



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

May 19, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

FSNB, National Association
Charter Number: 14546

1420 Southwest Lee Boulevard
Lawton, OK 73501

Office of the Comptroller of the Currency

8282 South Memorial Drive, Suite 300
Tulsa, OK 74133

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The lending test is rated: Outstanding.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on outstanding performance in the Memphis Multistate Metropolitan Area (MMSA), Arkansas, Delaware, Georgia, Louisiana, Mississippi, North Carolina, Oklahoma, Tennessee, and Texas rating areas.
- The Community Development (CD) Test rating is based on outstanding performance in Arkansas, Georgia, Louisiana, Mississippi, North Carolina, and Oklahoma rating areas and satisfactory performance in the Memphis MMSA, Delaware, Tennessee, and Texas rating areas.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment areas (AAs), the bank's loan-to-deposit ratio (LTD) was reasonable.

FSNB, National Association's (FSNB or bank) quarterly LTD ratio since the previous CRA performance evaluation (PE), from January 2021 to December 2024, averaged 38.5 percent. We compared the bank's LTD ratio to six similarly situated banks in their market area, with similar lending strategies, or similar branching networks. The aggregate average LTD ratio for competing banks was 46 percent, with a low average of 20.2 percent and a high average of 58 percent.

FSNB's average quarterly LTD ratio has increased by 5.5 percent since the prior CRA PE from 35.9 percent in March 2021 to 41.4 percent in December 2024. FSNB's strategy of primarily providing small dollar consumer loans significantly affects the LTD ratio.

Lending in Assessment Area

A substantial majority of the bank's loans were inside its AAs.

The bank originated and purchased 85.3 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer	4,246	85.30	732	14.70	4,978	7,760	82.08	1,694	17.92	9,454
Total	4,246	85.30	732	14.70	4,978	7,760	82.08	1,694	17.92	9,454
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

FSNB is a multistate community bank headquartered in Lawton, Oklahoma. FSNB is a wholly owned by JRMB II, a two-bank holding company also headquartered in Lawton, Oklahoma. FSNB's sister bank is The City National Bank and Trust Company of Lawton, also located in Lawton, Oklahoma.

FSNB was originally chartered in 1946 with a location on Fort Sill Army Post in Lawton, Oklahoma. FSNB operated only on military installations in Oklahoma, Delaware, South Carolina, Texas, and California until the year 2000. In 2000, FSNB began opening branches in Walmart stores. Since that time, the majority of FSNB's growth has been through opening branches inside Walmart stores. As of December 31, 2024, FSNB operated 73 full-service branches in nine states. Two branches were located on military bases, 63 branches inside Walmart stores, one branch in a CashSaver, and seven standalone branches. FSNB had three branches in Oklahoma, 33 branches in Tennessee, 12 branches in North Carolina, eight branches in Mississippi, five branches in Georgia, four branches in Arkansas, four branches in Louisiana, two branches in Delaware, and two branches in Texas. FSNB has 85 non-deposit taking ATMs.

FSNB operates in 10 rating areas, including in the Memphis MMSA and in the nine states listed above. The bank has a total of 20 AAs with one AA in each of the states of Oklahoma, Delaware, Georgia, Louisiana, Mississippi, and Texas. FSNB also has two AAs in the state of Arkansas, five AAs in North Carolina, and six AAs in Tennessee. The Memphis MMSA is also an AA.

FSNB's branch network is highly accessible and convenient to low- and moderate-income (LMI) individuals. The bank offers loan products to meet the needs of military families and LMI civilian customers. FSNB considers themselves a "second chance" bank and serves customers who have been turned down for accounts at other banks. FSNB offers these consumers a second chance at a bank account regardless of their banking history and offers accounts to people who have never had bank accounts before. FSNB does not conduct credit checks on new accounts—customers are accepted even if they have bad credit, no credit, or a negative history with financial reporting agencies.

FSNB Walmart branches offer extended hours to meet the needs of LMI individuals. Branches on military bases inside Base and Post Exchange stores are open seven days a week and also operate extended hours. Walmart branches have outside ATMs that are accessible when the Walmart store is open, which is mostly 24 hours a day. Military locations usually have ATMs throughout the base, and accessibility depends on building hours. FSNB also offers telephone, online, and mobile banking to offer greater access to customers.

FSNB provides services to non-customers. Non-customers can cash checks at any FSNB branch for a fee that is usually lower than other check cashing businesses. This service specifically targets unbanked and under-banked consumers who are disproportionately from lower-income households. FSNB's website offers financial education and fraud education resources to both customers and non-customers.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. FSNB's prior CRA Performance Evaluation (PE) was dated February 7, 2022, and resulted in a Satisfactory rating based on an Outstanding Lending Test and a Satisfactory CD Test.

As of December 31, 2024, FSNB reported total assets of \$463.1 million, total deposits of 374.9 million, and tier 1 capital of 75.2 million. Gross loans totaled \$155.4 million and represented 33.5 percent of

total assets. By dollar volume, FSNB's loan portfolio consists of 54.1 percent commercial loans, 22 percent residential real estate loans, 13.7 percent agricultural loans, seven percent other loans, and 3.2 percent consumer loans. By number, the bank's loan portfolio consists of 89 percent consumer loans, 5.9 percent residential real estate loans, 3.8 percent commercial loans, 1.3 percent agricultural loans, and less than one percent other loans.

FSNB Small Dollar Lending

FSNB's business strategy is focused on small dollar unsecured loans and vehicle secured loans across all markets. FSNB offers unsecured loans as low as \$300 dollars when other banks do not offer loans for this amount. These small dollar "micro-loans" are a primary loan need for LMI individuals and provide an alternative to non-financial institution payday, title, or other predatory loans that often trap consumers into recurring debt.

FSNB has flexible lending practices with regard to credit scores and underwriting. FSNB offers these types of loans regardless of geography. Applicants can apply at a branch, by phone, or online, making access to credit highly convenient. Although there are no financial education requirements attached to these loans, FSNB offers financial education classes throughout their several AAs.

FSNB analyzed loans \$5,000 and under made between January 1, 2022 and December 31, 2024. FSNB originated 4,833 loans for less than \$5,000 during the evaluation period. The majority of these loans were made to LMI individuals, with the median borrower income of only \$29,000. The average loan size was \$1,496 and had a \$97.27 average monthly payment. These types of loans make it possible for individuals to correct past credit problems or start building credit, which is important for advancing their financial health.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period includes all reported activity from January 1, 2022 to December 31, 2024. The bank's primary loan product (89 percent by number) is consumer loans. The evaluation considers consumer loans originated during the evaluation period, and the bank's CD loans, qualified investments, and community development service activities during the evaluation period.

In three of the bank's 20 AAs, boundary changes included in the Office of Management and Budget (OMB) Bulletin No. 23-01 resulted in changes to the bank's AA. In the Little Rock CSA, which consists of the Little Rock MSA and the Pine Bluff MSA, the Pine Bluff MSA became a micropolitan statistical area and Lincoln County was removed from the CSA. In the Atlanta MSA, the MSA was split into two MDs with the bank only having branches in one MD; this resulted in Bartow, Cherokee, Cobb, Haralson, Lamar, and Paulding Counties being removed from the AA and Lumpkin County being added to the AA. In the Fayetteville MSA, Harnett County was removed from the MSA. For each of these AAs, we performed a split analysis of performance for 2022-23 and 2024.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, we selected one AA within that state for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical

area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable, are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

When evaluating the bank’s overall performance, we placed greater weight on performance in states based on percentage of deposit concentrations, number of branch locations, and number of loan originations. The state of Oklahoma has the greatest concentration of deposits at 59.7 percent. The states of Tennessee, North Carolina, Oklahoma, and the Memphis MMSA have the most consumer loan originations, representing 65.8 percent combined. These rating areas represent a combined 69.9 percent of branch locations.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those 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.

In evaluating the bank’s performance under the Lending Test, we gave equal emphasis to the geographic distribution of the bank’s loans and the bank’s lending by borrower income level.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 Consumer Financial Protection Bureau, 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.

Multistate Metropolitan Statistical Area Rating

Memphis MMSA

CRA rating for the Memphis MMSA¹: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits adequate responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in the Memphis MMSA

The Memphis MMSA includes portions of Tennessee, Mississippi, and Arkansas. The MMSA consists of one county in Arkansas, four counties in Mississippi, and three counties in Tennessee. Counties included are Crittenden, AR; Desoto, Marshall, Tate, and Tunica, MS; Fayette, Shelby, and Tipton, TN. The Memphis MMSA has 354 census tracts: 57 low-income census tracts, 94 moderate-income census tracts, 90 middle-income census tracts, 98 upper-income census tracts, and 15 unclassified income tracts. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

FSNB operates 12 branches in the Memphis MMSA, representing 16.4 percent of the bank's total branches. The bank maintains 11 of their branches in Walmart stores while the remaining branch is in a CashSaver, a grocery store that caters to LMI communities. The bank closed one branch in the AA in 2023. The bank operates 12 non-deposit taking ATMs in the MMSA, one at each branch location. FSNB has \$15 million in deposits in the MMSA which represents 4 percent of total bank deposits. During the evaluation period, the bank originated or purchased 15.1 percent of its consumer lending in the AA.

Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked 44th out of 46 FDIC- insured depository institutions with 0.04 percent deposit market share. The top three banks by deposit market share are First Horizon Bank with a 32.6 percent deposit market share, Regions Bank with 11.2 percent deposit market share, and Pinnacle Bank with 5.8 percent deposit market share.

Memphis is considered a major inland port for the country, with the city being split by the Mississippi River. Memphis is also the nation's third busiest trucking corridor and also contains one of the busiest cargo airports in the world. The largest employer in the MMSA is FedEx, employing nearly as many individuals as the next four largest employers. The next largest employers are mostly centered in the medical field including Methodist Le Bonheur Healthcare, Baptist Memorial Healthcare, Naval Support Activity Mid-South, and St. Jude Children's Research Hospital.

¹ MMSA ratings reflect performance within the multistate metropolitan statistical area. Statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

As part of this evaluation, the OCC used community contacts previously conducted with organizations that serve the AA to gain a better understanding of the general community credit needs, as well as the economic conditions. One contact from an organization that promotes small businesses and entrepreneurship indicated there is a need for access to capital and microlending for small businesses. Two contacts that work with community service organizations in the AA indicated there is a need for financial education, workforce development, and affordable housing.

