



## **PUBLIC DISCLOSURE**

August 19, 2019

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

The First National Bank at Paris  
Charter Number: 14209

11 East Main Street  
Paris, AR 72855

Office of the Comptroller of the Currency

Victory Building  
1401 West Capitol Avenue  
Suite 350  
Little Rock, AR 72201

**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:

- The Lending Test rating is based on a full-scope review of the bank's one non-metropolitan statistical area (MSA) assessment area (AA).
- The loan-to-deposit (LTD) ratio is more than reasonable.
- A substantial majority of the bank's loans are inside its AA.
- The bank exhibits reasonable geographic distribution of loans in its AA. The bank's distribution of loans to borrowers with different incomes, farms of different income levels, and businesses of different sizes is reasonable.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of its AA, the bank's LTD ratio is more than reasonable. The bank's LTD ratio averaged 87.75 percent and ranged from 77.47 percent to 100.70 percent over the 21 quarters since the last CRA examination.

The bank's LTD ratio compares favorably with other financial institutions of similar size, location, and product offerings. FNB of Paris ranks second among three similarly situated banks. The average LTD ratios for the other two banks over the same 21 quarters are 93.95 percent and 42.62 percent. Competition from other financial institutions is above average. The bank's competitors include two local community banks and branches of large regional and nation-wide institutions.

<b>Institution Name</b>	<b>Assets (as of 6/30/2019) \$(000)</b>	<b>Average LTD Ratio</b>
The First National Bank of Paris	\$178,321	87.75%
First Western Bank	\$447,535	93.95%
Logan County Bank	\$83,036	42.62%
<b>Assessment Average</b>		<b>68.29%</b>

### Lending in Assessment Area

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

FNB Paris's ratio of lending within the AA is outstanding and exceeds the standard for satisfactory performance. The bank originated 93.02 percent of its total loans and 95.78 percent of the dollar volume

reviewed inside its AA during the evaluation period. This percentage does not include extensions of credit by affiliates.

In sampling the AA, a random sample of 23 loans of each of the bank's primary loan products (1-4 family residential, agricultural production and farmland, and small business loans) from 2016 and 2017-2018 was considered. Some loans were excluded from the sample, evidenced by total loans being less than 23 for loan type categories, as their criteria did not align with one of the loan types tested.

For all loan products reviewed, the bank originated a substantial majority within its AA. In 2016 a substantial majority, 93.75 percent of total loans reviewed, and 97.62 percent of the dollar volume reviewed originated inside the AA. In 2017-2018, a substantial majority, 92.31 percent of total loans reviewed, and 94.96 percent of dollar volume reviewed, originated within the AA. Refer to the chart below for loan product specific performance information.

<b>Lending in Assessment Area 2016 Data</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Agri.	20	95.24%	1	4.76%	21	\$465,645	92.50%	\$37,740	7.50%	\$503,385
1 to 4 Family Res.	20	100.00%	0	0.00%	20	\$1,539,006	100.00%	\$0	0.00%	\$1,539,006
Business	20	86.96%	1	13.04%	23	\$503,823	95.57%	\$23,364	4.43%	\$527,187
<b>Total</b>	<b>60</b>	<b>93.75%</b>	<b>4</b>	<b>6.25%</b>	<b>64</b>	<b>\$2,508,474</b>	<b>97.62%</b>	<b>\$61,104</b>	<b>2.38%</b>	<b>\$2,569,578</b>

<b>Lending in Assessment Area 2017-2018 Data</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Agri.	20	86.96%	3	13.04%	23	\$1,331,899	89.07%	\$163,484	10.93%	\$1,495,383
1 to 4 Family Res.	20	95.24%	1	4.76%	21	\$1,811,564	97.71%	\$42,500	2.29%	\$1,854,064
Business	20	95.24%	1	4.76%	21	\$2,340,862	96.50%	\$85,000	3.50%	\$2,425,862
<b>Total</b>	<b>60</b>	<b>92.31%</b>	<b>5</b>	<b>7.69%</b>	<b>65</b>	<b>\$5,484,325</b>	<b>94.96%</b>	<b>\$290,984</b>	<b>5.04%</b>	<b>\$5,775,309</b>

## Description of Institution

The First National Bank of Paris (FNB Paris) is a \$178 million, single-state financial institution headquartered in Paris, Arkansas. FNB Paris is a subsidiary of holding company Union Bancshares, Inc., which purchased the bank in 2005. FNB Paris's affiliate bank, Union Bank of Mena, in Mena, Arkansas was not considered in the evaluation.

