



PUBLIC DISCLOSURE

September 4, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Riddell National Bank
Charter Number 5267

1 East National Avenue
Brazil, IN 47834

Office of the Comptroller of the Currency

8777 Purdue Road, Suite 105
Indianapolis, IN 46268

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The lending test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on the bank's only assessment area (AA), located in the State of Indiana.
- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans were originated inside the bank's AA.
- Community development lending had a significantly positive impact in the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, The Riddell National Bank's (RNB or bank) LTD ratio is more than reasonable. RNB's quarterly LTD ratio averaged 92.6 percent. This was calculated since the last examination using 18 quarters of LTD ratios from September 30, 2014, to December 31, 2018. The LTD ratio fluctuated from a low of 87.5 percent, at June 30, 2018, to a high of 98.1 percent, at March 31, 2016. We compared RNB's LTD ratio to other banks that are similarly situated, one with assets of \$2.9 billion and one with assets of \$341.1 million. These banks' LTD ratios averaged 73.4 percent and 80.1 percent, respectively.

Lending in Assessment Area

A majority of the bank's loans are inside its AA. The bank originated 82.9 percent of its total loans inside the bank's AA during the evaluation period. The table below shows the number and dollar volume of loans originated inside and outside the bank's AA. Home mortgage loans are based on Home Mortgage Disclosure Act (HMDA) reportable loans and Small Business loans are based on a sample of loans.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	697	83.1	142	16.9	839	71,785	80.7	17,181	19.3	88,966
Small Business	32	80.0	8	20.0	40	2,904	78.9	336	21.1	3,240
Total	729	82.9	150	17.1	879	74,689	81.0	17,517	19.0	92,206

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data and HMDA Data

Description of Institution

RNB is an intrastate bank that is wholly owned by RNB Corporation, a one-bank holding company headquartered in Brazil, Indiana. At December 31, 2018, the bank had \$216.4 million in total assets and \$20.2 million in tier 1 capital. RNB has one subsidiary, RNB Investments, and one inactive affiliate, RNB Community Investments.

RNB offers traditional banking products and services at its main office and three branch locations. RNB has a branch located in Brazil, along with branches in Center Point, Indiana and in Terre Haute, Indiana. The main office is located in Brazil, Indiana, along with a branch location. The bank has three deposit-taking automated teller machines (ATMs). The main office, the branch in Brazil, and the branch in Terre Haute each have a deposit-taking ATM.

The bank's AA consists of all of Clay and Vigo Counties. These counties make up a portion of the Terre Haute, IN Metropolitan Statistical Area (Terre Haute MSA). The main office and two branches are located in Clay County and the Terre Haute branch is located in Vigo County. The Terre Haute MSA AA is the bank's only AA.

According to the June 30, 2018 FDIC Deposit Market Share Report, RNB had \$202.9 million in deposits, for a market share of 9.4 percent. RNB ranked fourth for deposit market share, out of nine institutions, in its AA. The main office held a majority of these deposits, with \$136.6 million in deposits, or 67.3 percent. The Terre Haute branch held \$36.5 million, or 18.0 percent. The Center Point branch held \$19.1 million, or 9.4 percent. The branch located in Brazil held \$10.7 million, or 5.3 percent.

At December 31, 2018, the bank's loan portfolio totaled \$177.9 million and represented 82.2 percent of total assets. The table below shows the loan portfolio composition:

Loan Portfolio Composition			
Loan Category	Amount (\$000s)	Percent of Total Loans	Percent of Total Assets
Home Mortgage	90,830	51.1	42.0
Business	56,442	31.7	26.1
Agricultural	16,098	9.0	7.4
Consumer	12,752	7.2	5.9
Other	1,773	1.0	0.8
Total	\$ 177,895	100.0%	82.2%

Source: Call Report for December 31, 2018

The table below shows the bank's originations during the evaluation period:

2016 – 2018 Loan Originations			
Loan Category	Amount (\$000s)	% of # of Loans Originated	% of \$ of Loans Originated
Home Mortgage	68,153	23.8	39.0
Business	63,868	20.9	36.5
Agricultural	23,702	5.5	13.6
Consumer	19,054	49.8	10.9
Total	\$174,777	100.0%	100.0%

Source: Internal Bank Report

RNB's originations, from January 1, 2016 through December 31, 2018, show a focus on home mortgage and business loans. Home mortgage and business loans accounted for 44.7 percent of originations by number and 75.5 percent by dollar volume. These two products were considered the bank's primary lending products for this CRA evaluation. The table also indicates a significant number of consumer loans originated during the evaluation period. The number and dollar volume of consumer loans includes home equity lines of credit (HELOCs) for comparability and consistency purposes. However, HELOCs are no longer categorized as consumer loans due to the 2018 HMDA changes. As a result, consumer loans were not considered a primary product for this evaluation.

RNB does not have any legal, financial, or other impediments that hinder its ability to meet the credit needs of its AA. RNB received a "Satisfactory" rating at its last Community Reinvestment Act (CRA) evaluation dated September 30, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated RNB using the Small Bank CRA procedures to assess the bank's record of meeting the credit needs of its community. Small Bank CRA procedures include an evaluation of:

- The bank's loan-to-deposit (LTD) ratio;
- The percentage of loans within the bank's AA;
- The bank's record of lending to borrowers of different income levels;
- The geographic distribution of the bank's loans; and
- The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its AA.

Under these procedures evaluating community development activities is optional. At management's request, we evaluated the impact of their community development lending.

The evaluation period for this review is from October 1, 2014 through December 31, 2018. Based on the number and dollar volume of lending, the bank's primary lending products are home mortgage loans and business loans. We evaluated home mortgage loans originations from January 1, 2016 through December 31, 2018 reported under the HMDA. Home mortgage loans include home purchase, home

refinance, and home improvement loans. The bank is not subject to CRA loan reporting requirements. We selected a random sample of business loans for analysis from January 1, 2016 through December 31, 2018. We sampled 20 business loans originated during 2016, and 20 business loans originated during the period of January 1, 2017 through December 31, 2018.

We performed two separate analyses, one for 2016 loan originations and one for 2017 through 2018 originations. This is due to the changes instituted by the 2015 American Community Survey (ACS), which updated population and housing information. The ACS also resulted in changes to the income designations of some census tracts (CTs). The bank did not change its lending strategy during the two analysis periods. For 2016, we used the 2010 U.S. Census for comparison purposes. We used 2016 and 2018 Dun and Bradstreet data for the business loan analysis.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more 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 a blend of the state ratings, and where applicable, multistate ratings. As RNB has only one AA, the overall rating is based on the performance in this area. The 2017 through 2018 analysis period received more weight than the 2016 analysis period, as this represents the majority of the evaluation period. Home mortgage loans and business loans were weighted equally when arriving at the overall conclusions, given the number and dollar volume of lending 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 Indiana

CRA rating for the State of Indiana: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- Community development lending had a significantly positive impact in the AA;
- A reasonable geographic distribution of loans; and,
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Description of Institution's Operations in Indiana

RNB operates four locations in the southwestern part of Central Indiana. Please refer to the *Description of Institution* section for additional details. The bank has one AA, the Terre Haute MSA, which had a population of 134,738, according to the 2010 U.S. Census. Based on the 2015 ACS, the population remained fairly stable, totaling 134,954. The AA includes 34 CTs. The 2015 ACS resulted in income designation changes to some CTs in the AA. For loans originated in 2016, income designation comparisons are based on the 2010 U.S. Census, which identified six low-income, six moderate-income, 15 middle-income, and seven upper-income CTs. For loans originated in 2017-2018, income designation comparisons are based on the 2015 ACS. After this change, the AA consisted of four low-income, nine moderate-income, 11 middle-income, and 10 upper-income CTs.

