

## PUBLIC DISCLOSURE

October 14, 2019

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community National Bank of Okarche Charter Number 18233

653 North Main Highway 81 Okarche, Oklahoma 73762

Office of the Comptroller of the Currency

The Harvey Parkway Building 301 NW 63rd Street, Suite 490 Oklahoma City, OK 73116-7908

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.

## **Table of Contents**

OVERALL CRA RATING	1
SCOPE OF THE EVALUATION	3
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.	3
STATE RATING	4
STATE OF OKLAHOMA	
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS	B-1
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS	C-1
APPENDIX D: TABLES OF PERFORMANCE DATA	D-1

## **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:

- Community National Bank of Okarche's (CNB) the bank's loan-to-deposit (LTD) ratio is reasonable considering the bank's size, financial condition, and credit needs of the assessment area (AA). The bank's average quarterly LTD ratio of 53.37 percent is in line with the average quarterly LTD ratios for similarly situated banks over the same time period.
- The majority of the bank's loans are inside its AA. The bank originated and purchased 83 percent of its total loans inside the bank's AA during the evaluation period.
- The bank meets the standard for satisfactory performance for lending to farms and businesses of different sizes.
- The bank has not received any consumer complaints regarding CRA performance during the assessment period.

#### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable. The average quarterly LTD ratio is 53.37 percent for the period ranging from June 30, 2015 to September 30, 2019. This is in line with the average quarterly LTD ratios for similarly situated banks over the same time-period. This information is depicted in the table below:

Loan-To-Deposit Ratios											
Institution	Total Assets \$000's (As of 9/30/19)	Average Loan to Deposit Ratio									
Community National Bank of Okarche, Okarche, Oklahoma	116,267	53.37%									
The Farmers and Merchants National Bank of Fairview, Fairview, Oklahoma	113,656	41.57%									
The First Bank of Okarche, Okarche, Oklahoma	110,727	46.79%									
Community State Bank, Hennessey, Oklahoma	68,741	43.12%									
Cleo State Bank, Cleo Springs, OK	86,917	40.85%									
Source: Institution Reports of Condition from June 30, 2015 to September 30,	2019.										

#### **Lending in Assessment Area**

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

The bank originated and purchased 83 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.

Lending Inside and Outside of the Assessment Area												
Loan Category	N	lumber o	of Loans			Dollar A	Amount o	of Loans \$(0	000s)			
	Inside Outside		de	Total	Inside		Outside		Total			
	#	%	#	%	#	\$	%	\$	%	\$(000s)		
Small Business	40	80	10	20	50	3,352	86	555	14	3,907		
Small Farm	43	86	7	14	50	4,567	86	747	14	5,314		
Total	83	83	17	17	100	7,919	86	1,302	14	9,221		

## **Description of Institution**

Community National Bank of Okarche (CNB) is a community bank based in Okarche, Oklahoma. Bank locations include CNB's headquarters and a non-deposit ATM at 653 North Main Street/Highway 81 in Okarche, Oklahoma and one branch location at 101 North Main in Fairview, Oklahoma. An additional non-deposit ATM in Fairview is located at the Sooner Coop Convenience Store at the intersection of South Main Street and Highway 60. CNB has not opened or closed any branch locations since the prior CRA examination.

CNB's primary focus is to serve agricultural, commercial, and consumer customers in the Okarche and Fairview areas. CNB is a full-service institution providing traditional loan and deposit products to meet community needs. There are no legal or financial impediments to prevent CNB from meeting the credit needs of the AA. CNB received an overall rating of "Satisfactory" at the previous examination dated April 28, 2015.

As of September 30, 2019, total bank assets amounted to approximately \$116 million, of which the loan portfolio totaled \$48 million or 42 percent. CNB's loan portfolio composition is depicted in the following table:

Loan Portfolio Composition as of September 30, 2019										
Loan Category	\$ (000)	%								
Business Loans & Related Real Estate	\$21,979	45.4%								
Agricultural Loans & Related Real Estate	\$13,910	28.7%								
Residential	\$6,985	14.4%								
Individual	\$2,789	5.8%								
Other	\$2,776	5.7%								

## **Scope of the Evaluation**

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

We evaluated CNB under the Small Bank CRA examination procedures, which consists solely of the lending test. The evaluation period covered all of 2016, 2017, and 2018. The lending test review focused on CNB's primary loan products, which are small business loans and small farm loans. The review included an evaluation of lending performance in CNB's single AA. This performance evaluation is based on 2010 U.S. Census demographic information and certain information updated by the 2015 American Community Survey (ACS). We compared lending in 2016 to the 2010 U.S Census data and lending in 2017 and 2018 to the updated ACS data.