FNB Paris has one non-MSA AA located in Arkansas that consists of four counties: Johnson, Franklin, Logan, and Scott. Per June 30, 2018, FDIC market share reports, FNB Paris ranked second in market share (only to Bank OZK) in the combined counties with 11.99 percent of the market. No deposits are outside of these counties. The table below presents the bank's market share within each county.<sup>1</sup>

All Counties	The First National Bank at Paris		All FDIC-Insured Institutions		June 30, 2018
	Number of Offices	Deposits	Number of Offices	Deposits	Deposit Market Share (%)
Franklin	<u>1</u>	3,982	10	308,758	1.29
Johnson	<u>1</u>	2,383	12	339,643	0.70
Logan	<u>3</u>	94,532	11	330,886	28.57
Scott	<u>1</u>	31,949	4	128,621	24.84
<b>Other Counties:</b>	<b>0</b>	<b>0</b>	<b>1,308</b>	<b>65,553,219</b>	
<b>State Totals:</b>	<b>6</b>	<b>132,846</b>	<b>1,345</b>	<b>66,661,127</b>	<b>0.20</b>

<sup>1</sup> FDIC market data collected as of June 30, 2018.

The bank operates six full service banking centers within Arkansas. The main branch is in Paris, with other branches located in Caulksville, Waldron, Booneville, Ozark, and Clarksville. The Ozark and Clarksville branches opened since the prior CRA exam. All branches offer drive in banking. Bank lobby hours are provided Monday through Friday at all locations. The bank does not operate any stand-alone Automated Teller Machines (ATMs).

Management's primary lending activities consist of real estate lending in all markets. Given the location of FNB Paris branches, agricultural lending and small dollar personal lending are key lending activities. Management anticipates continued loan and deposit growth in the Clarksdale and Ozark markets through 2020.

As of June 30, 2019, net loans totaled \$143.74 million and represented 80.04 percent of total assets. The majority of loans are real estate secured loans, which totaled \$110.17 million and represented 77.19 percent of total loans. The remainder of the loan portfolio consists of \$16.41 million (11.50 percent of total loans) for loans to individuals, \$9.35 million (6.55 percent) in agricultural loans, and \$8.88 million (6.22 percent) in commercial loans. Tier 1 capital as of June 30, 2019, totaled \$20.00 million, representing 11.73 percent of adjusted average assets.

No legal, financial, or other factors impeded the bank's ability to help meet the credit needs of its AA during the evaluation period. The bank received an overall rating of **"Satisfactory"** at the last CRA evaluation dated July 21, 2014.

## **Scope of the Evaluation**

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

An onsite examination of FNB Paris was performed to evaluate its Community Reinvestment Act (CRA) activities in its AA under the Small Bank CRA procedures. As part of the Small Bank procedures, a Lending Test was performed to evaluate management's record of meeting the credit needs of the bank's AAs through lending activities. Loan information used for this evaluation included a sample of small business loans, agricultural loans, and home mortgage loans from 2016, 2017, and 2018. The 2016 Federal Financial Institutions Examination Council (FFIEC) census files use the 2006 – 2010 American Community Survey (ACS) and the 2017 and forward FFIEC census files use the 2015 ACS 5-year estimates as basis for results.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank's overall rating is based on the full-scope review of its only non-MSA AA. Residential lending received the most weight considering the total amount of loans within the portfolio.

## **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 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 Arkansas

**CRA rating for the State of Arkansas<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank's LTD ratio is more than reasonable, reflecting a strong responsiveness to credit needs in the AA.
- A substantial majority of the bank's loans originated within the AA.
- The geographic distribution of loans and distribution of loans to borrowers with different incomes, farms of different income levels, and business of different sizes is reasonable and meets the standard for satisfactory performance.

### Description of Institution's Operations in Arkansas

The bank operates solely in Arkansas. The information provided in the *Description of Institution* section of this PE describes the institution's operations in Arkansas.

