



## PUBLIC DISCLOSURE

February 28, 2022

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The City National Bank of Metropolis  
Charter Number 8745

423 Ferry Street  
Metropolis, IL 62960

Office of the Comptroller of the Currency  
500 N. Broadway, Suite 1700  
St. Louis, MO 63102

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>1</b>
<b>DESCRIPTION OF INSTITUTION.....</b>	<b>2</b>
<b>SCOPE OF THE EVALUATION.....</b>	<b>3</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>5</b>
<b>STATE RATING .....</b>	<b>6</b>
<b>STATE OF ILLINOIS .....</b>	<b>6</b>
<b>COMMUNITY DEVELOPMENT TEST.....</b>	<b>10</b>
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: SUMMARY OF MMSA AND STATE RATINGS .....</b>	<b>B-1</b>
<b>APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>C-1</b>
<b>APPENDIX D: TABLES OF PERFORMANCE DATA .....</b>	<b>D-1</b>

## **Overall CRA Rating**

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

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

**The Community Development (CD) Test is rated: Outstanding.**

The City National Bank of Metropolis's (CNB) Community Reinvestment Act (CRA) performance is outstanding. We based our conclusions on CNBs lending and community development (CD) activities. The major factors that support this rating include:

- CNBs loan-to-deposit (LTD) ratio is reasonable.
- The distribution of loans to borrowers of various income levels is excellent.
- The geographic distribution of loans across geographies of different income levels is excellent throughout the assessment area (AA).
- CNB demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services.
- There were no complaints with respect to CNBs CRA performance.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the LTD ratio is reasonable. CNBs quarterly LTD ratio averaged 56.6 percent over the 12-quarter period ending December 31, 2021. Over the same period, the LTD ratio ranged from a low of 50.6 percent to a high of 61.4 percent.

To assess CNBs performance, we analyzed the LTD ratios of comparable institutions. The banks ranged in size from \$159.3 million to \$657.3 million with a combined average LTD ratio of 72.2 percent over the same evaluation period. CNB ranked sixth among the group. See the table below for further detail.

Institution	Average Quarterly LTD Ratio	Total Assets \$(000s) as of 12/31/2021
Farmers State Bank of Alto Pass.	90.6%	\$326,829
SouthernTrust Bank	79.2%	\$209,458
Legence Bank	71.8%	\$657,347
The Bank of Herrin	69.4%	\$315,853
Southern Illinois Bank	65.3%	\$159,326
<b>The City National Bank of Metropolis</b>	<b>56.6%</b>	<b>\$480,534</b>

*Source: Quarterly Call Reports from March 31, 2019 to December 31, 2021*

## Lending in Assessment Area

A majority of CNBs loans are inside its AA. The bank originated or purchased 62.5 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	10	50	10	50	20	2,275	54.2	1,919	45.7	4,195
Consumer	15	75	5	25	20	192	79	51	21	243
<b>Total</b>	<b>25</b>	<b>62.5</b>	<b>15</b>	<b>37.5</b>	<b>40</b>	<b>2,467</b>	<b>55.6</b>	<b>1,971</b>	<b>44.4</b>	<b>4,438</b>

*Source: Bank Data – Sample was randomly selected from loan originations and purchased between 1/1/2019 and 12/31/2021. Due to rounding, totals may not equal 100.0%*

## Description of Institution

CNB is an intrastate financial institution headquartered in Metropolis, Illinois and wholly owned by City National Bankcorp, Inc., a one-bank holding company. There were no affiliate or

subsidiary activities considered in this evaluation, and there were no merger or acquisition activities during the review period.

CNB operates a main bank location and one branch, both located in Metropolis, Illinois. CNB offers a variety of noncomplex products and services including deposit and loan products, online and mobile banking, and automated teller machine (ATM) services. ATM services include 10 ATMs, three of which are deposit-taking and located in Brookport, Illinois and at each bank location.

As of December 31, 2021, CNB reported assets totaling \$480.5 million and common equity tier one capital of \$56.7 million, or 25.5 percent of total risk-weighted assets. The loan portfolio totaled \$196.5 million, or 40.9 percent of total assets, and deposits totaled \$381.1 million.

<b>Loan Type</b>	<b>Dollars \$(000)</b>	<b>Percentage of Portfolio</b>
Commercial Loans	\$69,859	35.5%
Agricultural Loans	\$18,644	9.5%
Residential Loans	\$93,318	47.5%
Consumer Loans	\$14,696	7.5%
Other Loans	\$0	0%
<b>Total Loans</b>	<b>\$196,517</b>	<b>100%</b>

*Source: 12/31/2021 FFIEC Call Report*

CNB received an overall “Outstanding” at their last CRA evaluation dated February 4, 2019. There are no legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its AA.

