



## **PUBLIC DISCLOSURE**

September 9, 2019

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

The First National Bank of St. Ignace  
Charter Number 3886

132 North State Street  
St. Ignace, MI 49781

Office of the Comptroller of the Currency  
1200 North Mayfair Road, Suite 200  
Wauwatosa, WI 53226

**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 loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A substantial majority of loan originations are made within the bank's AA.
- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of businesses loans reflects reasonable distribution among geographies.

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

The bank's LTD ratio is lower than its peer banks; however, given the bank's sale of loans on the secondary market, the ratio is deemed reasonable for the bank's size, financial condition, and credit needs of its AA.

The bank's quarterly LTD ratio averaged 34.76 percent over the 11 quarters from December 31, 2016 to June 30, 2019. The bank ranks last in its peer group which includes four other similarly situated banks with average LTD ratios ranging from 55.66 percent to 99.51 percent during the specified period. The banks in this peer group have total assets ranging from \$123 million to \$312 million, with The First National Bank of St. Ignace (FNB St. Ignace) being the fourth largest in this group with total assets of \$254 million.

The bank originates residential real estate loans that are immediately sold on the secondary market. As of June 30, 2019, the bank had outstanding principal balances of \$23.1 million in loans serviced for others. This represents another 10.35 percent of total deposits that is not captured in the LTD ratio noted above.

### **Lending in Assessment Area**

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

The bank originated and purchased 90.3 percent of its total loans by number and 84.6 percent of its total loans by dollar amount inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. See the chart below for additional detail.

| <b>Lending Inside and Outside of the Assessment Area</b>  |                 |      |         |      |            |                                 |      |         |      |                   |
|---|-----------------|------|---------|------|------------|---------------------------------|------|---------|------|-------------------|
| Loan Category   | Number of Loans |      |         |      | Total<br># | Dollar Amount of Loans \$(000s) |      |         |      | Total<br>\$(000s) |
|   | Inside          |      | Outside |      |            | Inside                          |      | Outside |      |                   |
|   | #               | %    | #       | %    |            | \$                              | %    | \$      | %    |                   |
| Home Mortgage   |                 |      |         |      |            |                                 |      |         |      |                   |
| 2016  | 24              | 96.0 | 1       | 4.0  | 25         | 2,478                           | 96.9 | 80      | 3.1  | 2,558             |
| 2017/2018   | 25              | 92.6 | 2       | 7.4  | 27         | 2,433                           | 80.3 | 597     | 19.7 | 3,030             |
| <b>Subtotal</b>   | 49              | 94.2 | 3       | 5.8  | 52         | 4,911                           | 87.9 | 677     | 12.1 | 5,588             |
| Small Business  |                 |      |         |      |            |                                 |      |         |      |                   |
| 2016  | 21              | 84.0 | 4       | 16.0 | 25         | 2,425                           | 72.4 | 925     | 27.6 | 3,350             |
| 2017/2018   | 23              | 88.5 | 3       | 11.5 | 26         | 2,623                           | 92.5 | 212     | 7.5  | 2,835             |
| <b>Subtotal</b>   | 44              | 86.3 | 7       | 13.7 | 51         | 5,048                           | 81.6 | 1,137   | 18.4 | 6,185             |
| <b>Total</b>  | 93              | 90.3 | 10      | 9.7  | 103        | 9,959                           | 84.6 | 1,814   | 15.4 | 11,773            |
| <i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data<br/>Due to rounding, totals may not equal 100.0</i> |                 |      |         |      |            |                                 |      |         |      |                   |

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FNB St Ignace's performance under the Small Bank Lending Test. The Lending Test assesses the bank's record of meeting the credit needs of its AA through lending activities. We reviewed data for the bank's primary loan products, commercial loans and home mortgage loans, to evaluate the bank's lending performance.

This evaluation covers the period since the prior CRA examination, November 14, 2016, through September 9, 2019. The Lending Test evaluated loans originated between January 1, 2016 and December 31, 2018.

To provide more current and accurate demographic data, the federal banking agencies are now updating census data every five years instead of 10, beginning with the Census Bureau's 2015 American Community Survey (ACS). FNB St Ignace's AA was affected by this change, and the data from 2016 received a separate analysis from the 2017 through 2018 lending data. As a result, performance tables have been separated and include 2017 through 2018 analysis only. Data is discussed in the applicable narrative sections of the evaluation.

