



## **PUBLIC DISCLOSURE**

February 3, 2020

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

United Bank & Trust National Association  
Charter Number 24346

2101 S. Center Street  
Marshalltown, IA 50158

Office of the Comptroller of the Currency

Omaha Field Office  
13710 FNB Parkway  
Suite 110  
Omaha, NE 68154

**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 **Outstanding**.

**The lending test is rated: Outstanding**

The major factors that support this rating include:

- Management originates a substantial majority of loans to customers located inside the bank's AA.
- The distribution of loans to borrowers of different income levels is excellent compared to AA demographics.
- The distribution of loans to borrowers from different geographies is excellent compared to AA demographics.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD is reasonable. The LTD ratio of United Bank & Trust, National Association (UBT) averaged 60.64 percent over the last 18 quarters, with a quarterly low of 55.81 percent and a quarterly high of 73.27 percent. UBT's LTD is similar to three other community financial institutions of similar size, location, and product offerings. The other institutions had an average LTD ratio of 68.70 percent, ranging from 57.22 percent to 79.72 percent during the same time period.

### Lending in Assessment Area

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

The bank originated and purchased 85 percent of its loans by number inside the bank's AAs during the evaluation period. This analysis was performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	18	90%	2	10%	20	\$2,257	90%	242	10%	\$2,499
Small Business	16	80%	4	20%	20	\$4,903	61%	3,085	39%	\$7,988
Total	34	85%	6	15%	40	\$7,160	68%	3,327	32%	\$10,487

## Description of Institution

UBT is located in Marshalltown, Iowa. As of December 31, 2019, the bank had \$100 million in total assets. The bank has two full-service branches and two standalone ATMs located in Marshalltown. UBT is owned by Ames National Corporation (ANC) located in Ames, IA. As of June 30, 2019, ANC held five banks within its portfolio, with a consolidated total asset size of \$1.47 billion.

UBT has one AA that consists of Marshall County, Iowa. The AA has 10 census tracts (CTs), of which one is upper-income, seven are middle-income, and two are moderate-income. UBT offers a full range of deposit and loan products and services. The bank's primary loan products are business and home mortgage loans. As of December 31, 2019, UBT reported net loans of \$57.7 million and tier 1 capital of \$9.96 million. Net loans represent 57 percent of total assets. From 2017 to 2019, UBT originated \$37.3 million in business loans (46 percent of total originations), \$33.3 million in 1-4 family residential loans (42 percent), \$6.5 million in agricultural loans (eight percent), and \$2.9 million in consumer loans (four percent). Competition within the AA is high, with 11 banking institutions in the local market.

The last Community Reinvestment Act (CRA) examination occurred in 2015, with a Public Disclosure report date of November 2, 2015. UBT received a "*Satisfactory*" rating. There were no legal, financial, or other factors impeding UBT's ability to meet the credit needs of its AA during this evaluation period.

## **Scope of the Evaluation**

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

The evaluation period for the Lending Test during this examination is January 1, 2017 to December 31, 2019. The primary products evaluated were home mortgage and business loans. During the evaluation period, home mortgage loans accounted for 48 percent of loans originated by number and small business loans accounted for 47 percent of loans originated by dollar.

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

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

### **Ratings**

The overall rating is based on the bank’s one AA, which consists of Marshall County, Iowa.

## **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 does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution’s overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

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 Iowa**

#### **CRA rating for the State of Iowa: Outstanding**

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

The major factors that support this rating include:

- Management originates a substantial majority of loans to customers located inside the bank's AA.
- The distribution of loans to borrowers of different income levels is excellent compared to AA demographics.
- The distribution of loans to borrowers from different geographies is excellent compared to AA demographics.

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

The bank's primary business focus is to offer home mortgage, small business, and consumer loans in the local community. UBT also originates a moderate level of home mortgage loans that are sold into the secondary market. From 2017-2019, UBT sold 193 home mortgage loans totaling \$25.2 million to the secondary market. UBT has one AA, which is the entirety of Marshall County, Iowa. As of June 30, 2019, the FDIC deposit market share reports show that UBT ranks fifth out of 11 institutions in market share in Marshall County with \$90.5 million in local deposits. The bank has no non-local deposits.

In conducting the evaluation of UBT's CRA performance, examiners interviewed one community contact in Marshall County. The contact was a representative of a local economic development program. The contact stated that the overall economic condition in the area is stable, with good small business activity and strong performance in the commercial and industrial sectors. The contact noted that the local agricultural market and economy remains strained. The contact stated housing stock is low, as demand for housing is high but supply is limited. The contact also noted that the local institutions were meeting the credit needs of the community and was not aware of any discriminatory lending or unfair banking practices within the AA.