Assessment Area(s) - Memphis MMSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	354	16.10	26.55	24.86	28.25	4.24
Population by Geography	1,337,779	11.67	25.24	27.11	34.56	1.42
Housing Units by Geography	569,954	13.79	26.42	27.05	31.44	1.30
Owner-Occupied Housing by Geography	302,305	6.60	20.94	28.54	43.03	0.89
Occupied Rental Units by Geography	203,239	20.31	32.52	26.07	19.26	1.83
Vacant Units by Geography	64,410	26.93	32.89	23.19	15.47	1.52
Businesses by Geography	51,236	9.01	24.61	23.88	40.31	2.19
Farms by Geography	1,876	6.56	23.45	28.14	40.19	1.65
Family Distribution by Income Level	327,170	23.51	16.11	18.13	42.26	0.00
Household Distribution by Income Level	505,544	25.10	15.48	16.72	42.70	0.00
Unemployment rate (%)	6.83	13.84	9.31	6.38	3.62	5.23
Households Below Poverty Level (%)	16.24	37.22	22.02	12.95	6.18	35.96
Median Family Income (32820 - Memphis, TN-MS-AR MSA)		\$67,639	Median Housing Value			\$120,300
Median Family Income (32820 - Memphis, TN-MS-AR MSA) for 2024		\$83,000	Median Gross Rent			\$922
			Families Below Poverty Level			13.07
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 the Memphis MMSA

Examiners conducted a full-scope review of the Memphis MMSA.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS MMSA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the Memphis MMSA was excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the MMSA.

Consumer Loans

Refer to Table 13 in the MMSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans in low-income CTs exceeded the percentage of low-income households in those geographies. The percentage of bank loans in moderate-income CTs exceeded the percentage of households in those census tracts.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Memphis MMSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels.

Consumer Loans

Refer to Table 14 in the Memphis MMSA section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the Memphis MMSA is rated Satisfactory.

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

Number and Amount of Community Development Loans

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Memphis MMSA	0	0.00	0	0.00

During the evaluation period, the bank did not make any CD loans in the AA. FSNB's primary focus on small dollar retail and consumer lending contribute to the lack of CD loans. The bank also faces strong competition from 45 other financial institutions in the AA. All branches are located inside Walmart or Cashsaver stores. FSNB has less than one percent of deposit market share in the AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Memphis MMSA	12	911	4	2	16	100.00	913	100.00	0	0
Total	12	911	4	2	16	100.00	913	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB made four donations totaling \$2,300, representing 0.1 percent of allocated tier 1 capital. The bank had six prior period investments with an outstanding principal balance of \$911,345, representing 30.2 percent of allocated tier 1 capital.

The following are examples of qualified investments in the MMSA:

- The bank made an \$800 donation to a local organization that provides backpacks, school supplies, shoes, food, and toys to LMI children.
- FSNB made a \$750 donation a medical facility to help with various medical and support services for LMI children and their families.
- The bank provided \$300 to a local school that lost their school building in a tornado.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, employees provided 124 hours of community services to LMI individuals.

CD services included:

- Employees provided 124 hours of financial education classes through a community service organization that supports youth development. Classes were provided to 990 students at schools where a majority of students receive free or reduced lunch.

State Rating

State of Arkansas

CRA rating for the State of Arkansas²: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits adequate responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Arkansas

FSNB delineated two AAs in the state of Arkansas, the Little Rock CSA and the AR Non-MSA. The Crittenden County branch is included in and will be evaluated within the Memphis MMSA. The AR Non-MSA consists of Pope County, includes one branch, and is evaluated under limited-scope procedures. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

FSNB operates three branches within the state of Arkansas, representing 4.1 percent of total branches. All branches are located inside Walmart stores. The bank closed a fourth branch in the state in 2023. Each branch has a non-deposit taking ATM located outside the branch. The bank has \$1.9 million in deposits within the state, which represents 0.5 percent of total deposits. During the evaluation period, the bank originated or purchased 3.1 percent of its consumer lending within the state of Arkansas.

Little Rock CSA

The Little Rock CSA includes the Little Rock-North Little Rock-Conway AR MSA and the Pine Bluff AR micropolitan statistical area. For 2022-23, Pine Bluff was defined as a MSA but was changed to a micropolitan statistical area for 2024.

For 2022-23, the Little Rock CSA included Faulkner, Grant, Lonoke, Perry, Pulaski, Saline, Cleveland, Jefferson, and Lincoln Counties in Arkansas. The CSA consisted of 221 CTs including 17 low-income CTs, 48 moderate-income CTs, 98 middle-income CTs, 54 upper-income CTs, and four unclassified CTs.

In 2024, Lincoln County was removed from the CSA. The updated CSA consists of 217 CTs including 16 low-income CTs, 49 moderate-income CTs, 94 middle-income CTs, 54 upper-income CTs, and four unclassified CTs.

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

FSNB operates two branches within the Little Rock CSA, representing 2.7 percent of total branches. Both branches are located inside Walmart stores. The bank closed a third branch in the AA in 2023. Each branch has a non-deposit taking ATM located outside the branch. The bank has \$1.3 million in deposits within the AA, which represents 0.3 percent of total deposits. During the evaluation period, the bank originated or purchased 2.3 percent of its consumer lending within the AA.

Based on the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank ranked last out of 42 FDIC-insured depository institutions with no measurable deposit market share. The top three banks by deposit market share are Bank OZK first with a 23.8 percent deposit market share, Simmons Bank second with a 17.1 percent deposit market share, and Bank of America, N.A. third with a 12.3 percent deposit market share.

Little Rock is the state capital of Arkansas. Major industries in the Little Rock CSA include state and federal government, healthcare, and manufacturing. Major employers include the state of Arkansas, Tyson Foods, and several regional hospitals.

As part of this evaluation, the OCC used community contacts in the AA that were previously conducted to gain a better understanding of the general community credit needs and economic conditions. Community contacts included a local government organization focused on community development and nonprofit organizations focused on affordable housing and youth programs. Several contacts noted the need for affordable housing and assistance for the homeless. Contacts also noted the need for down payment assistance and workforce development programs.

Assessment Area(s) - Little Rock CSA 2022-2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	221	7.69	21.72	44.34	24.43	1.81
Population by Geography	835,782	5.89	19.49	45.65	28.36	0.60
Housing Units by Geography	369,785	6.72	20.94	44.61	27.31	0.43
Owner-Occupied Housing by Geography	206,934	3.13	15.64	47.38	33.43	0.42
Occupied Rental Units by Geography	116,272	11.27	27.71	40.08	20.52	0.42
Vacant Units by Geography	46,579	11.29	27.58	43.58	17.04	0.51
Businesses by Geography	31,547	6.08	20.47	39.21	33.65	0.59
Farms by Geography	1,371	2.48	21.81	44.42	31.15	0.15
Family Distribution by Income Level	205,082	22.80	16.57	19.46	41.17	0.00
Household Distribution by Income Level	323,206	24.66	16.47	16.67	42.20	0.00
Unemployment rate (%)	4.70	9.53	6.80	4.61	2.66	11.12
Households Below Poverty Level (%)	14.69	38.46	19.30	13.26	8.32	41.81
Median Family Income (30780 - Little Rock-North Little Rock-Conway, AR MSA)	\$72,289	Median Housing Value				\$136,100
Median Family Income (38220 - Pine Bluff, AR MSA)	\$53,908	Median Gross Rent				\$812
Median Family Income (30780 - Little Rock-North Little Rock-Conway, AR MSA) for 2023	\$83,100	Families Below Poverty Level				10.90
Median Family Income (38220 - Pine Bluff, AR MSA) for 2023	\$73,100					
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Little Rock CSA 2024						
2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	217	7.37	22.58	43.32	24.88	1.84
Population by Geography	822,841	5.81	19.97	44.91	28.70	0.61
Housing Units by Geography	365,092	6.55	21.47	43.96	27.59	0.43
Owner-Occupied Housing by Geography	204,133	3.08	15.95	46.70	33.85	0.42
Occupied Rental Units by Geography	115,475	10.85	28.40	39.71	20.62	0.42
Vacant Units by Geography	45,484	11.16	28.65	42.47	17.20	0.52
Businesses by Geography	30,732	5.97	20.69	39.13	33.67	0.54
Farms by Geography	1,314	3.04	22.37	41.78	32.65	0.15
Family Distribution by Income Level	202,454	22.80	16.57	19.41	41.22	0.00
Household Distribution by Income Level	319,608	24.68	16.51	16.69	42.11	0.00
Unemployment rate (%)	4.73	9.71	6.78	4.66	2.67	11.12
Households Below Poverty Level (%)	14.64	38.49	19.51	13.11	8.33	41.81
Median Family Income (30780 - Little Rock-North Little Rock-Conway, AR MSA)	\$72,289	Median Housing Value				\$136,400
Median Family Income (Non-MSAs - AR)	\$53,596	Median Gross Rent				\$815
Median Family Income (30780 - Little Rock-North Little Rock-Conway, AR MSA) for 2024	\$86,400	Families Below Poverty Level				10.84
Median Family Income (Non-MSAs - AR) for 2024	\$64,800					
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Arkansas

Examiners conducted a full-scope review of the Little Rock CSA. The Little Rock CSA is the largest AA in the state of Arkansas accounting for 68 percent of state deposits. The AR Non-MSA will receive a limited-scope review. Bank dedicated AAs located in the same CSA are combined, analyzed, and presented as one AA for the purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for the purposes of this evaluation. Due to OMB changes to the Little Rock CSA during the evaluation period, performance in 2022-2023 and performance in 2024 were analyzed separately.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the Little Rock CSA was excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Arkansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

2022-2023

The percentage of bank loans in low-income CTs exceeded the percentage of low-income households in those geographies. The percentage of bank loans in moderate-income geographies exceeded the percentage of households in those CTs.

2024

The percentage of bank loans in low-income CTs exceeded the percentage of low-income households in those geographies. The percentage of bank loans in moderate-income geographies exceeded the percentage of households in those CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Little Rock CSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Consumer Loans

Refer to Table 14 in the state of Arkansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

2022-2023

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers exceeded the percentage of moderate-income households.

2024

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers exceeded the percent of moderate-income households.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the AR Non-MSA was consistent with the bank's overall performance under the Lending Test in the full scope area. Performance in the limited-scope AA did not affect the Lending Test rating for the state.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Arkansas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the Little Rock CSA through qualified investments and CD services, considering the bank's capacity, community needs, and the availability of opportunities for community development in the AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Full-scope:				
Little Rock CSA	0	0.00	0.00	0.00
Limited-scope:				
AR Non-MSA	0	0.00	0.00	0.00

During the evaluation period, the bank did not make any CD loans in the AA. FSNB's primary focus on small dollar retail and consumer lending contribute to the lack of CD loans. The bank also faces strong competition from 41 other financial institutions in the AA. They operate only two branches inside Walmart stores and hold less than one percent of deposit market share in the AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-scope:										
Little Rock CSA	7	2,385	3	251	10	76.92	2,636	99.70	0	0
Limited-scope:										
AR Non-MSA	0	0	1	1	1	7.69	1	0.04	0	0
Broader Statewide or Regional Area	2	7	0	0	2	15.38	7	0.26	0	0
Total	9	2,392	4	252	13	100.00	2,644	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB purchased one municipal bond totaling \$250,000 and made two donations totaling \$1,000. FSNB had five prior period mortgage-backed securities (MBS) and two prior period municipal bonds with an outstanding principal balance of \$2.4 million. Investments represented 1,029.7 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- The bank purchased a \$250,000 municipal bond to finance improvements for local public schools. Approximately 71 percent of students in these schools are eligible for free or reduced lunch.
- FSNB made a donation totaling \$500 to a local nonprofit that supports a residential treatment program for abused and neglected girls in the foster care system.
- The bank made a donation totaling \$500 to a local nonprofit organization that provides groceries, medication, utility bill payment, and clothing for low-income people.

