development (CD) test rating is based on outstanding responsiveness to community needs through qualified CD loans, investments, and services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD is more than reasonable. FNB's quarterly LTD ratio averaged 92.8 percent over the 13 quarters since the prior evaluation, with a quarterly high of 107.7 percent and a quarterly low of 79.4 percent. The average LTD ratio is more than reasonable compared to similarly situated banks with averages ranging from 67.1 to 85.2 percent.

### Lending in Assessment Area

A majority of the bank's loans were inside its AA. Management originated or purchased 68.3 percent of its total loans by number and 81.9 percent by dollar, inside the AA 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.

		Lendin	g Inside	and Outs	side of the	Assessmen	t Area			
	N	Jumber o	f Loans		Total	Dollar A	Amount o	of Loans §	6(000s)	
Loan Category	Insie	Inside		Outside		Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business	13	65.0	7	35.0	20	1,718	87.8	238	12.2	1,956
Small Farm	14	70.0	6	30.0	20	1,982	77.2	585	22.8	2,567
Consumer	14	70.0	6	30.0	20	397	82.4	85	17.6	482
Total	41	68.3	19	31.7	60	4,097	81.9	908	18.1	5,005

Source: Random sample of loans from bank records that were originated and purchased between January 1, 2020, and December 31, 2021. Totals may reflect negligible variances due to rounding.

# **Description of the Institution**

FNB is a full-service, intrastate bank headquartered in Fairfield, Illinois. The bank is wholly owned by Fairfield Bancshares, Inc., a single bank holding company. FNB's assets represent the majority of the holding company's assets. As of December 31, 2021, FNB had \$676.3 million in total assets with \$376.3 million in loans, \$420.9 million in deposits, and \$73.0 million in tier 1 capital. There have not been any significant changes to FNB's corporate structure, including merger or acquisition activities, since the last CRA evaluation. The bank's business strategy focuses on agriculture and commercial loans.

As of December 31, 2021, the bank's loan portfolio represented 55.7 percent of total assets. Please refer to the table below for the loan portfolio breakdown:

	Loan Portfoli	o Composition	
Loan Category	Amount	Percent of Total	Percent of Total
Loan Category	(\$000s)	Loans	Assets
Business	173,784	46.2	25.7
Farm	121,411	32.3	18.0
Home Mortgage	69,837	18.5	10.3
Consumer	10,868	2.9	1.6
Other	364	0.1	0.1
Total	\$376,264	100.0%	55.7%

Source: Consolidated Reports of Condition and Income (call report) as of December 31, 2021

The bank has one AA for CRA purposes that encompasses the entireties of Wayne and White counties. The two counties are adjacent, located in nonmetropolitan statistical areas with similar demographic and economic characteristics, and each contains five census tracts (CT). All CTs in Wayne County and all but one CT in White County are designated as middle-income. White County also includes a single moderate-income tract.

FNB offers traditional lending and deposit products and services at its main office in Fairfield and at branches in Wayne City and Grayville, Illinois. All three locations provide drive-through facilities. The bank maintains six automated teller machines (ATM) throughout the AA, none of which have deposit-taking capabilities. In addition to its branches and ATM networks, FNB's delivery channels include digital banking options.

There were no legal or financial factors that impacted the bank's ability to meet the credit needs of its AA. However, beginning in 2020, the COVID-19 pandemic impacted the local economy, including unemployment rates. The U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) provided loans to assist businesses in maintaining their workforce. FNB participated in this program and originated 196 loans totaling \$3.1 million. The bank received an outstanding rating at its previous CRA evaluation, dated February 18, 2020.

# Scope of the Evaluation

## **Evaluation Period/Products Evaluated**

The OCC evaluated FNB's CRA performance using Intermediate Small Bank (ISB) procedures, which include a lending and CD test. The lending test evaluated the bank's record of meeting the credit needs of its AA through its lending activities spanning January 1, 2020, through December 31, 2021. The CD test evaluated the bank's CD lending, qualified investments, and CD service activities for the same period. Lending and CD activities in 2022 were not included in the evaluation period as peer aggregate data was not available at the time of this evaluation.

Examiners used call report data as of December 31, 2021, to calculate the bank's quarterly LTD ratio. The lending test includes an analysis of FNB's primary loan products. We selected farm loans and small business loans as the primary products based on our analysis of lending activity during the evaluation period. Conclusions regarding the bank's lending performance were based on a randomly selected sample of each product originated or renewed during the evaluation period. We also evaluated all CD loans, qualified investments, grants, and CD services submitted by FNB management to evaluate the bank's responsiveness to the credit needs of its AA.