We conducted one interview with a community contact as part of this evaluation. The contact was an Executive Director of a local chamber of commerce. During the meeting, the contact noted the main credit need in Paris and surrounding counties is affordable housing. Given the number of low- to moderate-income families in the area, there is a growing need for rental properties. Notably, residential rental properties were not included in the scope of our examination. However, examiners identified several loans categorized as residential rental properties that serve this need within the community. The contact noted the bank supports local community groups through access of a community center.

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

**FNB at Paris AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB at Paris 2016 AA</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)	18	0.0	5.6	77.8	16.7	0.0
Population by Geography	77,251	0.0	5.5	77.2	17.3	0.0
Housing Units by Geography	34,388	0.0	5.4	78.6	15.9	0.0
Owner-Occupied Units by Geography	21,593	0.0	4.5	77.2	18.3	0.0
Occupied Rental Units by Geography	7,162	0.0	9.0	79.6	11.4	0.0
Vacant Units by Geography	5,633	0.0	4.4	82.9	12.7	0.0
Businesses by Geography	3,089	0.0	6.6	79.7	13.7	0.0
Farms by Geography	247	0.0	2.8	76.9	20.2	0.0
Family Distribution by Income Level	20,009	19.5	19.6	19.9	41.0	0.0
Household Distribution by Income Level	28,755	23.9	17.5	17.1	41.5	0.0
Median Family Income Non-MSAs - AR		\$42,175	Median Housing Value			\$80,057
			Median Gross Rent			\$536
			Families Below Poverty Level			13.4%

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.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB at Paris 2017-2018 AA</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)	18	0.0	11.1	88.9	0.0	0.0
Population by Geography	76,667	0.0	10.9	89.1	0.0	0.0
Housing Units by Geography	34,682	0.0	10.5	89.5	0.0	0.0
Owner-Occupied Units by Geography	21,368	0.0	7.4	92.6	0.0	0.0
Occupied Rental Units by Geography	8,191	0.0	18.6	81.4	0.0	0.0
Vacant Units by Geography	5,123	0.0	10.3	89.7	0.0	0.0
Businesses by Geography	2,851	0.0	14.5	85.5	0.0	0.0
Farms by Geography	206	0.0	3.4	96.6	0.0	0.0
Family Distribution by Income Level	20,632	20.7	19.6	20.3	39.4	0.0
Household Distribution by Income Level	29,559	23.9	16.2	18.7	41.3	0.0
Median Family Income Non-MSAs - AR		\$45,060	Median Housing Value			\$86,609
			Median Gross Rent			\$576
			Families Below Poverty Level			16.2%

Source: 2015 ACS Census and 2018 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.

## Scope of Evaluation in Arkansas

We performed a full-scope review over the following bank AA.

- FNB Paris non-MSA AA – This AA consists of all whole CTs within Franklin, Johnson, Logan, and Scott Counties. There is a total of 18 CTs in these four counties.

## LENDING TEST

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

Based on a full-scope review, the bank's performance in Arkansas is reasonable.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in Arkansas. Out of the 18 CTs in the AA, there were no low-income tracts for 2016 or 2017-2018. Due to new census information, moderate income tracts increased from one tract in 2016 to two tracts for 2017-2018 reporting.

### *Home Mortgage Loans*

Table O shows the dispersion of residential real estate loans by geography. The geographic distribution of home mortgage loans reflects excellent distribution throughout the AA. In 2016, there were no low-income geographies. For moderate income geographies, the bank's mortgage lending exceeds both the percent of owner-occupied housing units and the aggregate lending in moderate income tracts. In 2017-2018, the percentage of residential loans in moderate-income geographies exceeded the percentage of owner-occupied housing units in the AA as well as the aggregate percentage of lending in the AA.

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

### *Small Loans to Businesses*

Table Q shows the distributions of loans to small businesses by geography. The geographic distribution of loans to small businesses by income category for 2016 reflects excellent distribution. FNB Paris's lending in moderate income tracts exceeds the percentage of businesses located within the tract. In 2017-2018, the percentage of bank loans to small businesses located in moderate income tracts was poor compared to the percentage of small businesses identified in the geography. This decrease is attributable to the AA gaining one additional moderate-income tract in Johnson County during the census year, which increased the total percentage of businesses located in such tracts.

