



## **PUBLIC DISCLOSURE**

November 5, 2018

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

First National Bank and Trust  
Charter Number 3601

225 State Street  
Phillipsburg, Kansas 67661

Office of the Comptroller of the Currency

2959 North Rock Road, Suite 510  
Wichita, Kansas 67226

**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**

**This institution is rated Outstanding.**

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

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

- First National Bank and Trust's (FNB&T) average loan-to-deposit ratio is reasonable.
- FNB&T made a majority of the loans in the Assessment Area (AA).
- Lending to farms of different sizes is excellent.
- FNB&T's Community Development (CD) activities demonstrate excellent responsiveness to community developments in its (AA).

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family

households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

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

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

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

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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 One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Description of Institution

FNB&T is an intrastate financial institution located in Phillipsburg, Kansas. As of December 31, 2017, FNB&T had total assets of \$204 million and Tier One Capital of \$31 million. The bank is a subsidiary of Golden Plains Bankshares, Inc., a \$31 million one-bank holding company also located in Phillipsburg, Kansas. There have been no significant changes in FNB&T's corporate structure, including merger or acquisition activities since the prior CRA examination.

FNB&T's AA includes Phillips, Smith, and Mitchell Counties. As of December 31, 2017, FNB&T operates five branches in nearby communities which include Long Island, Logan, Smith Center, Beloit, and Phillipsburg, Kansas. All facilities offer a full range of products including trust services. FNB&T has drive-up facilities in Phillipsburg, Smith Center, and Beloit. Each of these facilities have a cash dispensing Automated Teller Machine (ATM). The bank has an additional cash dispensing ATM at a grocery store in Phillipsburg. As of June 30, 2017, FNB&T's deposit share in the AA totaled \$171 million and ranked second out of eight depository institutions in the AA. FNB&T has not closed any offices since the prior CRA examination. FNB&T opened a full service branch in Beloit, Kansas, in October 2012.

In addition to the full range of consumer, commercial, and agricultural banking products and services, the bank offers online banking through their website. The website allows customers to obtain updated account activity, transfer funds between accounts, make loan payments, and receive E-statements. Bill pay is also available online. Customers have the option of mobile banking with personal devices, which allow customers the ability to check account balances, pay bills, and transfer money. Mobile deposit is also a feature of the application. FNB&T is a participating lender in the Kansas Housing Resources Commission's and the Federal Home Loan Bank's First Time Homebuyers Programs. These programs provide considerable tax savings for first time home buyers and grants to assist low- and moderate-income families with down payment and closing costs. During the evaluation period, FNB&T made 25 loans awarding \$142,500 in forgivable grants to first-time homebuyers. Other programs the bank is involved in include the Farm Service Agency Guaranteed Loans, Kansas Development Finance Authority loans, and Small Business Administration Loans.

As of December 31, 2017, the loan portfolio totaled \$139 million, which represented 84 percent of total deposits and 68 percent of total assets. The loan portfolio was comprised primarily of agricultural loans. The following table reflects the loan portfolio composition by loan type.

<b>Loan Portfolio Composition as of December 31, 2017</b>		
<b>Loan Type</b>	<b>Volume (\$000)</b>	<b>% of Total Loans</b>
Commercial	27,684	20
Residential Real Estate	26,064	19
Agricultural	75,491	54
Consumer	10,046	7
<b>Total Loans:</b>	<b>139,285</b>	<b>100</b>

All three of the counties in FNB&T's AA are designated by the FFIEC as distressed and/or underserved areas.

Based on its financial condition, the local economy, product offering, and competition, FNB&T has the ability to meet the various credit needs in its community. No legal impediments or other factors hinder its ability to meet the credit needs of its AA. The prior CRA examination dated July 15, 2013, rated FNB&T “Outstanding” under the Small Bank CRA examination criteria.

## **Scope of the Evaluation**

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

This Performance Evaluation assesses FNB&T’s performance using interagency Small Bank CRA examination procedures. Procedures include a lending test that evaluates the bank’s record of meeting AA credit needs through lending activities. Evaluating CD activities is optional under the Small Bank CRA procedures; however, at management’s request, the OCC reviewed the bank’s CD lending, qualified investments, and services. We analyzed agricultural loans for the period of January 1, 2015, through December 31, 2017. Agricultural loans were the primary product by dollar amount.