During the evaluation period, families living below the poverty level increased from 12.3 percent to 13.2 percent. The median housing value increased from \$93,190 to \$94,521, and the median gross rent increased from \$603 to \$683, making housing less affordable. Owner-occupied housing units decreased from 60.1 percent to 55.6 percent, while occupied rental units increased from 27.6 percent to 31.7 percent. Vacant units remained fairly stable overall. The average annual unemployment rates in Clay and Vigo counties were above the State of Indiana average for all three years under evaluation, according to the Bureau of Labor Statistics. The average annual unemployment rate for Clay County declined from 4.7 percent in 2016 to 3.9 percent in 2018, and Vigo County declined from 5.4 percent to 4.4 percent over the same time period. The State of Indiana's average annual unemployment rate was 4.4 percent in 2016 and declined to 3.4 percent in 2018.

Competition for home mortgage loans in the bank's AA is strong. Based on 2016 Peer Mortgage Data, RNB ranked third out of 186 lenders in its AA. They originated 242 home mortgage loans, accounting for 7.8 percent of the market share by number of loans. The two lenders ranking above them were First Financial Bank, with 19.2 percent, and Ruoff Mortgage Company, with 7.9 percent. Based on 2017 Peer Mortgage Data, RNB ranked third out of 176 lenders in its AA. They originated 209 home mortgage loans, accounting for 7.00 percent of the market share by number of loans. First Financial Bank and Ruoff Mortgage Company continued to rank above the bank, with 17.26 percent and 13.97 percent, respectively. The 2018 Peer Mortgage Data was not available at the time of this evaluation.

While the bank is not a CRA loan reporter, it is important to consider competition in the area, given that one of their primary products is business loans. Considering many banks are not required to report small business lending, competition is strong. We reviewed Peer Small Business Data in the AA, which compares all CRA reporting banks that made small business loans in the AA. Based on 2016 Peer Small Business Data, there were 56 CRA loan reporting lenders in the AA. Those lenders originated 1,423 loans. The top three lenders were First Financial, with 25.0 percent of loans, American Express, with 12.0 percent of loans, and Synchrony Bank, with 9.8 percent of loans. Based on 2017 Peer Small Business Data, there were 54 CRA loan reporting lenders in the AA. Those lenders originated 1,423 loans. The top three lenders were First Financial, with 24.2 percent of loans, American Express, with 14.1 percent of loans, and Synchrony Bank, with 9.5 percent of loans.

One new community contact was performed for this evaluation and one community contact performed in 2017 pertinent to the bank's AA was reviewed. Both contacts were economic development organizations. The contacts noted local banks have been very involved in supporting small businesses and financing community projects. One contact noted a need for more banks to offer United States Department of Agriculture financing. Continued involvement by banks in community projects is also needed through the purchase of tax increment financing bonds and sewer and water revenue bonds.

Terre Haute MSA 2016

Table A – Demographic Information of the Assessment Area						
Assessment Area: Terre Haute MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	17.6	17.6	44.1	20.6	0.0
Population by Geography	134,738	13.2	12.5	46.6	27.7	0.0
Housing Units by Geography	57,860	13.4	13.3	46.4	26.9	0.0
Owner-Occupied Units by Geography	34,784	6.2	12.6	49.6	31.6	0.0
Occupied Rental Units by Geography	15,968	24.6	14.5	40.3	20.6	0.0
Vacant Units by Geography	7,108	23.6	14.1	44.1	18.2	0.0
Businesses by Geography	6,258	19.0	10.6	45.9	24.5	0.0
Farms by Geography	324	1.9	3.1	59.0	36.1	0.0
Family Distribution by Income Level	32,599	20.7	19.0	19.3	40.9	0.0
Household Distribution by Income Level	50,752	24.3	16.7	17.6	41.4	0.0
Median Family Income MSA - 45460 Terre Haute, IN MSA		\$51,224	Median Housing Value			\$93,190
			Median Gross Rent			\$603
			Families Below Poverty Level			12.3%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