## Marshall County 2017-2019

**Table A – Demographic Information of the Assessment Area**

Assessment Area: Marshall County 2015 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	10	0.0	20.0	70.0	10.0	0.0
Population by Geography	40,962	0.0	21.8	70.6	7.5	0.0
Housing Units by Geography	16,736	0.0	21.6	70.4	8.0	0.0
Owner-Occupied Units by Geography	11,086	0.0	14.5	76.9	8.6	0.0
Occupied Rental Units by Geography	4,211	0.0	34.6	59.4	5.9	0.0
Vacant Units by Geography	1,439	0.0	38.5	52.1	9.5	0.0
Businesses by Geography	2,399	0.0	19.6	70.7	9.7	0.0
Farms by Geography	344	0.0	3.8	71.2	25.0	0.0
Family Distribution by Income Level	10,494	16.6	18.3	28.1	37.0	0.0
Household Distribution by Income Level	15,297	19.5	15.5	20.2	44.8	0.0
Median Family Income Non-MSAs - GA		\$61,681	Median Housing Value			\$104,433
			Median Gross Rent			\$659
			Families Below Poverty Level			7.1%

Source: 2015 ACS Census and 2019 D&B Data

Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

### Scope of Evaluation in Iowa

The bank operates in one AA. The AA is Marshall County, which is located in central Iowa. The AA includes the geographies where the bank has offices. This AA received a full-scope review.

### LENDING TEST

The bank's performance under the Lending Test in Iowa is rated Outstanding.

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

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

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

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

### Home Mortgage Loans

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

The geographic distribution of home mortgage loans to CTs of different income levels is excellent. Fourteen percent of households within the AA are located in moderate-income CTs. UBT originated 15 percent of home mortgage loans to borrowers located in moderate-income CTs. UBT compares favorably to the aggregate HMDA data, which shows that 13 percent of home mortgage loans were made to borrowers in a moderate-income CT. There are no low-income CTs in the bank's AA.

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

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

The geographic distribution of small loans to businesses is excellent. Twenty percent of AA businesses are located in moderate-income CTs. UBT originated 35 percent of small loans to businesses located in moderate-income CTs. There are no low-income CTs in the bank's AA.

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

The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines UBT offers.

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

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

The distribution of home mortgage loans to borrowers of different income levels is excellent. Seventeen percent of families in the AA are low-income. UBT made 15 percent of home mortgage loans to low-income borrowers. UBT compares similarly to aggregate HMDA data, which shows 16 percent of home mortgage loans were to low-income borrowers. Bank management indicated that the housing market in the AA is competitive, which limits the opportunity for low-income borrowers to purchase homes. Eighteen percent of families in the AA are moderate-income. UBT made 25 percent of home mortgage loans to moderate-income borrowers. Aggregate HMDA data shows that 31 percent of home mortgage loans were to moderate-income borrowers.

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

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

The distribution of small loans to businesses of different sizes is reasonable. Eighty percent of businesses in the AA had gross annual revenues of \$1 million or less. UBT originated 75 percent of their small business loans to businesses with gross annual revenues of \$1 million or less. UBT exceeds the aggregate CRA data, which indicates that 54 percent of small loans to businesses were to businesses with gross annual revenues of \$1 million or less.

### **Responses to Complaints**

There were no complaints relating to the bank's CRA performance during the assessment period.



# Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	(01/01/2017 to 12/31/2019)	
<b>Bank Products Reviewed:</b>	Home mortgage and business loans	
<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>
Iowa		
Marshall County	Full-scope	The AA includes all of Marshall County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS		United Bank & Trust National Association	
Overall Bank:		Lending Test Rating:	
	United Bank and Trust		Outstanding
State:			
	Iowa		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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																<b>2017-2019</b>		
	<b>Total Home Mortgage Loans</b>			<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
AA:	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Marshall County	20	2,542,565	100	0.0	0.0	0.0	14.5	15.0	12.6	76.9	80.0	75.9	8.6	5.0	11.5	0.0	0.0	0.0
<b>Total</b>	20	2,542,565	100	0.0	0.0	0.0	14.5	15.0	12.6	76.9	80.0	75.9	8.6	5.0	11.5	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2015 - 12/31/2019 Bank 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>2017-2019</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>		
AA:	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Marshall County	20	2,542,565	100	16.6	15.0	15.5	18.3	25.0	31	28.1	40.0	20.2	37.0	20.0	23	0.0	0.0	10.4
<b>Total</b>	20	2,542,565	100	16.6	15.0	15.5	18.3	25.0	31	28.1	40.0	20.2	37.0	20.0	23	0.0	0.0	10.4

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



<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>												<b>2017-2019</b>	
AA:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available- Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Marshall County	20	5,626,362	100	0.0	0.0	19.6	35.0	70.7	65.0	9.7	0.0	0.0	0.0
<b>Total</b>	20	5,626,362	100	0.0	0.0	19.6	35.0	70.7	65.0	9.7	0.0	0.0	0.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/202019 Bank Data; 2018 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>2017-2019</b>	
AA:	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	
Marshall County	20	5,626,362	100	347	80.0	75.0	53.6	4.6	15.0	15.4	10.0	
<b>Total</b>	20	5,626,362	100	347	80.0	75.0	53.6	4.6	15.0	15.4	10.0	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data "--" data not available. Due to rounding, totals may not equal 100.0*