



## **PUBLIC DISCLOSURE**

October 22, 2018

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

Community National Bank  
Charter Number 15417

1271 Market Street  
Dayton, TN 37321

Office of the Comptroller of the Currency

320 Seven Springs Way  
Suite 310  
Brentwood, TN 37027

**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: This institution is rated Satisfactory**

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

Community National Bank (CNB or bank) has a satisfactory record of meeting community credit needs based on the following:

- CNB's quarterly loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's lending is inside its assessment areas (AAs) by number of loans originated or purchased.
- The overall geographic distribution of loans reflects reasonable distribution in low- and moderate-income (LMI) census tracts (CTs).
- The overall borrower distribution of loans by income level reflects reasonable distribution of borrowers of different income levels and businesses of different sizes.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is

further classified into ‘male householder’ (a family with a male householder’ and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

**Limited 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

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

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

**Metropolitan 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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

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

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

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

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

## Description of Institution

Community National Bank (CNB or bank) is a privately owned, interstate bank that opened for business in 1964. CNB opened a branch in Dayton, Tennessee in 1967, which became CNB's main office in 1986. On March 1, 2009, CNB merged with Rossville Bank, another bank with common ownership. CNB's market is diversified with a primarily rural market in Tennessee and primarily an urban market in Georgia. As of June 30, 2018, CNB had total assets of \$216.9 million, and the tier 1 capital ratio was 12.3 percent. As of June 30, 2018, CNB had gross loans of \$158.4 million or 73 percent total assets. For the 12-month period ended June 30, 2018, the bank experienced loan growth of 18.3 percent, which was primarily funded by excess deposits and conversion of marketable securities.

There have been no fundamental changes to CNB's corporate structure since the last CRA examination. Advanced Banking Services, Inc. (ABS) remains a subsidiary to CNB and its sister bank, known as Simply Bank effective October 2018 and formerly known as First Bank of Tennessee. Each bank owns 50 percent of ABS. Although there were no changes in corporate structure, there were changes in management. Chief Executive Officer (CEO) and President Sherman Barnett retired October 2017. Director and ABS CEO David Seera served as interim CEO and President until April 2018 when Philip Barnes was hired as CNB's President; Mr. Seera continues to serve as CNB's interim CEO. President Barnes also serves on the Board.

The following table reflects the composition of CNB's loan portfolio based on the June 30, 2018, Report of Condition.

Loan Product Category	Gross Loans	
	Dollar (000's)	Percent (%)
Commercial/Commercial Real Estate	\$82,180	51.88
Residential Mortgage	48,295	30.49
Construction/Land Development	21,656	13.67
Farmland/Agriculture	851	0.54
Consumer	5,089	3.21
All Other Lending	344	0.21
<b>Total</b>	<b>\$158,415</b>	<b>100.00</b>

*Source: June 30, 2018 Report of Condition.*

CNB's offices are located in the states of Georgia and Tennessee. The Georgia branches are located in Walker County (Rossville and Flintstone) and Catoosa County (Ringgold). CNB's main office is located in Dayton, Tennessee, with additional Tennessee branch offices in Spring City and in Soddy-Daisy. All bank offices have cash-dispensing automated teller machines (ATMs) with an additional cash-dispensing ATM located on the campus of Bryan College in Dayton, Tennessee. Customers may also access their accounts through mobile banking or by the internet ([www.cnb-usa.com](http://www.cnb-usa.com)). Internet and mobile banking services include transfers between CNB accounts, review of bank balances and transactions, access to loan account information, and bill-pay capability for the internet banking product. In 2018, CNB began offering remote deposit services to customers.

Since the previous CRA examination, the bank has not closed, opened, or relocated any offices. Commercial mortgage and non-mortgage loans and residential home loans continue to be the lending focus at CNB. CNB also conducts lending activities for construction and development and consumer purposes. CNB also offers loans under the Small Business 504 program for community development



purposes. The bank offices offer a full-range of loan and deposit services. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of the communities it serves. CNB received a "Satisfactory" rating during its last Small Bank CRA examination dated March 31, 2014.

## **Scope of the Evaluation**

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

We completed a review of CNB's CRA performance in its AAs under the Small Bank examination procedures, which includes a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities.

The evaluation period for the Lending Test is January 1, 2015, through December 31, 2017, and includes all commercial and business loans and HMDA reportable loans during that period. We completed revenue and geographic distribution analyses on loans originated or purchased inside the AAs.

CNB's primary lending products are commercial mortgage loans, commercial non-mortgage loans, and residential home loans. The bank collects and reports residential home loan data under the requirements of the HMDA. The bank is not required to collect or report loan data for business loans; however, management elected to collect the data and provide it to us for analysis. Therefore, our evaluation is based on the HMDA and small business loans originated or purchased during the review period, not a sample.

### **Data Integrity**

We completed a data integrity review of information collected by management for HMDA mortgage loans originated during the years of 2015, 2016, and 2017 prior to this examination. We performed a limited scope data integrity review of the bank's commercial and business loans during this review. We found CNB's HMDA data and commercial and business loan data to be accurate and reliable.

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

Both of CNB's AAs, the Rhea County Non-MSA AA and the Chattanooga, TN-GA MSA AA, received full-scope reviews. There were no limited-scope AAs.

