



## **PUBLIC DISCLOSURE**

August 24, 2020

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

The First National Bank of Hartford  
Charter Number 7592

101 South 3<sup>rd</sup> Avenue  
Hartford, Alabama 36344

Office of the Comptroller of the Currency

3595 Grandview Parkway  
Suite 655  
Birmingham, Alabama 35243

**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:

- First National Bank of Hartford (FNB) or (Bank) had an excellent penetration for home mortgages and small business loans to borrowers of different income levels within its assessment areas (AAs).
- The loan-to-deposit ratio is reasonable given the Bank's size, financial condition, economic environment, and AAs credit needs.
- The Bank originates a majority of their loans within the AAs.

### Loan-to-Deposit Ratio

Considering FNB's size, financial condition, and credit needs of the AAs, the Bank's loan-to-deposit (LTD) ratio is reasonable.

FNB's quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 65.31 percent. We compared the Bank's LTD ratio to five similarly situated banks in their market area. The aggregate average LTD ratio for the competing banks was 64.95 percent, with a low average of 50.00 percent and a high average of 78.99 percent.

The following table reflects FNB's and similarly situated institutions' net LTD ratios over the review period of September 30, 2016 through March 31, 2020:

<b>Loan-To-Deposit Ratios</b>		
<b>Institution</b>	<b>Total Assets (in 000s) as of 03/31/20</b>	<b>Avg. LTD</b>
<i>First National Bank</i>	<i>\$122,888</i>	<i>65.31%</i>
Samson Banking Company, The	\$86,557	50.00%
Friend Bank	\$135,400	73.48%
Citizens Bank, The	\$148,701	78.99%
Sunsouth Bank	\$111,352	69.12%
Commercial Bank of Ozark, The	\$94,886	53.17%

*Source: Institution Reports of Condition for the 15-quarter period from September 30, 2016 to March 31, 2020.*

### Lending in Assessment Area

A majority of the FNB's loans are inside its AAs.

The Bank originated and purchased 64.62 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	219	64.60%	120	35.40%	339	\$14,198	55.60%	\$11,355	44.40%	\$25,553
Small Business	13	65.00%	7	35.00%	20	\$ 1,358	87.44%	\$ 195	12.56%	\$ 1,553
<b>Total</b>	<b>232</b>	<b>64.62%</b>	<b>127</b>	<b>35.38%</b>	<b>359</b>	<b>\$15,556</b>	<b>57.39%</b>	<b>\$11,550</b>	<b>42.61%</b>	<b>\$27,106</b>

## Description of Institution

FNB is a \$121.8 million bank with the main office located in Hartford, AL, as a single state institution. FNB has two branch locations, one in Slocomb, AL (Geneva County) and one in Enterprise, AL (Coffee County). The main office and both branches have an ATM on-site. The main office and both branches are not located in a distressed or under-served geography. FNB is wholly owned by First Hartford Bancshares, Inc., a one-bank holding company.

The Bank's primary strategy is to provide small business loans and residential loans to consumers. FNB provides traditional banking services, including business, residential, and consumer lending as well as deposit, funds transfer, and safe deposit services. Total loans of \$72 million represent 59 percent of total assets. Total one-to-four family residential real estate loans were \$31.6 million and represented 44 percent of total loans and 26 percent of total assets. Commercial real estate loans and other commercial and industrial loans were \$23.7 million and represented 33 percent of total loans and 19 percent of total assets. Loans to finance agricultural production were \$5.2 million and loans for farmland were \$4.1 million for a total of \$9.4 million in agricultural loans. Agricultural loans represented 13 percent of total loans and 8 percent of total assets. Consumer loans were \$6.6 million and represented 9 percent of total loans and 5 percent of total assets.

The Bank's Tier 1 capital, as of December 31, 2019 totaled \$18.3 million.

Local competition is moderate in the Geneva AA, with competition from four banks. The bank's competition in Coffee County is significant with competition from Synovus Bank, The Citizens Bank, Regions Bank, Trinity Bank, Wells Fargo Bank, Troy Bank and Trust, State Bank & Trust Company, and Woodforest National Bank.

FNB's preceding CRA examination was dated September 26, 2016 and it received a Satisfactory rating. No legal or financial constraints exists which prohibit the Bank from meeting AA credit needs.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We completed a full-scope review of FNB's CRA activities in its AAs under the small bank CRA procedures. This includes the lending test which evaluates the Bank's record of meeting the credit needs of the AAs through its lending activities. Conclusions regarding the lending test are based on samples of residential mortgage loans and small business loans. As of December 31, 2019, residential loans represented 44 percent of the loan portfolio. Total commercial loans represented 33 percent of total loans. Home loans and small business loans were selected for review since these two products comprise a significant portion of the loan portfolio. We analyzed years 2017, 2018, and 2019 for the lending test.