Broader Statewide or Regional Area

In addition to CD investments that benefit the bank's AAs, FSNB had two prior period investments totaling \$6.9 million in the broader statewide or regional area.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided five hours of financial education to 65 students at schools in the AA that primarily serve LMI students.

CD services included:

- One employee provided financial education through a local nonprofit that supports youth development to 20 students in a school where the majority of students receive free or reduced lunch.
- One employee provided financial education through a nonprofit organization to 45 students in a local school district where 75 percent of students are eligible for free or reduced lunch.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the AR Non-MSA was weaker than the bank's overall performance under the CD Test in the full-scope area due to a lower level of CD investments in the AR Non-MSA. Performance in the limited-scope AA did not affect the CD Test rating in the state.

State Rating

State of Delaware

CRA rating for the State of Delaware³: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits adequate responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Delaware

Dover MSA

The bank delineated one AA in the state of Delaware, the Dover MSA. The Dover MSA consists of Kent County in Delaware. The AA includes 42 CTs including nine moderate-income CTs, 21 middle-income CTs, 10 upper-income CTs, and two unclassified CTs. There are no low-income CTs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The bank operates two branches within the AA, representing 2.7 percent of total branches. Both branches are located inside Walmart stores. The bank has two non-deposit taking ATMs, one outside each branch. The bank had \$8.8 million in deposits within the AA, which represented 2.3 percent of the bank's total deposits. During the evaluation period, the bank originated or purchased 1.7 percent of its consumer lending within the AA.

Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked last out of 12 FDIC-insured depository institutions with 0.26 percent deposit market share. The top three banks by deposit market share are Wilmington Savings Fund Society ranked first with 27 percent deposit market share, Manufacturers and Traders Trust Company ranked second with 23 percent deposit market share, and PNC ranked third with 17 percent deposit market share.

The government industry leads the local economy with federal, state, and county government locations in the AA. The MSA's largest employer is the state of Delaware. Other significant industries include educational and health services, manufacturing, and retail trade.

As part of this evaluation, the OCC used one community contact previously conducted to get a better understanding of the general community credit needs, as well as economic conditions. The nonprofit

³ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

organization that works to strengthen communities through housing, lending, and education indicated the need for affordable housing, foreclosure and eviction support, and workforce development.

Assessment Area(s) - Dover MSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	0.00	21.43	50.00	23.81	4.76
Population by Geography	181,851	0.00	19.64	54.75	25.54	0.06
Housing Units by Geography	73,073	0.00	22.45	52.63	24.92	0.00
Owner-Occupied Housing by Geography	46,326	0.00	17.24	56.58	26.18	0.00
Occupied Rental Units by Geography	20,973	0.00	33.22	44.09	22.69	0.00
Vacant Units by Geography	5,774	0.00	25.13	51.96	22.91	0.00
Businesses by Geography	7,122	0.00	41.28	42.47	15.87	0.38
Farms by Geography	303	0.00	15.84	60.40	23.76	0.00
Family Distribution by Income Level	45,506	20.65	17.47	21.65	40.23	0.00
Household Distribution by Income Level	67,299	22.59	18.00	18.88	40.53	0.00
Unemployment rate (%)	5.97	0.00	8.40	5.52	5.14	0.00
Households Below Poverty Level (%)	12.67	0.00	15.75	12.03	11.26	0.00
Median Family Income (20100 - Dover, DE MSA)		\$70,383	Median Housing Value			\$218,350
Median Family Income (20100 - Dover, DE MSA) for 2024		\$91,300	Median Gross Rent			\$1,076
			Families Below Poverty Level			10.32
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Delaware

Examiners conducted a full-scope review of the Dover MSA. There are no limited-scope AAs in the state of Delaware.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN DELAWARE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Delaware section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans in moderate-income CTs exceeded the percentage of households in those geographies. There are no low-income CTs in the AA.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Dover MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels.

Consumer Loans

Refer to Table 14 in the state of Delaware section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers was near to the percentage of moderate-income households.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Delaware is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Dover MSA	0	0.00	0	0.00

During the evaluation period, the bank did not make any CD loans in the AA. FSNB's primary focus on small dollar retail and consumer lending contribute to the lack of CD loans. They operate only two branches in the AA and have less than one percent of deposit market share.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dover MSA	1	190	1	1	2	66.67	191	27.64	0	0
Broader Statewide or Regional Area with Direct Benefit	0	0	1	500	1	33.33	500	72.36	0	0
Total	1	190	1	501	3	100.00	691	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB made one donation totaling \$800. The bank had one prior period MBS with an outstanding principal balance of \$190,117. Investments represented 10.8 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- The bank made an \$800 donation to a nonprofit organization that provides affordable housing and neighborhood revitalization in the AA.

Broader Statewide or Regional Area

In addition to CD investments that benefit the bank's AA, FSNB made a \$500,000 municipal bond investment in a statewide organization that supports housing for LMI individuals.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided 11 community service hours to two organizations in the AA.

CD services included:

- One employee volunteered on a nonprofit board of directors, providing 10 qualified service hours to support affordable housing in the AA.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

- One employee provided a one hour financial education class to 46 attendees through a local nonprofit that supports affordable housing and education.

State Rating

State of Georgia

CRA rating for the State of Georgia⁴: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits excellent responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Georgia

Atlanta MSA

FSNB has delineated one AA in the state of Georgia, the Atlanta MSA. FSNB operates five branches in the AA, representing 6.8 percent of total branches. The bank closed one branch in the AA in 2024. All branches in the AA are located inside Walmart stores. FSNB has five non-deposit taking ATMs, one outside each branch plus one standalone ATM. The bank has \$3.2 million in deposits within the AA, which represents 0.86 percent of the bank's total deposits. During the evaluation period, the bank originated 2.1 percent of its consumer lending within the AA.

For 2022-2023, the AA consisted of 29 counties including Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton Counties. The AA contains 1,500 CTs including 118 low-income CTs, 367 moderate-income CTs, 472 middle-income CTs, 489 upper-income CTs, and 54 unclassified CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

For 2024, due to OMB changes, the bank's AA included only the Atlanta-Sandy Springs-Roswell Metropolitan Division (MD) portion of the MSA. The MD comprises twenty-four counties including Barrow, Butts, Carroll, Clayton, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Heard, Henry, Jasper, Lumpkin, Meriwether, Morgan, Newton, Pickens, Pike, Rockdale, Spalding, and Walton Counties. The AA contains 1,193 CTs, including 95 low-income CTs, 285 moderate-income CTs, 364 middle-income CTs, 397 upper-income CTs, and 52 unclassified CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies. Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked 78th out of 81 FDIC-insured depository institutions within the AA with no measurable deposit market share. The

⁴ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

top three banks by deposit market share are Truist Bank ranked first with a 21.89 percent deposit market share, Bank of America ranked second with a 20.31 percent deposit market share, and Wells Fargo ranked third with a 16.34 percent deposit market share.

The economy in the Atlanta MSA is anchored by healthcare and leisure/hospitality. Delta Air Lines is the area's largest employer with approximately 39,550 employees. Other major employers include Emory University & Emory Healthcare, Piedmont Healthcare, Northside Hospital, Publix Super Markets, and The Home Depot.

As part of the evaluation, the OCC used community contacts that were previously conducted to gain a better understanding of the general community needs, as well as economic conditions. These community contacts included organizations that support small business, affordable housing, and financial education. The contacts noted the need for affordable housing, down payment assistance, and food and utility assistance. Other contacts indicated the need for loans to entrepreneurs and start-up businesses. Several contacts indicated the need for financial education and workforce development programs.

Assessment Area(s) - Atlanta MSA 2022-2023						
2022 - 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,500	7.87	24.47	31.47	32.60	3.60
Population by Geography	6,089,815	6.45	25.11	33.26	32.90	2.28
Housing Units by Geography	2,330,974	7.23	25.21	32.16	32.82	2.58
Owner-Occupied Housing by Geography	1,382,025	3.09	20.13	35.88	39.54	1.35
Occupied Rental Units by Geography	770,294	13.40	33.46	26.55	22.16	4.42
Vacant Units by Geography	178,655	12.65	28.92	27.50	26.84	4.08
Businesses by Geography	442,374	5.80	23.04	29.87	38.39	2.89
Farms by Geography	10,963	4.19	23.94	38.13	32.35	1.40
Family Distribution by Income Level	1,444,562	21.94	17.16	19.66	41.24	0.00
Household Distribution by Income Level	2,152,319	23.68	16.32	18.03	41.97	0.00
Unemployment rate (%)	5.23	9.06	6.34	5.24	3.64	6.89
Households Below Poverty Level (%)	10.68	25.87	14.51	9.25	5.45	20.13
Median Family Income (12060 - Atlanta-Sandy Springs-Alpharetta, GA MSA)		\$84,791	Median Housing Value			\$207,650
Median Family Income (12060 - Atlanta-Sandy Springs-Alpharetta, GA MSA) for 2023		\$102,900	Median Gross Rent			\$1,199
			Families Below Poverty Level			8.36
FFIEC File - 2020 Census						
2023 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Assessment Area(s) - Atlanta MSA 2024						
						2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,193	7.96	23.89	30.51	33.28	4.36
Population by Geography	4,764,553	6.60	24.32	32.45	33.80	2.83
Housing Units by Geography	1,827,649	7.49	24.26	31.26	33.81	3.17
Owner-Occupied Housing by Geography	1,054,216	3.13	19.37	35.21	40.62	1.66
Occupied Rental Units by Geography	625,228	13.54	31.53	25.89	23.73	5.31
Vacant Units by Geography	148,205	13.04	28.32	25.83	27.91	4.90
Businesses by Geography	348,774	5.85	22.16	29.51	39.17	3.31
Farms by Geography	7,986	4.37	22.31	38.67	32.82	1.83
Family Distribution by Income Level	1,110,731	22.19	16.75	19.28	41.78	0.00
Household Distribution by Income Level	1,679,444	23.86	16.01	17.83	42.31	0.00
Unemployment rate (%)	5.41	9.43	6.62	5.51	3.68	7.05
Households Below Poverty Level (%)	11.33	27.57	15.30	9.90	5.81	20.10
Median Family Income (12054 - Atlanta-Sandy Springs-Roswell, GA MD)		\$81,951	Median Housing Value			\$200,800
Median Family Income (12054 - Atlanta-Sandy Springs-Roswell, GA MD) for 2024		\$100,900	Median Gross Rent			\$1,191
			Families Below Poverty Level			9.11
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Georgia

Examiners conducted a full-scope review of the Atlanta MSA. There are no limited-scope AAs in the state.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

2022-2023

The percentage of bank loans in low-income geographies exceeded the percentage of households in those geographies. The percentage of bank loans in moderate-income geographies exceeded the percentage of households in those geographies.

