

## PUBLIC DISCLOSURE

April 8, 2019

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Northfield Charter Number 2073

> 329 Division Street Northfield, MN 55057

Office of the Comptroller of the Currency

Campbell Mithun Tower 222 South Ninth Street Suite 800 Minneapolis, MN 55402-3393

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**

**INSTITUTIONS'S CRA RATING:** The institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

Primary factors supporting The First National Bank of Northfield's rating include:

- The distribution of loans to households of different income levels reflects reasonable penetration.
- A majority of loans are inside the bank's assessment area (AA).
- The bank's loan-to-deposit ratio (LTD) is reasonable.

#### **Definitions and Common Abbreviations**

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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.

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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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.

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Statistical Area (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The 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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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.

**Tier One 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.

## **Description of Institution**

The First National Bank of Northfield (FNB Northfield) is a \$208 million single-state national bank located in Northfield, Minnesota (MN). FNB Northfield has two full-service locations in Northfield, a loan production office (LPO) in Bloomington, MN, and four automated teller machines (ATMs). Both branches have a deposit-taking ATM. The other two ATMs do not accept deposits and are located at the two colleges in Northfield: Carleton College and St. Olaf University. FNB Northfield is 100 percent owned by Heywood Bancshares, Inc., a single-bank holding company. The bank has no other affiliates or related entities. The bank closed a drive-up branch in July 2016, which was located two blocks south of the main office and had limited hours. No merger or acquisition activities occurred during the evaluation period.

Business lending is the bank's primary focus with home mortgages representing another core product. As of December 31, 2018, the loan portfolio totaled \$158 million, or 76 percent of total assets, with total deposits of \$174 million, and tier one capital of \$19.5 million. The loan portfolio, by outstanding dollar volume, is comprised of 60 percent business loans, 30 percent home mortgage loans, 9 percent agricultural loans, and 1 percent consumer loans.

FNB Northfield has one AA, which includes seven contiguous CTs in the northern half of Rice County, MN. The AA is located south of the Minneapolis MN-WI multi-state MSA.

Competition in the bank's market is strong. As of December 31, 2018, the FDIC deposit share report indicated there were 10 financial institutions with 17 locations operating in Rice County. FNB Northfield ranks third with 15 percent of the total Rice County deposit share. Wells Fargo has the largest market share at 24 percent, and The State Bank of Faribault ranks second with 15 percent.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AA. The bank received a "Satisfactory" rating at the previous CRA performance evaluation dated February 18, 2014.

## Scope of the Evaluation

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

We evaluated FNB Northfield's CRA performance utilizing small bank performance standards consisting of the lending test which evaluates the bank's record of meeting the credits needs of its AA. The evaluation period for the LTD analysis and complaint review portions of the lending test covered February 19, 2014 to May 7, 2019. The evaluation period for the remaining portions of the lending test covered January 1, 2016 to December 31, 2018. Business and home mortgage loans are the bank's primary products for all evaluation periods, and originating home mortgages is a primary

strategic initiative. Refer to the table below to view originations by dollar and number during the evaluation period.

	Originations by Product Type												
		ge by Dollar olume	Percentage by Numb										
	2016	2017 & 2018	2016	2017 & 2018									
Agriculture	1.59%	6.92%	3.91%	6.88%									
Commercial	82.04%	66.95%	48.60%	38.71%									
Consumer	1.14%	1.75%	17.32%	24.30%									
Home Mortgage	15.23%	24.38%	30.17%	30.11%									
Total	100.00%	100.00%	100.00%	100.00%									

Demographic data is used in part to determine the bank's lending performance. The U.S. Census Bureau released updated demographic data from the 2015 American Community Survey (ACS) effective January 1, 2017. We analyzed 2016 loans separately from 2017-2018 loans given changes in AA demographic data. Based on changes made, census tract 0705.04 changed from upper- to middle-income in 2017.

We also reviewed the AA's financial, economic, and environmental factors to determine the bank's lending performance. We contacted a government official from the City of Northfield to gather additional insight on economic conditions, demographics, and lending needs in the AA. Refer to Appendix B for details.

