



PUBLIC DISCLOSURE

July 19, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Allendale
Charter Number 8293

301 East Main Street
Allendale, IL 62410

Office of the Comptroller of the Currency

8777 Purdue Road
Suite 105
Indianapolis, IN 46268-3104

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 **Satisfactory**.

The Lending Test is rated: Satisfactory.

The major factors supporting this rating include:

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

Loan-to-Deposit Ratio

The First National Bank of Allendale's (FNB or bank) LTD ratio is reasonable considering its asset size, financial condition, competition, and credit needs. FNB's quarterly LTD ratio averaged 78.6 percent during the 16-quarter period ending December 31, 2018. The LTD ratio fluctuated from a low of 73.6 percent for the quarter ended March 31, 2018, to a high of 82.6 percent for the quarter ended September 30, 2018. The bank's average LTD ratio is comparable, albeit lower, than the peer group's average ratio of 84.8 percent for the same 16-quarter period. We considered the average LTD ratios of five other banks with offices in the AA. These banks had asset sizes between \$312.7 million and \$571.3 million, with average LTD ratios between 77.5 percent and 89.4 percent.

Lending in Assessment Area

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

Based on a sample of loans, the bank originated 86.7 percent of loans by number and 93.1 percent of loans by dollar volume inside its AA. The following table details the number and dollar volume of loans originated inside versus outside of the bank's AA.

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		
	#	%	#	%		\$	%	\$	%	
Business	33	82.5%	7	17.5%	40	\$30,042	95.7%	\$1,364	4.3%	\$31,406
Farm	32	80.0%	8	20.0%	40	\$4,011	76.6%	\$1,222	23.4%	\$5,233
Consumer	37	92.5%	3	7.5%	40	\$447	86.8%	\$68	13.2%	\$515
Total	104	86.7%	16	13.3%	120	\$34,500	92.9%	\$2,654	7.1%	\$37,154

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data

Description of Institution

FNB is a nationally chartered, intrastate bank located in Allendale, Illinois. FNB is wholly owned by Allendale Bancorp, Inc., a one-bank holding company, also located in Allendale. FNB is a community-oriented bank that offers traditional loan and deposit products. The bank's business strategy focuses on business, farm, and consumer loans.

FNB operates three branches, including its main office, and three automated teller machines (ATMs) in the state of Illinois. The bank opened the West Salem branch and ATM during the evaluation period. The AA is in a non-Metropolitan Statistical Area (non-MSA) portion of the state. The AA is made up of six census tracts (CTs) and consists of all of Wabash County, Illinois, the southern portion of Lawrence County, Illinois, and the northern portion of Edwards County, Illinois. Wabash County has four CTs, Lawrence County has one CT, and Edwards County has one CT designated as an Underserved Middle-Income Nonmetropolitan Tract. In 2016, there were no low- or moderate-income CTs in the bank's AA. In 2017 and 2018, there were no low- and one moderate-income CT (Lawrence County) in the bank's AA. The U.S. Census Bureau's 2015 American Community Survey (ACS) changed the income designation of one CT from middle-income to moderate-income in 2017.

According to the June 30, 2018, FDIC Deposit Market Share Report, the bank had \$187.4 million in deposits, for a 26.1 percent market share. FNB ranked first, out of nine FDIC-insured depository institutions, for deposit market share. The top three depository institutions (FNB, Citizens National Bank of Albion, and Peoples State Bank of Newton) accounted for 62.8 percent of total deposits in the AA.

As of December 31, 2018, the bank had total assets of \$231.9 million and tier 1 capital of \$24.4 million. The bank's loan portfolio totaled \$158.7 million, or 68.5 percent of total assets. The table below shows the loan portfolio composition.

Loan Portfolio Composition			
Loan Category	Amount (\$000s)	Percent of Total Loans	Percent of Total Assets
Farm	\$ 54,660	34.4%	23.6%
Home Mortgage	\$ 48,687	30.7%	21.0%
Business	\$ 39,269	24.7%	16.9%
Consumer	\$ 16,125	10.2%	7.0%
Total	\$158,741	100.0%	68.5%

Source: Call Report as of December 31, 2018

FNB does not have any legal, financial, or other factors that would impede its ability to meet credit needs in the AA. The bank received a “Satisfactory” rating at its previous CRA evaluation, dated February 17, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNB under the Small Bank evaluation procedures, which include a lending test. The lending test evaluates the bank’s record of meeting the credit needs of its AA through its lending activities. The evaluation period for this review is February 18, 2015, through December 31, 2018. We utilized the bank’s loan register to identify loans originated from January 1, 2016, through December 31, 2018.