2024

The percentage of bank loans in low-income geographies exceeded the percentage of households in those geographies. The percentage of bank loans in moderate-income geographies was near to the percentage of households in those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Atlanta MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Consumer Loans

Refer to Table 14 in the state of Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

2022-2023

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers was below the percentage of moderate-income households in the AA.

2024

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers was below the percentage of moderate-income households in the AA.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Georgia is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited excellent responsiveness to community development needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering

the bank's capacity and the need and availability of such opportunities for community development in the bank's AA(s).

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Atlanta MSA	0	0.00	0	0.00

During the evaluation period, the bank did not make any CD loans in the AA. FSNB's primary focus on small dollar retail and consumer lending contribute to the lack of CD loans. They operate only five branches in the AA and have less than one percent of deposit market share.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Atlanta MSA	29	221	5	501	34	72.34	722	41.09	0	0
Broader Statewide or Regional Area with Direct Benefit	0	0	1	1,000	1	2.13	1,000	56.92	0	0
Broader Statewide or Regional Area with Indirect Benefit	12	35	0	0	12	25.53	35	1.99	0	0
Total	41	256	6	1,501	47	100.00	1,757	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB purchased two municipal bonds totaling \$500,000 and made three donations totaling \$650. FSNB had one prior period MBS and eight prior period SBA bonds with an outstanding principal balance of \$221,018. Investments represented 111.6 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- The bank purchased two municipal bonds totaling \$500,000 to support the improvements to water and sewer service and provides low-income customers assistance with wastewater bills and repairs.
- FSNB made a \$300 donation to an organization the provides programs who are in poverty, have housing instability, or other special needs.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

- The bank made a \$250 donation to an organization that provides support for a family violence crisis center.

Broader Statewide or Regional Area

In addition to CD investments that benefit the bank's AA, FSNB invested \$1 million in a municipal bond that supports affordable housing and had five prior period SBA bonds with an outstanding principal balance of \$34,726 in the broader statewide or regional area.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided 56 service hours to three qualified organizations.

The following are examples of CD service activities in the AA:

- One employee volunteered on a non-profit board of directors, providing 40 hours of qualified service hours to support a domestic violence shelter.
- A bank employee provided 14 hours of financial education to 188 students through a non-profit that supports youth development.
- One employee provided two hours of financial education to 13 residents through a local nonprofit that supports residents in need.

State Rating

State of Louisiana

CRA rating for the State of Louisiana⁵: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution of loans.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits excellent responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Louisiana

Shreveport MSA

The bank delineated one AA in the state of Louisiana, the Shreveport MSA. The Shreveport MSA consists of Bossier, Caddo, and DeSoto Parishes in Louisiana. The AA consists of 116 CTs, including nine low-income CTs, 33 moderate-income CTs, 36 middle-income CTs, 32 upper-income CTs, and six unclassified CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The bank operates four branches within the AA, representing 5.5 percent of total branches. Three branches are located inside Walmart stores, and one branch is a standalone location. The bank has four non-deposit taking ATMs with one located outside each branch location. The bank had \$3.2 million in deposits within the AA, representing 0.86 percent of total bank deposits. During the evaluation period, the bank originated or purchased 2.2 percent of its consumer lending within the AA.

Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked 23rd out of 24 FDIC-insured depository institutions with 0.03 percent deposit market share. The top three banks by deposit market share are Capital One with 16.8 percent deposit market share, JPMorgan Chase with 13.1 percent deposit market share, and Bonvenu Bank with 11.7 percent deposit market share.

The government industry leads the local economy with Barksdale Air Force Base and the City of Shreveport being some of the largest employers. Other significant industries include educational and healthcare services and leisure and hospitality services. The technology sector has started to see growth with a significant number of jobs created in 2024.

As part of this evaluation, the OCC used two community contacts previously conducted to gain a better understanding of the general community credit needs, as well as economic conditions. One contact

⁵ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

indicated the need for small dollar loans and financial education, and the other contact stated there was a need for quality early childhood education and housing development in the AA.

Assessment Area(s) - Shreveport MSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	116	7.76	28.45	31.03	27.59	5.17
Population by Geography	393,406	5.79	26.47	30.42	35.44	1.88
Housing Units by Geography	184,148	6.60	27.65	30.43	32.91	2.41
Owner-Occupied Housing by Geography	98,488	3.25	19.54	34.74	40.56	1.90
Occupied Rental Units by Geography	58,106	10.88	39.30	23.45	23.49	2.89
Vacant Units by Geography	27,554	9.51	32.11	29.75	25.42	3.22
Businesses by Geography	21,557	5.69	26.29	26.14	35.05	6.83
Farms by Geography	898	3.45	20.16	34.97	38.20	3.23
Family Distribution by Income Level	97,194	24.89	14.82	17.90	42.40	0.00
Household Distribution by Income Level	156,594	26.29	15.38	15.82	42.50	0.00
Unemployment rate (%)	6.34	12.32	9.24	6.26	3.49	10.42
Households Below Poverty Level (%)	19.36	43.15	28.54	16.46	9.45	35.15
Median Family Income (43340 - Shreveport-Bossier City, LA MSA)		\$59,467	Median Housing Value		\$131,750	
Median Family Income (43340 - Shreveport-Bossier City, LA MSA) for 2024		\$75,200	Median Gross Rent		\$836	
			Families Below Poverty Level		16.25	
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Louisiana

Examiners conducted a full-scope review of the Shreveport MSA. There are no limited-scope AAs in the state of Louisiana.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans in low-income CTs exceeded the percentage of households in those geographies. The percentage of bank loans in moderate-income CTs exceeded the percentage of households in those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Shreveport MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Consumer Loans

Refer to Table 14 in the state of Louisiana section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Louisiana is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Shreveport MSA	0	0.00	0	0.00

During the evaluation period, the bank did not make any CD loans in the AA. FSNB's primary focus on small dollar retail and consumer lending contribute to the lack of CD loans. The bank also faces strong competition from 23 other financial institutions in the AA. They operate only four branches and hold less than one percent deposit market share in the AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Shreveport MSA	4	821	2	750	6	60.00	1,571	33.84	0	0
Broader Statewide or Regional Area with Direct Benefit	0	0	1	500	1	10.00	500	10.77	0	0
Broader Statewide or Regional with Indirect Benefit	3	2,570	0	0	3	30.00	2,570	55.38	0	0
Total	7	3,391	3	1,250	10	100.00	4,641	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB purchased one municipal bond totaling \$750,000 and made one donation totaling \$144. The bank had three prior period MBS and one prior period Small Business Investment Company (SBIC) investment with an outstanding principal balance of \$820,528. Investments represented 242.8 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- The bank invested \$750,000 in a CDFI to support growth of low-income communities.
- FSNB made a \$144 donation to a nonprofit organization that provides school supplies for LMI students.

Broader Statewide or Regional Area

In addition to CD investments that benefit the bank's AA, FSNB purchased one municipal bond totaling \$500,000 and had two prior period municipal bonds and one prior period SBA bond with an outstanding balance of \$2.6 million in the broader statewide or regional area.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided 26 hours of financial education to 78 low-income individuals.

The following are examples of CD services in the AA:

- One bank employee provided six hours of financial education to residents of a low-income apartment complex.
- Bank employees provided 20 hours for financial education to LMI students at a local elementary school.

State Rating

State of Mississippi

CRA rating for the State of Mississippi⁶: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits excellent responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Mississippi

Jackson MS MSA

The bank delineated one AA in the state of Mississippi, the Jackson MS MSA. The Jackson MS MSA consists of Copiah, Hinds, Holmes, Madison, Rankin, Simpson, and Yazoo Counties in Mississippi. The AA consists of 160 CTs including 24 low-income CTs, 41 moderate-income CTs, 48 middle-income CTs, 45 upper-income CTs, and two unclassified CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The bank operates six branches within the AA, representing 8.2 percent of total branches. Four branches are located inside Walmart stores. The bank closed one branch in the AA in 2023. The bank has six non-deposit taking ATMs, one outside each branch. The bank had \$6.3 million in deposits within the AA, representing 1.7 percent of total deposits. During the evaluation period, the bank originated or purchased 8.1 percent of its consumer lending within the AA.

Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked 28th out of 31 FDIC-insured depository institutions with 0.03 percent deposit market share. The top three banks by deposit market share are Trustmark National Bank with 31 percent deposit market share, Regions Bank with 16.9 percent deposit market share, and BankPlus with 15.9 percent deposit market share.

Jackson, MS is the state capital of Mississippi. The economy in Jackson is anchored by the healthcare industry with the University of Mississippi Medical Center and Merit Health being the largest employers in the AA. Other major employers include Nissan North America and American Studios Inc.

As part of this evaluation, the OCC used two community contacts previously conducted to gain a better understanding of the general community credit needs, as well as economic conditions. These

⁶ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

organizations support small businesses and economic development. Contacts indicated there is a need for financial education and workforce development in the AA.

Assessment Area(s) - Jackson, MS MSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	160	15.00	24.38	30.00	29.38	1.25
Population by Geography	591,978	10.56	22.13	32.58	34.40	0.34
Housing Units by Geography	252,597	12.66	23.71	32.28	30.75	0.60
Owner-Occupied Housing by Geography	148,556	6.79	17.78	36.14	39.18	0.11
Occupied Rental Units by Geography	71,245	22.37	30.81	26.29	19.00	1.53
Vacant Units by Geography	32,796	18.14	35.18	27.80	18.10	0.78
Businesses by Geography	31,549	8.59	17.32	31.34	39.40	3.35
Farms by Geography	1,529	5.62	15.83	35.12	42.32	1.11
Family Distribution by Income Level	145,123	22.75	16.11	18.82	42.32	0.00
Household Distribution by Income Level	219,801	24.75	15.64	16.68	42.93	0.00
Unemployment rate (%)	7.15	16.08	10.67	5.62	4.10	9.13
Households Below Poverty Level (%)	15.53	36.54	22.29	11.56	7.16	26.04
Median Family Income (27140 - Jackson, MS MSA)		\$66,234		Median Housing Value		\$121,250
Median Family Income (27140 - Jackson, MS MSA) for 2024		\$79,600		Median Gross Rent		\$823
				Families Below Poverty Level		12.14
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Mississippi

Examiners conducted a full-scope review of the Jackson MS MSA. There are no limited-scope reviews in the state of Mississippi.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans in low-income geographies exceeded the percentage of households in those areas. The percentage of bank loans in moderate-income CTs exceeded the percentage of households in those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Jackson, MS MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels.

Consumer Loans

Refer to Table 14 in the state of Mississippi section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Mississippi is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Jackson MS MSA	2	40.00	2,542	68.48
Broader Statewide or Regional Area with Direct Benefit	2	40.00	1,000	26.94
Broader Statewide or Regional Area with Indirect Benefit	1	20.00	170	4.58
Total	5	100.00	3,712	100.00

During the evaluation period, FSNB made two CD loans totaling \$2.5 million, which represented 201.3 percent of allocated tier 1 capital.