### 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 assessment areas located within the same metropolitan statistical area (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

FNB's overall rating is based on the State of Alabama. The state rating is based on performance in the Bank's two AAs. The Geneva County AA was the predominate focus for this CRA examination. The Geneva County AA, a portion of the Dothan MSA, was selected for full scope; since, the majority of the bank's lending activities occurred in this AA. The Coffee County non-MSA AA was selected for a limited scope review. The Coffee County branch was open for only 16 months of the review period. During that time an insufficient number of small business loans were originated for a meaningful sample. Therefore, the scope of review for Coffee County was limited to home mortgage loans. For the overall rating of the combined AAs, we weighted home mortgage loans greater than small business loans due to the significant larger size of the home mortgage loans portfolio.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA 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 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 Alabama

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

**The Lending Test is rated: Satisfactory.**

The major factors that support this rating include:

- FNB had an excellent penetration for home mortgage and small business lending to borrowers of different income levels within its AAs.
- The LTD is reasonable given the Bank's size, financial condition, economic environment, and AAs credit needs.
- The Bank originates a majority of loans within its AAs.

### Description of Institution's Operations in Alabama

FNB is a \$121.8 million bank with the main office located in Hartford, AL, as a single state institution. FNB has two branch locations, one in Slocomb, AL (Geneva County) and one in Enterprise, AL (Coffee County). The main office and both branches have an ATM on-site. FNB is wholly owned by First Hartford Bancshares, Inc., a one-bank holding company.

As of June 30, 2019, FNB ranked first in deposits, out of two financial institutions in Geneva County, AL and ranked eighth in deposits, out of nine financial institutions in Coffee County, AL. FNB reported total deposits of \$97.6 million, or a 79.55 percent market share, as of June 30, 2019 in Geneva County. FNB reported total deposits of \$2.9 million, or a 0.54 percent market share, as of June 30, 2019 in Coffee County. Note that the Bank opened the Enterprise branch in Coffee County, AL in August 2018.

The AAs comply with regulatory requirements and do not arbitrarily exclude low-or moderate-income geographies. According to the 2015 U.S. Census Bureau, the population of the Geneva County and Coffee County AA's is 26,815 and 50,884, respectively. Geneva County has a total of 10,754 households with 8,043 owner occupied households. Coffee County has a total of 19,160 households with 12,960 owner occupied households.

Local competition in the AA is moderate in the Geneva AA, with competition from four banks. The bank's competition in Coffee County is significant with competition from Synovus Bank, The Citizens Bank, Regions Bank, Trinity Bank, Wells Fargo Bank, Troy Bank and Trust, State Bank & Trust Company, and Woodforest National Bank.

The community contact identified the financial community needs as: financial literacy training; single family, consumer, and small business loans. The community contact added that financial institutions in the area, have shown commitment to meeting the needs of the community.

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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.

## Geneva County, a portion of Dothan MSA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Geneva County AA 2019</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)	6	0.0	16.7	83.3	0.0	0.0
Population by Geography	26,815	0.0	18.0	82.0	0.0	0.0
Housing Units by Geography	12,658	0.0	20.7	79.3	0.0	0.0
Owner-Occupied Units by Geography	8,043	0.0	17.9	82.1	0.0	0.0
Occupied Rental Units by Geography	2,711	0.0	24.5	75.5	0.0	0.0
Vacant Units by Geography	1,904	0.0	26.8	73.2	0.0	0.0
Businesses by Geography	1,245	0.0	19.0	81.0	0.0	0.0
Farms by Geography	173	0.0	25.4	74.6	0.0	0.0
Family Distribution by Income Level	7,522	27.7	18.0	18.1	36.3	0.0
Household Distribution by Income Level	10,754	29.2	16.4	17.6	36.8	0.0
Median Family Income MSA - 20020 Dothan, AL MSA		\$51,581	Median Housing Value			\$78,033
			Median Gross Rent			\$534
			Families Below Poverty Level			18.0%
<i>Source: 2015 ACS and 2019 D&amp;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 Alabama

The Geneva County AA, a portion of the Dothan MSA, was selected for full scope; since, the majority of the Bank's lending activities occurred in this AA. The Coffee County non-MSA AA was selected for a limited scope review and was limited to the following factors: LTD; lending in/out of the AA; and home mortgage geographic and borrower income. Due to limited small business lending an analysis of the geographic and borrower income was not conducted. It is also noteworthy, that the Coffee County branch, located in Enterprise, AL, was only open for 16 months of our review period.



## **LENDING TEST**

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

### **Conclusions for Geneva County AA Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Geneva County, portion of Dothan MSA is good.

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

The bank exhibits poor geographic distribution of loans in the State. During the review period, there was no low-income and only two moderate-income CTs in each AA. Coupled with significant competition, the bank's success in making loans in the moderate-income CT was minimal.