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.

### ***Small Loans to Farms***

Table S shows the dispersion of loans to farms by geography. The geographic distribution of loans to farms reflects excellent dispersion. No farms were identified as being in a low-income tract. In 2016, FNB Paris's loans to farms in moderate-income tracts exceeded the percentage of farms identified as being in a moderate-income tract. For 2017-2018, FNB Paris's loans to farms in moderate-income tracts exceeded the percentage of farms identified as being in moderate-income tracts.

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.

### ***Lending Gap Analysis***

No lending gaps were identified during the review.

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

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

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

Table P shows the distribution of residential real estate loan to borrowers of different income levels. The borrower distribution of home mortgage loans reflects reasonable penetration throughout the AA. For 2016, FNB Paris's lending to low-income borrowers was adequate compared to the percentage of low-income families and exceeded the aggregate lending to low-income borrowers. FNB Paris's lending to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate lending to moderate-income borrowers. For 2017-2018, FNB Paris's residential real estate loans to low-income borrowers were somewhat lower than the percentage of low-income borrowers in the AA. The percentage of low-income borrowers in the AA exceeded the aggregate percentage of lending in the AA. Loans to moderate-income borrowers were somewhat lower than both the percentage of the demographic in the AA and the aggregate percentage of lending in the AA. The bank's ability to lend to low-income borrowers is diminished by a lack of low-income tracts in the AA. Additionally, the lending area has a large need for rental properties. Loans for rental properties are not shown in the percentage of bank loans made during the year.

Refer to Table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

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

Table R shows the distribution of loans to small businesses (revenues less than \$1 million) by gross annual revenues. The borrower distribution of small business loans within the AA reflects excellent distribution in both 2016 and 2017-2018. FNB Paris's percentage of loans to businesses with revenues less than \$1 million exceeds the percentage of identified small businesses in the AA for 2016 and 2017-2018.

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.

### ***Small Loans to Farms***

Table T shows the distribution of loans to farms of different sizes based on revenue. The borrower distribution of farm loans in the AA reflects excellent distribution. In 2016, FNB Paris's percentage of loans to AA small farms exceeded the percentage of reporting small farms in the AA with gross annual revenues of less than \$1 million. For 2017-2018, FNB Paris's percentage of lending to AA small farms exceeded the percentage of reporting small farms in the AA with gross annual revenues of less than \$1 million.

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.

### **Responses to Complaints**

There were no complaints related to the institution's CRA performance for 2016 or 2017-2018.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2016 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans Small Business Loans Small Farm Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not Applicable	Not Applicable
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Arkansas		
FNB at Paris AA	Full-Scope	This AA consists of all whole CTs within the counties of Johnson, Franklin, Logan, and Scott. There is a total of 18 CTs in these four counties.

## Appendix B: Summary of State Ratings

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RATINGS      The First National Bank at Paris	
Overall Bank:	Lending Test Rating
The First National Bank at Paris	Satisfactory
State:	
State of Arkansas	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/assessment area.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Statistical Area (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.

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the 2016 Geography</b>																			
Assessment Area:	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
FNB at Paris 2016 AA	20	\$1,539M	100%	1,399	0.0	0.0	0.0	4.5	10.0	2.3	77.2	60.0	80.3	18.3	30.0	17.4	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>\$1,539M</b>	<b>100%</b>	<b>1,399</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>4.5</b>	<b>10.0</b>	<b>2.3</b>	<b>77.2</b>	<b>60.0</b>	<b>80.3</b>	<b>18.3</b>	<b>30.0</b>	<b>17.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the 2017-2018 Geography</b>																			
Assessment Area:	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
FNB at Paris 2017 -2018 AA	20	\$1,812M	100	1,527	0.0	0.0	0.0	7.4	15.0	8.8	92.6	85.0	91.2	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>\$1,812M</b>	<b>100</b>	<b>1,527</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>7.4</b>	<b>15.0</b>	<b>8.8</b>	<b>92.6</b>	<b>85.0</b>	<b>91.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2016</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
FNB at Paris 2016 AA	20	\$1,539M	100%	1,399	19.5	10.0	5.4	19.6	30.0	14.7	19.9	15.0	21.4	41.0	45.0	40.0	0.0	0.0	18.6	
<b>Total</b>	<b>20</b>	<b>\$1,539M</b>	<b>100%</b>	<b>1,399</b>	<b>19.5</b>	<b>10.0</b>	<b>5.4</b>	<b>19.6</b>	<b>30.0</b>	<b>14.7</b>	<b>19.9</b>	<b>15.0</b>	<b>21.4</b>	<b>41.0</b>	<b>45.0</b>	<b>40.0</b>	<b>0.0</b>	<b>0.0</b>	<b>18.6</b>	