### **Ratings**

The bank's overall rating is based on the full-scope reviews of both AAs. The AAs were evenly weighted during this review

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

Pursuant to 12 CFR 25.28(c), “Community Reinvestment Act and Interstate Deposit Production Regulations” or 195.28(c), “Community Reinvestment” 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 assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution’s next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Criteria

CNB's performance under the Lending Test is Satisfactory.

### Loan-to-Deposit Ratio

CNB's average LTD ratio is reasonable given the bank's size, financial condition, and credit needs of its AAs. The LTD ratio is calculated on a bank-wide basis. The bank's quarterly average net LTD ratio from March 31, 2014, to June 30, 2018, is 68.5 percent. During the evaluation period, the net LTD quarterly ratio ranged from a low of 62 percent to a high of 82.2 percent. CNB's LTD ratio trended upward the latest three quarters of the review period at 74.5 percent for December 31, 2017, 74.6 percent for March 31, 2018, and 82.2 percent for June 30, 2018.

CNB's average LTD ratio is reasonable when compared to similarly situated banks in or near the bank's AAs, with consideration given to available lending opportunities as well as demographic and economic factors present in the AAs. The average LTD ratio of similarly-situated banks over the evaluation period was 71.7 percent, with a high average ratio of 97.5 percent and a low average ratio of 44.3 percent. Similarly-situated banks include those with total assets between \$101 million and \$979 million that operate in or adjacent to counties within the bank's AAs. The following table depicts quarterly average LTD ratios, with total assets as of June 30, 2018, for CNB and similarly-situated banks.

<b>Loan-to-Deposit Ratios</b>		
<b>Institution</b>	<b>Total Assets (\$000s)</b>	<b>Average Loan-to-Deposit Ratio (%)</b>
<b>Community National Bank</b>	<b>\$216,871</b>	<b>68.47</b>
First Bank of Tennessee	\$329,479	97.45
First Volunteer Bank	\$979,168	82.64
Mountain Valley Bank	\$101,015	72.35
Millennium Bank	\$173,377	76.53
Capital Bank	\$123,760	81.05
Bank of Lafayette	\$255,214	44.28
Bank of Dade	\$105,223	47.44

*Source: Institution's Reports of Condition for 18 quarterly periods from March 2014 to June 2018.*

### Lending in Assessment Area

CNB's lending in its AA is satisfactory. The distribution of lending inside versus outside the bank's AA is calculated on a bank-wide basis. By number of loans, a majority of the loan originations, refinances, and purchases were inside the bank's AA. For the three-year period ended December 2017, 65.9 percent of CNB's loan originations by number of loans for residential and business loans combined were within the bank's AAs. During that same period, 52.9 percent of business loans originations by dollar amount were within the bank's AAs. Refer to Table D below for the data used to evaluate the bank's lending inside and outside the bank's AAs; this data includes the total number of loans and total dollar amount of loan originations during the three-year period ended December 31, 2017.

<b>Table D – Lending Inside and Outside of the Assessment Areas</b>										
<b>Loan Category</b>	Number of Loans					Dollar Amount of Loans \$(000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage	224	69.35	99	30.65	323	\$10,100	33.77	\$19,810	66.23	\$29,910
Small Business	135	60.81	87	39.19	222	\$7,967	52.86	\$7,104	47.14	\$15,071
<b>Total</b>	<b>359</b>	<b>65.87</b>	<b>186</b>	<b>34.13</b>	<b>545</b>	<b>\$18,067</b>	<b>40.17</b>	<b>\$26,914</b>	<b>59.83</b>	<b>\$44,981</b>

*Source: Total Bank Loan Data or 2015, 2016 and 2017*

## **Multistate Metropolitan Area Rating-Chattanooga, TN-GA MSA AA**

### **CRA rating for the Chattanooga, TN-GA MSA AA: Satisfactory**

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

- Based on the data in the Tables in Appendix D and the following performance context considerations outlined below, the geographic distribution of the bank's home mortgage loans is excellent, and the borrower distribution among borrowers of different income, including low- and moderate-income individuals is reasonable. The geographic distribution of level of business loan originations is reasonable based on a limited level of loan originations in low-income areas coupled with an excellent performance in the moderate-income areas. Borrower distribution for business loans is excellent.

### **Description of Institution's Operations in the Chattanooga, TN-GA MSA AA**

Per 2010 U.S. census data, the Chattanooga, TN-GA, MSA is comprised of 106 CTs. Of these, 82 CTs are located in Chattanooga (Hamilton County), Tennessee, 11 CTs are located in Catoosa County, Georgia, and 13 CTs are located in Walker County, Georgia. The bank's TN-GA AA is comprised of 24 CTs. Eight of the bank's CTs are located in Hamilton County, 11 CTs are located in Catoosa County, and five CTs are located in Walker County. The eight CTs in Hamilton County are contiguous to each other and to Rhea County (Dayton and Spring City branches), the bank's non-MSA AA. Additionally, Catoosa County and Walker County, Georgia are contiguous to each other as are the 16 CTs comprising the bank's Georgia AA. Rossville serves as the bank's main office for the Georgia operation, while Dayton serves as the bank's main office for the Tennessee operation, including Hamilton County/Soddy Daisy. As of June 30, 2018, 58.31 percent of the bank's total deposits are derived from the Chattanooga, TN-GA MSA AA.

Please refer to the community profile for the Chattanooga, TN-GA MSA AA in Appendix C for additional detailed demographics and other performance context information for this AA.