The following are examples of CD loans the bank originated or purchased in this AA:

- FSNB made a \$2.5 million loan to a business to promote economic development. The loan was for improvements to a warehouse and retained LMI jobs.
- FSNB purchased a \$41,962 loan for an affordable housing apartment complex.

Broader Statewide or Regional Area

In addition to CD loans that benefit the bank's AA, FSNB purchased three loans that supported affordable housing totaling \$1.2 million in the broader statewide or regional area.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Jackson MS MSA	3	2,243	1	0	3	60.00	2,243	99.78	0	0
Broader Statewide or Regional Area with Indirect Benefit	2	5	0	0	2	40.00	5	0.22	0	0
Total	5	2,248	0	1	5	100.00	2,248	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB made one donation totaling \$100. FSNB had two prior period municipal bonds and one prior period SBIC investment with an outstanding principal balance of \$2.2 million. Investments represented 177.6 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- The bank made a \$100 donation to an organization that provides events and programs for disabled veterans.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Broader Statewide or Regional Area

In addition to CD investments that benefit the bank's AA, FSNB had two prior period SBA bonds with an outstanding principal balance of \$4,835 in the broader statewide or regional area.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provide 58 qualified service hours to support affordable housing and provide financial education.

Examples of CD Services in the AA:

- A bank employee volunteered on a board of directors for an organization that supports affordable housing, providing 55 qualified service hours.
- One employee provided three hours of financial education to six low-income students.

State Rating

State of North Carolina

CRA rating for the State of North Carolina⁷: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits excellent responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in North Carolina

The bank delineated five AAs in the state of North Carolina including the Fayetteville MSA, Jacksonville MSA, Raleigh MSA, Wilmington MSA, and NC Non-MSA. Refer to Appendix A, Scope of Examination, for details on each AA. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

The bank operates 12 branches in the state of North Carolina, representing 16.4 percent of total branches. Eleven branches are inside Walmart stores, and one is a standalone branch. All Walmart branches have a non-deposit taking ATM located outside the branch. The bank had \$36.1 million in deposits within the state, representing 9.6 percent of total deposits. During the evaluation period, the bank originated or purchased 17.3 percent of its consumer lending within the state of North Carolina.

Raleigh MSA

The Raleigh MSA consists of Franklin, Johnston, and Wake Counties in North Carolina. The AA consists of 299 CTs including 26 low-income CTs, 67 moderate-income CTs, 103 middle-income CTs, 97 upper-income CTs, and eight unclassified CTs.

The bank operates three branches within the AA, representing 4.1 percent of total branches. All branches are located inside Walmart stores. The bank has three non-deposit taking ATMs, one outside each branch. The bank had \$4.5 million in deposits within the AA, representing 1.2 percent of total deposits. During the evaluation period, the bank originated or purchased 2.7 percent of its consumer lending within the AA.

Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked last out of 36 FDIC-insured depository institutions with no measurable deposit market share. The top three banks by deposit market share are First Citizens Bank & Trust Co. with 61.1 percent deposit market share,

⁷ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Wells Fargo Bank with 8.9 percent deposit market share, and Truist Bank with 8.3 percent deposit market share.

The Raleigh MSA is located in central North Carolina, an area known as the “research triangle,” describing the three cities of Raleigh, Durham, and Chapel Hill; all cities that contain universities and research hospitals. The Raleigh MSA has a concentration of jobs in the professional and business services, as well as government or educational, and health services. WakeMed Health & Hospitals is the largest employer in the MSA, followed by North Carolina State University, and University of North Carolina (UNC) Rex Healthcare.

As part of this evaluation, the OCC used two community contacts previously conducted to gain a better understanding of the general community credit needs, as well as economic conditions. These organizations support community services for LMI individuals and economic development. Contacts indicated there is a need for downpayment assistance programs, affordable housing, access to transportation, small business development, and capital loans for small businesses.

Assessment Area(s) - Raleigh MSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	299	8.70	22.41	34.45	31.77	2.68
Population by Geography	1,413,982	7.33	21.02	36.62	33.25	1.78
Housing Units by Geography	548,432	7.76	21.78	36.33	32.54	1.58
Owner-Occupied Housing by Geography	333,928	4.54	20.25	37.43	36.53	1.25
Occupied Rental Units by Geography	173,685	13.02	24.19	34.88	25.78	2.12
Vacant Units by Geography	40,819	11.72	24.08	33.52	28.64	2.05
Businesses by Geography	86,836	6.52	18.21	36.00	38.11	1.16
Farms by Geography	2,789	6.70	22.12	39.48	30.05	1.65
Family Distribution by Income Level	341,462	21.99	16.89	20.91	40.21	0.00
Household Distribution by Income Level	507,613	23.29	16.85	18.10	41.76	0.00
Unemployment rate (%)	4.31	8.05	4.80	4.28	3.38	1.64
Households Below Poverty Level (%)	8.32	19.03	11.30	7.01	4.52	26.74
Median Family Income (39580 - Raleigh-Cary, NC MSA)		\$96,929	Median Housing Value			\$257,900
Median Family Income (39580 - Raleigh-Cary, NC MSA) for 2024		\$122,300	Median Gross Rent			\$1,127
			Families Below Poverty Level			6.10
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 North Carolina

Examiners conducted a full-scope review of the Raleigh MSA. The Raleigh MSA is the second largest AA for lending in the state. The Fayetteville MSA, Jacksonville MSA, Wilmington MSA, and NC Non-MSA received limited-scope reviews. Bank dedicated AAs located in the same MSA, or as applicable CSA, are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of North Carolina was Outstanding.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans in low-income CTs exceeded the percentage of low-income households in those geographies. The percentage of bank loans in moderate-income geographies exceeded the percentage of households in those CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Raleigh MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels.

Consumer Loans

Refer to Table 14 in the state of North Carolina section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans to low-income borrowers exceeded the percentage of low-income households. The percentage of bank loans to moderate-income borrowers was significantly below the percentage of moderate-income households.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fayetteville MSA, Jacksonville MSA, Wilmington MSA, and NC Non-MSA was consistent with the bank's overall performance under the Lending Test in the full scope area. Performance in the limited-scope AAs did not affect the Lending Test rating for the state.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of North Carolina is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Full-Scope:				
Raleigh MSA	2	33.33	1,085	31.95
Limited-Scope:				
Fayetteville MSA	1	16.67	650	19.14
Jacksonville MSA	0	0.00	0	0.00
Wilmington MSA	0	0.00	0	0.00
NC Non-MSA	0	0.00	0	0.00
Broader Statewide or Regional Area with Indirect Benefit	3	50.00	1,661	48.91
Total	6	100.00	3,396	100.00

During the evaluation period, FSNB made two loans totaling \$1.1 million in the full-scope AA, representing 119.2 percent of allocated tier 1 capital.

The following are examples of CD loans the bank originated or purchased in this AA:

- The bank purchased one loan participation totaling \$1 million in a LIHTC that funded a multifamily affordable housing complex in the AA.
- FSNB purchased one participation loan totaling \$85,000 in a LIHTC that provided affordable housing through funding a low-income multifamily apartment complex in the AA.

Broader Statewide or Regional Area

In addition to CD loans that benefit the bank's AAs, FSNB made three CD loans totaling \$1.7 million in the broader statewide or regional area.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Raleigh MSA	5	302	1	1	6	20.00	303	17.09	0	0
Limited-Scope:										
Fayetteville MSA	3	268	1	1	4	13.33	269	15.17	0	0
Jacksonville MSA	2	19	1	1	3	10.00	20	1.13	0	0
Wilmington MSA	3	63	1	1	4	13.33	64	3.61	0	0
NC Non-MSA	0	0	1	1	1	3.33	1	0.06	0	0
Broader Statewide or Regional Area with Direct Benefit	0	0	1	1,000	1	3.33	1,000	56.40	0	0
Broader Statewide or Regional Area with Indirect Benefit	11	116	0	0	11	36.67	116	6.54	0	0
Total	24	768	6	1,005	30	100.00	1,773	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB made one donation totaling \$500 in the full-scope AA. FSNB had three prior period MBS and two prior period SBA bond investments totaling \$302,272. Investments in the AA represented 33.3 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- FSNB made one donation totaling \$500 to a nonprofit organization that provides therapy, financial assistance, and domestic violence intervention to LMI individuals.

Broader Statewide or Regional Area

In addition to CD investments that benefit the bank's AAs, FSNB purchased one municipal bond totaling \$1 million and held 10 prior period SBA bonds and one prior period SBIC investment totaling \$115,836 in the broader statewide or regional area.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, employees provided four hours of financial education in the full-scope AA.

CD Services included:

- Bank employees provided four hours of financial education to 23 students in a school where the majority of students qualify for free or reduced lunch.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Fayetteville MSA was consistent with the bank's overall performance under the CD Test in the full-scope area. The bank's performance in the Jacksonville MSA, Wilmington MSA, and the NC Non-MSA was weaker than the bank's overall performance under the CD Test in the full-scope area due to a lower level of CD loans and investments in these AAs. Performance in the limited-scope AAs did not affect the CD Test rating in the state.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma⁸: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits excellent responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Oklahoma

Lawton MSA

The bank delineated one AA in the state of Oklahoma, the Lawton MSA. The Lawton MSA consists of Comanche and Cotton counties in Oklahoma. The AA includes 40 CTs including three low-income CTs, 10 moderate-income CTs, 17 middle-income CTs, seven upper-income CTs, and three unclassified CTs. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The bank operates three branches within the AA, representing 4.1 percent of total branches. One branch is located on the Fort Sill Army Base, and two branches are located in the city of Lawton. One branch was closed in the AA in 2022. The bank has 11 non-deposit taking ATMs, one outside each branch and an additional eight across the Ft. Sill Army Base. The bank had \$221.7 million in deposits within the AA, which represented 59.7 percent of the bank's total deposits. During the evaluation period, the bank originated or purchased 14.1 percent of its consumer lending within the AA.

Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked fifth out of 12 FDIC-insured depository institutions with a 10 percent deposit market share. The top three banks by deposit market share are Liberty National Bank ranked first with a 33.3 percent deposit market share, Arvest Bank ranked second with a 16.9 percent deposit market share, and BancFirst ranked third with a 13.1 percent deposit market share.

The economy in Lawton is anchored by the Fort Sill Army Post. It is the area's largest employer with approximately 25,000 soldiers attending basic training annually. Other major employers include the Goodyear Tire & Rubber Co. and the Comanche County Memorial Hospital.

⁸ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

As part of this evaluation, the OCC used one community contact previously conducted to get a better understanding of the general community credit needs, as well as economic conditions. The organization which is focused on the development and rehabilitation of affordable housing indicated the need for desirable affordable housing and services to address homelessness as community needs within the AA.