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

Refer to Table O in the state of Alabama 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.

The HMDA data for Geneva County disclosed originations of 196 home mortgage loans of which the bank granted 2.0 percent in the moderate-income CT. This compares very poor wherein 17.9 percent of the owner-occupied housing units are moderate-income CT and the aggregate lending is 14.1 percent.

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

Refer to Table Q in the state of Alabama section of 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.

The Bank's geographic distribution of small business loans within the one moderate-income census tracts reflects very poor dispersion, as 0.0 percent of commercial loans within the sample were originated in the moderate-income census tract.

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

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

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

Refer to Table P in the state of Alabama 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.

FNB Hartford's lending in Geneva County to home mortgage borrowers of different income levels reflects excellent penetration. Low- and moderate-income families represent 27.7 percent and 18.0 percent of the AA, respectively. The Bank's penetration of lending to low-income home mortgage borrowers of 25.5 percent for low-income borrowers and 22.4 percent exceeds the demographic comparators for both income categories and exceeds the percent of families for moderate-income

borrowers. The home mortgage loans to low-income borrowers was slightly below the percentage of families. The bank originated 47.9 percent of home mortgage loans to borrowers in both the low-income levels and the moderate-income levels

***Small Loans to Businesses***

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

The distribution of small business loans to borrowers of different incomes reflects excellent penetration. Lending to businesses with revenues of \$1 million or less represent 82.3 percent of the businesses in Geneva County and represents 100 percent of the bank loans.

**Responses to Complaints**

No public comments or complaints regarding the bank's CRA performance has been received.

**Conclusions for Coffee County, a non-MSA Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Coffee County non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

## 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>	09/27/16 to 12/31/19	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		None
<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>
<b>MMSA(s)</b>		
Geneva County, a portion of Dothan MSA	Full-scope	<i>The Geneva County AA is comprised of only Geneva County, a portion of the Dothan MSA.</i>
Coffee County, non-MSA	Limited Scope	The Coffee County AA is comprised of Coffee County.
State - Alabama		
Geneva County	Full-scope	
Coffee County	Limited scope	

# Appendix B: Summary of MMSA and State Ratings

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RATINGS	(BANK NAME)
Overall Bank:	Lending Test Rating
First National Bank	Satisfactory
MMSA or State:	
State of Alabama	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 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

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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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2017-2019</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Geneva County AA	196	11,155	89.5	0.0	0.0	0.0	17.9	2.0	14.1	82.1	98.0	85.9	0.0	0.0	0.0	0.0	0.0	0.0	
Coffee County AA	23	3,043	10.5	0.0	0.0	0.0	3.7	13.0	3.5	42.3	30.4	26.7	54.0	56.5	69.8	0.0	0.0	0.0	
<b>Total</b>	<b>219</b>	<b>14,198</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>9.2</b>	<b>3.2</b>	<b>6.3</b>	<b>57.5</b>	<b>90.9</b>	<b>42.4</b>	<b>33.3</b>	<b>5.9</b>	<b>51.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 U.S Census; 01/01/2017 - 12/31/2019 Bank 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>2017-2019</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Geneva County AA	196	11,155	89.5	27.7	25.5	10.8	18.0	22.4	20.9	18.1	16.8	20.0	36.3	30.6	28.9	0.0	4.6	19.4	
Coffee County AA	23	3,043	10.5	16.0	4.3	2.3	13.4	4.3	6.2	15.2	30.4	15.6	55.4	43.5	48.7	0.0	17.4	27.1	
<b>Total</b>	<b>219</b>	<b>14,198</b>	<b>100.0</b>	<b>20.3</b>	<b>23.3</b>	<b>4.6</b>	<b>15.1</b>	<b>20.5</b>	<b>10.1</b>	<b>16.2</b>	<b>18.3</b>	<b>16.8</b>	<b>48.4</b>	<b>32.0</b>	<b>43.5</b>	<b>0.0</b>	<b>5.9</b>	<b>25.0</b>	

Source: 2015 U.S Census; 01/01/2017 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2017-19	
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	
Geneva County AA 2019	20	2,011	100	0.0	0.0	19.0	0.0	81.0	100.00	0.0	0.0	0.0	0.0	
<b>Total</b>	20	2,011	100	<b>0.0</b>	0.0	<b>19.0</b>	0.0	<b>81.0</b>	100.00	<b>0.0</b>	0.0	<b>0.0</b>	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 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										2017-19	
Assessment Area:	Total Loans to Small Businesses			Businesses with Revenues <= 1MM		Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Geneva County AA	20	2,011	100.0	82.3	100.0	4.4	0.0	13.3	0.0		
<b>Total</b>	20	2,011	<b>100.0</b>	<b>82.3</b>	<b>100.0</b>	<b>4.4</b>	0.0	<b>13.3</b>	<b>0.0</b>		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%