### **Conclusions with Respect to Performance Tests in the Chattanooga, TN-GA MSA AA**

#### **LENDING TEST**

##### **Geographic Distribution of Loans**

The overall geographic distribution of loans in LMI CTs is satisfactory. The geographic distribution of mortgage loans in LMI CTs is excellent. The geographic distribution of business loans in moderate-income CTs is reasonable.

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

Based on the data in Table O for 2015-2016 and Table O for 2017, in appendix D, and the following performance context considerations, the bank's home mortgage loan originations and purchases reflect excellent distribution across geographies of different income levels.

- The bank's home mortgage loans in LMI geographies reflects excellent distribution. The proportion of loans was stronger than the proportion of owner-occupied housing units in those geographies and stronger than the aggregate distribution of loans in those geographies.

### **Small Loans to Businesses**

Based on the data in Table Q for 2015-2016 and Table Q for 2017, in appendix D, and the following performance context considerations, the geographic distribution of the bank's originations and purchases of small loans to businesses is reasonable.

- The distribution of the bank's small loans to businesses in LMI geographies reflects reasonable distribution. In years 2015, 2016, and 2017, the proportion of loans was stronger than the proportion of businesses in moderate-income geographies and the aggregate distribution of loans in those geographies.
- The bank has limited opportunities to lend to businesses within these low-income geographies inside of their AA, based on the existence of only two low-income CTs in this AA. Within these two low-income CTs, there was no business lending in 2017 and very limited business lending in 2015 and 2016. The location of bank offices away from these two CTs has some adverse impact on the bank's ability to lend within these areas.

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

The overall borrower distribution among borrowers of different income levels and businesses of different sizes is reasonable.

### **Home Mortgage Loans**

Based on the data in Table P for 2015-2016 and the Table P for 2017, in appendix D, and the following performance context considerations, the distribution of the bank's originations and purchases of home mortgage loans to individuals of different income levels, including low- and moderate-income individuals is reasonable.

- The distribution of the bank's home mortgage loans to LMI borrowers reflects reasonable distribution. The proportion of loans was generally comparable to the proportion of LMI families and generally stronger than the aggregate distribution of loans to those borrowers.

### **Small Loans to Businesses**

Based on the data in Table R for 2015-2016 and Table R for 2017, in appendix D, and the following performance context considerations, the borrower distribution of the bank's originations and purchases of small loans to small businesses by revenue is excellent.

- The distribution of the bank's small loans to small businesses by revenue reflects excellent distribution. For the review period, the proportion of CNB loans was stronger than both the proportion of small businesses and the aggregate distribution of loans to those businesses.

## **Rhea County, TN – Non-MSA AA**

### **CRA rating for the Rhea County, TN - Non-MSA AA: Satisfactory**

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

- Based on the data in the Tables in Appendix D and the following performance context considerations outlined below, the geographic distribution of the bank's home mortgage and small business loan originations and purchases is reasonable. This AA had no LMI CTs in the years of 2015 and 2016, and no low-income CTs in 2017. In 2017, the geographic distribution of the bank's home mortgage loans was slightly above the aggregate and the proportion of owner-occupied housing units for the moderate-income CTs, but the geographic distribution for business loans was lower based on a limited level of loan originations. Borrower distribution for both home mortgage loans and business loans was excellent.

### **Description of Institution's Operations in the Rhea County, TN - Non-MSA AA**

This Tennessee non-MSA AA consists of all six CTs in Rhea County. In 2015 and 2016, all CTs were middle-income and distressed (poverty). In 2017, the CTs changed to the following distribution: two moderate-income tracts, three middle-income tracts, and one upper-income tract. The middle-income tracts were considered distressed (poverty/unemployment). CNB has two locations in Rhea County, which is located in eastern Tennessee. The main office is located in Dayton and one branch is located in Spring City. The bank's total deposits derived from Rhea County are 41.7 percent as of June 30, 2018.

Please refer to the community profile for the Rhea County AA in Appendix C for additional detailed demographics and other performance context information for this AA.

### **Conclusions with Respect to Performance Tests in the Rhea County, TN – Non-MSA AA**

#### **LENDING TEST**

#### **Geographic Distribution of Loans**

There were no LMI CTs within the Rhea County AA during 2015-2016. There were no low-income CTs within the Rhea County AA during 2017. The geographic distribution of loans for 2017 reflects reasonable distribution in moderate-income CTs for CNB's home mortgage loans and small business loan originations. The geographic distribution of home mortgage loans were comparable to the AA characteristics, which offset a weaker distribution in the moderate-income geographies for business loans.

#### **Home Mortgage Loans**

Based on the data in Table O for 2015-2016 and Table O for 2017, in appendix D, and the following performance context considerations, the geographic distribution of the bank's home mortgage loan originations and purchases is reasonable.

- The distribution of the bank’s home mortgage loans in the moderate-income geographies for 2017 is reasonable. The proportion of loans was stronger than the proportion of owner-occupied housing units in those geographies, and stronger than the aggregate distribution of loans in those geographies.

### **Small Loans to Businesses**

Based on the data in Table Q for 2015-2016 and Table Q for 2017, in appendix D, and the following performance context considerations, the geographic distribution of the bank’s originations and purchases of small loans to businesses in 2017 is reasonable.

