



PUBLIC DISCLOSURE

November 18, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Stigler
Charter Number 7217

300 East Main Street
Stigler, Oklahoma

Office of the Comptroller of the Currency

8282 South Memorial Drive, Suite 300
Tulsa, Oklahoma 74133

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The First National Bank of Stigler (FNB) exhibits a **reasonable** distribution of home mortgage and commercial loans to individuals of different income levels and businesses with different gross annual revenue levels, given the product lines offered by the bank.
- FNB exhibits an **excellent** geographic distribution of home mortgage and commercial loans within the assessment area (AA).
- The loan-to-deposit (LTD) ratio is **reasonable** based on FNB's performance context and lending opportunities within their designated AA.
- A **substantial majority** of FNB's home mortgage and commercial loans originated during the evaluation period are inside the AA.
- FNB has satisfactory banking services delivery systems established to effectively reach low- and moderate-income (LMI) individuals and geographies.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is **reasonable**. FNB's quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 37.83 percent. We compared the bank's LTD ratio to six similarly situated banks in their regional area. The aggregate average LTD ratio for the competing banks was 45.85 percent, with a low average of 24.84 percent and a high average of 86.67 percent. FNB's average LTD ratio is slightly depressed due to a large volume of public deposits. When these deposits are factored in, FNB's average quarterly LTD ratio rises to 42.96 percent, which is comparable to the competing banks.

Lending in Assessment Area

A **substantial majority** of FNB's loans are inside its AA. The bank originated 82 percent of the total number of loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. We also factored these conclusions into the analysis of the geographic distribution of lending-by-income level of the geography. The following table presents a more specific identification of this lending performance.

Lending Inside and Outside of the Haskell County Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	31	78	9	22	40	1,334	66	695	34	2,029
Commercial & Industrial	35	88	5	12	40	1,828	57	1,352	43	3,180
Total	66	82	14	18	80	3,162	61	2,047	39	5,209

Source: Evaluation period: 1/2/2016 through 12/31/2018 Bank Data

Description of Institution

FNB is a \$113 million rural community bank headquartered in Stigler, Oklahoma, and a subsidiary of Stigler Bancorporation, Inc., a one-bank holding company. FNB serves its single AA (Haskell County) with a main banking and drive-thru facility at 300 East Main Street, Stigler, Oklahoma, which includes an automated teller machine. The bank is in a moderate-income census tract (CT) and there are no branch facilities. FNB offers a diverse line of deposit and loan products during reasonable hours, Monday through Saturday, and offers banking services by telephone and the internet. There is a moderate level of competition for banking services. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AA.

FNB's strategic lending focus is to originate residential real estate loans, commercial and industrial loans, and agricultural production loans, although the bank also participates in various loan programs that provide either 100 percent financing or financing with minimal down payment requirements. As of September 30, 2019, residential real estate loans represent 20 percent of the loan portfolio. Commercial and industrial loans represent 14 percent of the loan portfolio. Agriculture loans represent 13 percent of the loan portfolio. The dollar level of total loans is 33 percent of total assets as of the same date. Management does not anticipate any significant changes in the composition of the loan portfolio. A CRA PE was last prepared August 31, 2015, and a "Satisfactory" rating was assigned.

Scope of the Evaluation

Period/Products Evaluated

We evaluated FNB using the small bank standards for assessing performance. FNB's primary loan products include residential real estate loans and commercial and industrial loans. The lending test evaluates the bank's record of meeting the credit needs of its AA. We assessed the bank's performance under this test using a loan sample comprising 40 residential real estate loans and 40 commercial and industrial loans, originated from January 2, 2016 through December 31, 2018. FNB is not required to report under the Home Mortgage Disclosure Act (HMDA). The sample is representative of the bank's business strategy since the last CRA PE.

Selection of Areas for Full-Scope Review

A full-scope review was completed on FNB's single AA, consisting of Haskell County, OK. Please refer to appendix A, scope of examination, for additional information regarding this AA.