### **Data Integrity**

The bank does not report HMDA or CRA data, so the OCC did not perform a data integrity review. We did not experience any data integrity inaccuracies during our review.

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

FNB&T has designated Phillips, Smith, and Mitchell Counties as its AA, all of which are Non-MSA geographies. The AA meets regulatory requirements, as it consists of whole geographies and does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income geographies. The OCC performed a full-scope review of the AA. Please refer to Appendix A for more information.

### **Ratings**

The bank’s overall rating is based on the full scope review of its one AA, and the lending performance within the AA. The evaluation period of 2015 and 2016 will receive more consideration due to higher lending volumes over a 24-month period. The OCC reviewed CD activities to determine if the activities were responsive to AA needs and if they enhanced credit availability in the AA.

## **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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this 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.

# Conclusions with Respect to Performance Tests

## LENDING TEST

FNB&T’s performance under the lending test is satisfactory. FNB&T has demonstrated satisfactory performance based on its reasonable average quarterly loan-to-deposit (LTD) ratio, the majority of loans originated inside the AA, and excellent penetration of loans to farms of different sizes.

### Loan-to-Deposit Ratio

FNB&T’s quarterly average LTD ratio since the prior CRA examination is reasonable at 72 percent. This ratio reflects satisfactory performance given the bank’s capacity to lend, market competition, local demographic and economic factors, and lending opportunities available in the AA. We compared FNB&T to six other similarly situated banks. The six banks’ ratios averaged 74 percent and ranged from 55 percent to 107 percent. FNB&T ranked third when compared with the other banks’ average LTD ratios.

### Lending in Assessment Area

A majority of FNB&T’s lending activity is inside the AA. Based on our sample, the bank granted 62 percent by number and 71 percent by dollar amount. We reviewed 40 agricultural loans.

Table D - Lending Inside and Outside of the Phillips-Smith-Mitchell Counties Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Agricultural	25	62	15	38	40	3,337	71	1,379	29	4,716
<b>Total</b>	25	62	15	38	40	3,337	71	1379	29	4716

*Source: 01/01/2015-12/31/17 Bank Data  
Due to rounding, totals may not equal 100.0*

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

Lending to farms of different sizes reflects excellent distribution when compared to aggregate data. Farms in our sample without available revenue information was significant at 20 and 30 percent, respectively, for the 2015-2016 period and 2017 period. All of the loans without farm revenue information were well below \$100,000, and typically reflect a very small farm operation where the bank’s documented income consisted of wages and not farm income. As a result, the rating also reflects borrower distribution of loans to farms by loan size. In both evaluation periods, 75 percent of the loans were for \$100,000 or less and all loans were less than \$1 million. Refer to Table T in Appendix C for the facts and data used to evaluate the borrower distribution of the bank’s loan originations and purchases.

## **Geographic Distribution of Loans**

We did not perform an analysis of the geographic distribution of loans. The AA does not contain any low- or moderate-income tracts. Therefore, this analysis would not be meaningful.

## **Responses to Complaints**

FNB&T did not receive any written complaints related to its CRA performance during the evaluation period.

## **Qualified Investments and CD Services (Optional)**

FNB&T's performance under the CD Test is rated "Outstanding". CD loans and qualified investments total \$6.2 million. This represents 20 percent of Tier One Capital. In addition, FNB&T performed CD services for 18 organizations totaling 365 hours. This involved 36 percent of bank employees and included five leadership positions. These services included financial education, economic development, medical care, and other assistance for essential infrastructure.

FNB&T provided the AA with 16 CD loans totaling \$4.6 million. The loans and leases funded improvements for several equipment upgrades.

- One CD loan for \$1.2 million provided remodeling for a nursing home in Phillips County. The not-for-profit organization provides 24-hour nursing care regardless of an individual's financial resources.
- One CD loan for \$1.4 million provided funds to build a gym and classrooms for schools in Mitchell County.

