



PUBLIC DISCLOSURE

February 16, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank
Charter Number 10465

302 South Main Street
Cloverdale, IN 46120

Office of the Comptroller of the Currency
8777 Purdue Road, Suite 105
Indianapolis, IN 46268

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: First National Bank (FNB) is rated Satisfactory.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The bank’s loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans are originated inside the bank’s assessment area (AA).
- Lending to individuals of different income levels and businesses of different sizes is reasonable.
- Geographic distribution of loans in the AA is excellent.

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AA, FNB’s LTD ratio is reasonable. FNB’s quarterly LTD ratio averaged 56.8 percent. This was calculated since the last evaluation using eight quarters of LTD ratios from March 31, 2018, to December 31, 2019. The LTD ratio fluctuated from a low of 54.0 percent, at December 31, 2019, to a high of 58.7 percent, at September 30, 2018. The LTD ratio includes a notable level of public funds. If the ratios are adjusted for the public funds, the average LTD ratio increases from 56.8 percent to 77.6 percent.

The OCC compared FNB’s LTD ratio to seven other banks that are similarly situated, with assets ranging from \$168.8 million to \$504.1 million. These banks’ ratios averaged between 50.2 percent and 98.1 percent.

Lending in Assessment Area

A majority of FNB’s loans are inside its AA. The bank originated and purchased 78.8 percent of its total loans inside the bank’s AAs during the evaluation period.

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	329	79.5	85	20.5	414	48,084	78.2	13,420	21.8	61,504
Business	13	65.0	7	35.0	20	1,497	64.0	852	36.0	2,349
Total	342	78.8	92	21.2	434	49,581	77.6	14,272	22.4	63,853

Description of Institution

FNB is a federally chartered, national bank operating in Cloverdale, Indiana, with no affiliates or subsidiaries. FNB offers traditional banking products and services at its main office in Cloverdale and six branch locations in Indiana. The bank has eight deposit-taking automated teller machines (ATMs). A ninth ATM located at the Putnam County Hospital does not take deposits. In addition to its branch and

ATM networks, FNB's delivery channels include internet, mobile, and telephone banking. The bank's business strategy focuses on home mortgage and business loans.

The AA consists of Hendricks, Johnson, Monroe and Putman Counties. For purposes of this evaluation, the two census tracts (CTs) in Owen County were excluded due to the low lending volume compared to other CTs. The AA is located in the Indianapolis-Carmel-Anderson Metropolitan Statistical Area (MSA).

At December 31, 2020, FNB had \$383.9 million in total assets and \$31.4 million in tier 1 capital. The loan portfolio totaled \$178.2 million and represented 46.4 percent of total assets. The table below shows the loan portfolio composition:

Loan Portfolio Composition			
Loan Category	Amount (\$000's)	Percent of Total Loans	Percent of Total Assets
Commercial Loans	\$ 83,030	46.6%	21.6%
Residential Loans	\$ 60,630	34.0%	15.8%
Agricultural Loans	\$ 25,998	14.6%	6.8%
Consumer Loans	\$ 4,315	2.4%	1.1%
Other	\$ 4,262	2.4%	1.1%
Total Loan Portfolio	\$ 178,235	100.0%	46.4%

There are no financial, legal, or other impediments that would hinder the bank's ability to help meet the credit needs of its assessment area. The bank received a rating of "Satisfactory" at the last CRA examination dated February 12, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC evaluated FNB using the Small Bank CRA procedures to assess its record of meeting the credit needs of its community, which includes a Lending Test. The evaluation period for this review is from January 1, 2017, through December 31, 2019. Based on the number and dollar volume of lending, FNB's primary lending products are home mortgage and business loans. For home mortgage loans, examiners verified the integrity and utilized the 2017, 2018, and 2019 data reported by the bank under the requirements of the Home Mortgage Disclosure Act (HMDA). For business loans, examiners randomly selected a sample of each loan type originated during 2017, 2018, and 2019 to gather pertinent data.

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 assessment areas 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

FNB's overall rating is a blend of the state ratings, and where applicable, multistate ratings. The OCC placed more weight on the bank's performance for business loans, given the number and dollar volume of lending during the evaluation period and the bank's business strategy.