- The distribution of the bank’s small loans to businesses in 2017 geographies reflects reasonable distribution. In the moderate-income geographies for 2017, the proportion of loans was generally weaker than both the proportion of businesses in the moderate-income geographies and the aggregate distribution of loans in those geographies. CNB had limited opportunities to lend to businesses in the LMI geographies inside of this AA as there were only two moderate-income CTs in this AA in 2017, and no LMI CTs in 2015 and 2016.
- However, all middle income CTs in this AA were considered distressed for the years of 2015, 2016, and 2017. In the years of 2015 and 2016, the bank’s lending performance for middle-income CTs was comparable to the proportion of businesses and the aggregate and was excellent compared to those variables in 2017.

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

The overall borrower distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.

### **Home Mortgage Loans**

Based on the data in Table P for 2015-2016 and Table P for 2017, in appendix D, and the following performance context considerations, the borrower distribution of the bank’s originations and purchases of home mortgage loans is excellent.

- The distribution of the bank’s home mortgage loans to LMI borrowers reflects excellent distribution. While the proportion of loans was generally weaker comparable to the proportion of low-income families, the proportion of loans was stronger than the proportion of moderate-income families. The proportion of loans was stronger than the aggregate distribution of loans to all LMI borrowers for both 2015-2016 and 2017.

### **Small Loans to Businesses**

Based on the data in Table R for 2015-2016 and Table R for 2017, in appendix D, and the following performance context considerations, the borrower distribution of the bank’s originations and purchases of small loans to small businesses by revenue is excellent.



- The distribution of the bank's small loans to small businesses by revenue reflect excellent distribution. In 2015-2016 and 2017, the proportion of CNB loans was stronger than both the proportion of small businesses, and the aggregate distribution of loans to those businesses.

## **Responses to Complaints**

The bank did not receive any CRA-related complaints during the evaluation period.

## 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 metropolitan and nonmetropolitan areas 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>	Lending Test : (01/01/2015 to 12/31/2017)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Community National Bank Dayton, Tennessee	Home Mortgage Loans Business Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Chattanooga, TN-GA MSA Rhea County, TN – Non-MSA	Full-Scope Full-Scope	

# Appendix B: Summary of Multistate Metropolitan Area and State Ratings

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RATINGS	COMMUNITY NATIONAL BANK
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
Community National Bank	Satisfactory
<b>Multistate Metropolitan Area:</b>	
Chattanooga, TN-GA MSA	Satisfactory
<b>Other Full Scope AA:</b>	
Rhea County, TN	Satisfactory

## Appendix C: Community Profiles for Full-Scope Areas

### Chattanooga, TN-GA Multistate Metropolitan Statistical Area AA

Per 2010 U.S. census data, the Chattanooga, TN-GA, MSA is comprised of 106 CTs. Of these, 82 CTs are located in Chattanooga (Hamilton County), Tennessee, 11 CTs are located in Catoosa County, Georgia, and 13 CTs are located in Walker County, Georgia. The bank's TN-GA AA is comprised of 24 CTs. Eight of the bank's CTs are located in Hamilton County, 11 CTs are located in Catoosa County, and five CTs are located in Walker County. The AA meets the requirements of the regulations and does not arbitrarily exclude any LMI areas. There are no natural boundaries within the AA that hinder accessibility. The eight CTs in Hamilton County are contiguous to each other and to Rhea County (Dayton and Spring City branches), the bank's non-MSA AA. Additionally, Catoosa County and Walker County, Georgia are contiguous to each other as are the 16 CTs comprising the bank's Georgia AA. Rossville serves as the bank's main office for the Georgia operation, while Dayton serves as the bank's main office for the Tennessee operation, including Hamilton County/Soddy Daisy. Customers have access to bank branches during normal business hours on weekdays and from 9am to 12pm at the Rossville, Georgia location drive thru on Saturdays. As of June 30, 2018, 58.31 percent of the bank's total deposits are derived from the Chattanooga, TN-GA MSA AA.

Table A – Demographic Information of the Assessment Area						2015-16
Assessment Area: Chattanooga, TN-GA MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	8.3	16.7	54.2	20.8	0.0
Population by Geography	128,923	7.0	18.4	53.5	21.1	0.0
Housing Units by Geography	55,078	7.1	19.9	53.9	19.1	0.0
Owner-Occupied Units by Geography	35,849	4.2	16.2	55.8	23.9	0.0
Occupied Rental Units by Geography	13,540	13.2	25.6	51.8	9.4	0.0
Vacant Units by Geography	5,689	11.1	30.1	47.0	11.8	0.0
Businesses by Geography	5,806	7.9	19.3	53.0	19.8	0.0
Farms by Geography	159	5.0	11.9	56.6	26.4	0.0
Family Distribution by Income Level	34,864	21.3	20.7	21.1	36.9	0.0
Household Distribution by Income Level	49,389	23.6	19.0	17.3	40.1	0.0
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA		\$54,527	Median Housing Value			\$121,714
			Median Gross Rent			\$639
			Families Below Poverty Level			10.3%