### Selection of Areas for Full-Scope Review

The bank's only AA received a full-scope review. Refer to *Appendix A: Scope of Examination* for details of the full-scope AA.

### Ratings

The bank's overall rating is based on the State of Illinois rating. The state rating is based on the fullscope review of the bank's sole AA. In our evaluation, we gave more weight to the distribution by farm and business gross annual revenues and by income level of borrowers than to the geographic distribution of loans. This determination was made based on there being no low- and only one moderate-income CT in the bank's AA during the evaluation period.

# **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 Illinois**

## CRA rating for the State of Illinois: Outstanding

## The lending test rating: Satisfactory

## The community development test rating: Outstanding

The major factors that support these ratings include:

- The geographic dispersion of small farm and small business loans, and loans to consumers throughout the AA is reasonable.
- The distribution of loans to farms and businesses of different sizes, and to consumers of different income levels is excellent.
- FNB demonstrated excellent responsiveness to CD needs in its AA through qualified CD lending, investments, and services.
- FNB did not receive any complaints during the evaluation period.

# Description of the Institution's Operations in Illinois

FNB has one AA in the state of Illinois. The AA includes the entireties of Wayne and White counties. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income CTs. The largest city in the AA is Fairfield, Illinois.

The total population of the AA is 31,019. The two counties consist of 10 CTs with zero low-income tracts, one moderate-income tract, nine middle-income tracts, and zero upper-income tracts. There are no tracts designated as *distressed* or *underserved* by the Board of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation (FDIC), and the OCC in 2020 and 2021.

FNB has strong competition within the AA. As of June 30, 2021, there were nine financial institutions operating 16 banking offices in the AA, including FNB. Competition in the AA included several local community banks as well as branches of regional banks. The June 30, 2021, FDIC Deposit Market Share Report shows FNB ranks first in deposit market share at 39.0 percent. FNB's major competitors in the AA were The First National Bank of Carmi with 21.8 percent of the deposit market share, and Banterra Bank with 11.4 percent.

On average, the annual unemployment rates for the two counties within the AA were at or below the state unemployment rates for 2020, and 2021. State unemployment for Illinois going into the pandemic was 4.0 percent. At the peak of the COVID-19 pandemic in April 2020, the unemployment rates were 18.5 percent in White County and 19.4 percent in Wayne County, surpassing the state rate of 17.7 percent. Although significantly reduced, by the end of 2021, the unemployment rates for Wayne and White counties and for the state of Illinois remained around one percent higher than pre-pandemic levels.

Annual Unemployment Rates									
2019 2020 2021									
State of Illinois	4.0	9.3	6.1						
Wayne County	4.6	8.4	4.7						
White County	3.7	7.9	5.0						

The major industries in the AA include agriculture, services, and healthcare facilities. The largest employers in the area include Fairfield Memorial Hospital, Horizon Healthcare, and the local school districts.

Opportunities for community reinvestment include support of organizations that provide services for low- and moderate-income families. There are limited opportunities for financing affordable housing projects. A community contact identified a need for a homeless shelter in Wayne County. Opportunities for support include funding for subsidized housing and financial support to assist the homeless with their transition into affordable housing projects. The contact indicated local banks are active in meeting the community's needs.

The following table shows demographic information covering FNB's AA of Wayne and White counties.

Assessment A	Area: Wayı	ne and Whi	te counties in <b>1</b>	Illinois		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	10.0	90.0	0.0	0.0
Population by Geography	31,019	0.0	7.2	92.8	0.0	0.0
Housing Units by Geography	15,034	0.0	8.1	91.9	0.0	0.0
Owner-Occupied Units by Geography	10,253	0.0	6.5	93.5	0.0	0.0
Occupied Rental Units by Geography	2,961	0.0	10.4	89.6	0.0	0.0
Vacant Units by Geography	1,820	0.0	13.4	86.6	0.0	0.0
Businesses by Geography	1,806	0.0	8.6	91.4	0.0	0.0
Farms by Geography	227	0.0	4.8	95.2	0.0	0.0
Family Distribution by Income Level	8,873	22.0	18.5	22.1	37.4	0.0
Household Distribution by Income Level	13,214	24.9	17.1	18.2	39.8	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housi	ng Value		\$73,054
			Median Gross	Rent		\$533
			Families Below	w Poverty Lev	vel	10.7%

# Non-MSA AA including Wayne and White counties in Illinois

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

# **Conclusion With Respect to Performance Tests in Illinois**

# **Lending Test**

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

# Distribution of Loans by Income Level of the Geography

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

## Small Loans to Businesses

Refer to Table Q in 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.