To evaluate lending, we used data from bank reports and a random sample of home mortgage and business loans originated in the bank's AA. Our lending analysis utilized the most recent available demographic and aggregate peer lending data.

### Selection of Areas for Full-Scope Review

FNB St. Ignace has one AA in the state of Michigan, and a full-scope review was performed for this AA. The AA comprises of the full counties of Mackinac and Luce and partial counties of Chippewa, Emmet, and Cheboygan. The AA does not lie in an MSA.

## Ratings

The bank's overall rating is based on its performance within the single AA. In reaching our overall rating, we gave more weight to certain lending criteria than other areas.

## 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 Michigan

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

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

The major factors that support this rating include:

- The LTD ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment area AA.
- A substantial majority of loan originations are made within the bank's AA.
- The borrower distribution of loans reflects reasonable distribution among borrowers of different incomes. The borrower distribution of loans reflects reasonable distribution among businesses of different sizes.
- The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of businesses loans reflects reasonable distribution among geographies.

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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.

## Description of Institution's Operations in Michigan

FNB St. Ignace is a \$254 million community bank headquartered in St. Ignace, Michigan. The bank is majority owned by Mackinac National Bancorp, Inc., a one bank holding company. The bank operates seven full-service branches located in Cedarville, Mackinac Island, Naubinway, Newberry, and St. Ignace. The main office and five other branches are located in a middle-income census tract (CT). The branch located in Newberry, Michigan is in a moderate-income CT. Additionally, the bank has five off-premises ATM locations; three in grocery stores in St. Ignace, Cedarville, and Newberry, and at a hotel and taxi stand on Mackinac Island. No branches were opened or closed since the last CRA examination.

The bank's business strategy is to serve the credit and depository needs of its local community. The bank offers traditional commercial and consumer loan and deposit products and provides insurance products through a non-affiliated third party. As of June 30, 2019, the loan portfolio totaled \$85.4 million and represented 33.6 percent of total assets. By dollar volume, the loan portfolio consists of 66.11 percent commercial loans, 28.79 percent residential real estate loans, 4.85 percent consumer loans, and 0.25 percent other loans. Tier 1 capital totals \$19.7 million.

FNB St. Ignace has one AA, which includes 17 CTs, located in Michigan. The AA includes the full counties of Mackinac and Luce, and partial counties of Chippewa, Emmet, and Cheboygan. The AA does not lie in a metropolitan statistical area (MSA). Based on the FFIEC's 2018 List of Distressed or Underserved Nonmetropolitan Middle-Income Geographies, four CTs in Mackinac County were listed as distressed and underserved middle-income CTs due to unemployment and remote rural location; one CT in Luce County was listed as a distressed and underserved middle-income CT due to poverty, unemployment, and remote rural location; four CTs in Chippewa County were listed as distressed middle-income CTs due to unemployment; one CT in Emmet County was listed as a distressed and underserved middle-income CT due to unemployment and remote rural location; and one CT in Cheboygan County was listed as a distressed and underserved middle-income CT due to unemployment and remote rural location. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

There are no legal or financial impediments limiting the bank's ability to meet the credit needs of its AA. FNB St. Ignace's last CRA evaluation, dated November 14, 2016, resulted in a Satisfactory rating using the Small Bank procedures.

### Employment and Economic Factors

Tourism continues to be the primary economic activity in the area. According to Data USA, the largest industries in the AA are accommodation & food services, health care and social assistance, and retail trade, with mining as the highest paying industry. The largest seasonal employer is the Grand Hotel on Mackinac Island, and major year-round employers include the Sault Tribe of Chippewa Indians, Mackinac Straits Area Hospital, and Mackinac Bridge Authority.

The annual unemployment rate as of June 2019 for Cheboygan County was 3.8 percent, Chippewa County was 6.4 percent, Emmet County was 4.7 percent, Luce County was 5.8 percent, and Mackinac County was 3.4 percent. The annual unemployment rate for the State of Michigan was 4.4 percent during the same period. Unemployment rates within the AA are seasonal, with higher unemployment during the fall and winter seasons and lower unemployment during the spring and summer tourist season. The effect is particularly pronounced in Mackinac County, where unemployment reached

20.9 percent in January 2019, and then decreased to 3.4 percent in June 2019. The unique economic and demographic makeup of the AA could have an adverse impact on loan demand in the area.