Loan Category	Amount (000s)	Percent of Total
Business	\$109,207	54.6%
Residential	\$66,191	33.1%
Farm	\$14,436	7.2%
Consumer	\$10,085	5.1%
Total	\$199,919	100.0%

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

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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 Indiana

CRA rating for the State of Indiana: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- An excellent geographic distribution of loans.
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

Description of Institution's Operations in Indiana

FNB has one AA within the state of Indiana rating area, located within the Indianapolis-Carmel-Anderson MSA. Please refer to the *Description of Institution* section for additional details. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income (LMI) geographies. During the evaluation period, there were twelve CTs designated as moderate-income and one low-income CT in the AA.

According to the June 30, 2020 FDIC Market Share Report, FNB had \$325.2 million in deposits, for a market share of 4.1 percent, ranking eleventh out of the 31 institutions operating in the AA. The top three depository institutions (JPMorgan Chase Bank, PNC Bank, and First Merchants) accounted for 32.3 percent of total deposits in the AA.

Competition for home mortgage loans in FNB's AA is strong. Based on 2019 Peer Mortgage Data, the top lenders were Caliber Home Loans with 5.6 percent, Ruoff Home Mortgage with 4.4 percent, and Huntington National Bank with 4.0 percent. All three institutions are significantly larger than FNB. The bank ranked 46th out of 48 lenders operating in the AA. According to the 2015 ACS US Census, the number of owner-occupied housing units totaled 110,459, and there were 35,577 LMI families in the AA.

Businesses in the AA totaled 26,978 and are primarily small businesses (86.0 percent are businesses with gross annual revenues of \$1 million or less) based on 2019 Dun and Bradstreet (D&B). D&B did not have revenue information for 10.2 percent of AA businesses. Of the businesses in the AA, a total of 285, or 1.1 percent are in the low-income CT and a total of 4,461 or 16.5 percent, are in the moderate-income CT. We reviewed Peer Small Business Data in the AA, which compares all CRA reporting banks that made small business loans in the AA. Based on 2019 Peer Small Business Data, there were 100 CRA loan reporting lenders in the AA. Those lenders originated 7,183 loans. The top three lenders were JP Morgan Chase Bank, with 27.3 percent of loans, American Express National Bank, with 13.5 percent of loans, and PNC Bank, with 6.4 percent of loans.

The unemployment rates for each county in the Indiana MSA AA generally trended with the statewide unemployment rate and showed improvement during the evaluation period. According to the 2015 ACS

US Census, 8.1 percent of households were below the poverty level. The following table summarizes the annual unemployment rates:

Unemployment Rates			
Area	2017	2018	2019
Hendricks County	2.9	2.9	2.7
Johnson County	3.0	2.9	2.7
Monroe County	3.6	3.4	3.1
Putman County	3.7	3.8	3.5
State of Indiana	3.6	3.5	3.3

The primary business industries in the AA according to Hoosiers by the Numbers, were service industries, retail trade, construction, finance, insurance, and real estate. Some of the major employers were Mr. Electric and Amazon Fulfillment Center in Hendricks County, Whisper Hearing Center and Johnson Memorial Hospital in Johnson County, Nice-pak Products Inc. and Toa LLC in Morgan County, and International Automotive Components and Walmart Distribution Center in Putnam County. Many residents commute to the Indianapolis metro area for employment.

One new community contact was performed for this evaluation. The contact noted FNB has been very involved in supporting lending for small businesses. The community-based development contact stated the need for support will continue as new and existing local businesses face competition from online sales.

Indianapolis-Carmel-Anderson MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: AA - FNB of Cloverdale						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	1.6	19.0	49.2	30.2	0.0
Population by Geography	406,133	1.0	14.4	46.0	38.6	0.0
Housing Units by Geography	158,493	1.1	15.2	47.1	36.6	0.0
Owner-Occupied Units by Geography	110,459	0.6	11.6	45.9	42.0	0.0
Occupied Rental Units by Geography	35,721	2.5	25.1	49.4	23.0	0.0
Vacant Units by Geography	12,313	1.4	18.8	51.6	28.2	0.0
Businesses by Geography	26,978	1.1	16.5	43.8	38.6	0.0
Farms by Geography	1,273	0.4	11.2	53.8	34.6	0.0
Family Distribution by Income Level	107,723	15.6	17.4	21.9	45.1	0.0
Household Distribution by Income Level	146,180	16.3	14.5	19.4	49.8	0.0
Median Family Income MSA - 26900 Indianapolis-Carmel-Anderson, IN MSA		\$66,803	Median Housing Value			\$150,857
			Median Gross Rent			\$864
			Families Below Poverty Level			6.2%

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 Indiana

The bank has only one AA, Hendricks, Johnson, Monroe and Putman Counties in the Indianapolis-Carmel-Anderson MSA. The OCC performed a full-scope review of the AA. Refer to the table in Appendix A: Scope of the Examination for additional information.

