



## **PUBLIC DISCLOSURE**

April 8, 2019

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

First Citizens Bank of Polson, National Association  
Charter Number 24670

213 First Street West  
Polson, Montana 59860

Office of the Comptroller of the Currency

Seattle Field Office  
101 Stewart Street, Suite 1010  
Seattle, WA 98101

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

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>3</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>4</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>8</b>
<b>SCOPE OF THE EVALUATION.....</b>	<b>8</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>10</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....</b>	<b>11</b>
<b>LENDING TEST .....</b>	<b>11</b>
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## Overall CRA Rating

### The Lending Test is rated: Satisfactory

- First Citizens Bank of Polson's (Bank) average loan-to-deposit (LTD) ratio is reasonable given the Bank's size, financial condition, and credit needs of its assessment area (AA).
- The Bank originates a substantial majority of its loans in the AA.
- The Bank demonstrates excellent distribution of loans to borrowers of different incomes and revenues compared to area demographics.
- The Bank demonstrates a reasonable distribution of loans to geographies of different incomes compared to area demographics.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under the U.S. Department of Housing and Urban Development (HUD) Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AA(s) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(s).

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 CT delineated by the U.S. Census Bureau 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement, and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing, and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 metropolitan area/AA.

**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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan area.

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

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

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

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

## **Description of Institution**

The Bank is a \$19 million community bank headquartered in Polson, Montana. The Bank is owned by Flathead Lake Bancorporation, Inc., a single-bank holding company also located in Polson, Montana. The Bank has one location in Polson, Montana, and offers automated teller machine (ATM) services at this and one other off-site location. Management has designated all of Lake County, Montana as the Bank's AA. The Bank did not open or close any branches during the evaluation period, nor did any merger or acquisition activity occur during the evaluation period.

There are no known legal, financial, or other impediments limiting the Bank's ability to meet the credit needs of its AA. However, the Bank's current financial condition may limit its ability to meet the AA's credit needs in the future.

As of December 31, 2018, loans represent 58 percent of the Bank's total assets. The loan portfolio is composed of commercial loans (65 percent), residential real estate loans (23 percent), and consumer loans (8 percent). Total equity capital is \$1.88 million. The Bank's primary loan products for this review were determined to be commercial loans to small businesses and consumer loans. These loan products reflect the Bank's primary lending focus during the evaluation period.

The Bank operated under a Consent Order relating to safety and soundness concerns during the evaluation period. Nevertheless, the Bank remained focused on meeting the credit needs of its community. The last CRA examination dated January 6, 2014, rated the Bank "Satisfactory."

## **Scope of the Evaluation**

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

We evaluated the Bank's performance within its AA using the small bank CRA full scope procedures. The Bank's overall rating is based on the Lending Test, which evaluates the Bank's record of meeting the credit needs of the AA through its lending activities. The evaluation period for the Lending Test was January 1, 2016 through December 31, 2018. We evaluated loans originated in 2016 separately from loans originated in 2017 and 2018, because 2017 demographic information was updated with data collected from the American Community Survey (ACS). The Lending Test evaluated commercial loans to small businesses and consumer loans, as these were determined to be the Bank's primary loan products.

### **Data Integrity**

We selected a sample of 20 loans originated within the evaluation period, January 1, 2016 through December 31, 2018, for each primary loan product in order to evaluate the Bank's lending within its AA.



We then selected two samples of each primary loan product that were originated during 2016, and 2017-2018. These samples included 20 commercial loans to small businesses originated in 2016, 20 commercial loans to small businesses originated in 2017-2018, 20 consumer loans originated in 2016, and 20 consumer loans originated in 2017-2018. Information used to evaluate the Bank's lending performance was verified by reviewing documents in the loan files of each borrower. Conclusions regarding the Bank's lending performance are supported by the integrity of this information.

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

The Bank has identified all of Lake County, Montana as its only AA. This AA received a full-scope review during this examination. Please refer to Appendix A-1 and Appendix B-1 for additional information on the AA.

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

Pursuant to 12 C.F.R. §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 Consumer Financial Protection Bureau, as applicable.