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

In each state where the bank has an office, we selected one or more of AAs within that state 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**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

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

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

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

## **State Rating**

#### State of Oklahoma

CRA rating for the State of Oklahoma: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- Community National Bank of Okarche's the bank's loan-to-deposit (LTD) ratio is reasonable considering the bank's size, financial condition, and credit needs of the AA. The bank's average quarterly LTD ratio of 53.37 percent is in line with the average quarterly LTD ratios for similarly situated banks over the same time period.
- The majority of the bank's loans are inside its AA. The bank originated and purchased 83 percent of its total loans inside the bank's AA during the evaluation period.
- The bank meets the standard for satisfactory performance for lending to farms and businesses of different sizes.
- The bank has not received any consumer complaints regarding CRA performance during the assessment period.

## **Description of Institution's Operations in Oklahoma**

CNB is a full-service institution providing traditional loan and deposit products to meet the community needs. FNB's primary focus is to serve commercial, agricultural, and consumer customers in the Okarche and Fairview areas.

CNB's AA consists of two whole census tracts, 9583 and 9584, located in the southern portion of Kingfisher County, two whole census tracts, 3002.01 and 3002.02, located in the northern portion of Canadian County, and the entirety of Major County, which includes census tracts 9551, 9552, and 9553. CNB's headquarters is in Okarche, Oklahoma, which is situated on the county line dividing Kingfisher County and Canadian County. CNB's Fairview, Oklahoma branch is in the central portion of Major County. CNB's AA satisfies all requirements of the CRA regulation. The AA consists of whole geographies and does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income geographies.

Based on the 2010 US Census Data, census tracts #3002.01 and #3002.02 in Canadian County are middle-income tracts, and census tracts #9583 and #9584 in Kingfisher County are upper-income tracts. Census tracts #9551 and #9553 in Major County are upper-income tracts and #9552 in Major County is a middle-income tract. The updated 2015 US Census Data indicates no changes to the income level of any census tracts. The following tables describe demographic and economic characteristics of the AA:

Table A – Demograj	phic Infor	mation of	the Assessn	nent Area -	- 2016	
Assessme	nt Area: (	Communi	ty NB of Ok	arche		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	57.1	42.9	0.0
Population by Geography	25,406	0.0	0.0	57.7	42.3	0.0
Housing Units by Geography	10,851	0.0	0.0	59.7	40.3	0.0
Owner-Occupied Units by Geography	7,598	0.0	0.0	55.8	44.2	0.0
Occupied Rental Units by Geography	1,858	0.0	0.0	68.5	31.5	0.0
Vacant Units by Geography	1,395	0.0	0.0	69.1	30.9	0.0
Businesses by Geography	1,715	0.0	0.0	57.1	42.9	0.0
Farms by Geography	244	0.0	0.0	59.8	40.2	0.0
Family Distribution by Income Level	7,001	13.0	14.4	20.8	51.7	0.0
Household Distribution by Income Level	9,456	14.5	13.8	16.9	54.8	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$58,775	Median Housi	\$108,844		
Median Family Income Non-MSAs - OK		\$47,749	Median Gross	\$599		
			Families Belo	w Poverty Le	vel	7.2%

Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographi	c Informa	tion of th	e Assessmei	nt Area – 2	017/2018	
Assessme	nt Area: (	Communi	ty NB of Ok	arche		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	42.9	57.1	0.0
Population by Geography	26,259	0.0	0.0	44.8	55.2	0.0
Housing Units by Geography	11,037	0.0	0.0	41.7	58.3	0.0
Owner-Occupied Units by Geography	7,671	0.0	0.0	44.3	55.7	0.0
Occupied Rental Units by Geography	2,029	0.0	0.0	29.8	70.2	0.0
Vacant Units by Geography	1,337	0.0	0.0	44.4	55.6	0.0
Businesses by Geography	1,905	0.0	0.0	40.1	59.9	0.0
Farms by Geography	208	0.0	0.0	50.0	50.0	0.0
Family Distribution by Income Level	7,094	13.2	13.8	21.6	51.4	0.0
Household Distribution by Income Level	9,700	16.1	13.2	15.0	55.6	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA	A - 36420 \$64,058 Median Housing Value					\$126,520
Median Family Income Non-MSAs - OK		\$51,698	Median Gross	\$670		
			Families Belo	w Poverty Le	vel	6.8%

Source: 2015 ACS Census and 2018 D&B Data

Due to rounding, totals may not equal 100.0 (\*) The NA category consists of geographies that have not been assigned an income classification.

The demographic information outlined on the previous page indicates a good economy for CNB's AA with an improving trend. Median family income for both the MSA and non-MSA portions of the AA have improved from 2016 to 2018. Additionally, the percentage of families below the poverty level has decreased from 7.2 percent to 6.8 percent. The total population and number of housing units has increased while the number of vacant units has decreased. The number of businesses reported in the AA has increased by 190 while the number of farms has decreased by 36.

According to the Oklahoma Employment Security Commission, the unemployment rate in Kingfisher County, the location of CNB's headquarters, is low for September 2019 at 1.8 percent. This represents no change year-over-year as the unemployment rate at September 2018 was also 1.8 percent. The Kingfisher County unemployment rate compares favorably to the State of Oklahoma unemployment rate of 3.1 percent.