There is moderate competition in the area from several other financial institutions. According to the June 30, 2018 FDIC market share data, FNB St. Ignace has total deposits of \$232.8 million with a market share of 12.25 percent, ranking them first among all financial institutions operating in the AA. Other competing financial institutions had a deposit market share ranging from 0.98 percent (the State Savings Bank of Manistique) to 11.98 percent (Citizens National Bank of Cheboygan).

### Community Contact

We spoke with a community contact from a local Chamber of Commerce. The contact stated that the overall needs of the community are being met by local financial institutions. The contact also noted that the area depends heavily on tourism, that tourism in the area has increased over the past several years, and that there has also been some recent growth in new businesses in the area.

| <b>Table A – Demographic Information of the Assessment Area - 2016</b>                                   |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: FNB St Ignace Non-MSA</b>  |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 17       | 0.0                   | 11.8                         | 70.6                     | 0.0                     | 17.6                  |
| Population by Geography  | 39,412   | 0.0                   | 14.4                         | 80.0                     | 0.0                     | 5.6                   |
| Housing Units by Geography   | 28,841   | 0.0                   | 11.3                         | 88.7                     | 0.0                     | 0.0                   |
| Owner-Occupied Units by Geography  | 12,220   | 0.0                   | 8.6                          | 91.4                     | 0.0                     | 0.0                   |
| Occupied Rental Units by Geography   | 2,794    | 0.0                   | 23.6                         | 76.4                     | 0.0                     | 0.0                   |
| Vacant Units by Geography  | 13,827   | 0.0                   | 11.2                         | 88.8                     | 0.0                     | 0.0                   |
| Businesses by Geography  | 2,206    | 0.0                   | 8.5                          | 91.3                     | 0.0                     | 0.2                   |
| Farms by Geography   | 124      | 0.0                   | 1.6                          | 98.4                     | 0.0                     | 0.0                   |
| Family Distribution by Income Level  | 10,062   | 20.5                  | 20.5                         | 22.7                     | 36.3                    | 0.0                   |
| Household Distribution by Income Level   | 15,014   | 24.7                  | 17.3                         | 19.0                     | 39.0                    | 0.0                   |
| Median Family Income Non-MSAs - MI   |          | \$51,187              | Median Housing Value         |                          |                         | \$126,510             |
|  |          |                       | Median Gross Rent            |                          |                         | \$573                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 10.9%                 |
| <i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i>  |          |                       |                              |                          |                         |                       |
| <i>Due to rounding, totals may not equal 100.0</i>   |          |                       |                              |                          |                         |                       |
| <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

| Table A – Demographic Information of the Assessment Area – 2018   |        |               |                              |                  |                 |               |
|---|--------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: FNB St Ignace Non-MSA  |        |               |                              |                  |                 |               |
| Demographic Characteristics   | #      | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)   | 16     | 0.0           | 18.8                         | 68.8             | 0.0             | 12.5          |
| Population by Geography   | 39,221 | 0.0           | 27.7                         | 68.3             | 0.0             | 4.0           |
| Housing Units by Geography  | 29,845 | 0.0           | 18.1                         | 81.9             | 0.0             | 0.0           |
| Owner-Occupied Units by Geography   | 11,649 | 0.0           | 19.5                         | 80.5             | 0.0             | 0.0           |
| Occupied Rental Units by Geography  | 3,484  | 0.0           | 33.4                         | 66.6             | 0.0             | 0.0           |
| Vacant Units by Geography   | 14,712 | 0.0           | 13.4                         | 86.6             | 0.0             | 0.0           |
| Businesses by Geography   | 2,164  | 0.0           | 19.0                         | 80.5             | 0.0             | 0.5           |
| Farms by Geography  | 135    | 0.0           | 18.5                         | 81.5             | 0.0             | 0.0           |
| Family Distribution by Income Level   | 9,933  | 21.3          | 21.4                         | 22.6             | 34.7            | 0.0           |
| Household Distribution by Income Level  | 15,133 | 23.6          | 18.9                         | 19.4             | 38.1            | 0.0           |
| Median Family Income Non-MSAs - MI  |        | \$53,542      | Median Housing Value         |                  |                 | \$117,224     |
|   |        |               | Median Gross Rent            |                  |                 | \$602         |
|   |        |               | Families Below Poverty Level |                  |                 | 12.0%         |
| <i>Source: 2015 ACS Census and 2018 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0</i><br><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 is rated Satisfactory.