Assessment Area(s) - Lawton MSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	7.50	25.00	42.50	17.50	7.50
Population by Geography	126,652	5.92	21.67	46.51	22.25	3.64
Housing Units by Geography	54,659	7.97	23.60	45.51	20.64	2.28
Owner-Occupied Housing by Geography	24,708	5.01	14.57	49.60	29.82	0.99
Occupied Rental Units by Geography	20,748	9.92	33.73	40.41	12.38	3.56
Vacant Units by Geography	9,203	11.52	25.00	46.01	14.59	2.88
Businesses by Geography	3,352	6.62	31.74	35.86	23.00	2.77
Farms by Geography	204	2.45	9.31	47.06	41.18	0.00
Family Distribution by Income Level	29,491	22.38	17.46	18.73	41.43	0.00
Household Distribution by Income Level	45,456	23.57	15.65	18.68	42.10	0.00
Unemployment rate (%)	5.77	16.75	6.20	5.42	4.02	3.40
Households Below Poverty Level (%)	15.14	27.12	21.54	12.71	7.16	37.64
Median Family Income (30020 - Lawton, OK MSA)		\$65,335	Median Housing Value			\$101,850
Median Family Income (30020 - Lawton, OK MSA) for 2024		\$71,200	Median Gross Rent			\$749
			Families Below Poverty Level			11.99
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Oklahoma

Examiners conducted a full-scope review of the Lawton MSA. There are no limited-scope AAs in the state of Oklahoma.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank's percentage of consumer loans in low-income geographies exceeded the percentage of households in those geographies. The bank's percentage of consumer loans in moderate-income geographies also exceeded the percentage of households in those geographies.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Lawton MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Consumer Loans

Refer to Table 14 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank's percentage of consumer loans to low-income borrowers exceeded the percentage of those households. The bank's percentage of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Responses to Complaints

No complaints were received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Oklahoma is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Lawton MSA	2	66.67	16,000	95.50
Broader Statewide or Regional Area with Indirect Benefit	1	33.33	754	4.50
Total	3	100.00	16,754	100.00

During the evaluation period, the bank made two CD loans totaling \$16 million, representing 35.6 percent of allocated tier 1 capital.

The following are examples of CD loans the bank originated or purchased in this AA:

- The bank made a \$6 million loan to a government organization to support infrastructure projects that benefit LMI residents including road resurfacing, water and sewer line replacements, improvements to public transportation, and other miscellaneous projects.
- FSNB originated a \$10 million loan to finance renovations and update equipment in a local hospital that serves the AA.

Broader Statewide or Regional Area

In addition to loans that benefit the bank's AA, FSNB made one loan totaling \$753,557 to finance a low-income apartment complex in the broader statewide or regional area.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lawton MSA	2	257	18	26	20	83.33	283	21.60	0	0
Broader Statewide or Regional Area with Direct Benefit	0	0	1	1,000	1	4.17	1,000	76.34	0	0
Broader Statewide or Regional Area with Indirect Benefit	3	27	0	0	3	12.50	27	2.06	0	0
Total	5	284	19	1,026	24	100.00	1,310	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB made 18 donations totaling \$25,900 in the AA. The bank also had two prior period MBS with an outstanding balance of \$256,736. Investments represented 0.06 percent of allocated tier 1 capital.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

The following are examples of qualified investments in the AA:

- FSNB made four donations totaling \$15,250 to an organization that provides coats for kids in need.
- The bank provided two grants totaling \$3,000 to an organization that provides health and behavioral services to veterans, servicemembers, and their families.
- FSNB made three donations totaling \$2,100 to a local nonprofit foundation that provides grants to teachers in the local school district.

Broader Statewide or Regional Area

In addition to CD investments and donations that benefit the bank's AA, FSNB made one investment totaling \$1 million in a statewide housing program and had two prior period SBA bond investments totaling \$27,443 in the broader statewide or regional area.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided 139 hours of CD services.

Examples of CD Services include:

- One employee volunteered on a non-profit board of directors, providing 55 qualified service hours to an organization that supports the local school district teachers and LMI students.
- A bank employee volunteered 36 hours on the board of directors for a local organization that provides food for people in need.
- One employee volunteered 40 hours on a committee for the local chapter of a nationwide organization that provides community services for LMI individuals.

State Rating

State of Tennessee

CRA rating for the State of Tennessee⁹: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits adequate responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Tennessee

The bank delineated six AAs in the state of Tennessee including the Clarksville MSA, Jackson TN MSA, Johnson City-Kingsport CSA, Knoxville MSA, Nashville MSA, and TN Non-MSA. Refer to Appendix A, Scope of Examination, for details on each AA. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

Tennessee counties that are part of the Memphis MMSA are evaluated separately under the Memphis MMSA section of this report.

The bank operates 24 branches, excluding the Memphis MMSA branches, in the state of Tennessee, representing 30.1 percent of total branches. Two branches were closed during the evaluation period. The bank has 24 non-deposit taking ATMs in the state. The bank had \$40.9 million in deposits within the state, representing 10.9 percent of total deposits. During the evaluation period, the bank originated or purchased 19.3 percent of its consumer lending within the state of Tennessee.

Knoxville MSA

The Knoxville MSA consists of Anderson, Blount, Campbell, Knox, Loudon, Morgan, Roane, and Union Counties in Tennessee. The AA consists of 225 CTs including 13 low-income CTs, 48 moderate-income CTs, 102 middle-income CTs, 54 upper-income CTs, and eight unclassified CTs.

The bank operates five branches within the AA, representing 4.1 percent of total branches. All branches are located inside Walmart stores. The bank has five non-deposit taking ATMs, one outside each branch. The bank had \$7.5 million in deposits within the AA, representing 2 percent of total deposits. During the evaluation period, the bank originated or purchased 4.2 percent of its consumer lending within the AA.

⁹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Based on the June 30, 2024 FDIC Summary of Deposit Market Share Report, the bank ranked last out of 42 FDIC-insured depository institutions with 0.03 percent deposit market share. The top three banks by deposit market share are First Horizon Bank with 17.6 percent deposit market share, Truist Bank with 14.6 percent deposit market share, and Regions Bank with 12.2 percent deposit market share.

The economy is centered in education and health services, leisure and hospitality services, and government. Top employers include Covenant Health, University of Tennessee and the U.S. Department of Energy.

As part of this evaluation, the OCC used two community contacts previously conducted to gain a better understanding of the general community credit needs, as well as economic conditions. These organizations support affordable housing development and financial education. Contacts indicated there is a need for flexible lending products tailored to the credit needs of the LMI community.

Assessment Area(s) - Knoxville MSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	225	5.78	20.44	46.22	24.00	3.56
Population by Geography	879,773	4.63	17.86	50.00	26.09	1.42
Housing Units by Geography	389,820	5.25	19.19	50.47	24.49	0.60
Owner-Occupied Housing by Geography	239,155	2.17	16.39	53.19	28.23	0.02
Occupied Rental Units by Geography	106,552	11.32	24.05	43.09	19.69	1.84
Vacant Units by Geography	44,113	7.30	22.63	53.55	15.78	0.73
Businesses by Geography	30,684	4.07	15.42	41.72	37.55	1.24
Farms by Geography	1,203	2.99	12.97	56.77	26.85	0.42
Family Distribution by Income Level	224,776	20.70	17.56	20.41	41.34	0.00
Household Distribution by Income Level	345,707	24.03	16.26	17.26	42.44	0.00
Unemployment rate (%)	4.83	8.90	7.19	4.72	2.87	4.91
Households Below Poverty Level (%)	13.67	36.29	20.35	12.10	6.58	51.22
Median Family Income (28940 - Knoxville, TN MSA)		\$71,711		Median Housing Value		\$167,500
Median Family Income (28940 - Knoxville, TN MSA) for 2024		\$87,700		Median Gross Rent		\$836
				Families Below Poverty Level		9.40
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Tennessee

Examiners conducted a full-scope review of the Knoxville MSA. The Knoxville MSA is the second largest AA for lending in the state. The Clarksville MSA, Jackson TN MSA, Johnson City-Kingsport CSA, Nashville MSA, and TN Non-MSA received limited-scope reviews. Bank dedicated AAs located in the same MSA, or as applicable CSA, are combined, analyzed, and presented as one AA for purposes of this evaluation. Similarly, bank delineated non-MSA AAs within the same state are combined, analyzed, and presented as one AA for purposes of this evaluation.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Tennessee section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans in low-income CTs exceeded the percentage of low-income households in those geographies. The percentage of bank loans in moderate-income geographies exceeded the percentage of households in those CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Knoxville MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Consumer Loans

Refer to Table 14 in the state of Tennessee section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank's percentage of consumer loans to low-income borrowers exceeded the percentage of low-income households. The bank's percentage of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Responses to Complaints

No complaints were received during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Clarksville MSA, Jackson TN MSA, Johnson City-Kingsport MSA, Nashville MSA, and TN Non-MSA was consistent with the bank's overall performance under the Lending Test in the full scope area. Performance in the limited-scope AAs did not affect the Lending Test rating for the state.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Tennessee is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Full-Scope:				
Knoxville MSA	0	0.00	0	0.00
Limited-Scope:				
Clarksville MSA	0	0.00	0	0.00
Jackson, TN MSA	0	0.00	0	0.00
Johnson City-Kingsport CSA	0	0.00	0	0.00
Nashville MSA	1	100.00	109	100.00
Tennessee Non-MSA	0	0.00	0	0.00
Total	1	100.00	109	100.00

During the evaluation period, the bank did not make any CD loans in the full-scope AA. FSNB's primary focus on small dollar consumer and retail vehicle lending contribute to the lack of CD loans. The bank also faces strong competition from 41 other financial institutions in the AA. They operate only five branches inside Walmart stores and have less than one percent of deposit market share in the AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Knoxville MSA	4	331	1	1	5	18.52	332	10.53	0	0
Limited-Scope:										
Clarksville MSA	0	0	1	1	1	3.70	1	0.03	0	0
Jackson, TN MSA	1	1	1	1	2	7.41	2	0.06	0	0
Johnson City-Kingsport CSA	1	44	3	1	4	14.81	45	1.43	0	0
Nashville MSA	10	1,761	1	2	11	40.74	1,763	55.92	0	0
TN Non-MSA	0	0	1	2	1	3.70	2	0.06	0	0
Broader Statewide or Regional Area	2	8	1	1,000	3	11.11	1,008	31.97	0	0
Total	18	2,145	9	1,008	27	100.00	3,153	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB made one donation totaling \$750 in the full-scope AA. The bank had three prior period MBS and one prior period SBA bond investment totaling \$331,407. Investments represented 22.2 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- The bank made one donation totaling \$750 to a local nonprofit that provides community services to LMI individuals. Programs include educational and safety programs, meals for seniors, and coats for foster children.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, two bank employees provided 14 hours of financial education at schools that primarily serve LMI in the full-scope AA

CD services included:

- Two bank employees provided 14 hours of financial education to 469 students at schools where a majority of students qualify for free or reduced lunch.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Nashville MSA was consistent with the bank's overall performance under the CD Test in the full-scope area. The bank's performance in the Clarksville MSA, Jackson TN MSA, Johnson City-Kingsport MSA, and the TN Non-MSA was weaker than the bank's overall performance under the CD Test in the full scope area due to a lower level of CD activities in these AAs. Performance in the limited-scope AAs did not affect the CD Test rating in the state.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

State Rating

State of Texas

CRA rating for the State of Texas¹⁰: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution.
- The distribution of loans to individuals of different incomes is excellent.
- The bank exhibits adequate responsiveness to community development needs through CD loans, qualified investments, and CD services considering the bank's capacity, community needs, and the availability of opportunities for CD.