FNB's lending reflected reasonable dispersion of small loans to businesses by income level of the geographies. The bank did not originate any loans to businesses in low- or moderate-income tracts. However, this performance is explainable, in part, due to the AA having no low- and only one moderate-income CT. Further, there is strong competition within the AA and the bank's closest location is approximately 15 miles from the moderate-income CT.

## Small Loans to Farms

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

FNB's lending reflected reasonable dispersion of small loans to farms by income level of the geographies, despite not originating any loans to farms in low- or moderate-income tracts. This performance is explainable due to the AA having no low- and only one moderate-income CT. Further, there is strong competition within the AA and there are only 11 farms within the moderate-income CT.

## **Consumer** Loans

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

Lending to geographies of different income levels in the AA reflects reasonable dispersion. The bank originated 5.0 percent of consumer loans in its moderate-income CT. Although slightly below the demographic comparator, the performance is reasonable given the AA contains only a single moderate-income CT, strong competition, and there is a 15-mile distance to the nearest bank location from the moderate-income CT.

## Lending Gap Analysis

In addition to the overlap of the COVID-19 pandemic during the evaluation period, and the specific challenges noted above, the bank's lending performance in its moderate-income geography, is also related to changes to the bank's AA. Adjustments to the AA were made after the conclusion of the review period, and the result was the addition of a few tracts to encompass all White County, including

its single moderate-income CT. While not arbitrarily excluded, management was not aware that the moderate-income tract was part of the bank's AA.

## Distribution of Loans by Income Level of the Borrower

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

#### Small Loans to Businesses

Refer to Table R in 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 bank's distribution of loans to businesses of different sizes is excellent. The bank originated 80.0 percent of its loans to businesses with annual gross revenues of less than \$1.0 million. This slightly exceeded the demographic comparator and far exceeded the aggregate comparator.

#### Small Loans to Farms

Refer to Table T in 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 bank's distribution of loans to farms of different sizes is excellent. The bank originated 90.0 percent of its loans to farms with annual gross revenues of less than \$500,000. Although slightly below the demographic comparator, it far exceeded the aggregate comparator.

#### **Consumer** Loans

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

FNB's distribution of consumer loans to borrowers of different income levels is reasonable. FNB originated 20.0 percent of loans to low-income borrowers, which was slightly below the demographic comparator. FNB originated 25.0 percent of loans to moderate-income borrowers, exceeding the demographic comparator.

#### **Responses to Complaints**

FNB did not receive any written complaints regarding its CRA performance during the evaluation period.

# **Community Development Test**

The bank's performance under the community development test in the state of Illinois is 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

The CD loans table, shown below, sets forth the information 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.

		CD Loans		
		Tota	ıl	
Assessment Area	#	% Of Total #	\$(000's)	% Of Total \$
Non-MSA AA	2	100.0	2,070	100.0

FNB demonstrated adequate responsiveness to the needs of its AA through CD lending. During the evaluation period, management originated two CD loans totaling \$2.1 million. One smaller loan was made to support the acquisition and expansion of a business that subsequently retained and created new jobs for low- to moderate-income (LMI) individuals. The other was a letter of credit to support a hospital that provides critical care access for the entire community, including LMI individuals using Medicaid benefits.

### Number and Amount of Qualified Investments

				Qualifi	ed Inv	vestments					
	Dric	or Period*	Curr	ent Period		-	Fotal		Unfunded		
Assessment	FIIC	or renou	Cull						Con	nmitments**	
Area	#	\$(000's)	#	\$(000's)	#	% Of	\$(000's)	% Of	#	\$(000's)	
						Total #		Total \$			
Non-MSA AA	24	5,483	18	4,512	42	89.4	9,995	68.3	0	0	
Broader											
Regional /	4	2,722	1	1,925	5	10.6	4,647	31.7	0	0	
Statewide Area											

\* 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.

FNB's level of qualified investments demonstrates excellent responsiveness to the CD needs of its AA. Management made 18 qualified investments in its AA totaling \$4.5 million. In addition, the bank maintained 24 prior period investments totaling \$5.5 million. Current period investments were to support school districts in the bank's AA where the majority of students qualify for free or reduced-price meals under the United States Department of Agriculture's National School Lunch Program guidelines. Prior period investments also included support of public utilities in previously distressed or LMI CTs.

Beyond its demonstrated responsiveness to the CD needs of its AA, management also maintained four prior period investments and made five new investments in the broader regional area, within the bank's marketing footprint, that also serve the needs of the LMI population in the bank's AA.