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017-2018</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
FNB at Paris 2017-2018 AA	20	\$1,812M	100.0	1,527	20.7	10.0	5.4	19.6	10.0	16.9	20.3	15.0	19.8	39.4	65.0	37.9	0.0	0.0	20.0	
<b>Total</b>	<b>20</b>	<b>\$1,812M</b>	<b>100.0</b>	<b>1,527</b>	<b>20.7</b>	<b>10.0</b>	<b>5.4</b>	<b>19.6</b>	<b>10.0</b>	<b>16.9</b>	<b>20.3</b>	<b>15.0</b>	<b>19.8</b>	<b>39.4</b>	<b>65.0</b>	<b>37.9</b>	<b>0.0</b>	<b>0.0</b>	<b>20.0</b>	

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>													<b>2016</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
FNB at Paris 2016 AA	20	\$503,822	100.0	0.0	0.0	6.6	10.0	79.7	60.0	13.7	30.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>\$503,822</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>6.6</b>	<b>10.0</b>	<b>79.7</b>	<b>60.0</b>	<b>13.7</b>	<b>30.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>													<b>2017-2018</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
FNB at Paris 2017-2018 AA	20	\$2,458M	100.0	0.0	0.0	14.4	5.0	85.6	95.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>\$2,458M</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>14.4</b>	<b>5.0</b>	<b>85.6</b>	<b>95.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FNB at Paris 2016 AA	20	\$503,822	100.0	--	77.3	100.0	--	4.7	0.0	18.0	0.0
<b>Total</b>	<b>20</b>	<b>\$503,822</b>	<b>100.0</b>	<b>--</b>	<b>77.3</b>	<b>100.0</b>	<b>--</b>	<b>4.7</b>	<b>0.0</b>	<b>18.0</b>	<b>0.0</b>

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FNB at Paris 2017-2018 AA	20	\$2,458M	100.0	--	76.4	90.0	--	5.0	0.0	18.6	10.0
<b>Total</b>	<b>20</b>	<b>\$2,458M</b>	<b>100.0</b>	<b>--</b>	<b>76.4</b>	<b>90.0</b>	<b>--</b>	<b>5.0</b>	<b>0.0</b>	<b>18.6</b>	<b>10.0</b>

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

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>													<b>2016</b>	
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	
FNB at Paris 2016 AA	20	\$465,645	100.0	0.0	0.0	2.8	35.0	76.9	45.0	20.2	20.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>\$465,645</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>2.8</b>	<b>35.0</b>	<b>76.9</b>	<b>40.0</b>	<b>20.2</b>	<b>20.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>													<b>2017-2018</b>	
Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	
FNB at Paris 2017-2018 AA	20	\$1,332M	100.0	0.0	0.0	4.8	15.0	95.2	85.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>\$1,332M</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>4.8</b>	<b>15.0</b>	<b>95.2</b>	<b>85.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2016</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FNB at Paris 2016 AA	20	\$465,645	100.0	--	96.8	100.0	--	0.0	0.0	3.2	0.0
<b>Total</b>	<b>20</b>	<b>\$465,645</b>	<b>100.0</b>	<b>--</b>	<b>96.8</b>	<b>100.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>3.2</b>	<b>0.0</b>

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2017-2018</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FNB at Paris 2017-2018 AA	20	\$1,332M	100.0	--	96.5	100.0	--	0.0	0.0	3.5	0.0
<b>Total</b>	<b>20</b>	<b>\$1,332M</b>	<b>100.0</b>	<b>--</b>	<b>96.5</b>	<b>100.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>3.5</b>	<b>0.0</b>

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