



## **PUBLIC DISCLOSURE**

November 28, 2022

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

First National Bank of Trinity  
Charter Number 13706

145 South Robb Street  
Trinity, TX 75862

Office of the Comptroller of the Currency

1800 West Loop 281, Suite 306  
Longview, TX 75604

**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 Community Reinvestment Act (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 lending test rating is based on a reasonable distribution of lending to low- and moderate-income (LMI) borrowers and businesses of different sizes, an excellent distribution of loans in LMI geographies, a substantial majority of loans purchased or originated in the assessment area (AA), and a reasonable loan-to-deposit (LTD) ratio.

### Loan-to-Deposit Ratio

Considering the institution's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The institution's average LTD ratio during the evaluation period was 51.6 percent. The LTD ratio is slightly below average when compared to similarly situated financial institutions. Similarly situated financial institutions located in Houston, San Jacinto, Trinity, and Walker counties consisted of asset sizes ranging from \$57.1 million to \$334.4 million with an average LTD of 57.4 percent.

### Lending in Assessment Area

A substantial majority of the institution's loans are inside the delineated AA. The institution originated and purchased 80 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the institution 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	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	16	80.0	4	20.0	20	1,641	57.9	1,192	42.1	2,833
Consumer	16	80.0	4	20.0	20	563	73.4	204	26.6	767
Total	32	80.0	8	20.0	40	2,204	61.2	1,396	38.8	3,600

### Description of Institution

The First National Bank of Trinity (FNB or institution) is headquartered in Trinity, Texas. In addition to the main branch in Trinity, FNB has a branch located in Riverside, Texas and a loan production office (LPO) located in Jefferson, Texas. The LPO was sold in September 2020 and a branch was opened in Jefferson, Texas in August 2020. FNB is a single-state institution and is not the subsidiary of a holding company. There are no affiliated subsidiaries of FNB.

FNB is a full-service community financial institution providing traditional deposit and loan products to its customers. The institution's AA consists of Trinity and Marion counties in their entirety as well as one census tract in each of Walker, San Jacinto, and Houston counties.

As of September 30, 2022, FNB's assets totaled \$79.9 million. Net loans represented 47.7 percent of total assets. Total loans consisted of \$26.3 million in real estate loans, \$9.4 million in consumer loans, \$2.1 million in commercial loans, and \$639,000 in agricultural loans. Tier 1 capital totaled \$7.8 million.

There are no legal, financial, or other factors impeding the institution's ability to meet the credit needs in the designated AA. The institution's CRA performance was previously evaluated as of October 9, 2018. The institution received an overall rating of "Satisfactory".

## **Scope of the Evaluation**

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

The Office of the Comptroller of the Currency (OCC) evaluated the CRA performance of FNB using Small Bank performance criteria, which consists of the lending test. The evaluation covered the period from January 1, 2019, through December 31, 2021. In evaluating the institution's lending performance, examiners reviewed home mortgage and consumer lending, consistent with the institution's lending focus.

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

In each state where FNB has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area are combined and evaluated as a single AA. Similarly, 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 institution'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 delineated AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Texas

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

**The lending test is rated:** Satisfactory.

- A substantial majority of the institutions lending is within the AA.
- The borrower distribution of loans to LMI borrowers is reasonable.
- The geographic distribution of loans across geographies of different income levels is excellent.
- The institution's LTD ratio is reasonable.

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

FNB Trinity operates in one AA in the State of Texas as mentioned in the Description of Institution and the Scope of the Evaluation sections. The AA is comprised of Marion and Trinity counties in their entirety and one census tract in Houston, San Jacinto, and Walker counties. FNB has three locations and three ATMs located in Trinity, Riverside, and Jefferson, Texas.

FNB's primary lending focus is on one- to four-family residential real estate and consumer loans. Competitors include local community banks, savings associations, credit unions, and larger regional banks located within the AA. FNB AA deposits totaled \$59.2 million representing 17 percent of deposit market share. FNB ranks third out of seven financial institutions in the AA.

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

**Non-MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA</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)	12	0.0	25.0	75.0	0.0	0.0
Population by Geography	40,874	0.0	20.3	79.7	0.0	0.0
Housing Units by Geography	20,958	0.0	23.9	76.1	0.0	0.0
Owner-Occupied Units by Geography	10,875	0.0	23.6	76.4	0.0	0.0
Occupied Rental Units by Geography	2,526	0.0	36.8	63.2	0.0	0.0
Vacant Units by Geography	7,557	0.0	20.1	79.9	0.0	0.0
Businesses by Geography	1,766	0.0	16.1	83.9	0.0	0.0
Farms by Geography	78	0.0	21.8	78.2	0.0	0.0
Family Distribution by Income Level	8,624	20.6	23.9	19.9	35.6	0.0
Household Distribution by Income Level	13,401	28.3	17.9	18.6	35.1	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$90,497
			Median Gross Rent			\$620
			Families Below Poverty Level			11.8%
<i>Source: 2015 ACS and 2020 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>						

The AA is comprised of Marion and Trinity counties in their entirety and one census tract in Houston, San Jacinto, and Walker counties. The AA consists of 12 census tracts, including three moderate-income and nine middle-income census tracts. The AA meets the requirements of the CRA. The AA's local economy is primarily retail trade, manufacturing, and health care services. Major employers in the AA include: HEB Grocery, Walmart, local hospitals, government agencies, and school districts. A contact in the AA indicated that local financial institutions are doing a good job meeting the needs of the community.