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

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. The geographic distribution of business loans reflects reasonable distribution among geographies.

#### *Home Mortgage Loans*

Refer to table O in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### **2016 Conclusions**

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Based on our random sample, the bank originated 4.2 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's originated loans is below the demographics that show 8.6 percent of owner-occupied housing is in moderate-income geographies. The percentage of bank loans is below aggregate peer lending data, which show 8.9 percent of peer home mortgage lending was in moderate-income geographies.

#### **2017-2018 Conclusions**

The geographic distribution of home mortgage loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Based on our random sample, the bank originated 16.0 percent of home mortgage loans in moderate-income geographies. The percentage of the bank's originated loans is below the demographics that show 19.5 percent of owner-occupied housing is in



moderate-income geographies. The percentage of bank loans is below aggregate peer lending data, which show 18.3 percent of peer home mortgage lending was in moderate-income geographies.

### ***Small Loans to Businesses***

Refer to table Q in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

#### ***2016 Conclusions***

The geographic distribution of business loans reflects reasonable distribution among geographies. There are no low-income CTs in the bank's AA. Based on our sample, the bank originated 4.8 percent of small business loans in moderate-income geographies. This percentage is below the demographics which show 8.5 percent of AA businesses are in moderate-income geographies. The percentage of bank loans exceeds the aggregate peer lending data, which shows 3.8 percent of peer lending was to businesses in moderate-income geographies.

#### ***2017-2018 Conclusions***

The geographic distribution of business loans reflects poor distribution among geographies. There are no low-income CTs in the bank's AA. Based on our random sample, the bank originated 4.4 percent of small business loans in moderate-income geographies. This percentage is less than the demographics, which show 19.0 percent of AA businesses are in moderate-income geographies. The percentage of bank loans is below the aggregate peer lending data, which shows 15.1 percent of peer lending was to businesses in moderate-income geographies.

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

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

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

Refer to table P in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### ***2016 Conclusions***

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 8.3 percent of its home mortgages to low-income families, which is below the demographics that show 20.5 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate peer lending data, which show 6.0 percent of peer lending within the AA was to low-income families. Based on our random sample, the bank originated 12.5 percent of home mortgages to moderate-income families, which is below the demographics that show 20.5 percent of families in the AA are moderate-income. The bank's lending is also below the aggregate peer lending data, which show 13.8 percent of peer lending within the AA was to moderate-income families.

#### ***2017-2018 Conclusions***

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. The bank originated 8.3 percent of its home mortgages to low-income

families, which is below the demographics that show 21.3 percent of families in the AA are low-income. The percentage of bank loans to low-income families exceeds the aggregate peer lending data, which show 4.7 percent of peer lending within the AA was to low-income families. The bank originated 33.3 percent of home mortgages to moderate-income families, which exceeds the demographics that show 21.4 percent of families in the AA are moderate-income. The bank's lending also exceeds the aggregate peer lending data, which show 18.8 percent of peer lending within the AA was to moderate-income families.

### ***Small Loans to Businesses***

Refer to table R in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

### ***2016 Conclusions***

The borrower distribution of loans reflects excellent distribution among businesses of different sizes. Our random sample shows the bank originated 85.7 percent of its business loans to AA small businesses (business with gross annual revenues of \$1.0 million or less). The bank's lending exceeds the demographics that show 80.9 percent of AA businesses are small businesses. The bank's lending also exceeds the aggregate peer lending data, which show 52.7 percent of peer business lending in the AA was to small businesses.

### ***2017-2018 Conclusions***

The borrower distribution of loans reflects reasonable distribution among businesses of different sizes. Our random sample shows the bank originated 78.3 percent of its business loans to AA small businesses. The bank's lending is below the demographics that show 79.8 percent of AA businesses are small businesses. The bank's lending exceeds the aggregate peer lending data, which show 56.9 percent of peer business lending in the AA was to small businesses.

### **Responses to Complaints**

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practices during this evaluation.