Source: 2010 U.S. Census and 2016 D&B Data  
Due to rounding, totals may not equal 100.0  
(\* ) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area							2017
Assessment Area: Chattanooga, TN-GA MSA AA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	24	8.3	29.2	45.8	16.7	0.0	
Population by Geography	130,519	7.3	28.9	48.0	15.8	0.0	
Housing Units by Geography	55,891	7.0	31.4	47.0	14.6	0.0	
Owner-Occupied Units by Geography	34,382	3.5	29.1	49.0	18.4	0.0	
Occupied Rental Units by Geography	14,537	13.5	35.3	45.7	5.5	0.0	
Vacant Units by Geography	6,972	10.9	34.7	39.8	14.6	0.0	
Businesses by Geography	6,108	7.8	24.9	52.5	14.8	0.0	
Farms by Geography	183	4.9	21.3	50.3	23.5	0.0	
Family Distribution by Income Level	34,845	23.9	18.7	22.1	35.4	0.0	
Household Distribution by Income Level	48,919	26.2	16.9	18.3	38.6	0.0	
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA		\$58,694	Median Housing Value			\$118,079	
			Median Gross Rent			\$694	
			Families Below Poverty Level			12.9%	
<i>Source: 2015 ACS Census and 2017 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>							

Table C - Branch and ATM Distribution by Geography Income Level												2015-2016
Assessment Area: Chattanooga, TN-GA MSA AA												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	2	8.3	9,029	7.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	16.7	23,699	18.4	1	25.0	1	25.0	1	25.0	0	0.0
Middle	13	54.2	68,986	53.5	2	50.0	2	50.0	2	50.0	0	0.0
Upper	5	20.8	27,209	21.1	1	25.0	1	25	1	25.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>24</b>	<b>100.0</b>	<b>128,923</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>
<i>Source: 2010 U.S. Census &amp; Bank Data</i> <i>Due to rounding, totals may not equal 100.0</i>												

Table C - Branch and ATM Distribution by Geography Income Level												2017	
Assessment Area: Chattanooga, TN-GA MSA AA													
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches		
	#	%	#	%	#	%	#	%	#	%	#	%	
Low	2	8.3	9,573	7.3	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	7	29.2	37,701	28.9	3	75.0	3	75.0	3	75.0	0	0.0	
Middle	11	45.8	62,687	48.0	0	0.0	0	0.0	0	0.0	0	0.0	
Upper	4	16.7	20,558	15.8	1	25.0	1	25.0	1	25.0	0	0.0	
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Totals</b>	<b>24</b>	<b>100.0</b>	<b>130,519</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	

Source: 2015 ACS Census & Bank Data  
Due to rounding, totals may not equal 100.0

## Hamilton County

Hamilton County (Tennessee) is the largest county located in the Chattanooga, TN-GA MSA AA. The county seat is located in Chattanooga, Tennessee. The bank designated eight of the 82 CTs in Hamilton County as part of their AA. Of these CTs, two are low-income (25 percent), one is moderate-income (12.5 percent), four are middle-income (50 percent), and one is upper-income (12.5 percent), according to 2017 USCB data. This distribution represents a change from the 2015-2016 CTs. In 2015 and 2016, two CTs were low-income (25 percent), four CTs were middle-income (50 percent), and two CTs were upper-income (25 percent). There were no distressed CTs during our review period in Hamilton County. According to the 2016 USCB, Hamilton County has a population of 351 thousand with a growth rate of 4.4 percent since 2010. The population of the CTs included in the bank's AA is 36,449 or 10.4 percent of the total Hamilton County population. Other cities in the county include East Ridge, Hixson, Ootlewah, Sale Creek, and Ridgeside. The bank's Soddy Daisy branch is located in a moderate-income CT in Hamilton County and represents 4.3 percent of total deposits as of June 30, 2018.

Hamilton County's economy is broad-based in the food industry, trucking, education, and health care. As of August 2018, the Bureau of Labor Statistics (BLS) reported a 3.7 percent unemployment rate for the county. The largest employers in Hamilton County are Craftworks Restaurants & Breweries, LLC with 17,309 employees; New Mountain Lake Holdings, LLC, a trucking company with 10,885 employees; Memorial Health Care System with 8,800 employees; U.S. Express Inc., a trucking company with 8,600 employees; and Hamilton County Board of Education with 5,000 employees. The 2016 USCB reports median household income of \$49,434 in Hamilton County.

## Catoosa County

Catoosa County (Tennessee) is located in the Chattanooga, TN-GA MSA AA. The bank designated all 11 CTs in Catoosa County as part of their AA. Of these CTs, two are moderate-income (18.2 percent), six are middle-income (54.5 percent), and three are upper-income (27.3 percent), according to 2017 USCB data. This distribution represents a change from 2015 and 2016. In 2015 and 2016, one CT was moderate-income (9.1 percent), seven CTs were middle-income (54.5 percent), and three CTs were

upper-income (27.3 percent). No CTs were considered distressed during our review period. According to the 2015 USCB, Catoosa County has a population of 65 thousand with a growth rate of 2.2 percent since 2010. Cities in the county include Ringgold and Fort Oglethorpe. The county seat is located in Ringgold. The bank's Ringgold branch is located in an upper-income tract in Catoosa County and represents 13.8 percent of total deposits as of June 30, 2018.

Catoosa County's economy is centered in manufacturing. As of August 2018, the BLS reported an unemployment rate of 3.3 percent for Catoosa County. The largest employers in Catoosa County include, Five Star Holding Co., a manufacturing company with 2,000 employees; Catoosa County Schools, with 1,900 employees; and Shaw Industries Group, Inc., a floor covering business with 250 employees. The 2016 USCB reports median household income of \$52,265 in Catoosa County.