Description of Institution's Operations in Texas

Wichita Falls MSA

The bank delineated one AA in the state of Texas, the Wichita Falls MSA. The Wichita Falls MSA consists of Archer, Clay, and Wichita Counties in Texas. The AA consists of 50 CTs including three low-income CTs, 13 moderate-income CTs, 24 middle-income CTs, nine upper-income CTs, and one unclassified CT. The AA meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income geographies.

The bank operates two branches within the AA, representing 2.7 percent of total branches. One branch is located on Sheppard Air Force Base (AFB), while the other branch is a standalone branch in Wichita Falls. The bank has seven non-deposit taking ATMs within the AA. One ATM is located outside each branch, and an additional five ATMs are located throughout Sheppard AFB. The bank had \$35.6 million in deposits within the AA, representing 9.5 percent of total deposits. During the evaluation period, the bank originated or purchased 2.3 percent of its consumer lending within the AA.

Based on the June 30, 2024, FDIC Summary of Deposit Market Share Report, the bank ranked 11th out of 14 FDIC-insured depository institutions with 0.83 percent deposit market share. The top three banks by deposit market share are American National Bank & Trust with 37.4 percent deposit market share, First National Bank with 17.4 percent deposit market share, and First Bank with 11.2 percent deposit market share.

The economy in Wichita Falls is primarily tied to military jobs and Oil and Gas production. Sheppard AFB is the MSA's largest employer. Other major employers include United Regional Health Care System and Midwestern State University.

¹⁰This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

As part of this evaluation, the OCC used one community contact previously conducted to gain a better understanding of community credit needs, as well as economic conditions. The organization that supports affordable housing indicated the need for affordable housing, home improvement, and auto lending in the AA.

Assessment Area(s) - Wichita Falls MSA 2022-2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	6.00	26.00	48.00	18.00	2.00
Population by Geography	148,128	4.08	20.06	57.10	18.76	0.00
Housing Units by Geography	65,512	4.80	22.65	54.93	17.62	0.00
Owner-Occupied Housing by Geography	35,903	2.86	17.56	60.97	18.61	0.00
Occupied Rental Units by Geography	20,307	7.01	29.51	47.46	16.02	0.00
Vacant Units by Geography	9,302	7.44	27.32	47.93	17.32	0.00
Businesses by Geography	4,857	12.37	19.23	49.82	18.45	0.12
Farms by Geography	243	4.94	11.93	48.15	34.98	0.00
Family Distribution by Income Level	36,209	20.88	18.44	20.52	40.16	0.00
Household Distribution by Income Level	56,210	25.36	15.82	16.96	41.86	0.00
Unemployment rate (%)	4.02	16.04	7.37	3.38	1.50	0.00
Households Below Poverty Level (%)	16.48	44.20	27.42	11.59	11.61	0.00
Median Family Income (48660 - Wichita Falls, TX MSA)		\$66,634	Median Housing Value			\$100,050
Median Family Income (48660 - Wichita Falls, TX MSA) for 2024		\$81,400	Median Gross Rent			\$804
			Families Below Poverty Level			11.41
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
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 Texas

Examiner conducted a full-scope review of the Wichita Falls MSA. There are no limited-scope AAs in the state of Texas.

Refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 in the state of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The percentage of bank loans in low-income CTs was well below the percentage of households in those geographies. The percentage of bank loans in moderate-income geographies exceeded the percentage of households in moderate-income CTs.

Lending Gap Analysis

The OCC evaluated the lending distribution in the Wichita Falls MSA to determine if any unexplained, conspicuous gaps existed. Examiners did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Consumer Loans

Refer to Table 14 in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank's percentage of consumer loans to low-income borrowers exceeded the percentage of low-income households. The bank's percentage of consumer loans to moderate-income borrowers was below the percentage of moderate-income households.

Responses to Complaints

There were no CRA-related complaints received during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Texas is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Wichita Falls MSA	0	0.00	0	0.00
Broader Statewide or Regional Area with Indirect Benefit	1	100.00	8,000	100.00

During the evaluation period, the bank did not make any CD loans in the AA. FSNB's primary focus on small dollar retail and consumer lending contribute to the lack of CD loans. They operate only two branches in the AA with one branch located on Sheppard Air Force Base and one inside a Walmart store.

Broader Statewide or Regional Area

In addition to CD activities that benefit the bank's AA, FSNB made one loan totaling \$8 million in the broader statewide or regional area.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Wichita Falls MSA	0	0	5	5	5	10.87	5	0.42	0	0
Broader Statewide or Regional Area with Direct Benefit	0	0	1	1,000	1	2.17	1,000	84.25		
Broader Statewide or Regional Area with Indirect Benefit	37	128	3	54	40	86.96	182	15.33	0	0
Total	37	128	9	1,059	46	100.00	1,187	100.00	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including prior period investments that remain outstanding as of the end of evaluation period.

During the evaluation period, FSNB made five donations totaling \$4,925, representing 0.1 percent of allocated tier 1 capital.

The following are examples of qualified investments in the AA:

- The bank made a donation totaling \$2,500 to a qualified organization that provides assistance to children in the foster care system.
- FSNB made a \$1,100 donation to the local chapter of a nationwide nonprofit that supports affordable housing.
- The bank made a \$1,000 donation to a qualified organization that provides resources to people living in poverty.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Broader Statewide or Regional Area

In addition to CD investments that benefit the bank's AA, FSNB made one municipal bond investment totaling \$1 million and one SBA bond investment totaling \$54,475 in the broader statewide or regional area. The bank also had eight prior period SBA bond investments totaling \$128,260 in the broader statewide or regional area.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank employees provided 399 qualified service hours in the AA.

Examples of qualified CD services include:

- Bank employees provided 244 hours of financial education to 9,392 LMI military personnel.
- A bank employee volunteered on a non-profit board of directors, providing 55 qualified service hours to support affordable housing.
- One bank employee volunteered on a non-profit board of directors, providing 55 qualified service hours to support community services for LMI individuals.

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 MSA(s) and non-MSA(s) 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:	01/01/22 to 12/31/24	
Bank Products Reviewed:	Consumer loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Memphis, TN-MS-AR MSA (Memphis MMSA)	Full-scope	Includes DeSoto, Marshall, Tate, and Tunica Counties in Mississippi; Crittenden County in Arkansas; Fayette, Shelby, and Tipton Counties in Tennessee.
Arkansas		
Little Rock-North Little Rock, AR Combined Statistical Area (Little Rock CSA)	Full-scope	For 2022-23, includes Faulkner, Grant, Lonoke, Perry, Pulaski, Saline, Cleveland, Jefferson, and Lincoln Counties. For 2024, includes Faulkner, Grant, Lonoke, Perry, Pulaski, Saline, Cleveland, and Jefferson Counties.
Arkansas Non-MSA (AR Non-MSA)	Limited-scope	Includes Pope County.
Delaware		
Dover, DE MSA (Dover MSA)	Full-scope	Includes Kent County.
Georgia		
Atlanta-Sandy Springs-Roswell, GA MSA (Atlanta MSA)	Full-scope	For 2022-23, includes Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan, Newton, Paulding, Pickens, Pike, Rockdale, Spalding, and Walton Counties. For 2024, includes Barrow, Butts, Carroll, Clayton, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Heard, Henry, Jasper, Lumpkin, Meriwether, Morgan, Newton, Pickens, Pike, Rockdale, Spalding, and Walton Counties.
Louisiana		
Shreveport-Bossier City, LA MSA (Shreveport MSA)	Full-scope	Includes Bossier, Caddo, and De Soto Counties.
Mississippi		
Jackson, MS MSA (Jackson MS MSA)	Full-scope	Includes Copiah, Hinds, Holmes, Madison, Rankin, Simpson, and Yazoo Counties.
North Carolina		
Raleigh-Cary, NC MSA (Raleigh MSA)	Full-scope	Includes Franklin, Johnston, and Wake Counties.
Fayetteville, NC MSA (Fayetteville MSA)	Limited-scope	For 2022-23, includes Cumberland, Harnett, and Hoke Counties. For 2024, includes Cumberland and Hoke Counties.
Jacksonville, NC MSA (Jacksonville MSA)	Limited-scope	Includes Onslow County.
North Carolina Non-MSA (NC Non-MSA)	Limited-scope	Includes Richmond County.
Wilmington, NC MSA (Wilmington MSA)	Limited-scope	Includes New Hanover and Pender Counties.
Oklahoma		

Lawton, OK MSA (Lawton MSA)	Full-scope	Includes Comanche and Cotton Counties.
Tennessee		
Knoxville, TN MSA (Knoxville MSA)	Full-scope	Includes Anderson, Blount, Campbell, Knox, Loudon, Morgan, Roane, and Union Counties.
Clarksville, TN-KY MSA (Clarksville MSA)	Limited-scope	Includes Montgomery and Stewart Counties in Tennessee. No Kentucky counties are included.
Jackson, TN MSA (Jackson TN MSA)	Limited-scope	Includes Chester, Crockett, Gibson, and Madison Counties.
Johnson City-Kingsport-Bristol, TN-VA CSA (Johnson City-Kingsport CSA)	Limited-scope	Includes Carter, Unicoi, Washington, Hawkins, and Sullivan Counties in Tennessee. No Virginia counties are included.
Nashville-Davidson-Murfreesboro-Franklin, TN MSA (Nashville MSA)	Limited-scope	Includes Cannon, Cheatham, Davidson, Dickson, Macon, Maury, Robertson, Rutherford, Smith, Sumner, Trousdale, Williamson, and Wilson Counties.
Tennessee Non-MSA (TN Non-MSA)	Limited-scope	Includes Cumberland, McMinn, Putnam, and Warren Counties.
Texas		
Wichita Falls, TX MSA (Wichita Falls MSA)	Full-scope	Includes Archer, Clay, and Wichita Counties.

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
FSNB, National Association	Outstanding	Outstanding	Outstanding
MMSA or State:			
Memphis MMSA	Outstanding	Satisfactory	Satisfactory
Arkansas	Outstanding	Outstanding	Outstanding
Delaware	Outstanding	Satisfactory	Satisfactory
Georgia	Outstanding	Outstanding	Outstanding
Louisiana	Outstanding	Outstanding	Outstanding
Mississippi	Outstanding	Outstanding	Outstanding
North Carolina	Outstanding	Outstanding	Outstanding
Oklahoma	Outstanding	Outstanding	Outstanding
Tennessee	Outstanding	Satisfactory	Satisfactory
Texas	Outstanding	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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 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.