FNB’s primary lending products are business, farm, and consumer loans. Consumer loans represented 71.1 percent of the number and 13.3 percent of the dollar volume of loan originations for 2016 through 2018. Business loans represented 14.0 percent of the number and 40.2 percent of the dollar volume of loan originations. Farm loans represented 8.7 percent of the number and 37.4 percent of the dollar volume of loan originations during the same timeframe. Refer to the table below.

Loan Category	Amount (\$000s)	Percent of Total
Business	\$111,111	40.2%
Farm	\$103,505	37.4%
Consumer	\$36,825	13.3%
Residential	\$25,291	9.1%
Total	\$276,732	100.0%

We sampled a total of 120 loans. We sampled 60 loans originated in 2016, divided equally between the primary product types of business, farm, and consumer. We sampled 60 additional loans originated during the period beginning January 1, 2017 through December 31, 2018, again divided equally between the three primary product types. We compared the bank’s lending performance with demographic data from the 2010 U.S. Census, the 2015 ACS, and 2016 and 2018 Dun & Bradstreet (D&B) data. The income designation of one CT in the AA changed in 2017, as noted above. Therefore, we reviewed the 2016 loan samples separately from the 2017-2018 loan samples. No affiliate activity was included in this analysis. FNB did not change its lending strategy during the two analysis periods.

Refer to the table in Appendix A for additional information.

Selection of Areas for Full-Scope Review

We performed a full-scope review of the bank's sole AA. The full-scope review considers performance context, quantitative, and qualitative factors. See Appendix A for additional information.

Ratings

As FNB has only one AA, the overall rating is based on the performance in this area. The 2017-2018 analysis period received more weight than the 2016 analysis period, as it represents the majority of the evaluation period. We also placed more weight on the bank's performance for business and farm loans, given the higher volume of loan originations in both number and dollar volume.

Discriminatory or Other Illegal Credit Practices Review

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

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

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Illinois

CRA rating for the State of Illinois: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that supports this rating include:

- A substantial majority of loans are originated inside the bank's AA.
- The bank's LTD ratio is reasonable.
- Lending to individuals of different income levels and businesses and farms of different sizes is excellent.
- Geographic distribution of loans in the AA is reasonable.

Description of Institution's Operations in Illinois

FNB has one AA within the state of Illinois rating area. The AA includes the non-MSA Wabash County, one adjacent CT in the northern portion of Edwards County and one adjacent CT in the southern portion of Lawrence County. It is appropriate that the AA does not include all of Lawrence County, as the bank has no branches in the rest of the county. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. There were no low-income CTs in the AA. There were no moderate-income CTs in 2016 and one moderate-income CT in 2017 and 2018.

The bank operates a main office and three branches in the state of Illinois. On June 4, 2016, FNB opened a branch in West Salem, Illinois. There were no other branch openings or closings in the state during the evaluation period.

The primary business focus is business, farm, and consumer loans.

Refer to the community profile for the state of Illinois below for detailed demographics and other performance context information for the AA that received a full-scope review.

Table A – Demographic Information of the Assessment Area 2016**Assessment Area: Allendale**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	0.0	100.0	0.0	0.0
Population by Geography	20,125	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	9,331	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	6,594	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,655	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,082	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	766	0.0	0.0	100.0	0.0	0.0
Farms by Geography	113	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	5,762	18.6	18.2	24.6	38.6	0.0
Household Distribution by Income Level	8,249	23.4	14.6	20.0	42.1	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$72,823
			Median Gross Rent			\$495
			Families Below Poverty Level			7.3%

Source: 2010 U.S. Census and 2016 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.

Table A – Demographic Information of the Assessment Area 2017-18**Assessment Area: Allendale**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	83.3	0.0	0.0
Population by Geography	21,705	0.0	35.4	64.6	0.0	0.0
Housing Units by Geography	7,821	0.0	15.0	85.0	0.0	0.0
Owner-Occupied Units by Geography	5,144	0.0	14.1	85.9	0.0	0.0
Occupied Rental Units by Geography	1,606	0.0	12.1	87.9	0.0	0.0
Vacant Units by Geography	1,071	0.0	23.2	76.8	0.0	0.0
Businesses by Geography	767	0.0	14.9	85.1	0.0	0.0
Farms by Geography	113	0.0	23.9	76.1	0.0	0.0
Family Distribution by Income Level	4,578	19.1	19.6	23.4	37.9	0.0
Household Distribution by Income Level	6,750	24.5	15.3	18.6	41.7	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$77,396
			Median Gross Rent			\$560
			Families Below Poverty Level			8.3%

Source: 2015 ACS Census and 2018 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.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in Edwards County was 5.8 percent, Lawrence County was 7.2 percent, and Wabash County was 5.0 percent in December 2018. The state and national unemployment rates were 4.4 percent and 3.9 percent, respectively.