### **Walker County**

Walker County (Georgia) is located in the Chattanooga, TN-GA MSA AA. The bank designated five of the 13 CTs in Walker County as part of their AA. Of these CTs, four are moderate-income (80 percent) and one is middle-income (20 percent), according to 2017 USCB data. This distributions represents a change from 2015 and 2016. In 2015 and 2016, three CTs were moderate-income (60 percent) and two CTs were middle-income (40 percent). Walker County had no distressed CTs during our review period. According to the 2015 USCB, Walker County has a population of 68 thousand with a decline of 0.9 percent since 2010. The county seat is located in LaFayette. Other cities in Walker County include Chickamuaga, Lookout Mountain, and Rossville. The bank's Rossville branch is located in a moderate-income CT and represents 30 percent of the bank's total deposits as of June 30, 2018.

Walker County's economy is broad-based in manufacturing, food service, and education. As of August 2018, the BLS reported an unemployment rate of 3.6 percent for Walker County. The largest employers in Walker County include, Walker County Schools with 1,900 employees; Roper Corporation, a manufacturing company with 1,800 employees; Walker County Board of Education with 1,500 employees; and Shaw Industries, Inc. a floor covering business with 1,000 employees.

### **Community Contact**

We made two community contacts in the Chattanooga, TN-GA MSA AA, one in Tennessee and one in Georgia. The community contact in Tennessee for Chattanooga, TN-GA, MSA AA, noted the financial institutions were not doing enough to foster economic growth in all communities. The contact explained Chattanooga's economic growth had improved; however, politics and profit have prevented the economic attention needed in low-income and minority communities in the area. The contact expressed that financial institutions in Chattanooga need to do better for all of its communities. The community contact in Georgia noted that financial institutions are trying their best to meet the needs of the community. The community contact stated that there is a need for loans ranging from \$5,000 to \$50,000 for individuals and small businesses, and there is a need for more multi-family housing units in densely populated counties.

## Rhea County, TN - Non-MSA AA

The Tennessee non-MSA AA consists of all CTs in Rhea County. Rhea County has a total of six CTs. In 2015 and 2016, all CTs were middle-income and distressed (poverty). In 2017, the CTs changed to the following distribution: two moderate-income tracts, three middle-income tracts, and one upper-income tract. The middle-income tracts were considered distressed (poverty/unemployment). The AA meets the requirement of the regulation and does not arbitrarily exclude any LMI areas. There are no natural boundaries within the AA that hinder accessibility. The CTs are contiguous to each other. The six CTs in Rhea County are also contiguous to the eight CTs in the adjoining Hamilton County/Chattanooga, TN-GA MSA AA, where the bank's Soddy-Daisy branch is located. CNB has two locations in Rhea County. The main office is located in Dayton and one branch is located in Spring City. As of 2017, there are two moderate-income tracts in Rhea County. Of the 8,365 families living in Rhea County, 1,966 families (23.5 percent) are considered low-income and 1,297 families (15.5 percent) are considered moderate-income. There are 1,606 (19.2 percent) families below the poverty level. The unemployment rate is 6.8 percent.

CNB is located in eastern Tennessee. Dayton serves as the county seat of Rhea County and is located on U.S. Highway 27, a major north-south interstate connector. Other towns located in Rhea County include Spring City and Graysville. Customers have access to bank branches during normal business hours on weekdays and from 9am to 12pm at the Dayton location drive thru on Saturdays. As of June 30, 2018, 41.7 percent of the bank's total deposits are derived from Rhea County.

<b>Assessment Area: Community Rhea County, TN AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	6	0.0	0.0	100.0	0.0	0.0
Population by Geography	31,809	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	14,166	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	8,837	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	3,024	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	2,305	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,334	0.0	0.0	100.0	0.0	0.0
Farms by Geography	58	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	8,449	20.4	18.1	21.7	39.8	0.0
Household Distribution by Income Level	11,861	23.9	15.2	19.9	41.0	0.0
Median Family Income Non-MSAs - TN		\$44,386	Median Housing Value			\$102,518
			Median Gross Rent			\$532
			Families Below Poverty Level			14.2%
<i>Source: 2010 U.S. Census and 2016 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>						



Table A – Demographic Information of the Assessment Area							2017
Assessment Area: Community Rhea County, TN AA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	6	0.0	33.3	50.0	16.7	0.0	
Population by Geography	32,394	0.0	42.0	43.8	14.1	0.0	
Housing Units by Geography	14,406	0.0	38.6	45.9	15.5	0.0	
Owner-Occupied Units by Geography	8,564	0.0	32.1	51.3	16.7	0.0	
Occupied Rental Units by Geography	3,981	0.0	59.5	28.6	11.9	0.0	
Vacant Units by Geography	1,861	0.0	24.3	57.9	17.7	0.0	
Businesses by Geography	1,315	0.0	49.7	39.6	10.7	0.0	
Farms by Geography	48	0.0	41.7	50.0	8.3	0.0	
Family Distribution by Income Level	8,365	23.5	15.5	20.1	41.0	0.0	
Household Distribution by Income Level	12,545	25.5	17.2	15.3	42.0	0.0	
Median Family Income Non-MSAs - TN		\$46,254	Median Housing Value			\$109,261	
			Median Gross Rent			\$589	
			Families Below Poverty Level			19.2%	
<i>Source: 2015 ACS Census and 2017 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>							

Table C - Branch and ATM Distribution by Geography Income Level												2015-2016
Assessment Area: Rhea County, TN AA												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Middle	6	100.0	31,809	100.0	2	100.0	3	100.0	2	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>6</b>	<b>100.0</b>	<b>31,809</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>
<i>Source: 2010 U.S. Census &amp; Bank Data</i> <i>Due to rounding, totals may not equal 100.0</i>												

