



PUBLIC DISCLOSURE

August 24, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Peoples National Bank of Checotah
10051

300 West Gentry
Checotah, Oklahoma 74426

Office of the Comptroller of the Currency

8282 South Memorial Drive
Suite 300
Tulsa, OK 74133

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 one full-scope assessment area (AA) in the state of Oklahoma.

- The bank's loan-to-deposit (LTD) ratio is **reasonable**.
- A **substantial majority** of loans were originated or purchased inside the bank's AA.
- The bank exhibits **excellent** geographic distribution of loans.
- The bank exhibits **excellent** distribution of loans to individuals of different income levels.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable.

People's National Bank of Checotah's (PNB) quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 38.30 percent. We compared the bank's LTD ratio to two similarly situated banks in their market area. The aggregate average LTD ratio for the competing banks was 48.53 percent, with a low average of 39.85 percent and a high average of 57.21 percent.

Lending in Assessment Area

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

The bank originated or purchased 92.1 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA level.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	24	96%	1	4.0%	25	1,343	85.5%	227	14.4%	1,571
Consumer	23	88.4%	3	11.5%	26	621	86.4%	97	13.5%	719
Total	47	92.1%	4	7.8%	51	1,965	85.8%	325	14.1%	2,289
<i>Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0</i>										

Description of Institution

PNB is a \$137 million community bank located in Checotah, Oklahoma, and a subsidiary of Peoples National Bancshares, a one-bank holding company located in Checotah. PNB has one subsidiary, Peoples Community Development Corporation, which was organized in 1997. There have been no mergers or acquisitions since the previous CRA PE. PNB is not required to report under the Home Mortgage Disclosure Act (HMDA).

The bank has one rating area, the state of Oklahoma, with one AA. PNB's AA includes nine census tracts (CTs) in Eastern Oklahoma. The AA includes all six CTs in McIntosh County and three CTs in Muskogee County. PNB serves McIntosh County and Muskogee County through the main banking location at 300 W. Gentry, Checotah, Oklahoma, which is in a moderate-income CT.

A limited service drive-thru branch is located in a moderate-income CT at 303 North Broadway, Checotah, Oklahoma. A full-service branch with an automated teller machine (ATM) is located in the Walmart at 131 Paul Carr Drive, Checotah, Oklahoma. Bank owned ATMs are also located in the Lakeview Grocery at 418990 Texanna Rd, Eufaula, Oklahoma, a middle-income CT, and at 403 W. Gentry, Checotah, Oklahoma, a moderate-income CT. All ATMs are located inside the bank's AA. PNB's primary lending is focused on serving consumer and residential real estate loan customers within McIntosh and Muskogee counties and the surrounding areas. Most of the bank's consumer and home mortgage lending are transacted through the Checotah main branch.

The bank offers a variety of loan and deposit products to meet the needs of the local community. As of December 31, 2019, PNB's tier 1 capital totaled \$24.1 million resulting in a tier 1 leverage ratio of 17.35 percent, relative to the peer group of 12.17 percent. The bank reported total loans of \$44.7 million or 32 percent of average assets, and total deposits of \$109 million. The loan portfolio composition includes the following: 35.12 percent consumer loans, 31.7 percent 1-4 family residential, 10.38 percent farm real estate, 10.07 percent farm production, 9.03 percent commercial real estate, 2.66 percent commercial loans, and 1.04 percent other loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. A CRA PE was last prepared as of May 25, 2015, and the bank received an overall rating of "Outstanding."

The following table illustrates the composition of the bank's loan portfolio as of December 31, 2019, which represents 32 percent of total assets, based on the data presented in the Consolidated Reports of Condition and Income. Management does not anticipate any significant changes in the composition of the loan portfolio in the near future.

Loan Category	Dollars (\$000's)	%
Commercial Real Estate Loans	4,040	9.03
Commercial Loans	1,191	2.66
Residential Real Estate Loans	14,185	31.70
Farm Production Loans	4,506	10.07
Farm Real Estate Loans	4,643	10.38
Consumer Loans	15,714	35.12
Other Loans	465	1.04
Total	44,744	100

Scope of the Evaluation

This PE is an assessment of PNB's ability to meet the credit needs of the community in which it operates. We completed a full-scope review of PNB's CRA activities in its AA under the small bank CRA examination procedures. This includes the lending test which evaluates the bank's record of meeting for the credit needs of the AA through its lending activities.

Conclusions regarding the lending test are based on samples of consumer loans and residential mortgage loans. The evaluation period for the lending test was January 1, 2017 through December 31, 2019. This PE is based on 2010 U.S. Census data and the updated 2015 American Community Survey (ACS) demographic information. We combined and analyzed 2017, 2018, and 2019 data due to the 2015 ACS U.S. Census that applies to the data beginning in 2017.

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

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 metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area 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 the 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 primarily on performance in the AA.

PNB has only one AA in one state. Ratings are based solely on the results of this AA.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under the state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this 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 PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects **excellent** distribution throughout the AA.
- The distribution of loans to individuals of different income levels is **excellent**.