Industries driving the local economy include agriculture, healthcare, and retail. The largest employers in the area include Duke Energy, Wabash General Hospital, Wabash Valley Community College, and the local school district. Many residents commute to Evansville, Indiana area for employment. Businesses in the AA total 767 and are primarily small businesses (75.0 percent are businesses with gross annual revenues of \$1 million or less). D&B did not have revenue information for 18.1 percent of AA businesses. Of the businesses in the AA, a total of 114, or 14.9 percent, are in the moderate-income CT. Farms in the AA total 113, and 98.2 percent are farms with gross annual revenues of \$1 million or less. Twenty-seven, or 23.9 percent, of these farms are in the moderate-income CT.

Community Contact

One community contact was performed with a community-based development organization serving the Wabash County area. The representative felt the bank met their needs during the evaluation period due to the bank's participation in the Illinois USDA Rural Development Guaranteed Housing Program. This program enables qualified low- or moderate-income families to become homeowners. Under the program guidelines, FNB originated loans totaling \$601,345 in 2016, \$530,550 in 2017, and \$601,346 in 2018.

Scope of Evaluation in Illinois

This analysis reflects a full-scope review of the AA in this state.

The Allendale AA has one moderate-income CT. We also determined that business, farms, and consumer loans were the primary products in the AA based on the volume of loan originations during the evaluation period. Home mortgages are not a primary product based on both the dollar amount of loan originations and the bank's business strategy.

Refer to the table in Appendix A: Scope of Examination for additional information.

LENDING TEST

The bank's performance under the Lending Test in the state of Illinois is Satisfactory. Lending to both businesses and farms of different sizes is excellent. The geographic distribution is reasonable. We compared the bank's performance with both demographic comparators and aggregate lender information. We placed more weight on the demographic comparator analysis, as this bank and most of its competitors are not required to report small loans made to businesses and farms.

Distribution of Loans by Income Level of the Geography

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

We evaluated performance based on the volume of loan originations in 2017 and 2018. There were no moderate-income CTs in 2016; therefore, no analysis was performed. There was one moderate-income CT in 2017-2018 within the AA. There were no low-income CTs in the AA in 2016, 2017, or 2018.

Small Loans to Businesses

The geographic distribution of small loans to businesses is reasonable.

FNB's distribution of small loans to businesses in 2017-2018 in the moderate-income CT was reasonable. The proportion of loans in the moderate-income CT was comparable to the proportion of businesses in that geography and below the aggregate distribution of loans in that geography. We considered the bank's business strategy of targeting small businesses and the level of competition for small business loans to the low percentage of businesses (14.9 percent) located in the moderate-income CT. According to the 2017 Market Share Peer Small Business Data report, FNB ranked ninth out of 30 financial institutions lending in the AA, for a 4.0 percent market share. The top three lending institutions (American Express, Chase Bank, and First Mid-Illinois) accounted for 38.5 percent of total small business loans.

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

Small Loans to Farms

The geographic distribution of small loans to farms is reasonable.

FNB's distribution of small loans to farms in 2017-2018 in the moderate-income CT was reasonable. The proportion of loans in the moderate-income CT was comparable to the proportion of farms in that geography and above the aggregate distribution of loans in that geography.

Refer to Table S in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination of small loans to farms.

Consumer Loans

The geographic distribution of loans to consumers is reasonable.

FNB's distribution of loans to consumers originated in 2017-2018 in the moderate-income CT was reasonable. The proportion of loans in the moderate-income CT was comparable to the proportion of households in that geography.

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

Lending Gap Analysis

We reviewed summary reports and maps and analyzed FNB's lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in the AA. The bank had primary product originations in all CTs within the 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 and farms of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

The bank's originations of small loans to businesses by revenue is excellent. Ninety percent of the number of business loans sampled were made to small businesses.

The distribution of small loans to businesses by revenue in 2016 was excellent. The bank's proportion of loans was significantly stronger than the percentage of small businesses in the AA and the aggregate distribution of loans to those businesses.

FNB's distribution of small loans to businesses by revenue in 2017-2018 was excellent. The bank's proportion of loans was significantly stronger than the percentage of small businesses in the AA and the aggregate distribution of loans to those businesses.