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

The OCC will consider any information that this Bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the Bank'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.

# Conclusions with Respect to Performance Tests

## LENDING TEST

The Bank’s LTD ratio is reasonable given the Bank’s size and performance context. For the evaluation period, January 1, 2016 through December 31, 2018, the Bank originated a substantial majority of its small business and consumer loans to borrowers inside the AA. The Bank has excellent penetration of credit to borrowers of different incomes and to businesses of different sizes.

### Loan-to-Deposit Ratio

The Bank’s LTD ratio is reasonable given its size, financial condition, and the AA’s credit needs; and it meets the standard for satisfactory performance. The Bank’s average quarterly LTD ratio was 71 percent for the 21 quarters from December 31, 2013 to December 31, 2018. The ratio ranged from a quarterly low of 64 percent to a quarterly high of 79 percent during the review period.

The Bank’s average LTD ratio is higher than the average LTD ratio of five other similarly-situated banks. The average quarterly LTD ratio for these five banks was 63 percent over the same time period. The ratio ranged from a quarterly low of 34 percent to a quarterly high of 104 percent.

### Lending in Assessment Area

The Bank’s lending staff originated a substantial majority, both by number and dollar amount, of small business and consumer loans to customers within its AA during the evaluation period. The loan sample included 20 small business and 20 consumer loans originated from January 1, 2016 through December 31, 2018. Polson originated 88 percent by number and 89 percent by dollar in the AA. See Table A below for details.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	17	85%	3	15%	20	\$597,963	88%	\$85,239	12%	\$ 683,202
Consumer	18	90%	2	10%	20	\$197,844	95%	\$ 9,633	5%	\$ 207,477
<b>Total</b>	35	88%	5	13%	40	\$795,807	89%	\$94,872	11%	\$ 890,679

*Source: 01/01/2016-12/31/2018 Bank Data  
Due to rounding, totals may not equal 100.0*

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

The Bank's distribution of loans to borrowers of different incomes and businesses of different sizes reflects excellent penetration compared to area demographics and meets the standard for satisfactory performance.

In 2016, the Bank originated 70 percent of its consumer loans to low- and moderate-income borrowers. This significantly exceeded the total percentage of low- and moderate-income households in the AA of 46 percent. In 2017-2018, the Bank originated 45 percent of its consumer loans to low- and moderate-income borrowers. This compares reasonably well with the total percentage of low- and moderate-income households in the AA of 48 percent. Please refer to Table V in Appendix C for the facts and data used to evaluate lending to borrowers of different incomes.

In 2016, the Bank originated 95 percent of its commercial loans in the AA to small businesses with revenues less than \$1 million. This exceeded the total percentage of small businesses in the AA with revenues less than \$1 million of 87 percent. In 2017-2018, the Bank originated 80 percent of its commercial loans in the AA to small businesses with revenues less than \$1 million. This compares reasonably well with the total percentage of small businesses in the AA with revenues less than \$1 million of 87 percent. The Bank's level of lending to small businesses in the AA with revenues less than \$1 million was significantly higher than the aggregate level of lending in the AA, with the aggregate level in 2016 at 46 percent and 2017-2018 at 61 percent. Please refer to Table R in Appendix C for the facts and data used to evaluate businesses of different sizes.

## **Geographic Distribution of Loans**

The geographic distribution of consumer and commercial loans to small businesses reflects a reasonable dispersion of credit across the AA. The Bank's AA consists of only moderate- and middle-income CTs.

In 2016 and 2017-2018, the Bank originated 100 percent of its consumer loans in moderate- and middle-income CTs, which compared favorably to the area demographics of 100 percent of households in the AA located in moderate- and middle income CTs. Please refer to Table U in Appendix C for the facts and data used to evaluate lending to borrowers with different incomes.

In 2016, the Bank originated 10 percent of its small business loans in the moderate-income CTs and 90 percent of its small business loans in the middle-income CTs. The Bank's lending in the moderate-income CTs was significantly below the number of small businesses in the CT of 32 percent. However, the Bank's lending in the middle-income CTs significantly exceeded the number of small businesses in the CT of 68 percent. Please refer to Table Q in Appendix C for the facts and data used to evaluate lending to small businesses of different incomes.