Table C - Branch and ATM Distribution by Geography Income Level												2017	
Assessment Area: Rhea County, TN AA													
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches		
	#	%	#	%	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	2	33.3	13,615	42.0	1	50.0	2	66.7	1	50.0	0	0.0	
Middle	3	50.0	14,203	43.8	0	0	0	0.0	0	0	0	0.0	
Upper	1	16.7	4,576	14.1	1	50.0	1	33.3	1	50.0	0	0.0	
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Totals</b>	<b>6</b>	<b>100.0</b>	<b>32,394</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	

*Source: 2015 ACS Census & Bank Data  
Due to rounding, totals may not equal 100.0*

Rhea County’s economic base is diverse. Over the past 30 years, it has moved from an agricultural economy to an industrial and service economy. Manufacturing industries make up over 40 percent of non-agriculture employment opportunities. There are approximately 13,140 full-time employees in Rhea County. The largest employers in Rhea County are La-Z-Boy, a furniture manufacture with 1,400 employees; Tennessee Valley Authority, an electric company with 1,100 employees; Rhea County School District with 650 employees; and International Automotive Components Group, an automotive manufacturing company with 626 employees. Other employers include Bryan College, Robinson Manufacturing Company, Suburban Manufacturing Company, Rhea Medical Center, and Wal-Mart Stores Inc.

Due to the economic downturn from 2008-2011, Rhea County experienced an increase in unemployment, with the peak being in 2009 with over 13 percent unemployment. Several local employers laid-off workers during this time. Since then, the economy and unemployment numbers have improved.

**Community Contact**

A community contact was made for Rhea County AA, who expressed that the financial institutions in the AA were meeting the needs of the community and committed to economic growth in the community.

## 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 areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems. [Note: Do not renumber the tables.]

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 MA/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 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) throughout those geographies. Because small business data is 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 Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

- 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. Because small farm data is 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 (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer 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 throughout 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 MA/assessment area.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16	
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	
Chattanooga, TN-GA MSA AA	60	3,560	100.0	3,925	4.2	6.7	2.0	16.2	21.7	12.0	55.8	51.7	57.1	23.9	20.0	28.8	0.0	0.0	0.0	
<b>Total</b>	<b>60</b>	<b>3,560</b>	<b>100.0</b>	<b>3,925</b>	<b>4.2</b>	<b>6.7</b>	<b>2.0</b>	<b>16.2</b>	<b>21.7</b>	<b>12.0</b>	<b>55.8</b>	<b>51.7</b>	<b>57.1</b>	<b>23.9</b>	<b>20.0</b>	<b>28.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2010 U.S Census; 01/01/2015 - 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	
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	
Chattanooga, TN-GA MSA AA	42	3,255	100.0	3,907	3.5	4.8	2.9	29.1	59.5	24.5	49.0	26.2	50.4	18.4	9.5	22.2	0.0	0.0	0.0	
<b>Total</b>	<b>42</b>	<b>3,255</b>	<b>100.0</b>	<b>3,907</b>	<b>3.5</b>	<b>4.8</b>	<b>2.9</b>	<b>29.1</b>	<b>59.5</b>	<b>24.5</b>	<b>49.0</b>	<b>26.2</b>	<b>50.4</b>	<b>18.4</b>	<b>9.5</b>	<b>22.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16
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
Rhea Co. AA	90	2,433	100.0	872	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>90</b>	<b>2,433</b>	<b>100.0</b>	<b>872</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 U.S Census; 01/01/2015 - 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
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
Rhea Co. AA	32	852	100.0	809	0.0	0.0	0.0	32.1	34.4	33.3	51.3	46.9	51.3	16.7	18.8	15.5	0.0	0.0	0.0
<b>Total</b>	<b>32</b>	<b>852</b>	<b>100.0</b>	<b>809</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>32.1</b>	<b>34.4</b>	<b>33.3</b>	<b>51.3</b>	<b>46.9</b>	<b>51.3</b>	<b>16.7</b>	<b>18.8</b>	<b>15.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2015-16</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Chattanooga, TN-GA MSA AA	60	3,560	100.0	3,925	21.3	18.3	8.8	20.7	23.3	21.1	21.1	16.7	19.7	36.9	31.7	26.3	0.0	10.0	24.1	
<b>Total</b>	<b>60</b>	<b>3,560</b>	<b>100.0</b>	<b>3,925</b>	<b>21.3</b>	<b>18.3</b>	<b>8.8</b>	<b>20.7</b>	<b>23.3</b>	<b>21.1</b>	<b>21.1</b>	<b>16.7</b>	<b>19.7</b>	<b>36.9</b>	<b>31.7</b>	<b>26.3</b>	<b>0.0</b>	<b>10.0</b>	<b>24.1</b>	

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Chattanooga, TN-GA MSA AA	42	3,255	100.0	3,907	23.9	16.7	7.5	18.7	16.7	19.1	22.1	11.9	20.4	35.4	50.0	30.9	0.0	4.8	22.1	
<b>Total</b>	<b>42</b>	<b>3,255</b>	<b>100.0</b>	<b>3,907</b>	<b>23.9</b>	<b>16.7</b>	<b>7.5</b>	<b>18.7</b>	<b>16.7</b>	<b>19.1</b>	<b>22.1</b>	<b>11.9</b>	<b>20.4</b>	<b>35.4</b>	<b>50.0</b>	<b>30.9</b>	<b>0.0</b>	<b>4.8</b>	<b>22.1</b>	