For CRA purposes, CNB has identified one AA in the state of Illinois. The AA includes the entirety of Massac County, which is a Non-Metropolitan Statistical Area (Non-MSA) AA, and the same AA utilized during the previous CRA evaluation. The AA conforms to regulatory requirements and does not arbitrarily exclude low- and moderate-income (LMI) geographies.

## **Scope of the Evaluation**

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

The scope of this evaluation includes an assessment of CNB under the Intermediate Small Bank performance criteria which consists of a lending test and a CD test. The lending test evaluates the bank’s record of meeting the credit needs of its AA through its lending activities. The CD test evaluates the bank’s record of responding to the CD needs of its AA through CD lending and providing qualified investments, donations, and services. The evaluation period for the examination is January 1, 2019 through December 31, 2021. Qualifying activities performed in response to the significant impact of the COVID-19 pandemic across the United States were considered from January 1, 2020 through December 31, 2020. Activities occurring on or after January 1, 2022 will be consider in the subsequent evaluation.

The OCCs analysis of qualified investments included the investment portfolio as well as a donations and grants made during the evaluation period that had CD as its primary purpose.

Qualified investments included investments that met the definition of CD and were made prior to and remained outstanding through the end of the current evaluation period or were made during the current evaluation period. Examiners considered prior-period investments at the book value of the investment at the end of the current evaluation period and current-period investments at their original investment amount.

Based on our review of all loans originated and purchased in the evaluation period, we determined commercial and consumer lending accounted for 51 percent of total dollar amount and 78 percent of the total number of all loans originated or purchased. Based on this information, CNBs primary lending products for this evaluation are commercial and consumer loans. We compared these loans to 2015 American Community Survey (ACS) U.S. Census, 2020 peer small business data, June 2021 data provided by Dun & Bradstreet (D&B), and 2020 CRA aggregate peer data.

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

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the Scope section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A for a list of full- and limited-scope AAs.

### **Ratings**

CNBs overall rating is based solely on its performance in the state of Illinois. The state of Illinois rating is derived from the bank's performance under the CRA Intermediate Small Bank lending test as well as related performance context information from the bank's AA. The CD test received more consideration in the overall rating given demographic and economic factors affecting the AA. Of the four CTs within the CNBs AA, three are considered distressed due to poverty or unemployment. We placed more weight on performance from consumer lending given the significant number of loans originated during the evaluations period.

## **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 Illinois

**CRA rating for the State of Illinois:** Outstanding.

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

**The Community Development Test is rated:** Outstanding.

The major factors that support this rating include:

- The distribution of loans to borrowers of various income levels is excellent.
- The distribution of loans across geographies of different income levels is excellent throughout the AA.
- CNB demonstrates excellent responsiveness to CD needs of its AA through CD loans, qualified investments, and CD services.
- There were no complaints with respect to CNBs CRA performance.

### Description of Institution's Operations in Illinois

CNB has designated all of Massac County in Illinois as its AA. The AA consists of one moderate-income census tract (CT) and three middle-income CTs. The three middle-income CTs have been considered distressed due to poverty or unemployment since the last examination.

#### Competition

Competition for deposits in the AA is low. As of June 30, 2021, CNB reported \$370 million in deposits in the AA, representing 100 percent of the bank's total deposits as of that date. According to June 30, 2021 Federal Deposit Insurance Corporation (FDIC) market share information, the bank ranks first in market share with 82.6 percent of the market. The only other two depository institutions are Banterra Bank and Legence Bank representing 13.1 percent and 4.3 percent of the market, respectively.

#### Demographics

The following table provides a summary of the AA demographics, including housing and business information, for the Massac County AA.