2017-2018

Table A – Demographic Information of the Assessment Area						
Assessment Area: Riddell						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	11.8	26.5	32.4	29.4	0.0
Population by Geography	134,954	6.2	24.5	31.5	37.8	0.0
Housing Units by Geography	58,046	6.4	24.3	33.1	36.2	0.0
Owner-Occupied Units by Geography	32,279	3.6	17.3	35.8	43.2	0.0
Occupied Rental Units by Geography	18,381	10.7	35.1	28.3	25.9	0.0
Vacant Units by Geography	7,386	7.9	27.9	33.2	31.0	0.0
Businesses by Geography	6,251	7.2	25.1	30.5	37.2	0.0
Farms by Geography	352	1.7	8.5	38.1	51.7	0.0
Family Distribution by Income Level	32,120	21.6	17.6	19.6	41.2	0.0
Household Distribution by Income Level	50,660	25.0	16.3	17.1	41.5	0.0
Median Family Income MSA - 45460 Terre Haute, IN MSA		\$53,828	Median Housing Value			\$94,521
			Median Gross Rent			\$683
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Indiana

The bank has only one AA, the Terre Haute MSA. We performed a full-scope review of the bank's AA.

Refer to the table in Appendix A: Scope of Examination for additional information.

LENDING TEST

The bank's performance under the Lending Test in Indiana is rated Outstanding.

Based on a full-scope review, the bank's lending performance in the state of Indiana is excellent. The geographic distribution of home mortgage loans and small loans to businesses is reasonable. The borrower distribution of home mortgage loans and small business loans is reasonable. We did not identify any conspicuous lending gaps. The bank's community development lending is excellent, which enhanced the Lending Test rating.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Overall, the geographic distribution of home mortgage loans is reasonable.

The geographic distribution of home mortgage loans in 2017-2018 was reasonable. The bank's percentage of loans in low-income CTs was somewhat below the percentage of owner-occupied housing units and was near to aggregate lending in those geographies. The bank's percentage of loans in moderate-income CTs was somewhat below the percentage of owner-occupied housing units and was near to aggregate lending in those geographies. The geographic distribution of home mortgage loans in 2016 was not inconsistent with the performance in 2017-2018.

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

Small Loans to Businesses

Overall, the geographic distribution of small loans to businesses is reasonable.

The geographic distribution of small loans to businesses in 2017-2018 was reasonable. The bank's percentage of small loans to businesses in low-income CTs was near to the percentage of businesses located in those geographies and was somewhat below aggregate lending. The percentage of loans in moderate-income CTs was below the percentage of businesses located in those geographies and was below aggregate lending. The geographic distribution of small loans to businesses in 2016 was not inconsistent with the performance in 2017-2018. Based on the strong level of competition within the area for these loans, noted in the Description of Institution's Operations in Indiana section, this distribution is reasonable.

Refer to Table Q in the State of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

Lending Gap Analysis

We reviewed summary reports and maps and analyzed RNB's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Overall, the borrower distribution of home mortgage loans is reasonable.

The borrower distribution of home mortgage loans in 2017-2018 was reasonable. The distribution of the bank's lending to low-income borrowers was well below the percentage of low-income families but near to aggregate lending. The distribution of loans to moderate-income borrowers exceeded the percentage

of moderate-income families in the AA and was near to aggregate lending. The borrower distribution of home mortgage loans in 2016 was not inconsistent with the performance in 2017-2018.

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

Small Loans to Businesses

Overall, the borrower distribution of small loans to businesses is reasonable.

The borrower distribution of small loans to businesses in 2017-2018 was reasonable. In 2017-2018, the percentage of small loans to small businesses (businesses with gross annual revenues of \$1.0 million or less) was below the percentage of small businesses in the AA. This performance was enhanced by the percentage of bank loans exceeding aggregate lending in the AA. The borrower distribution of small loans to businesses in 2016 was inconsistent with the performance in 2017-2018. In 2016, the borrower distribution was excellent. The percentage of bank loans substantially met the percentage of small businesses in the AA and exceeded aggregate lending.