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2015-16</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>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Rhea Co. AA	90	2,433	100.0	872	20.4	12.2	5.3	18.1	21.1	14.6	21.7	32.2	23.7	39.8	28.9	37.5	0.0	5.6	18.9	
<b>Total</b>	<b>90</b>	<b>2,433</b>	<b>100.0</b>	<b>872</b>	<b>20.4</b>	<b>12.2</b>	<b>5.3</b>	<b>18.1</b>	<b>21.1</b>	<b>14.6</b>	<b>21.7</b>	<b>32.2</b>	<b>23.7</b>	<b>39.8</b>	<b>28.9</b>	<b>37.5</b>	<b>0.0</b>	<b>5.6</b>	<b>18.9</b>	

*Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017</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>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Rhea Co. AA	32	852	100.0	809	23.5	12.5	4.0	15.5	37.5	16.9	20.1	15.6	20.5	41.0	25.0	39.3	0.0	9.4	19.3	
<b>Total</b>	<b>32</b>	<b>852</b>	<b>100.0</b>	<b>809</b>	<b>23.5</b>	<b>12.5</b>	<b>4.0</b>	<b>15.5</b>	<b>37.5</b>	<b>16.9</b>	<b>20.1</b>	<b>15.6</b>	<b>20.5</b>	<b>41.0</b>	<b>25.0</b>	<b>39.3</b>	<b>0.0</b>	<b>9.4</b>	<b>19.3</b>	

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



<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2015-16</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Chattanooga, TN-GA MSA AA	58	2,753	100	1,407	7.7	3.4	9.8	18.8	22.4	17.8	53.3	62.1	50.0	20.2	12.1	22.4	0.0	--	0.0	
<b>Total</b>	<b>58</b>	<b>2,753</b>	<b>100</b>	<b>1,407</b>	<b>7.7</b>	<b>3.4</b>	<b>9.8</b>	<b>18.8</b>	<b>22.4</b>	<b>17.8</b>	<b>53.3</b>	<b>62.1</b>	<b>50.0</b>	<b>20.2</b>	<b>12.1</b>	<b>22.4</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Chattanooga, TN-GA MSA AA	22	3,622	100	1,407	7.8	--	9.8	24.9	40.9	24.7	52.5	40.9	48.5	14.8	18.2	16.9	0.0	--	0.0	
<b>Total</b>	<b>22</b>	<b>3,622</b>	<b>100</b>	<b>1,407</b>	<b>7.8</b>	<b>--</b>	<b>9.8</b>	<b>24.9</b>	<b>40.9</b>	<b>24.7</b>	<b>52.5</b>	<b>40.9</b>	<b>48.5</b>	<b>14.8</b>	<b>18.2</b>	<b>16.9</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2015-16</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Rhea Co. AA	27	1,551	100	194	0.0	--	0.0	0.0	--	0.0	100.0	100	100.0	0.0	--	0.0	0.0	--	0.0	
<b>Total</b>	<b>27</b>	<b>1,551</b>	<b>100</b>	<b>194</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Rhea Co. AA	28	512	100	194	0.0	--	0.0	49.7	35.7	53.6	39.6	57.1	38.1	10.7	7.1	8.2	0.0	--	0.0	
<b>Total</b>	<b>28</b>	<b>512</b>	<b>100</b>	<b>194</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>49.7</b>	<b>35.7</b>	<b>53.6</b>	<b>39.6</b>	<b>57.1</b>	<b>38.1</b>	<b>10.7</b>	<b>7.1</b>	<b>8.2</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2015-16</b>	
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	
Chattanooga, TN-GA MSA AA	58	2,753	100	1,407	82.3	91.7	43.9	4.1	4.2	13.6	4.2	
<b>Total</b>	<b>58</b>	<b>2,753</b>	<b>100</b>	<b>1,407</b>	<b>82.3</b>	<b>91.7</b>	<b>43.9</b>	<b>4.1</b>	<b>4.2</b>	<b>13.6</b>	<b>4.2</b>	

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017</b>	
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	
Chattanooga, TN-GA MSA AA	22	3,621	100	1,407	85.7	90.9	43.9	4.3	9.1	10.0	--	
<b>Total</b>	<b>22</b>	<b>3,621</b>	<b>100</b>	<b>1,407</b>	<b>85.7</b>	<b>90.9</b>	<b>43.9</b>	<b>4.3</b>	<b>9.1</b>	<b>10.0</b>	<b>--</b>	

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2015-16</b>	
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	
Rhea Co. AA	37	1,080	100	194	79.4	91.9	45.4	3.3	--	17.3	8.1	
<b>Total</b>	<b>37</b>	<b>1,080</b>	<b>100</b>	<b>194</b>	<b>79.4</b>	<b>91.9</b>	<b>45.4</b>	<b>3.3</b>	<b>--</b>	<b>17.3</b>	<b>8.1</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017</b>	
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	
Rhea Co. AA	28	512	100	194	80.0	85.7	45.4	3.9	--	16.1	14.3	
<b>Total</b>	<b>28</b>	<b>512</b>	<b>100</b>	<b>194</b>	<b>80.0</b>	<b>85.7</b>	<b>45.4</b>	<b>3.9</b>	<b>--</b>	<b>16.1</b>	<b>14.3</b>	
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>												