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

Small Loans to Farms

The distribution of the bank's originations and purchase of small loans to farms by revenue was reasonable. Ninety five percent of the number of farm loans sampled were made to small farms in 2016.

FNB's distribution of small loans to farms by revenue in 2016 was reasonable. The bank's proportion of loans was comparable to the percentage of small farms in the AA, and was significantly stronger than the aggregate distribution of loans to those farms.

FNB's distribution of small loans to farms in 2017-2018 by revenue was reasonable. The bank's proportion of loans was below the percentage of small farms in the AA, and was significantly stronger than the aggregate distribution of loans to those farms.

Refer to Table T in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations of small loans to farms.

Consumer Loans

The distribution of the bank's originations of consumer loans by income is excellent.

FNB's distribution of consumer loans in 2016 by income was excellent. The bank's proportion of loans in low-income tracts exceeded the percentage of households in the AA. The bank's proportion of loans in moderate-income CTs was slightly below the percentage of households in the AA.

FNB's distribution of consumer loans in 2017-2018 by income was excellent. The bank's proportion of loans in moderate-income CTs exceeded the percentage of households in the AA. The bank's proportion of loans in low-income CTs was comparable to the percentage of households in the AA.

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

Responses to Complaints

During the evaluation period, FNB did not receive any complaints related to its performance in helping to meet the credit needs of its 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:	01/01/2016 to 12/31/2018	
Bank Products Reviewed:	Small business, small farm, consumer loans	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Allendale	Full-scope	<i>County of Wabash and Partial Counties of Edwards and Lawrence.</i>

Appendix B: Summary of Ratings

RATINGS First National Bank of Allendale	
Overall Bank:	Lending Test Rating
<i>First National Bank of Allendale</i>	Satisfactory
MMSA or State:	
<i>Illinois</i>	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 Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1

million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table Q: Assessment Area Distribution of Small Loans to Businesses by Income Category of the Geography																			2017-18	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Allendale	20	2,002	100.0	114	0.0	0.0	0.0	14.9	10.0	21.9	85.1	90.0	78.1	0.0	--	0.0	0.0	--	0.0	
Total	20	2,002	100.0	114	0.0	0.0	0.0	14.9	10.0	21.9	85.1	90.0	78.1	0.0	--	0.0	0.0	--	0.0	

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

Table R: Assessment Area Distribution of Small Loans to Businesses by Gross Annual Revenues											2016
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
Allendale	18	1,089,780	100	115	78.3	90.0	47.8	6.0	10.0	15.7	0.0
Total	18	1,089,780	100	115	78.3	90.0	47.8	6.0	10.0	15.7	0.0
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table R: Assessment Area Distribution of Small Loans to Businesses by Gross Annual Revenues											2017-18
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
Allendale	19	1,201,773	100	114	76.7	95.0	51.8	6.6	5.0	16.7	0.0
Total	19	1,201,773	100	114	76.7	95.0	51.8	6.6	5.0	16.7	0.0
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>											

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Allendale	20	4,382	100.0	45	0.0	0.0	0.0	23.9	15.0	11.1	81.2	85.0	88.9	0.0	0.0	0.0	0.0	--	0.0	
Total	20	4,382	100.0	45	0.0	0.0	0.0	23.9	15.0	11.1	81.2	85.0	88.9	0.0	0.0	0.0	0.0	--	0.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2016
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	
Allendale	20	2,311,064	100.0	36	98.2	95.0	41.7	0.9	5.0	0.9	0.0	
Total	20	2,311,064	100.0	36	98.2	95.0	41.7	0.9	5.0	0.9	0.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues												2017-18
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	
Allendale	20	3,196	100.0	45	98.3	85.0	44.4	0.9	15.0	0.9	0.0	
Total	20	3,196	100.0	45	98.3	85.0	44.4	0.9	15.0	0.9	0.0	
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017-8	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Allendale	20	208,506	100.0	0.0	0.0	13.7	10%	86.3	90%	0.0	0.0	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Allendale	20	259,838	100.0	23.4	35.0	14.6	10.0	20.0	40.0	42.1	15.0	0.0	0.0	
Total	20	259,838	100.0	23.4	35.0	14.6	10.0	20.0	40.0	42.1	15.0	0.0	0.0	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Allendale	20	208,506	100.0	24.5	25.0	15.3	35.0	18.6	10.0	41.7	30.0	0.0	0.0	
Total	20	208,506	100.0	24.5	25.0	15.3	35.0	18.6	10.0	41.7	30.0	0.0	0.0	

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