## **Responses to Complaints**

Neither the Bank nor the OCC received any CRA related complaints during this evaluation 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 metropolitan and nonmetropolitan areas 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>	Lending Test (excludes community development loans): 1/01/2016 to 12/31/2018	
<b>Financial Institution</b>		<b>Products Reviewed</b>
First Citizens Bank of Polson National Association Polson, Montana		Consumer Loans Commercial Loans to Small Businesses
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>None</i>	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Lake County, Montana	Full Scope	The Bank has one AA.

## Appendix B: Community Profiles for Full-Scope Areas

Table B – Demographic Information of the AA						
AA: Lake County 2010 Census 2016 Activity Year						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	25.0	75.0	0.0	0.0
Population by Geography	28,746	0.0	31.5	68.5	0.0	0.0
Housing Units by Geography	16,089	0.0	32.4	67.6	0.0	0.0
Owner-Occupied Units by Geography	8,162	0.0	29.9	70.1	0.0	0.0
Occupied Rental Units by Geography	3,853	0.0	37.3	62.7	0.0	0.0
Vacant Units by Geography	4,074	0.0	32.7	67.3	0.0	0.0
Businesses by Geography	2,223	0.0	32.5	67.5	0.0	0.0
Farms by Geography	275	0.0	35.3	64.7	0.0	0.0
Family Distribution by Income Level	7,949	27.1	18.4	22.3	32.3	0.0
Household Distribution by Income Level	12,015	28.3	18.0	17.5	36.2	0.0
Median Family Income Non-MSAs - MT		\$54,061	Median Housing Value			\$206,131
<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>			Median Gross Rent			\$565
			Families Below Poverty Level			15.4%

Table B – Demographic Information of the AA						
AA: Lake County 2015 Census 2017-2018 Activity Year						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	12.5	87.5	0.0	0.0
Population by Geography	29,157	0.0	14.3	85.7	0.0	0.0
Housing Units by Geography	16,613	0.0	9.5	90.5	0.0	0.0
Owner-Occupied Units by Geography	8,325	0.0	9.6	90.4	0.0	0.0
Occupied Rental Units by Geography	3,653	0.0	16.8	83.2	0.0	0.0
Vacant Units by Geography	4,635	0.0	3.7	96.3	0.0	0.0
Businesses by Geography	2,217	0.0	8.3	91.7	0.0	0.0
Farms by Geography	263	0.0	14.8	85.2	0.0	0.0
Family Distribution by Income Level	7,880	27.4	20.2	19.7	32.8	0.0
Household Distribution by Income Level	11,978	29.2	18.9	16.7	35.3	0.0
Median Family Income Non-MSAs - MT		\$59,958	Median Housing Value			\$229,863
<i>Source: 2015 ACS Census and 2018 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>			Median Gross Rent			\$632
			Families Below Poverty Level			15.8%

The Bank operates from a single location in Polson, Montana that serves as both its headquarters and its main bank location. The Bank maintains one ATM onsite and has one off-site ATM location. The Bank's primary business focus during the review period has been consumer loans and commercial loans to small businesses.

The Bank's AA consists entirely of Lake County, MT, which contains eight CTs. The AA has no low-income CTs and no upper-income CTs. In 2016, two CTs were moderate-income and six were middle-income. All six middle-income CTs were designated as Distressed Middle-Income Non-Metropolitan Census Tracts characterized by poverty. In 2017-2018, one CT was moderate-income and seven were middle-income. In 2017 all seven middle-income CTs were designated as Distressed Middle-Income Non-Metropolitan Census Tracts characterized by poverty. In 2018 none of the CTs in the AA were designated as Distressed Middle-Income Non-Metropolitan Census Tracts.

The 2018 population of Lake County was 29,157. The 2015 ACS US Census data shows that the median family income for the 2017-2018 review period was \$59,958, which indicates that a substantial proportion of families living in the area were low- or moderate-income (47 percent), and that 15 percent of families in the area were below the poverty line.