## 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, 2016 through December 31, 2018 |   |
| <b>Bank Products Reviewed:</b>                          | Home mortgage and small business          |   |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>             | <b>Products Reviewed</b>  |
| <i>None</i>   |   |   |
| <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>  |
| Non-MSA   | Full-scope                                | Full counties of Mackinac and Luce. Partial counties of Chippewa, Emmet, and Cheboygan. |
|   |   |   |

# Appendix B: Summary of State Ratings

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| RATINGS       |  | The First National Bank of St. Ignace |  |
|---------------|--|---------------------------------------|--|
| Overall Bank: |  | Lending Test Rating:                  |  |
| Satisfactory  |  | 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 nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## Appendix D: Tables of Performance Data

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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 30th 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.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2016**

| 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  |
| Non-MSA AA       | 25                        | 2,558        | 100.0        | 414            | 0.0                               | 0.0          | 0.0        | 8.6                               | 4.2          | 8.9        | 91.4                              | 95.8         | 91.1        | 0.0                               | 0.0          | 0.0        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>     | <b>25</b>                 | <b>2,558</b> | <b>100.0</b> | <b>414</b>     | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> | <b>8.6</b>                        | <b>4.2</b>   | <b>8.9</b> | <b>91.4</b>                       | <b>95.8</b>  | <b>91.1</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

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

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-18**

| 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  |
| Non-MSA AA       | 27                        | 3,030        | 100.0        | 426            | 0.0                               | 0.0          | 0.0        | 19.5                              | 16.0         | 18.3        | 80.5                              | 84.0         | 81.7        | 0.0                               | 0.0          | 0.0        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>     | <b>27</b>                 | <b>3,030</b> | <b>100.0</b> | <b>426</b>     | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> | <b>19.5</b>                       | <b>16.0</b>  | <b>18.3</b> | <b>80.5</b>                       | <b>84.0</b>  | <b>81.7</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

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

| <b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b> |                                  |              |                   |                       |                             |                     |                  |                                  |                     |                  |                                |                     |                  |                               |                     |                  |                                       |                     | <b>2016</b>      |
|--|----------------------------------|--------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|
|  | <b>Total Home Mortgage Loans</b> |              |                   |                       | <b>Low-Income Borrowers</b> |                     |                  | <b>Moderate-Income Borrowers</b> |                     |                  | <b>Middle-Income Borrowers</b> |                     |                  | <b>Upper-Income Borrowers</b> |                     |                  | <b>Not Available-Income Borrowers</b> |                     |                  |
| <b>Assessment Area:</b>  | <b>#</b>                         | <b>\$</b>    | <b>% of Total</b> | <b>Overall Market</b> | <b>% Families</b>           | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>              | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>             | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                     | <b>% Bank Loans</b> | <b>Aggregate</b> |
| Non-MSA AA   | 25                               | 2,558        | 100.0             | 414                   | 20.5                        | 8.3                 | 6.0              | 20.5                             | 12.5                | 13.8             | 22.7                           | 20.8                | 22.7             | 36.3                          | 58.3                | 44.9             | 0.0                                   | 0.0                 | 12.6             |
| <b>Total</b>   | <b>25</b>                        | <b>2,558</b> | <b>100</b>        | <b>414</b>            | <b>20.5</b>                 | <b>8.3</b>          | <b>6.0</b>       | <b>20.5</b>                      | <b>12.5</b>         | <b>13.8</b>      | <b>22.7</b>                    | <b>20.8</b>         | <b>22.7</b>      | <b>36.3</b>                   | <b>58.3</b>         | <b>44.9</b>      | <b>0.0</b>                            | <b>0.0</b>          | <b>12.6</b>      |

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

| <b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b> |                                  |              |                   |                       |                             |                     |                  |                                  |                     |                  |                                |                     |                  |                               |                     |                  |                                       |                     | <b>2017-18</b>   |
|--|----------------------------------|--------------|-------------------|-----------------------|-----------------------------|---------------------|------------------|----------------------------------|---------------------|------------------|--------------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|---------------------------------------|---------------------|------------------|
|  | <b>Total Home Mortgage Loans</b> |              |                   |                       | <b>Low-Income Borrowers</b> |                     |                  | <b>Moderate-Income Borrowers</b> |                     |                  | <b>Middle-Income Borrowers</b> |                     |                  | <b>Upper-Income Borrowers</b> |                     |                  | <b>Not Available-Income Borrowers</b> |                     |                  |
| <b>Assessment Area:</b>  | <b>#</b>                         | <b>\$</b>    | <b>% of Total</b> | <b>Overall Market</b> | <b>% Families</b>           | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>              | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>             | <b>% Bank Loans</b> | <b>Aggregate</b> | <b>% Families</b>                     | <b>% Bank Loans</b> | <b>Aggregate</b> |
| Non-MSA AA   | 27                               | 3,030        | 100.0             | 426                   | 21.3                        | 8.3                 | 4.7              | 21.4                             | 33.3                | 18.8             | 22.6                           | 4.2                 | 20.9             | 34.7                          | 54.2                | 44.6             | 0.0                                   | 0.00                | 11.0             |
| <b>Total</b>   | <b>27</b>                        | <b>3,030</b> | <b>100.0</b>      | <b>426</b>            | <b>21.3</b>                 | <b>8.3</b>          | <b>4.7</b>       | <b>21.4</b>                      | <b>33.3</b>         | <b>18.8</b>      | <b>22.6</b>                    | <b>4.2</b>          | <b>20.9</b>      | <b>34.7</b>                   | <b>54.2</b>         | <b>44.6</b>      | <b>0.0</b>                            | <b>0.00</b>         | <b>11.0</b>      |

