



## **PUBLIC DISCLOSURE**

November 21, 2022

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

The First National Bank and Trust Company of Miami  
Charter Number 5252

2 North Main Street  
Miami, Oklahoma 74354

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 Lending Test rating is based on one full-scope assessment area (AA) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans were originated inside the bank's AA.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AA.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.
- The bank originated 537 Paycheck Protection Program (PPP) loans totaling \$9.4 million during the evaluation 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 First National Bank and Trust Company of Miami's (FNB&T or bank) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 57.8 percent. We compared the bank's LTD ratio to four similarly situated banks in the area. The aggregate average LTD ratio for the competing banks was 68.8 percent, with a high average of 83.3 percent and a low average of 53.3 percent. The bank's LTD ratio has declined since the beginning of the COVID-19 pandemic due to a large influx of deposits.

### Lending in Assessment Area

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

The bank originated 75.2 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.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	47	78.3	13	21.7	60	4,561	66.0	2,350	34.0	6,911
Small Farm	38	71.7	15	28.3	53	3,006	58.2	2,163	41.8	5,169
<b>Total</b>	<b>85</b>	<b>75.2</b>	<b>28</b>	<b>24.8</b>	<b>113</b>	<b>7,567</b>	<b>62.6</b>	<b>4,513</b>	<b>37.4</b>	<b>12,080</b>

*Source: Bank Data  
Due to rounding, totals may not equal 100.0%*

## **Description of Institution**

FNB&T is a \$226 million rural community bank located in Miami, Oklahoma. FNB&T is a single-state institution with the main bank facility located in downtown Miami, Oklahoma. The bank is a wholly owned subsidiary of First Miami Bancshares, Inc., a two-bank holding company headquartered at the main bank address. No subsidiaries or affiliates were considered as part of the PE.

The bank has one rating area, the state of Oklahoma, and one AA. The Ottawa County AA consists of all census tracts (CTs) in Ottawa County. There are three branch locations within the AA. The main bank and the North Main branch are located in Miami, Oklahoma, and the Fairland branch is located in Fairland, Oklahoma. The bank operates four automated teller machines, three in Miami, Oklahoma and one in Fairland, Oklahoma.

FNB&T offers a variety of loan and deposit products to meet community needs. In addition to providing traditional loan and deposit products and services, FNB&T also offers online banking, mobile banking, and telephone banking. As of December 31, 2021, tier 1 capital was approximately \$16 million and net loans totaled \$87 million, or 40 percent of total assets. The loan portfolio consists of 48.1 percent agricultural loans, 26.5 percent residential real estate loans, 20.5 percent commercial loans, 4.5 percent consumer loans, and less than one percent other loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs within its AA. A CRA PE was last prepared July 16, 2018, and the bank received an overall rating of Satisfactory.

## **Scope of the Evaluation**

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

We completed a full-scope review of FNB&T's CRA activities in its AA under the Small Bank CRA procedures. This included the lending test which evaluates the bank's record of meeting the credit needs of the AA through its lending activities.

The bank's primary products include agricultural and home mortgage loans. Conclusions regarding the lending test are based on samples of agricultural loans and residential real estate loans originated from January 1, 2019, through December 31, 2021. Home mortgage information is considered in context because the analysis is based on a sample of loans rather than on total bank originations and purchases over the evaluation period.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs 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.

FNB&T has one AA in the state of Oklahoma. The AA consists of all of Ottawa County within the Oklahoma non-MSA area. The bank's overall rating is based on a full-scope review of this AA. There were no Office of Management and Budget changes to the bank's AA during the review period.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

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

The OCC has not identified that this institution 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<sup>1</sup>: Satisfactory**

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the bank's AA.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.
- The bank originated 537 PPP loans totaling \$9.4 million during the evaluation period.

### Description of Institution's Operations in Oklahoma

FNB&T operates three locations in one AA, Ottawa County, within the state of Oklahoma.

#### Ottawa County

Table A – Demographic Information of the Assessment Area						
Assessment Area: Ottawa County AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	33.3	66.7	0.0	0.0
Population by Geography	32,085	0.0	25.5	74.5	0.0	0.0
Housing Units by Geography	14,067	0.0	27.4	72.6	0.0	0.0
Owner-Occupied Units by Geography	8,433	0.0	21.0	79.0	0.0	0.0
Occupied Rental Units by Geography	3,628	0.0	38.6	61.4	0.0	0.0
Vacant Units by Geography	2,006	0.0	34.1	65.9	0.0	0.0
Businesses by Geography	1,593	0.0	30.6	69.4	0.0	0.0
Farms by Geography	108	0.0	8.3	91.7	0.0	0.0
Family Distribution by Income Level	8,200	26.2	19.9	21.6	32.2	0.0
Household Distribution by Income Level	12,061	28.7	17.4	18.6	35.3	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$84,387
			Median Gross Rent			\$617
			Families Below Poverty Level			17.8%

Source: 2015 American Community Survey (ACS) and 2020 Dun & Bradstreet (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.

<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.