**Scope of Evaluation in Texas**

The OCC evaluated the CRA performance of FNB using Small Bank performance criteria, which includes the lending test. The evaluation covered the period from January 1, 2019, through December 31, 2021. In evaluating the institution's lending performance, examiners reviewed home mortgage and consumer lending, consistent with the institution's lending focus.

**LENDING TEST**

The institution's performance under the lending test in Texas is rated Satisfactory.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the institution's performance in the non-MSA AA is good.

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

The institution exhibits excellent geographic distribution of loans in the State.

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

Refer to Table O in the State of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the institution's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is excellent. The institution's home mortgage lending in the moderate-income geographies is less than the percentage of owner-occupied housing units; however, it exceeds the aggregate lending in the AA. There are no low-income geographies.

#### ***Consumer Loans***

Refer to Table U in the State of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the institution's consumer loan originations and purchases.

The geographic distribution of consumer loans is excellent. Lending in moderate-income geographies exceeds the percentage of households located in the same geographies. There are no low-income geographies in the AA.

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

The institution exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the institution.

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

Refer to Table P in the State of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower distribution of home mortgage lending to LMI borrowers in the AA is reasonable. The institution's lending to low-income borrowers is below the percentage of families identified as low-income; however, it significantly exceeds the aggregate lending. There was no lending to borrowers identified as moderate-income in the AA. While the lending to moderate-income borrowers needs to improve, opportunities to originate loans to low- and moderate-income families is limited. The percentage of households living below the poverty line is over 18 percent. Additionally, the average median housing cost is over \$90,000 making it difficult for a lower-income family to qualify for a home mortgage loan.

#### ***Consumer Loans***

Refer to Table V in the State of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's consumer loan originations and purchases.



The borrower distribution of consumer loans is reasonable. Low-income borrower lending is near to the percentage of households in the AA while moderate-income borrower lending exceeds the percentage of households in the AA.

### **Responses to Complaints**

There were no complaints related to the institution's CRA performance within the State of Texas during the review timeframe.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	(01/01/19 to 12/31/21)	
<b>Bank Products Reviewed:</b>	Home mortgage and consumer loans	
<b>Affiliates</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>States</b>		
Texas	Full-Scope	

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	First National Bank of Trinity
Overall Bank:	Lending Test Rating
First National Bank of Trinity	Satisfactory
MMSA or State:	
Texas	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders (Home Mortgage Disclosure Act 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/AA.

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

**Consumer Loan:** A loan 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 an MSA 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/AA.

**Median Family Income:** The median income determined by the U.S. Bureau of the Census 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 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 MSA 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 MMSA. 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 MMSA, the institution will receive a rating for the MMSA.

**Small Loan to Business:** 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 to Farm:** 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

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### Content of Standardized Tables

A separate set of tables is provided for each state. All MMSA, if applicable, are presented in one set of tables. References to the “institution” include activities of any affiliates that the institution 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 Home Mortgage Disclosure Act or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the Federal Deposit Insurance Corporation and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this Performance Evaluation.

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 institution 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 institution 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 institution 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 institution loan data to aggregate data from geographic areas larger than the institution’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 institution to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the institution in low-, moderate-, middle-, and upper-

income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the institution's AA.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the institution to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the institution in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the institution to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.



<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																<b>2019-2021</b>		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$ (000's)	% 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
Non-MSA	20	2,526	100.0	0.0	0.0	0.0	23.6	15.0	14.5	76.4	85.0	85.5	0.0	5	0.0	0.0	--	0.0
<b>Total</b>	<b>20</b>	<b>2,526</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>23.6</b>	<b>15.0</b>	<b>14.5</b>	<b>76.4</b>	<b>85.0</b>	<b>85.5</b>	<b>0.0</b>	<b>5</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 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>2019-2021</b>		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$ (000's)	% 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
Non-MSA	20	2,526	100.0	20.6	10.0	4.0	23.9	0	11.1	19.9	30.0	16.5	35.6	60.0	47.6	0.0	--	20.8
<b>Total</b>	<b>20</b>	<b>2,526</b>	<b>100.0</b>	<b>20.6</b>	<b>10.0</b>	<b>4.0</b>	<b>23.9</b>	<b>0</b>	<b>11.1</b>	<b>19.9</b>	<b>30.0</b>	<b>16.5</b>	<b>35.6</b>	<b>60.0</b>	<b>47.6</b>	<b>0.0</b>	<b>--</b>	<b>20.8</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>												<b>2019-2021</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$ (000's)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	20	629	100.0	0.0	0.0	26.1	30.0	73.9	70.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>629</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>26.1</b>	<b>30.0</b>	<b>73.9</b>	<b>70.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 20XX U.S Census; 01/01/20XX - 12/31/20XX Bank Data. Due to rounding, totals may not equal 100.0*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2019-2021</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$ (000's)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	20	629	100.0	28.3	25.0	17.9	20.0	18.6	25.0	35.1	30.0	0.0	0.0
<b>Total</b>	<b>20</b>	<b>629</b>	<b>100.0</b>	<b>28.3</b>	<b>25.0</b>	<b>17.9</b>	<b>20.0</b>	<b>18.6</b>	<b>25.0</b>	<b>35.1</b>	<b>30.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%*