Demographic Information of the Assessment Area						
Assessment Area: Massac County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	25.0	75.0	0.0	0.0
Population by Geography	15,016	0.0	16.3	83.7	0.0	0.0
Housing Units by Geography	7,097	0.0	17.6	82.4	0.0	0.0
Owner-Occupied Units by Geography	4,365	0.0	13.9	86.1	0.0	0.0
Occupied Rental Units by Geography	1,622	0.0	24.2	75.8	0.0	0.0
Vacant Units by Geography	1,110	0.0	22.7	77.3	0.0	0.0
Businesses by Geography	763	0.0	30.7	69.3	0.0	0.0
Farms by Geography	66	0.0	6.1	93.9	0.0	0.0
Family Distribution by Income Level	3,765	26.2	19.4	19.2	35.2	0.0
Household Distribution by Income Level	5,987	28.0	18.0	18.0	36.0	0.0
Median Family Income Non-MSAs - IL		\$59,323	Median Housing Value			\$85,246
			Median Gross Rent			\$690
			Families Below Poverty Level			14.5%
<p>Source: 2015 ACS Census and 2021 D&amp;B Data            Due to rounding, totals may not equal 100.0            (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Geographic Distribution of the Population

According to the 2015 ACS Census data, the AAs population was 15,016 with 2,454 (16.3 percent) residing in the moderate-income CTs and 12,562 (83.7 percent) in the middle-income CTs.

Household Distribution by Income Level

According to the same data, there were 5,987 households in the AA. Approximately 1,677 (28.0 percent) of those households were low income, 1,079 (18.0 percent) were moderate income, 1,075 (18 percent) were middle income, and 2,146 (36 percent) were upper income. Households below the poverty level were high at 16.1 percent. Of the 5,987 households in the AA, only 998 (16.7 percent) were located in the moderate-income CT. These households were predominately LMI with 327 (32.8 percent) low income, 234 (23.5 percent) moderate income, and 238 (23.9 percent) living below the poverty level.

Based on the information in the table below, low-income families in the AA earned less than \$32,100 (2019) and up to \$32,900 (2021), and moderate-income families earned from \$32,100 (2019) to \$52,650 (2021).

<b>Median Family Income Ranges IL NA Median Family Income</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
2019 (\$64,200)	<\$32,100	\$32,100 to <\$51,360	\$51,360 to <\$77,040	≥\$77,040
2020 (\$65,800)	<\$32,900	\$32,900 to <\$52,640	\$52,640 to <\$78,960	≥\$78,960
2021 (\$65,800)	<\$32,900	\$32,900 to <\$52,640	\$52,640 to <\$78,960	≥\$78,960

*Source: FFIEC*

*Employment and Economic Factors*

Based on the Bureau of Labor Statistics report, the annual unemployment rates for Massac County ranged from a high of 10 percent in 2020 to a low of 5.3 percent in 2019. The average unemployment rate for 2021 is 5.7 percent. The unemployment rate increased significantly in early 2020 due to COVID-19 pandemic-related factors but has stabilized. The state of Illinois and national averages have seen similar trends.

<b>Annual Unemployment Rates</b>			
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Massac County	5.3%	10%	5.7%
State of Illinois	4.0%	9.2%	6.1%
National	3.7%	8.1%	5.4%

*Source: US Department of Labor; Bureau of Labor Statistic. Rates are not seasonally adjusted.*

*According to Moody’s Analytics, Illinois’ economic recovery will proceed at a slightly slower pace than the region and the U.S. Tailwinds to the manufacturing base are numerous but easing of supply-chain bottlenecks is key to the near-term forecast. Longer term, IL will underperform because of poor population trends and troubled state and local finances.*

The top employment sectors in Illinois are education and health services (15.7 percent), professional and business services (15.6 percent), government (13.8 percent), retail trade (9.7 percent), and manufacturing (9.7 percent).

Based on the 2015 ACS Census data and June 2021 D&B data, there are 829 total businesses in the AA of which 763 (92.0 percent) are non-farm businesses. The majority of non-farm businesses are located in the middle-income CT (69.3 percent), with the remaining located in the moderate-income CT. There are no low- or upper-income CTs in the AA. Of the 763 non-farm businesses, 623 (81.7 percent) are considered small business with annual revenue of less than \$1 million.

Community Contacts

Through discussions with a local economic leader, it was determined that local financial institutions are involved in the community and meeting the community's banking needs overall. The contact recognized CNB for providing donations to organizations that directly provide financial assistance to LMI individuals to help them toward sustaining self-sufficiency.

**Scope of Evaluation in Illinois**

Examiners completed a full-scope review of the banks only AA, Massac County. Refer to Appendix A for more information.

**LENDING TEST**

CNBs performance under the Lending Test in Illinois is rated Outstanding.

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

Based on a full-scope review, the bank's lending performance in the state of Illinois is excellent.

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

CNB exhibits excellent geographic distribution of loans in the state of Illinois.

***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.

The geographic distribution of small loans to businesses is adequate. The percentage of small loans originated or purchased to businesses in moderate-income geographies was below percentage of businesses in those geographies and aggregate percentage of all reporting lenders. There are no low-income CTs in the AA.