Community contacts for Kingfisher County and Major County were referenced as part of this evaluation. Generally, local institutions are adequately filling the immediate credit needs of the community. The contact for Kingfisher County cited housing development, financial education, workforce training, and medical services as needs for the low- moderate-income population in the area.

### Scope of Evaluation in Oklahoma

This evaluation assesses CNB's performance focusing primarily on five performance criteria: the loan-to-deposit ratio; lending in the assessment area; lending to farms and businesses of different sizes; geographic distribution of loans, and responses to CRA related complaints. Since CNB's AA does not include any low- or moderate-income census tracts, a geographic distribution of loans within the AA would not be meaningful and was not performed.

To assess CNB's lending performance, we evaluated 25 farm loans and 25 business loans originated during 2016. Additionally, we evaluated 25 farm loans and 25 business loans originated during 2017 and 2018.

#### LENDING TEST

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

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

An analysis of the geographic distribution of loans sampled would not be meaningful since there are no low- or moderate-income census tracts in CNB's AA.

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

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

#### Small Loans to Businesses

Refer to Table R 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.

Lending to businesses in the AA reflects reasonable penetration and meets the standard for satisfactory performance.

The borrower distribution of loans to small businesses based on the sample of 2016 originations reflects reasonable penetration. The percentage of bank loans originated to businesses with revenues less than \$1.0 million is lower than the reported percentage of businesses with revenues less than \$1.0 million. However, the percentage of bank loans was higher than the aggregate peer percentage.

The borrower distribution of loans to small businesses based on the sample of 2017 and 2018 originations reflects reasonable penetration. The percentage of bank loans originated to businesses with revenues less than \$1.0 million is in line with the reported percentage of businesses with revenues less than \$1.0 million and exceeds the aggregate peer percentage.

#### Small Loans to Farms

Refer to Table T 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 farms.

Lending to farms in the AA reflects reasonable penetration and meets the standard for satisfactory performance.

The borrower distribution of loans to small farms based on the sample of 2016 originations reflects reasonable penetration. The percentage of bank loans originated to farms with revenues less than \$1.0 million is in line with the reported percentage of farms with revenues less than \$1.0 million and exceeds the aggregate peer percentage.

The borrower distribution of loans to small farms based on the sample of 2017 and 2018 originations reflects reasonable penetration. The percentage of bank loans originated to farms with revenues less than \$1.0 million is lower than the reported percentage of farms with revenues less than \$1.0 million. However, the percentage of bank loans was higher than the aggregate peer percentage.

## **Responses to Complaints**

There have been no consumer complaints pertaining to CNB's CRA performance during this evaluation period.

## **Appendix A: Scope of Examination**

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

Time Period Reviewed:	4/29/2015 - 10/14/201	9								
Bank Products Reviewed:	Small business, small f	arm.								
List of Assessment Areas and Type of Examination										
Rating and Assessment Areas	Type of Exam	Other Information								
Oklahoma										
		Census Tracts #3002.01 and #3002.02 in Canadian								
		County								
Community ND of Okaraha	Full Saana	Census Tracts #9583 and #9584 in Kingfisher								
Community NB of Okarche	Full-Scope	County								
		Census Tracts #9551, #9552, #9553 in Major								
		County								

## **Appendix B: Summary of MMSA and State Ratings**

RATINGS Comm	unity National Bank of Okarche
Overall Bank:	Lending Test Rating
Community NB of Okarche	Satisfactory

## **Appendix C: Definitions and Common Abbreviations**

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **Appendix D: Tables of Performance Data**

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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 R. Assessment Area Loan Distribution to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- **Table T.** Assessment Area Loan Distribution to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												
	Т	otal Loans to	Small Business	ses	Businesses with Revenues <= 1MM			Businesses wi > 1M		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Community NB of Okarche	20	1,688	100.0	500	78.8	65.9	56.0	7.3	34.1	13.9	0.0	
Total	20	1,688	100.0	500	78.8	65.9	56.0	7.3	34.1	13.9	0.0	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-											
	Total Loans to Small Businesses			Businesses	with Revenue	s <= 1MM	Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Community NB of Okarche	20	1,664	100.0	555	79.6	81.5	51.2	7.0	18.5	13.4	0.0
Total	20	1,664	100.0	555	79.6	81.5	51.2	7.0	18.5	13.4	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, Due to rounding, totals may not equal 100.0.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2016												
	Total Loans to Farms			Farms	with Revenues <	= 1MM	_ *************************************	Revenues > //M	Farms with Revenues Not Available			
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Community NB of Okarche	20	2,037	100.0	167	99.2	100.0	75.4	0.8	0.0	0.0	0.0	
Total	20	2,037	100.0	167	99.2	100.0	75.4	0.8	0.0	0.0	0.0	

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

Table T: A	5	2017-18									
	Total Loans to Farms				Farms	with Revenues <	= 1MM		Revenues > //M	Farms with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Community NB of Okarche	23	2,530	100.0	156	98.1	76.3	73.1	1.0	23.7	1.0	0.0
Total	23	2,530	100.0	156	98.1	76.3	73.1	1.0	23.7	1.0	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data. Due to rounding, totals may not equal 100.0.