FNB&T purchased 22 qualified investments totaling \$1.5 million inside of its AA. The bank made an additional \$137 thousand in donations. While the investments are not innovative or complex, the investments helped with infrastructure for water, sewer, and street improvements. FNB&T also donated to aid in the start-up of a not-for-profit childcare center.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/2015 to 12/31/2017 CD Loans, investments, and services: 07/16/2013 to 12/31/2017	
<b>Financial Institution</b>		<b>Products Reviewed</b>
First National Bank and Trust (FNB&T) Phillipsburg, Kansas		Agricultural Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	None	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Phillipsburg AA Nonmetropolitan Area Phillips-Smith-Mitchell Counties	Full-Scope	Non-MSA; contains all middle income tracts. Refer to Appendix B for additional detail.

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

### Phillipsburg AA - Non-MSA AA in Kansas

Table A – Demographic Information of the Assessment Area Assessment Area: Phillips-Smith-Mitchell Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	100.0	0.0	0.0
Population by Geography	15,537	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	8,574	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	5,096	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,607	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,871	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,383	0.0	0.0	100.0	0.0	0.0
Farms by Geography	430	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	4,328	16.2	19.8	21.8	42.2	0.0
Household Distribution by Income Level	6,703	22.8	17.2	18.3	41.8	0.0
Median Family Income Non-MSAs - KS		\$56,877	Median Housing Value			\$76,332
			Median Gross Rent			\$508
			Families Below Poverty Level			6.5%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FNB&T designates Phillips, Smith, and Mitchell Counties as its AA. Phillips and Smith Counties are contiguous, while Mitchell County is in close proximity. This AA is a non-metropolitan statistical area. The AA includes seven census tracts, all of which are middle-income tracts. The AA is reasonable, complies with the regulation and does not arbitrarily exclude any low- or moderate-income areas.

The 2015 ACS U.S. Census data reflects a population of 15,537, with 100 percent in middle-income tracts. The unemployment rate of 2.1 percent is well below The Bureau of Labor Statistics September 2018 unemployment rate for Kansas at 3.3 percent and the nationwide rate of 3.7 percent.

The economic condition of the AA is stable and is dominated by agriculture. Although agriculture is expected to benefit from expected pickup in global demand, tariffs are expected to offset improving fundamentals and result in minimal net progress. Agriculture has been impacted by low commodity prices and dry conditions. Major employers for Phillips and Smith County include healthcare and social assistance, agriculture, and educational services. Major employers for Mitchell County include healthcare and social assistance, retail trade, agriculture, and manufacturing.

Competition among financial institutions in the AA is strong. Based on the Federal Deposit Insurance Corporation's most recent deposit market share report dated June 30, 2017, FNB&T ranks second in deposit market share at 26.7 percent of the deposits within the AA. The top competitor has a market share of 30 percent.

### **Community Contacts**

As a part of this evaluation, examiners use community contacts to assess the credit needs and opportunities in the AA. All three contacts noted agriculture as a primary credit need, and agricultural stresses include low commodity prices and some decline in land values. All contacts stated the financial institutions in the area are involved in the community and are meeting the credit needs. One contact noted that the financial institutions provide appropriate options for farm credit needs in the area.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

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

**Table 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. Because small farm data is 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 (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer 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 throughout 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 MA/assessment area.

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2015-16**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Phillipsburg AA	20	1,937	100.0	163	97.9	70.0	37.7	1.4	10.0	0.7	20.0
<b>Total</b>	<b>20</b>	<b>1,937</b>	<b>100.0</b>	<b>163</b>	<b>97.9</b>	<b>70.0</b>	<b>37.1</b>	<b>1.4</b>	<b>10.0</b>	<b>0.7</b>	<b>20.0</b>

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Phillipsburg AA	20	3,979	100.0	163	97.7	60.0	37.4	1.4	10.0	0.9	30.0
<b>Total</b>	<b>20</b>	<b>3,979</b>	<b>100.0</b>	<b>163</b>	<b>97.7</b>	<b>60.0</b>	<b>37.4</b>	<b>1.4</b>	<b>10.0</b>	<b>0.9</b>	<b>30.0</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0