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

Community Development Lending

The bank's community development lending had a significantly positive impact on the AA and enhanced the bank's lending test rating. RNB made six community development loans during the review period totaling \$1.9 million, or 9.4 percent of tier 1 capital. The community development loans were made to one organization supporting low- and moderate-income individuals through the Head Start program and services for disabled adults and youth.

Responses to Complaints

During the evaluation period, RNB did not receive any complaints related to its performance in helping to meet the credit needs of its AA.

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 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”.

Time Period Reviewed:	10/1/2014 to 12/31/2018	
Bank Products Reviewed:	Home Mortgage, Small Business Community Development Loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Indiana		
Portion of Terre Haute, IN MSA	Full-scope	Clay and Vigo Counties only

Appendix B: Summary of MMSA and State Ratings

RATINGS	The Riddell National Bank
Overall Bank:	Lending Test Rating
The Riddell National Bank	Outstanding
State:	
Indiana	Outstanding

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.

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

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 30th 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
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	
Riddell	242	25,799	100.0	3,103	6.2	1.2	2.7	12.6	4.5	9.1	49.6	57.4	50.9	31.6	36.8	37.4	0.0	0.0	0.0	
Total	242	25,799	100.0	3,103	6.2	1.2	2.7	12.6	4.5	9.1	49.6	57.4	50.9	31.6	36.8	37.4	0.0	0.0	0.0	

*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*

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
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	
Riddell	455	45,986	100.0	2,984	3.6	0.7	1.7	17.3	13.0	14.6	35.8	36.5	35.5	43.2	49.9	48.1	0.0	0.0	0.0	
Total	455	45,986	100.0	2,984	3.6	0.7	1.7	17.3	13.0	14.6	35.8	36.5	35.5	43.2	49.9	48.1	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
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
Riddell	242	25,799	100.0	3,103	20.7	5.4	6.5	19.0	12.0	17.9	19.3	18.6	22.3	40.9	58.3	37.8	0.0	5.8	15.5
Total	242	25,799	100.0	3,103	20.7	5.4	6.5	19.0	12.0	17.9	19.3	18.6	22.3	40.9	58.3	37.8	0.0	5.8	15.5

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
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
Riddell	455	45,986	100.0	2,984	21.6	3.7	5.7	17.6	18.7	19.2	19.6	21.8	23.2	41.2	50.5	36.8	0.0	5.3	15.0
Total	455	45,986	100.0	2,984	21.6	3.7	5.7	17.6	18.7	19.2	19.6	21.8	23.2	41.2	50.5	36.8	0.0	5.3	15.0

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

Table Q: Assessment Area Distribution of Small Loans to Businesses by Income Category of the Geography																			2016
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Riddell	20	1,693	100.0	1,408	19.0	0.0	21.0	10.6	5.0	10.7	45.9	70.0	41.7	24.5	25.0	26.7	0.0	0.0	0.0
Total	20	1,693	100.0	1,408	19.0	0.0	21.0	10.6	5.0	10.7	45.9	70.0	41.7	24.5	25.0	26.7	0.0	0.0	0.0

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

Table Q: Assessment Area Distribution of Small Loans to Businesses by Income Category of the Geography																			2017-18
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Riddell	20	2,165	100.0	1,394	7.2	5.0	11.1	25.1	5.0	21.0	30.5	45.0	27.4	37.2	45.0	40.5	0.0	0.0	0.0
Total	20	2,165	100.0	1,394	7.2	5.0	11.1	25.1	5.0	21.0	30.5	45.0	27.4	37.2	45.0	40.5	0.0	0.0	0.0

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate 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
Riddell	20	1,693	100.0	1,408	76.4	75.0	39.5	6.9	25.0	16.7	0.0
Total	20	1,693	100.0	1,408	76.4	75.0	39.5	6.9	25.0	16.7	0.0
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
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
Riddell	20	2,165	100.0	1,394	75.5	55.0	44.3	7.1	45.0	17.4	0.0
Total	20	2,165	100.0	1,394	75.5	55.0	44.3	7.1	45.0	17.4	0.0
<i>Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data "--" data not available. Due to rounding, totals may not equal 100.0</i>											