LENDING TEST

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

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the state of Indiana is reasonable. The geographic distribution of home mortgage loans and small loans to businesses is excellent. The borrower distribution of home mortgage loans and small business loans is reasonable. The OCC did not identify any conspicuous lending gaps.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

The geographic distribution of home mortgage loans is excellent.

FNB's percentage of loans in the moderate-income CT was above the percentage of owner-occupied housing units and aggregate lending. The bank's percentage of loans in the low-income CT was below the percentage of owner-occupied housing units and the aggregate lending in those geographies. Based on the strong level of competition within the AA for the low number of owner-occupied units in the one low-income CT, this distribution is reasonable.

Refer to Table O in the state of Indiana 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.

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent.

FNB's percentage of loans in the moderate-income CT was above the percentage of small businesses (businesses with gross annual revenues of \$1.0 million or less) and the aggregate lending in those geographies. The bank's percentage of loans in the low-income CT was below the percentage of small businesses and the aggregate lending. Based on the strong level of competition within the AA for the low number of businesses in the one low-income CT, this distribution is reasonable.

Refer to Table Q in the state of Indiana 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.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The borrower distribution of home mortgage loans is reasonable.

The distribution of the bank's lending to moderate-income borrowers was equal to the percentage of moderate-income families and below the level of aggregate lending. The distribution of the bank's lending to low-income borrowers was below the percentage of low-income families and above the aggregate lending. FNB reported a high number of borrowers whose income was not reported related to non-owner occupied home mortgage lending, which could include moderate- and low-income families. The limited number of families and the strong lender competition in the AA makes it more difficult to lend to LMI families.

Refer to Table P in the state of Indiana 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.

Small Loans to Businesses

The borrower distribution of small loans to businesses is reasonable.

The distribution of the bank's lending to small businesses was below the percentage of small businesses and significantly above aggregate lending. Based on the strong level of competition for the number of small businesses in the AA and the high percentage of businesses with revenue not available, this distribution is reasonable.

Refer to Table R in the state of Indiana 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.

Responses to Complaints

During the evaluation period, FNB did not receive any complaints related to its performance in helping meet the credit needs of the AA.

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 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”.

Time Period Reviewed:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Home mortgage, small business	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Indiana		
Indianapolis-Carmel-Anderson IN MSA	Full-scope	Hendricks County Johnson County Morgan County Putnam County

Appendix B: Summary of MMSA and State Ratings

RATINGS		First National Bank of Cloverdale	
Overall Bank:		Lending Test Rating	
First National Bank of Cloverdale		Satisfactory	
State:			
Indiana		Satisfactory	

Appendix C: Definitions and Common Abbreviations

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

Content of Standardized Tables

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
AA - FNB of Cloverdale	329	48,084	100.0	23,316	0.6	0.0	0.5	11.6	22.8	10.1	45.9	69.0	43.2	42.0	8.2	46.2	0.0	0.0	0.0
Total	329	48,084	100.0	23,316	0.6	0.0	0.5	11.6	22.8	10.1	45.9	69.0	43.2	42.0	8.2	46.2	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-19

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
AA - FNB of Cloverdale	329	48,084	100.0	23,316	15.6	10.0	8.2	17.4	17.3	20.7	21.9	19.1	22.4	45.1	43.2	32.3	0.0	10.3	16.4
Total	329	48,084	100.0	23,316	15.6	10.0	8.2	17.4	17.3	20.7	21.9	19.1	22.4	45.1	43.2	32.3	0.0	10.3	16.4

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-19	
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	% Business	% Bank Loans	Aggregate	% Business	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
FNB of Cloverdale	20	2,520	100	6,861	1.1	0.0	0.7	16.5	20.0	15.1	43.8	70.0	44.7	38.6	10.0	39.6	0.0	0.0	0.0	
Total	20	2,520	100	6,861	1.1	0.0	0.7	16.5	20.0	15.1	43.8	70.0	44.7	38.6	10.0	39.6	0.0	0.0	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2019 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												2017-19	
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		
AA - FNB of Cloverdale	20	2,520	100	6,861	86.0	80.0	44.8	3.9	20.0	10.2	0.0		
Total	20	2,520	100	6,861	86.0	80.0	44.8	3.9	20.0	10.2	0.0		

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