Ratings

FNB's CRA rating is **satisfactory**.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation. The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation

State Rating

State of Oklahoma

CRA Rating for the State of Oklahoma: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The LTD ratio is **reasonable** based on FNB's performance context and lending opportunities within their designated AA.
- FNB exhibits a **reasonable** distribution of home mortgage and commercial loans to individuals of different income levels and businesses with different gross annual revenue levels, given the product lines offered by the bank.
- FNB exhibits an **excellent** geographic distribution of home mortgage and commercial loans within the AA.
- A **substantial majority** of FNB's home mortgage and commercial loans originated during the evaluation period are inside the AA.
- FNB established alternative banking services delivery systems to effectively reach LMI individuals and geographies.

Community Contact

During this examination we contacted one member of the local community within the AA to gain a better understanding of the general community credit and development needs and discuss local economic conditions. The contact indicated the area needs an increased supply of quality, affordable residential housing, and housing opportunities for senior citizens, such as an assisted living facility. Additionally, Haskell County, OK was adversely affected with the bankruptcy and closure of the Haskell County Hospital, losing all services with the exception of emergency room services.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Haskell County, OK 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	25.0	75.0	0.0	0.0
Population by Geography	12,850	0.0	33.8	66.2	0.0	0.0
Housing Units by Geography	6,046	0.0	32.0	68.0	0.0	0.0
Owner-Occupied Units by Geography	3,590	0.0	28.9	71.1	0.0	0.0
Occupied Rental Units by Geography	1,313	0.0	46.8	53.2	0.0	0.0
Vacant Units by Geography	1,143	0.0	24.7	75.3	0.0	0.0
Businesses by Geography	607	0.0	54.7	45.3	0.0	0.0
Farms by Geography	57	0.0	19.3	80.7	0.0	0.0
Family Distribution by Income Level	3,377	25.3	20.1	22.2	32.4	0.0
Household Distribution by Income Level	4,903	29.0	18.7	16.4	35.9	0.0
Median Family Income Non-MSAs - OK		\$51,698	Median Housing Value			\$80,155
			Median Gross Rent			\$573
			Families Below Poverty Level			15.1%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

LENDING TEST

The bank's performance under the lending test in Oklahoma is rated **Satisfactory**.

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

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Home mortgage lending patterns during the evaluation period indicate an **excellent** geographic distribution of loans within all tracts of the AA, particularly the CT designated as a moderate-income tract. The distribution accurately represents the percentage of owner-occupied housing units of each CT. For example, the decline in lending within middle-income tracts since the 2010 census data is primarily due to the change in designation of CT 2792 (i.e. city of Stigler and surrounding area) from a middle-income CT to moderate-income.

Previously Haskell County did not have any moderate-income designated CTs. There are no low-income CTs within the AA. Please refer to Table O in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

Loans to Small Businesses

Small business lending patterns during the evaluation period indicate an **excellent** geographic distribution of loans within the AA, particularly the CT designated as a moderate-income tract. The distribution accurately represents the percentage of businesses of each CT. For example, the significant decline in loans to small businesses within middle-income CTs since the 2010 census data is primarily due to the change in designation of CT 2792 (i.e. city of Stigler and surrounding area) from a middle-income CT to moderate-income. Previously, Haskell County did not have any CT designated as moderate-income. The low level of loans to small businesses within the upper-income tract during 2016 is due to the very small number of businesses (105) within this CT, which provides a limited number of business loan opportunities. There are no low-income tracts within the AA. Please refer to Table Q in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of loans to small businesses.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Home mortgage lending patterns during the evaluation period indicate a **reasonable** distribution of loans to individuals of different income levels and businesses and farms of different sizes, particularly among low- and moderate-income borrowers. Please refer to Table P in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Loans to Small Businesses

Small business lending patterns during the evaluation period indicate a **reasonable** distribution of loans to businesses within the AA, particularly businesses with gross annual revenues less than \$1 million. Please refer to Table R in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of loans to small businesses.