## **Data Integrity**

To evaluate FNB Northfield's lending performance, we selected random samples for each evaluation period and primary product. The sample included 42 home mortgage loans and 43 business loans from 2016, and 60 home mortgage loans and 60 business loans from 2017-2018. We used information from the bank's loan files to complete our review.

## Selection of Areas for Full-Scope Review

FNB Northfield has one AA, which is referred to as the Northfield AA throughout this report. Refer to Appendix A for an outline of the examination scope, and Appendix B for a full description of the AA and the community profile.

## **Ratings**

FNB Northfield's overall rating is based on the bank's lending performance within the Northfield AA. We evaluated lending performance using the following four performance criteria: the LTD ratio, lending in the AA, lending to borrowers of different income levels,

and responses to CRA related complaints. We gave equal weight to business loans and home mortgage loans in our analysis.

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

Pursuant to 12 CFR 25.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area 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 Consumer Financial Protection Bureau, 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.

# **Conclusions with Respect to Performance Tests**

#### LENDING TEST

FNB Northfield's performance under the lending test is Satisfactory. The bank's lending activity reflects satisfactory responsiveness to credit needs within the AA. The bank's LTD ratio is reasonable. FNB Northfield originates a majority of loans inside its AA. The distribution of loans to businesses and consumers of different income levels reflects reasonable penetration. The bank did not receive any CRA related complaints during the evaluation period. We did not perform the geographic distribution test during this evaluation due to the AA consisting of only middle- and upper-income census tracts. Refer to the sections below for details.

#### Loan-to-Deposit Ratio

FNB Northfield's LTD ratio is reasonable. The bank's LTD ratio averaged 82.75 percent over 20 quarters since the prior CRA evaluation. The bank's quarterly LTD ratio ranged from a low of 72.08 percent in December 2013 to a high of 87.87 percent in September 2016. FNB Northfield ranks third among five similarly situated banks with similar assets

sizes in Rice County. The average LTD ratio of the four peer banks is 75.06 percent with a range of 57 percent to 89 percent during the evaluation period.

Loan-to-Deposit Ratios for Similarly Situated Banks										
Bank Total Assets as of 12/31/2018 Average LTD (\$000's) (1Q14-4Q18)										
Community Resource Bank	\$314,434	89.39%								
Reliance Bank	\$143,563	88.11%								
The First National Bank of Northfield	\$207,505	82.75%								
The State Bank of Faribault	\$208,809	65.89%								
1st United Bank	\$142,380	60.84%								

Source: Call Report Data.

#### **Lending in Assessment Area**

FNB Northfield originates a majority of its loans inside its AA. We analyzed 40 home mortgage loans and 40 business loans originated between January 1, 2016 and December 31, 2018. FNB Northfield originated 61 percent of loans by number and 39 percent by dollar within its AA. A few large-dollar business loans located outside of the AA skewed the dollar amount ratios. The following table shows the lending by product type inside and outside the AA.

Len	Lending Inside and Outside of the Assessment Area (2016 – 2018)													
	N	umber o	of Lo	ans		Dollar A	(000s)							
Loan Category	Inside		Οι	ıtside	Total	Inside		Outsi	de	Total				
	#	%	#	%	#	\$	%	\$	%	\$(000s)				
Home Mortgage	31	77.50	9	22.50	40	\$3,783	71.22	\$1,528	28.78	\$5,311				
Business	18	45.00	22	55.00	40	\$2,792	23.91	\$8,883	76.09	\$11,675				
Total	49	61.25	31	38.75	80	\$6,575	38.71	\$10,411	61.29	\$16,986				
Source: OCC loan sample														

#### Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

FNB Northfield's distribution of loans to home mortgage borrowers and businesses of different income levels reflects reasonable penetration.

#### **Business Loans**

The borrower distribution of business loans from 2016-2018 reflects reasonable penetration among businesses of different income levels.

In 2016, the bank originated 65 percent of loans by number to small businesses. This is reasonable and above the peer aggregate percentage of 56 percent. The lending level

is below demographic data showing small businesses comprising 89 percent of all businesses. Small business lending needs in the AA is low, as evidenced by the peer aggregate data also being far below the demographic composition. Many businesses in Northfield are profitable with strong revenue streams, reducing the need for credit. Additionally, many small businesses are retail stores and service industry businesses with minimal credit needs.