The largest industries in Lake County are healthcare and social assistance, retail trade, and educational services (Source: DataUSA/Census Bureau). The average unemployment rate for Lake County from 2016 to 2018 was 4.5 percent, higher than the state-wide average unemployment rate of 3.9 percent and the national unemployment rate of 4.4 percent for the same time period (Source: Bureau of Labor Statistics).

Based on an interview with a representative from a local organization that provides and coordinates community services for area residents, employment opportunities are present in the area; however, most of the jobs that are available typically pay lower wages. The representative went on to identify affordable housing as the primary need within the local community. She mentioned that some financial institutions in the area are involved in providing credit and financing for affordable housing, but the need remains significant.

Other financial institutions with a presence in the Bank's AA include Glacier Bank, First Interstate Bank, Valley Bank of Ronan, and Eagle Bank. According to the FDIC Deposit Market Share Report as of June 30, 2018, the Bank has a 4.38 percent market share of deposits in the AA and ranks fifth out of the five financial institutions in terms of total deposits. The FDIC report also shows that 100 percent of the Bank's deposits originated inside its market area.



## Appendix C: 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 areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this performance evaluation. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

- Table Q. AA 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 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) throughout those geographies. Because small business data is not available for geographic areas smaller than counties, it may be necessary to compare Bank loan data to aggregate data from geographic areas larger than the Bank’s AA.
- Table R. AA Distribution of Loans to Small Businesses by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the Bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the Bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.
- Table U. AA 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 throughout those geographies.
- Table V. AA 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 MA/AA

**Table Q: AA 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		
	#	\$	% of Total	Overall Market	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate
Lake County AA	--	--	--	1,068	0.0	0.0	0.0	32.5	10.0	31.1	67.5	90.0	68.9	0.0	0.0	0.0
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>1,068</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>32.5</b>	<b>10.0</b>	<b>31.1</b>	<b>67.5</b>	<b>90.0</b>	<b>68.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

**Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-2018**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total	Overall Market	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate
Lake County AA	--	--	--	617	0.0	0.0	0.0	8.1	15.0	8.8	91.9	85.0	91.2	0.0	0.0	0.0
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>617</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.1</b>	<b>15.0</b>	<b>8.8</b>	<b>91.9</b>	<b>85.0</b>	<b>91.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

<b>Table R: AA 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	
Lake County AA	--	--	--	1,068	87.2	95.0	46.3	4.5	5.0	8.4	0.0	
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>1,068</b>	<b>87.2</b>	<b>95.0</b>	<b>46.3</b>	<b>4.5</b>	<b>5.0</b>	<b>8.4</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: AA 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	
Lake County AA	--	--	--	617	86.8	80.0	60.8	4.4	15.0	8.8	5.0	
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>617</b>	<b>86.8</b>	<b>80.0</b>	<b>60.8</b>	<b>4.4</b>	<b>15.0</b>	<b>8.8</b>	<b>5.0</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

**Table U: AA Distribution of Consumer Loans by Income Category of the Geography** **2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Lake County AA 2016	--	--	--	0.0	0.0	32.3	35.0	67.7	65.0	0.0	0.0	0.0	0.0

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

**Table U: AA Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Lake County AA 2017-2018	--	--	--	0.0	0.0	11.8	15.0	88.2	85.0	0.0	0.0	0.0	0.0

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

<b>Table V - AA Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2016</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Lake County AA 2016	--	--	--	28.3	35.0	18.0	35.0	17.5	20.0	36.2	10.0	0.0	0.0	
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>28.3</b>	<b>35.0</b>	<b>18.0</b>	<b>35.0</b>	<b>17.5</b>	<b>20.0</b>	<b>36.2</b>	<b>10.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table V - AA Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2017-18</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Lake County AA 2017-2018	--	--	--	29.2	15.0	18.9	30.0	16.7	25.0	35.3	25.0	0.0	5.0	
<b>Total</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>29.2</b>	<b>15.0</b>	<b>18.9</b>	<b>30.0</b>	<b>16.7</b>	<b>25.0</b>	<b>35.3</b>	<b>25.0</b>	<b>0.0</b>	<b>5.0</b>	

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