Responses to Complaints

FNB did not receive any consumer complaints regarding their performance under the CRA during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/2/2016 through 12/31/2018	
Bank Products Reviewed:	Home Mortgage and Commercial & Industrial	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Single AA comprising one complete county: Haskell County	Full-Scope	AA consists of whole geographies. The AA comprises four contiguous census tracts. One is designated as a moderate-income tract (previously designated as middle-income) and three are designated as middle-income tracts (one of these was previously designated as upper-income). There are no census tracts designated as low-income or upper-income. The bank facility is in a moderate-income tract adjacent to one of the middle-income tracts.

Appendix B: Summary of State Ratings

RATINGS The First National Bank of Stigler	
Overall Bank:	Lending Test Rating
The First National Bank of Stigler	Satisfactory
MMSA or State:	
Oklahoma	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: 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: 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 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

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 AA. Deposit data is compiled by the FDIC and are available as of June 30th of each year.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2016		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Home Mortgage	20	585	100	0.0	0.0	0.0	0.0	0.0	0.0	75.6	100.0	78.6	24.4	0.0	21.4	0.0	0.0	0.0	
Total	20	585	100	0.0	0.0	0.0	0.0	0.0	0.0	75.6	100.0	78.6	24.4	0.0	21.4	0.0	0.0	0.0	

Source: 2010 United States Census; 01/02/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2017-18		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Home Mortgage	20	1,304	100	0.0	0.0	0.0	28.9	45.0	45.7	71.1	55.0	70.0	0.0	0.0	0.0	0.0	0.0	0.0	
Total	20	1,304	100	0.0	0.0	0.0	28.9	45.0	45.7	71.1	55.0	70.0	0.0	0.0	0.0	0.0	0.0	0.0	

Source: 2015 United States Census; 01/02/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2016		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Home Mortgage	20	585	100	19.5	10.0	1.8	16.2	15.0	16.1	24.8	30.0	18.8	39.6	45.0	43.8	0.0	0.0	19.6	
Total	20	585	100	19.5	10.0	1.8	16.2	15.0	16.1	24.8	30.0	18.8	39.6	45.0	43.8	0.0	0.0	19.6	

Source: 2010 United States Census; 01/02/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2017-18		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Home Mortgage	20	1,304	100	25.3	15.0	8.7	20.1	20.0	12.3	22.2	30.0	21.7	32.4	35.0	43.5	0.0	0.0	13.8	
Total	20	1,304	100	25.3	15.0	8.7	20.1	20.0	12.3	22.2	30.0	21.7	32.4	35.0	43.5	0.0	0.0	13.8	

Source: 2015 United States Census; 01/02/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2016	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available- Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Commercial & Industrial	20	775	100	0.0	0.0	0.0	0.0	83.6	95.0	16.4	5.0	0.0	0.0
Total	20	775	100	0.0	0.0	0.0	0.0	83.6	95.0	16.4	5.0	0.0	0.0

Source: 2016 D&B Data; 01/02/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography												2017-18	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available- Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Commercial & Industrial	20	1,000	100	0.0	0.0	54.7	75.0	45.3	25.0	0.0	0.0	0.0	0.0
Total	20	1,000	100	0.0	0.0	54.7	75.0	45.3	25.0	0.0	0.0	0.0	0.0

Source: 2018 D&B Data; 01/02/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Commercial & Industrial	20	775	100	111	79.7	70.0	49.6	6.0	30.0	14.3	0.0	
Total	20	775	100	111	79.7	70.0	49.6	6.0	30.0	14.3	0.0	
<i>Source: 2016 D&B Data; 01/02/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Commercial & Industrial	20	1,000	100	121	77.4	75.0	38.8	6.4	25.0	16.2	0.0	
Total	20	1,000	100	121	77.4	75.0	38.8	6.4	25.0	16.2	0.0	
<i>Source: 2018 D&B Data; 01/02/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>												