In 2017 and 2018, the bank originated 50 percent of loans by number to small businesses. This is reasonable as it is near the peer aggregate percentage of 62 percent. The bank's ratio of loans to small businesses decreased in this period due to an increase in lending to one large business with numerous small-dollar loans. The opportunity to lend to small businesses in the AA continues to be challenging for all lenders as evidenced by the peer aggregate lending percentage compared to the demographic composition of 88 percent.

Refer to Table R in Appendix C-3 for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases to small businesses.

#### **Home Mortgage Loans**

The borrower distribution of home mortgage loans from 2016-2018 reflects reasonable penetration among borrowers of different income levels.

In 2016, the bank originated 2 percent of home mortgage loans by number and dollar to low-income borrowers, and 10 percent by number and dollar to moderate-income borrowers. The level of lending to low-income borrowers falls below the demographic of 9 percent, but meets the peer lending ratio of 2 percent. The level of lending to moderate-income borrowers is reasonable compared to the demographic rate of 11 percent. Home mortgage loan levels to low- and moderate-income borrowers is hindered by the bank's strategic actions to assist and refer borrowers to government loan programs offered at other financial institutions. FNB Northfield prepares the loan documentation, but does not close or fund the loan. Additionally, the AA also includes two colleges which decreases home mortgage lending opportunities and increases the demographic of low- and moderate-income persons.

In 2017 and 2018, the bank originated 2 percent of home mortgage loans by number and dollar to low-income borrowers. FNB Northfield originated 15 percent of home mortgage loans by number and 10 percent by dollar to moderate-income borrowers. Lending to low-income borrowers falls below the demographic rate 13 percent, but is near the peer aggregate level of 3 percent. Lending to moderate-income borrowers is reasonable and exceeds the demographic rate of 13 percent and peer aggregate level of 12 percent.

Refer to Table P in Appendix C-2 for the facts and data used to evaluate the bank's distribution of home mortgage loan originations and purchases.

## **Geographic Distribution of Loans**

We did not perform a geographic distribution test because the AA consists entirely of middle- and upper-income census tracts. Therefore, the data would not provide a meaningful analysis.

### **Responses to Complaints**

During the evaluation period, FNB Northfield did not receive any complaints related to performance in AA credit needs.

# **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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "full-scope").

Time Period Reviewed	Lending Test: (1/1/2016 to	12/31/2018)				
Financial Institution		Products Reviewed				
The First National Bank of Northfiel Northfield, Minnesota	d (FNB Northfield)	Business loans Home mortgage loans				
List of Assessment Areas and Ty	pe of Examination					
Assessment Area	Type of Exam	Other Information				
Northfield AA	Full-Scope	Refer to Appendix B				

# **Appendix B: Community Profiles for Full-Scope Areas**

#### Northfield AA 2016

Table A – I	Demographic	Information	of the Assessme	nt Area								
	Assessment A	rea: FNB No	rthfield 2016									
Demographic Characteristics	Demographic Characteristics # Low Moderate % of # Middle % of # Upper % of #											
Geographies (Census Tracts)	7	0.0	0.0	28.6	71.4	0.0						
Population by Geography	31,604	0.0	0.0	28.6	71.4	0.0						
Housing Units by Geography	11,281	0.0	0.0	24.6	75.4	0.0						
Owner-Occupied Units by Geography	7,945	0.0	0.0	18.4	81.6	0.0						
Occupied Rental Units by Geography	2,397	0.0	0.0	46.0	54.0	0.0						
Vacant Units by Geography	939	0.0	0.0	22.6	77.4	0.0						
Businesses by Geography	2,010	0.0	0.0	25.9	74.1	0.0						
Farms by Geography	227	0.0	0.0	9.3	90.7	0.0						
Family Distribution by Income Level	7,283	9.1	11.0	20.9	59.0	0.0						
Household Distribution by Income Level	10,342	14.3	9.4	16.3	60.0	0.0						
Median Family Income Non-MSAs - MN		\$57,683	Median Housin	Median Housing Value								
			Median Gross Rent			\$746						
Families Below Poverty Level												

Source: 2010 U.S. Census and 2016 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.