The Ottawa County AA is within the Oklahoma non-MSA area and includes all nine CTs in Ottawa County. The Ottawa County AA consists of three moderate-income CTs and six middle-income CTs. There are no low-income or upper-income CTs in the AA. The main bank is located in a moderate-income CT, while the North Main and Fairland branches are located in middle-income CTs. The Ottawa County AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

The city of Miami is the county seat of Ottawa County. Other major cities and towns within Ottawa County include Commerce, Fairland, Afton, Wyandotte, and Quapaw. The local economy is diversified in the areas of agriculture, healthcare, education, tourism, manufacturing, and retail trade. The AA is also home to nine Native American tribal nations. The poverty rate in the county is high at 17.8 percent.

Competition in the AA is strong and includes several state-chartered banks and branches of non-local banks. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Data, FNB&T's deposit market share in the AA is 30.4 percent. FNB&T is ranked first among eight banks in the AA. Arvest Bank and International Bank of Commerce hold 20.6 percent and 19.2 percent of the deposit market share, respectively.

We consulted one community contact within the AA, a community-based business group, to gain a better understanding of the general community credit needs as well as local economic conditions. The community contact indicated that general economic conditions were improving, but there is a need for more small business, agricultural, and manufacturing lending in the AA.

## **Scope of Evaluation in Oklahoma**

FNB&T has one AA in the state of Oklahoma. This AA includes Ottawa County in the Oklahoma non-MSA area of the state. The state rating is based on a full-scope review of the AA. There are no limited-scope review areas.

Refer to the Scope of Evaluation table in appendix A for a listing of all bank AAs.

## **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Ottawa County AA is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the state.

There were no low-income CTs in the AA during the evaluation period.



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

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 and purchases.

The percentage of bank loans in moderate-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate lending in those geographies.

### ***Small Loans to Farms***

Refer to table S 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 small loans to farms.

The bank's small farm lending in moderate-income geographies was near to the percentage of farms and exceeded the aggregate lending in those CTs.

### ***Lending Gap Analysis***

There were no unexplained conspicuous gaps based on the geographic distribution of loans, branch locations, and the performance context.

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

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

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

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.

The percentage of bank loans to low-income borrowers was lower than both the percentage of low-income families and the aggregate lending to those borrowers. The percentage of bank loans to moderate-income borrowers was near to both the percentage of moderate-income families and the aggregate lending to those borrowers.

Lending to LMI borrowers is hindered by their inability to meet current home mortgage lending standards. FNB&T also refers LMI borrowers who qualify for government-insured home mortgages products, such as Federal Housing Administration (FHA) and Rural Development, to secondary market lenders.

### ***Small Loans to Farms***

Refer to table T 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 small loans to farms.

The percentage of bank loans to farms with revenues of less than or equal to \$1 million was near to the percentage of farms identified as having revenues of less than or equal to \$1 million and exceeded the

aggregate lending to those farms. FNB&T also originated 537 PPP loans totaling \$9.4 million during the evaluation period.

### **Responses to Complaints**

FNB&T received no CRA-related complaints during the review period.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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>	January 1, 2019, to December 31, 2021	
<b>Bank Products Reviewed:</b>	Home mortgage Small Farm	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
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>
Oklahoma		
Ottawa County	Full-scope	Consists of all of Ottawa County, Oklahoma

# Appendix B: Summary of MMSA and State Ratings

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RATINGS	The First National Bank and Trust Company of Miami
Overall Bank:	Lending Test Rating
FNB&T	Satisfactory
State:	
Oklahoma	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved non-metropolitan 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 non-farm or non-residential real estate or are classified as commercial and industrial loans.

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

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

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



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. 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 bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (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 U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households 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 bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Ottawa County AA	47	4,561	100.0	597	0.0	0.0	0.0	21.0	27.7	17.8	79.0	72.3	82.2	0.0	0.0	0.0	0.0	0.0	0.0		
<b>Total</b>	<b>47</b>	<b>4,561</b>	<b>100.0</b>	<b>597</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>21.0</b>	<b>27.7</b>	<b>17.8</b>	<b>79.0</b>	<b>72.3</b>	<b>82.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 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>2019-21</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Ottawa County AA	47	4,561	100.0	597	26.2	4.3	9.2	19.9	17.0	19.4	21.6	19.2	19.9	32.2	48.9	28.3	0.0	10.6	23.1		
<b>Total</b>	<b>47</b>	<b>4,561</b>	<b>100.0</b>	<b>597</b>	<b>26.2</b>	<b>4.3</b>	<b>9.2</b>	<b>19.9</b>	<b>17.0</b>	<b>19.4</b>	<b>21.6</b>	<b>19.2</b>	<b>19.9</b>	<b>32.2</b>	<b>48.9</b>	<b>28.3</b>	<b>0.0</b>	<b>10.6</b>	<b>23.1</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%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-21
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Ottawa County AA	38	3,006	100.0	74	0.0	0.0	0.0	8.3	7.9	0.0	91.7	92.1	100.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>38</b>	<b>3,006</b>	<b>100.0</b>	<b>74</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.3</b>	<b>7.9</b>	<b>0.0</b>	<b>91.7</b>	<b>92.1</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2019-21
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Ottawa County AA	38	3,006	100.0	74	95.4	94.7	54.1	2.8	2.6	1.9	2.6	
<b>Total</b>	<b>38</b>	<b>3,006</b>	<b>100.0</b>	<b>74</b>	<b>95.4</b>	<b>94.7</b>	<b>54.1</b>	<b>2.8</b>	<b>2.6</b>	<b>1.9</b>	<b>2.6</b>	

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%