***Consumer Loans***

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

The geographic distribution of consumer loans is excellent. The percentage of consumer loans originated or purchased to borrowers in moderate-income geographies was near the percentage of households in those geographies. This conclusion considers the few numbers of households located in the moderate-income CT and the significant amount of LMI borrowers who may not qualify for loans. There are no low-income CTs in the AA.

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

We analyzed CNBs business and consumer lending originations over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous lending gaps in the AAs.

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

CNB exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

#### ***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.

The distribution of small loans to businesses of different sizes is excellent. The percentage of small business loans originated or purchased to small businesses with revenues of less than \$1 million far exceeded the percentage of small businesses in the AA and the aggregate percentage of all reporting lenders.

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

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

The distribution of consumer loans among individuals of different income levels is excellent. The percentage of consumer loans originated or purchased to LMI borrowers far exceeded the percentage of households for LMI borrowers.

### **Responses to Complaints**

The bank did not receive any CRA-related complaints during the evaluation period.

### **Community Development Test**

CNBs performance under the CD Test in the state of Illinois is rated Outstanding.

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

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through community development loans, qualified investments, and CD services considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

### **Number and Amount of Community Development Loans**

CD loans demonstrated outstanding responsiveness to CD needs and opportunities in the AA during the evaluation period. CNB originated 45 loans totaling \$12 million during the evaluation period. This equates to approximately 21 percent of the bank's common equity tier 1 capital (\$56.66 million) as of December 31, 2021. The majority of these loans provided revitalization or stabilization to LMI and distressed middle-income geographies. Other qualified loans promoted community services for LMI individuals.

### **Number and Amount of Qualified Investments**

CD investments demonstrated adequate responsiveness to CD needs and opportunities in the AA during the evaluation period. In aggregate, CD investments and donations totaled \$2.5 million, or four percent of common equity tier 1 capital, during the evaluation period.

- CNB holds one municipal investment with a fair market value of \$2 million from the local school district, where over 50 percent of students are eligible for free or low-cost lunches under the National School Lunch Program.
- The remaining qualified investments consisted of 37 qualified donations totaling \$85,819 in the AA during the evaluation period. The majority of donations supported community service organizations or the local school district.

### **Extent to Which the Bank Provides Community Development Services**

CD services demonstrated outstanding responsiveness to the CD service needs and opportunities of the AA during the evaluation period. In aggregate CNB documented seven service activities totaling 246 hours of qualifying CD services in the AA during the evaluation period. These CD services are comprised of bank employees providing financial expertise to community service organizations and financial education at the local schools.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the 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>	01/01/2019 to 12/31/2021	
<b>Bank Products Reviewed:</b>	Small Business Loans and Consumer Loans Community Development Loans, Qualified Investments, and Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Illinois</b>		
Illinois Non-MSA AA	Full Scope	Massac County

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS: The City National Bank of Metropolis</b>		
<b>Overall Bank:</b>	<b>Lending Test Rating</b>	<b>CD Test Rating</b>
The City National Bank of Metropolis	Outstanding	Outstanding
<b>MMSA or State:</b>		
Illinois	Outstanding	Outstanding

## 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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

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

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21
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 2021	20	2,171	100	96	0.0	0	0.0	30.7	20	35.4	69.3	80	64.6	0	0	0.0	0.0	0	0.0
<b>Total</b>	<b>20</b>	<b>2,171</b>	<b>100</b>	<b>96</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>30.7</b>	<b>20</b>	<b>35.4</b>	<b>69.3</b>	<b>80</b>	<b>64.6</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21
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 2021	20	2,171	100	96	81.7	90	39.6	3.7	10	14.7	0	
<b>Total</b>	<b>10</b>	<b>2,171</b>	<b>100</b>	<b>96</b>	<b>81.7</b>	<b>90</b>	<b>39.6</b>	<b>3.7</b>	<b>10</b>	<b>14.7</b>	<b>0</b>	

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-21	
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	
Non-MSA AA 2021	20	234	100	0.0	0	16.7	15	83.3	85	0.0	0	0.0	0	
<i>Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-21	
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	
Non-MSA AA 2021	20	234	100	28.0	40	18.0	45	18.0	10	36.0	5	0.0	0	
<b>Total</b>	<b>20</b>	<b>234</b>	<b>100</b>	<b>28.0</b>	<b>40</b>	<b>18.0</b>	<b>45</b>	<b>18.0</b>	<b>10</b>	<b>36.0</b>	<b>5</b>	<b>0.0</b>	<b>0</b>	
<i>Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														