#### Northfield AA 2017-2018

Table A – I	Demographic 1	Information	of the Assessme	nt Area									
Ass	Assessment Area: FNB Northfield 2017-2018												
Demographic Characteristics	Upper % of #	NA* % of #											
Geographies (Census Tracts)	7	0.0	0.0	42.9	57.1	0.0							
Population by Geography	32,126	0.0	0.0	39.3	60.7	0.0							
Housing Units by Geography	11,391	0.0	0.0	38.4	61.6	0.0							
Owner-Occupied Units by Geography	8,057	0.0	0.0	29.6	70.4	0.0							
Occupied Rental Units by Geography	2,496	0.0	0.0	68.5	31.5	0.0							
Vacant Units by Geography	838	0.0	0.0	32.7	67.3	0.0							
Businesses by Geography	2,069	0.0	0.0	33.0	67.0	0.0							
Farms by Geography	192	0.0	0.0	10.9	89.1	0.0							
Family Distribution by Income Level	7,340	12.8	13.0	21.0	53.3	0.0							
Household Distribution by Income Level	10,553	18.6	12.5	15.0	53.9	0.0							
Median Family Income Non-MSAs - MN		\$63,182	Median Housin	g Value		\$212,416							
			Median Gross l	Rent		\$815							
			Families Below	Poverty Level		5.8%							

FNB Northfield's AA consists of the northern half of Rice County. Business loans and home mortgage loans are the bank's primary focus. The bank also has a LPO in Bloomington, MN that generates business loans from borrowers across the Minneapolis-St. Paul metropolitan area.

Economic conditions in and around Northfield are strong. The two colleges provide a strong foundation to the local economy. The economy is diverse and not heavily dependent on a single industry. The service industry comprises the largest percentage of businesses at 39 percent. The population within the AA is getting older. From 2016 to 2018, the percentage of households earning Social Security income increased from 23 percent to 29 percent, and the percentage of retired households increased from 13 percent to 17 percent.

As part of this review, we contacted a community member to gain an understanding of the area's economic conditions, credit needs, and involvement of local financial institutions. The community contact indicated the economy is doing well, and local financial institutions are actively involved in meeting the credit needs of the community. The city has collaborated with financial institutions on numerous redevelopment projects including Tax Incremental Financing to attract employers and housing programs. The contact noted FNB Northfield is proactively involved with economic development and good at building new relationships.

## **Appendix C: Tables of Performance Data**

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

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Table	D.	A accordance to A mod	Distribution	of Hama	Montgogo	Looma her	Imaamaa	Totogo www	of the De	T4T4 O TT1 O T4
- i i ame	P:	<b>Assessment Area</b>	i i jisi ribililion	ог поше	MOLISASE	LOAUS DV	income (	alegory	or the bo	rrower
~ ~ _ ~	- •		DISCIPLIE	01 1101110	1110105050				01 1110 20	

2016

	Total Home Mortgage Loans			Loans	Low-Income Borrowers			Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FNB Northfield	42	\$4,557	100.0	1,249	9.1	2.0	2.0	11.0	10.0	14.1	20.9	21.0	23.9	59.0	67.0	45.9	0.0	0.0	14.1

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2017-18

	Total Home Mortgage Loans			Loans	Low-Income Borrowers			Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market		% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FNB Northfield	60	\$8,537	100.0	1,049	12.8	2.0	2.6	13.0	15.0	12.3	21.0	20.0	27.9	53.3	63.0	40.5	0.0	0.0	16.7

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues										
	<b>Total Loans to Small Businesses</b>	Businesses with Revenues <= 1MM	Businesses with Revenues > 1MM	Businesses with R Not Availal						

	Т	Total Loans to S	Small Businesse	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FNB Northfield	field 43 \$10,216 100.0 475		475	88.6	65.0	56.0	4.6	35.0	6.8	0.0	

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data

Due to rounding, totals may not equal 100.0

## Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2017-18

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FNB Northfield	60	\$9,142	100.0	411	87.7	50.0	61.6	4.7	50.0	7.6	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data

Due to rounding, totals may not equal 100.0