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
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   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate  | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate  | % Businesses                | % Bank Loans | Aggregate  |
| Non-MSA AA       | 25                              | 3,350        | 100.0        | 425            | 0.0               | 0.0          | 0.0        | 8.5                    | 4.8          | 3.8        | 91.3                 | 95.2         | 96.2        | 0.0                 | 0.0          | 0.0        | 0.2                         | 0.0          | 0.0        |
| <b>Total</b>     | <b>25</b>                       | <b>3,350</b> | <b>100.0</b> | <b>425</b>     | <b>0.0</b>        | <b>0.0</b>   | <b>0.0</b> | <b>8.5</b>             | <b>4.8</b>   | <b>3.8</b> | <b>91.3</b>          | <b>95.2</b>  | <b>96.2</b> | <b>0.0</b>          | <b>0.0</b>   | <b>0.0</b> | <b>0.2</b>                  | <b>0.0</b>   | <b>0.0</b> |

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
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   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate  | % Businesses                | % Bank Loans | Aggregate  |
| Non-MSA AA       | 26                              | 2,835        | 100.0        | 390            | 0.0               | 0.0          | 0.0        | 19.0                   | 4.4          | 15.1        | 80.5                 | 95.7         | 84.9        | 0.0                 | 0.0          | 0.0        | 0.5                         | 0.0          | 0.0        |
| <b>Total</b>     | <b>26</b>                       | <b>2,835</b> | <b>100.0</b> | <b>390</b>     | <b>0.0</b>        | <b>0.0</b>   | <b>0.0</b> | <b>19.0</b>            | <b>4.4</b>   | <b>15.1</b> | <b>80.5</b>          | <b>95.7</b>  | <b>84.9</b> | <b>0.0</b>          | <b>0.0</b>   | <b>0.0</b> | <b>0.5</b>                  | <b>0.0</b>   | <b>0.0</b> |

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

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b> |                                 |              |              |                |                                 |              |             |                                |              |  | <b>2016</b>  |  |
|--|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|--|
| Assessment Area:   | Total Loans to Small Businesses |              |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |  |
|  | #                               | \$           | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |  |
| Non-MSA AA   | 25                              | 3,350        | 100.0        | 425            | 80.9                            | 85.7         | 52.7        | 4.6                            | 14.3         | 14.5                                   | 0.0          |  |
| <b>Total</b>   | <b>25</b>                       | <b>3,350</b> | <b>100.0</b> | <b>425</b>     | <b>80.9</b>                     | <b>85.7</b>  | <b>52.7</b> | <b>4.6</b>                     | <b>14.3</b>  | <b>14.5</b>                            | <b>0.0</b>   |  |

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

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b> |                                 |              |              |                |                                 |              |             |                                |              |  | <b>2017-18</b> |  |
|--|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|----------------|--|
| Assessment Area:   | Total Loans to Small Businesses |              |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |                |  |
|  | #                               | \$           | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans   |  |
| Non-MSA AA   | 26                              | 2,835        | 100.0        | 390            | 79.8                            | 78.3         | 56.9        | 4.8                            | 21.7         | 15.5                                   | 0.0            |  |
| <b>Total</b>   | <b>26</b>                       | <b>2,835</b> | <b>100.0</b> | <b>390</b>     | <b>79.8</b>                     | <b>78.3</b>  | <b>56.9</b> | <b>4.8</b>                     | <b>21.7</b>  | <b>15.5</b>                            | <b>0.0</b>     |  |

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