Description of Institution's Operations in Oklahoma

PNB operates two branches in their AA within the state of Oklahoma. The AA consists of nine CTs, including all six CTs in McIntosh County and three CTs in Muskogee County. Within the AA, there are no low-income CTs, three moderate-income CTs and six middle-income CTs. In the McIntosh County AA, there are no low-income CTs, three moderate-income, and three middle-income CTs. All three CTs in the Muskogee County AA are designated as middle-income. As indicated above, the bank's AA does not have any designated low- or upper-income CTs. Table A below reflects PNB's AA:

Table A – Demographic Information of the Assessment Area						
Assessment Area: Combined						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	33.3	66.7	0.0	0.0
Population by Geography	34,498	0.0	27.5	72.5	0.0	0.0
Housing Units by Geography	19,728	0.0	25.2	74.8	0.0	0.0
Owner-Occupied Units by Geography	10,647	0.0	23.6	76.4	0.0	0.0
Occupied Rental Units by Geography	3,075	0.0	39.4	60.6	0.0	0.0
Vacant Units by Geography	6,006	0.0	20.8	79.2	0.0	0.0
Businesses by Geography	1,470	0.0	49.6	50.4	0.0	0.0
Farms by Geography	100	0.0	21.0	79.0	0.0	0.0
Family Distribution by Income Level	9,592	24.5	17.6	23.4	34.4	0.0
Household Distribution by Income Level	13,722	27.4	17.7	17.8	37.1	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$88,354
			Median Gross Rent			\$583
			Families Below Poverty Level			16.0%
<i>Source: 2015 ACS and 2019 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>						

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

Competition from other banks in the market area is considered strong. According to the June 30, 2019 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, PNB's deposit market share in their AA was 31 percent and ranked first among seven depository institutions in the AA.

We consulted one community contact within the AA to gain a better understanding of the general community credit needs, as well as, local economic conditions. The contact indicated that the local economic conditions were stable, and that general banking and credit needs for small businesses were being met. The contact further stated that the banks in the area are very involved with meeting the credit needs of the community and there are no real issues with the area banks' performance.

Scope of Evaluation in Oklahoma

PNB has only one AA which includes all six CTs in McIntosh County and three CTs in Muskogee County. PNB serves McIntosh County and Muskogee County primarily through the main banking location in Checotah, Oklahoma. This one PNB AA received a full-scope review. There are no limited-scope review areas.

LENDING TEST

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

Based on a full-scope review, the bank's lending performance in the state of Oklahoma is **excellent**.

Distribution of Loans by Income Level of the Geography

The bank exhibits **excellent** geographic distribution of loans in the AA.

There were no low-income CTs in the AA during the evaluation period.

Home Mortgage Loans

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

For 2017-2019, the percentage of bank loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution in those CTs.

Consumer Loans

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

For 2017-2019, the percentage of bank loans in moderate-income geographies exceeds the percentage of households in those CTs.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income levels given the product lines offered by the bank.

Home Mortgage Loans

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

For 2017-2019, the percentage of bank loans to low-income borrowers was somewhat lower than the percentage of low-income families but exceeds the aggregate percentage of lending to those borrowers.

For 2017-2019, the percentage of bank loans to moderate-income borrowers was near to the percentage of moderate-income families but exceeds the aggregate percentage of lending to those borrowers.

Consumer Loans

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

For 2017-2019, the percentage of bank loans to low-income borrowers was somewhat lower than the percentage of low-income households.

For 2017-2019, the percentage of bank loans to moderate-income borrowers was lower than the percentage of moderate-income households.

Responses to Complaints

PNB received no CRA-related complaints during the evaluation period.

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:	January 1, 2017 to December 31, 2019	
Bank Products Reviewed:	Home Mortgage and Consumer Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A – No affiliates were considered as part of this review.		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Oklahoma		
Peoples NB Checotah AA	Full-Scope	Consists of nine CTs in Eastern Oklahoma. AA includes all six CTs in McIntosh County and three CTs in Muskogee County.

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 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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-2019		
Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
#	\$	% of Total	% 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		
24	\$1,343	100	0.0	--	0.0	23.6	62.5	28.3	76.4	37.5	71.7	0.0	--	0.0	0.0	--	0.0		
Total	24	\$1,343	100	0.0	--	0.0	23.6	62.5	28.3	76.4	37.5	71.7	0.0	--	0.0	0.0	--	0.0	

Source: 2015 U.S Census; 01/01/2017 - 01/01/2019 Bank Data, 2019 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																	2017-2019		
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate		
24	\$1,343	100	24.5	16.6	5.2	17.6	16.6	13.7	23.4	41.6	18.8	34.4	25.0	44.7	0.0	--	17.5		
Total	24	\$1,343	100	24.5	16.6	5.2	17.6	16.6	13.7	23.4	41.6	18.8	34.4	25.0	44.7	0.0	--	17.5	

Source: 2015 U.S Census; 01/01/2017 - 01/01/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
	23	621	100	0.0	--	27.1	65.2	72.9	34.7	0.0	--	0.0	--	
<i>Source: 2015 U.S Census; 01/01/2015 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-2019	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
	23	621	100	27.4	21.7	17.7	8.7	17.8	21.7	37.1	47.8	0.0	--	
Total	23	621	100	27.4	21.7	17.7	8.7	17.8	21.7	37.1	47.8	0.0	--	
<i>Source: 2015 U.S Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0</i>														