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. 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 AA.
- Table 10. 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

- Table 11. 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 AA.
- Table 12. 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 \$500,000) 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 13. 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 14. 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/AA.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Memphis MMSA

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
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
Memphis MMSA 2022-2024	750	1,067	100.00	12.11	18.40	25.59	33.73	27.55	30.00	33.48	16.00	1.27	1.87
Total	750	1,067	100.00	12.11	18.40	25.59	33.73	27.55	30.00	33.48	16.00	1.27	1.87
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Memphis MMSA 2022-2024	750	1,067	100.00	25.09	71.07	15.47	21.87	16.72	6.53	42.72	0.53	--	--
Total	750	1,067	100.00	25.09	71.07	15.47	21.87	16.72	6.53	42.72	0.53	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%													

State of Arkansas

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2023
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
Little Rock CSA 2022-2023	76	118	100.00	6.06	17.11	19.98	23.68	44.75	46.05	28.79	11.84	0.42	1.32
Total	76	118	100.00	6.06	17.11	19.98	23.68	44.75	46.05	28.79	11.84	0.42	1.32
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2024
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
Little Rock CSA 2024	39	50	100.00	5.89	7.69	20.45	25.64	44.18	48.72	29.07	17.95	0.42	0.00
Total	39	50	100.00	5.89	7.69	20.45	25.64	44.18	48.72	29.07	17.95	0.42	0.00
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
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
Arkansas Non-MSA 2022-2024	39	65	100.00	--	--	8.72	23.08	56.04	61.54	35.24	15.38	--	--
Total	39	65	100.00	--	--	8.72	23.08	56.04	61.54	35.24	15.38	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2023
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Little Rock CSA 2022-2023	76	118	100.00	24.66	63.16	16.47	26.32	16.67	9.21	42.20	1.32	--	--
Total	76	118	100.00	24.66	63.16	16.47	26.32	16.67	9.21	42.20	1.32	--	--
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Little Rock CSA 2024	39	50	100.00	24.68	61.54	16.51	23.08	16.69	10.26	42.11	5.13	--	--
Total	39	50	100.00	24.68	61.54	16.51	23.08	16.69	10.26	42.11	5.13	--	--
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Arkansas Non-MSA 2022-2024	39	65	100.00	19.72	69.23	18.53	20.51	16.34	2.56	45.41	7.69	--	--
Total	39	65	100.00	19.72	69.23	18.53	20.51	16.34	2.56	45.41	7.69	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%													

State of Delaware

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2022 - 2024	
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
Dover MSA 2022-2024	85	165	100.00	--	--	22.22	27.06	52.69	45.88	25.09	27.06	--	--
Total	85	165	100.00	--	--	22.22	27.06	52.69	45.88	25.09	27.06	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2022 - 2024	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Dover MSA 2022-2024	85	165	100.00	22.59	67.06	18.00	16.47	18.88	7.06	40.53	9.41	--	--
Total	85	165	100.00	22.59	67.06	18.00	16.47	18.88	7.06	40.53	9.41	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0%													

State of Georgia

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2023
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
Atlanta MSA 2022-2023	83	127	100.00	6.78	20.48	24.90	33.73	32.55	34.94	33.32	8.43	2.45	2.41
Total	83	127	100.00	6.78	20.48	24.90	33.73	32.55	34.94	33.32	8.43	2.45	2.41

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2024
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
Atlanta MSA 2024	20	30	100.00	7.01	30.00	23.90	20.00	31.74	40.00	34.33	5.00	3.02	5.00
Total	20	30	100.00	7.01	30.00	23.90	20.00	31.74	40.00	34.33	5.00	3.02	5.00

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2023
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Atlanta MSA 2022-2023	83	127	100.00	23.68	80.72	16.32	13.25	18.03	4.82	41.97	1.20	--	--
Total	83	127	100.00	23.68	80.72	16.32	13.25	18.03	4.82	41.97	1.20	--	--

Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Atlanta MSA 2024	20	30	100.00	23.86	85.00	16.01	10.00	17.83	0.00	42.31	5.00	--	--
Total	20	30	100.00	23.86	85.00	16.01	10.00	17.83	0.00	42.31	5.00	--	--

Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Louisiana

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
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
Shreveport MSA 2022-2024	112	155	100.00	6.08	13.39	26.87	33.04	30.55	32.14	34.23	17.86	2.27	3.57
Total	112	155	100.00	6.08	13.39	26.87	33.04	30.55	32.14	34.23	17.86	2.27	3.57
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Shreveport MSA 2022-2024	112	155	100.00	26.29	66.07	15.38	26.79	15.82	4.46	42.50	2.68	--	--
Total	112	155	100.00	26.29	66.07	15.38	26.79	15.82	4.46	42.50	2.68	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

State of Mississippi

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
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
Jackson, MS MSA 2022-2024	402	656	100.00	11.84	24.13	22.00	30.35	32.95	29.85	32.64	15.67	0.57	0.00
Total	402	656	100.00	11.84	24.13	22.00	30.35	32.95	29.85	32.64	15.67	0.57	0.00
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Jackson, MS MSA 2022-2024	402	656	100.00	25.00	71.89	15.74	23.13	16.70	3.73	42.55	1.24	--	--
Total	402	656	100.00	25.00	71.89	15.74	23.13	16.70	3.73	42.55	1.24	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

State of North Carolina

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
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
Jacksonville MSA 2022-2024	80	106	20.00	0.84	0.00	20.26	30.00	52.19	51.25	26.69	18.75	0.03	0.00
North Carolina Non-MSA 2022-2024	61	94	15.25	--	--	26.74	19.67	66.33	67.21	6.93	13.11	--	--
Raleigh MSA 2022-2024	132	184	33.00	7.44	23.48	21.60	42.42	36.56	25.76	32.85	7.58	1.55	0.76
Wilmington MSA 2022-2024	127	184	31.75	4.59	14.96	26.85	44.09	32.97	28.35	34.89	12.60	0.71	0.00
Total	400	568	100.00	6.16	12.50	22.50	37.00	38.16	38.00	31.96	12.25	1.22	0.25
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2023
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
Fayetteville MSA 2022-2023	308	539	100.00	0.86	3.25	21.90	29.22	53.55	47.40	23.67	20.13	0.01	0.00
Total	308	539	100.00	0.86	3.25	21.90	29.22	53.55	47.40	23.67	20.13	0.01	0.00
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2024
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
Fayetteville MSA 2024	153	285	100.00	1.14	1.31	21.67	26.80	52.07	54.25	25.11	17.65	0.01	0.00
Total	153	285	100.00	1.14	1.31	21.67	26.80	52.07	54.25	25.11	17.65	0.01	0.00
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Jacksonville MSA 2022-2024	80	106	20.00	20.03	61.25	18.58	23.75	20.39	12.50	41.00	2.50	--	--
North Carolina Non-MSA 2022-2024	61	94	15.25	31.60	67.21	16.02	21.31	15.17	11.48	37.20	0.00	--	--
Raleigh MSA 2022-2024	132	184	33.00	23.29	93.94	16.85	6.06	18.10	0.00	41.76	0.00	--	--
Wilmington MSA 2022-2024	127	184	31.75	25.21	88.19	15.32	8.66	17.37	0.79	42.10	2.36	--	--
Total	400	568	100.00	23.53	81.50	16.73	12.75	18.11	4.50	41.63	1.25	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2023
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Fayetteville MSA 2022-2023	308	539	100.00	24.44	60.06	16.00	27.27	18.25	10.06	41.31	2.60	--	--
Total	308	539	100.00	24.44	60.06	16.00	27.27	18.25	10.06	41.31	2.60	--	--
Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2023 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Fayetteville MSA 2024	153	285	100.00	24.17	55.56	16.19	25.49	18.28	12.42	41.36	6.54	--	--
Total	153	285	100.00	24.17	55.56	16.19	25.49	18.28	12.42	41.36	6.54	--	--
Source: FFIEC File - 2024 Census; 1/1/2024 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													

State of Oklahoma

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
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
Lawton MSA 2022-2024	703	2,299	100.00	7.25	9.39	23.31	25.46	45.41	42.25	21.86	19.77	2.16	3.13
Total	703	2,299	100.00	7.25	9.39	23.31	25.46	45.41	42.25	21.86	19.77	2.16	3.13
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Lawton MSA 2022-2024	703	2,299	100.00	23.57	59.03	15.65	15.93	18.68	12.80	42.10	12.23	--	--	
Total	703	2,299	100.00	23.57	59.03	15.65	15.93	18.68	12.80	42.10	12.23	--	--	
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.														
Due to rounding, totals may not equal 100.0%														

State of Tennessee

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
Clarksville MSA 2022-2024	65	115	6.77	1.53	3.08	19.29	40.00	46.30	26.15	32.00	30.77	0.88	0.00
Jackson, TN MSA 2022-2024	28	49	2.92	7.23	28.57	9.51	17.86	58.36	39.29	24.06	14.29	0.84	0.00
Johnson City-Kingsport CSA 2022-2024	152	186	15.83	2.14	0.66	20.89	30.26	52.30	51.97	24.67	17.11	--	--
Knoxville MSA 2022-2024	209	292	21.77	4.99	11.96	18.75	22.01	50.08	52.63	25.60	13.40	0.58	0.00
Nashville MSA 2022-2024	351	518	36.56	4.91	15.10	23.22	31.91	41.84	43.87	29.24	8.83	0.80	0.28
Tennessee Non-MSA 2022-2024	155	245	16.15	--	--	13.78	17.42	72.45	72.90	13.77	9.68	--	--
Total	960	1,405	100.00	4.22	9.27	20.46	27.29	47.93	50.42	26.78	12.92	0.61	0.10

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Clarksville MSA 2022-2024	65	115	6.77	19.15	56.92	16.20	15.38	18.81	16.92	45.84	10.77	--	--
Jackson, TN MSA 2022-2024	28	49	2.92	25.74	42.86	15.10	46.43	17.88	3.57	41.28	7.14	--	--
Johnson City-Kingsport CSA 2022-2024	152	186	15.83	24.16	75.00	16.15	19.08	17.45	3.29	42.24	2.63	--	--
Knoxville MSA 2022-2024	209	292	21.77	24.15	77.03	16.30	16.75	17.30	4.78	42.26	1.44	--	--
Nashville MSA 2022-2024	351	518	36.56	22.25	78.92	17.16	17.38	18.87	2.85	41.72	0.85	--	--
Tennessee Non-MSA 2022-2024	155	245	16.15	23.07	60.00	15.86	29.68	18.21	7.74	42.86	2.58	--	--
Total	960	1,405	100.00	22.96	72.29	16.61	20.21	18.25	5.10	42.18	2.40	--	--

Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Texas

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022 - 2024
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
Wichita Falls MSA 2022-2024	116	229	100.00	4.36	2.59	21.88	34.48	56.09	51.72	17.67	11.21	--	--
Total	116	229	100.00	4.36	2.59	21.88	34.48	56.09	51.72	17.67	11.21	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022 - 2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wichita Falls MSA 2022-2024	116	229	100.00	25.36	70.69	15.82	12.93	16.96	12.07	41.86	4.31	--	--
Total	116	229	100.00	25.36	70.69	15.82	12.93	16.96	12.07	41.86	4.31	--	--
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.													
Due to rounding, totals may not equal 100.0%													