In addition to the investments noted above, the bank made \$123,150 in grants to 26 qualified community organizations and non-profit organizations in the AA. These included donations made as a part of the "Community Proud – Local Matters" grants awarded during the COVID-19 pandemic to help sustain business and jobs during government-mandated shutdowns; and to notable organizations such as The Hope Center, Feed My Sheep Soup Kitchen, Hope Ministries of Geff, and the Fairfield Memorial Hospital Foundation that fight food insecurity and provide for health care, among other services focusing on the LMI population.

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

FNB's CD services reflect excellent responsiveness in meeting community needs within the AA. The bank's size in relation to the size and needs of the communities within its AA were considered in our evaluation. We also considered the fact that a significant portion of the evaluation period overlapped with the onset and height of the COVID-19 pandemic, thereby limiting in-person service opportunities to some degree.

FNB participates alongside the Farm Services Agency offering services to local, agricultural borrowers. The bank also works with the State of Illinois AgInvest and BusinessInvest programs which provide qualified borrowers below-market rate loans to start, expand, or add value to their enterprises. During the COVID-19 pandemic, FNB offered loan payment deferrals to those adversely affected and in need of short-term relief. On the deposit side, FNB offers interest-bearing deposit accounts with low-minimum balance requirements, along with free internet-, phone-, or mobile-banking solutions, improving access for LMI individuals.

During the evaluation period, 11 employees of FNB gave 551.5 hours of their time across six organizations that serve residents within the AA. Bank employees used their financial skills in service as board members and volunteers for local organizations whose purpose or programs support LMI individuals or families in the AA and beyond. Hours were donated to the Wayne County CEO Program, which provides financial and vocational training and the Junior Achievement program which promotes financial literacy, both of which serve students in areas where more than half of the students qualify for free or reduced-price lunches, live in substitute care, or whose families receive public aid. Service was also performed at the Career Development Center which teaches life skills to LMI individuals with disabilities. Finally, bankers served as directors at Fairfield Memorial Hospital, which serves a broad regional population that includes an underserved area and LMI individuals, and on the Edwards County Council on Aging, which serves senior citizens in several counties that include LMI individuals.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed:	01/01/2020 - 12/31/2021	
Bank Products Reviewed:	Small business, small farm	, and consumer loans.
	Community development le	oans, qualified investments, and community
	development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type	e of Examination	
<b>Rating and Assessment Areas</b>	Type of Exam	Other Information
Illinois		
Non-MSA	Full-scope	Wayne and White counties

# **Appendix B: Summary of State Ratings**

	RATINGS (The Fair	rfield National Bank	)
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
The Fairfield National Bank	Satisfactory	Outstanding	Outstanding
MMSA or State:			
Illinois	Satisfactory	Outstanding	Outstanding

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

# **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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**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.

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**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.

# **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 O.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of owner-occupied housing units throughout those geographies. The<br/>table also presents aggregate peer data for the years the data is available.
- Table P.Assessment Area Distribution of Home Mortgage Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of families by income level in each MMSA/assessment area. The<br/>table also presents aggregate peer data for the years the data is available.
- Table Q.Assessment Area Distribution of Loans to Small Businesses by Income Category of<br/>the Geography The percentage distribution of the number of small loans (less than or<br/>equal to \$1 million) to businesses that were originated and purchased by the bank in low-,<br/>moderate-, middle-, and upper-income geographies compared to the percentage distribution<br/>of businesses (regardless of revenue size) in those geographies. Because aggregate small<br/>business data are not available for geographic areas smaller than counties, it may be<br/>necessary to compare bank loan data to aggregate data from geographic areas larger than<br/>the bank's assessment area.
- Table R.Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue<br/>- Compares the percentage distribution of the number of small loans (loans less than or<br/>equal to \$1 million) originated and purchased by the bank to businesses with revenues of<br/>\$1 million or less to: 1) the percentage distribution of businesses with revenues of greater<br/>than \$1 million; and 2) the percentage distribution of businesses for which revenues are not<br/>available. The table also presents aggregate peer small business data for the years the data<br/>is available.

- Table S.Assessment Area Distribution of Loans to Farms by Income Category of the<br/>Geography The percentage distribution of the number of small loans (less than or equal<br/>to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,<br/>and upper-income geographies compared to the percentage distribution of farms (regardless<br/>of revenue size) throughout those geographies. The table also presents aggregate peer data<br/>for the years the data is available. Because aggregate small farm data are not available for<br/>geographic areas smaller than counties, it may be necessary to use geographic areas larger<br/>than the bank's assessment area.
- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -<br/>Compares the percentage distribution of the number of small loans (loans less than or equal<br/>to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1<br/>million or less to: 1) the percentage distribution of farms with revenues of greater than \$1<br/>million; and 2) the percentage distribution of farms for which revenues are not available.<br/>The table also presents aggregate peer small farm data for the years the data is available.
- Table U.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of households by income level in each MMSA/assessment area.

Table Q: the Geog			t Area	Distr	ibution	of Loa	ins to	Small	Busine	esses k	oy Inco	me Cat	tegory	y of		202	20-2021
	Total Loans to Small Businesses		Low-Income Tracts			Moderate-Income Tracts			Middle-	Income T	[racts	Upper	-Income	Tracts	Not Available - Income Tracts		
Assessment Area:	#	\$ (000)	% Of Businesses	% Of Bank Loans	Aggregate	% Of Businesses	% Of Bank Loans	Aggregate	% Of Businesses	% Of Bank Loans	Aggregate	% Of Businesses	% Of Bank Loans	Aggregate	% Of Businesses	% Of Bank Loans	Aggregate
Non-MSA AA	20	1,718	0.0	0.0	0.0	8.6	0.0	7.6	91.4	100.00	92.4	0.0	0.0	0.0	0.0	0.0	0.0
Source: 2021 De Due to rounding				1 Bank E	Data; 2021 CF	RA Aggregate	e Data.										

Table R: Assessmen Revenues	nt Area	Distrib	ution of Loans to	Small I	Businesso	es by Gro	oss Annua	1		2020-2021
	]	Fotal Loans to	Small Businesses	Ві	isinesses with I <= 1MM		Businesses w > 1M			s with Revenues Available
Assessment Area:	#	\$ (000)	Overall Market	% Of Businesses	% Of Bank Loans	Aggregate	% Of Businesses	% Of Bank Loans	% Of Businesses	% Of Bank Loans
Non-MSA AA	20	1,718	394	77.8	80.0	58.9	5.2	15.0	17.1	5.0
Source: 2021 D&B Data; 01/01/202 Due to rounding, totals may not equ		21 Bank Data;	2021 CRA Aggregate Data.			·	•		•	•

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Assessment Area:	Lo	Total Loans to Farms		Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			2020-2021 Not Available - Income Tracts		
	#	\$ (000)	% Of Farms	% Of Bank Loans	Aggregate	% Of Farms	% Of Bank Loans	Aggregate	% Of Farms	% Of Bank Loans	Aggregate	% Of Farms	% Of Bank Loans	Aggregate	% Of Farms	% Of Bank Loans	Aggregat	
Non-MSA AA	20	1,982	0.0	0.0	0.0	4.8	0.0	3.1	95.2	100.0	96.9	0.0	0.0	0.0	0.0	0.0	0.0	

		Total Loans t	o Farms	Fa	rms with Revenu	es <= 1MM	Farms with R	evenues > 1MM	2020–2021 Farms with Revenues Not Available	
Assessment Area:	#	\$ (000)	Overall Market	% Of Farms	% Of Bank Loans	Aggregate	% Of Farms	% Of Bank Loans	% Of Farms	% Of Bank Loans
Non-MSA AA	20	1,982	130	96.9	90.0	37.7	1.8	10.0	1.3	0.0

Charter Number: 6609

Table U: Assessment Area Distribution of Consumer Loans by IncomeCategory of the Geography											2020-2021		
Assessment Area:	Total Consumer Loans		Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% Of House holds	% Of Bank Loans	% Of House holds	% Of Bank Loans	% Of House holds	% Of Bank Loans	% Of House holds	% Of Bank Loans	% Of Households	% Of Bank Loans	
Non-MSA AA	20	397	0.0	0.0	7.4	5.0	92.6	95.0	0.0	0.0	0.0	0.0	
Source: 2015 AC Data. 2021 CRA Due to rounding,	Aggregate Date	<i>a</i> .			<u> </u>				11				

Fable V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower											2020-2021	
	Total Consumer		Loans Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% Of Households	% Of Bank Loans	% Of Households	% Of Bank Loans	% Of Households	% Of Bank Loans	% Of Households	% Of Bank Loans	% Of Households	% Of Bank Loans
Non-MSA AA	20	397	24.9	20.0	17.1	25.0	18.2	10.0	39.8	45.0	0.0	0.0
Source: 2015 ACS; 2021 CRA Aggregat Due to rounding, tot	te Data		Data.									1