



## **PUBLIC DISCLOSURE**

July 09, 2018

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

The First National Bank of Pawnee  
Charter Number 5224

601 Harrison Street  
Pawnee, Oklahoma 74058

Office of the Comptroller of the Currency  
Tulsa Field Office  
8282 South Memorial Drive, Suite 300  
Tulsa, Oklahoma 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

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

The First National Bank of Pawnee (FNB) has a **satisfactory** record of meeting the credit needs of the community.

- FNB's quarterly loan-to-deposit (LTD) ratio is reasonable.
- A majority of lending is within the bank's assessment area (AA) by the number of loans originated or purchased, during the review period.
- The overall geographic distribution of loans reflects reasonable dispersion in the moderate-income census tracts (CTs). There are no low-income CTs in the bank's AA.
- The overall distribution of loans by income level of the borrower reflects excellent penetration amongst small business and small farm borrowers.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

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

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

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

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Description of Institution

FNB is a \$62 million rural community bank located in Pawnee, Oklahoma. FNB is 100 percent owned by George Madison Corporation, a one-bank holding company. FNB operates from its main office located at 601 Harrison Street and a drive-thru facility located at 655 Illinois Street, both in Pawnee, Oklahoma. The bank also provides banking access through automated teller machines at these locations. The main bank provides service during reasonable hours Monday through Friday. The drive-thru facility provides services during reasonable hours Monday through Saturday. During the evaluation period, there were no branch openings or closures. Based on the June 30, 2017 FDIC Deposit market Share Report, the bank's presence in the AA is reasonable with 27 percent of the deposit market share in the AA.

A CRA Performance Evaluation (PE) was last prepared on January 6, 2014, and a “**Satisfactory**” rating was assigned. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of the AA.

The bank's lending practices primarily focus on providing banking services to commercial and retail customers in Pawnee County. The vast majority of the bank's existing customers are near or within the city of Pawnee, Oklahoma. FNB offers a variety of loan and deposit products, including Internet banking and other financial services. The bank's lending initiatives are primarily focused on small business and small farm loan products.

The table below illustrates the composition of the bank's loan portfolio as of June 30, 2018. Total loan and leases comprised 42 percent of total assets, based on the information captured in the June 30, 2018 Consolidated Reports of Condition and Income (Call Report). Management does not anticipate any significant changes in the composition of the loan portfolio in the near future.

<b>Loan Category</b>	<b>Dollar (000's)</b>	<b>% of Portfolio</b>
Commercial Real Estate Loans	\$9,318	35%
Commercial Loans	\$2,705	10%
Residential Real Estate Loans	\$4,138	16%
Farm Production Loans	\$4,918	19%
Farm Real Estate Loans	\$2,513	10%
Consumer Loans	\$2,019	8%
Other Loans	\$494	2%
<b>Total</b>	<b>\$26,105</b>	<b>100%</b>

Source: June 30, 2018 Consolidated Reports of Condition and Income

# **Scope of the Evaluation**

## **Evaluation Period/Products Evaluated**

We completed a full-scope review of FNB's CRA activities in its AA utilizing the Small Bank examination procedures. FNB's primary loan products include loans to finance agricultural production and other loans to farmers (28 percent of total loans), commercial real estate (26 percent of total loans), and farmland including farm residential and other improvement (14 percent of total loans).

The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities inside/outside the AA, to small business and small borrowers with gross operating revenue above and below \$1 million, and penetrations within various income tract levels. To determine the bank's lending pattern we reviewed all small business and small farm loans originated between January 1, 2015 and December 31, 2017. FNB is not required to report lending activity under the Home Mortgage Disclosure Act.

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

The full-scope review is comprised of originations within the bank's pre-determined AA, Pawnee County, Oklahoma. There are no limited-scope review areas.

## **Ratings**

As there is only one AA, the bank's overall rating is based solely on the full-scope review.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

# Conclusions with Respect to Performance Tests

## LENDING TEST

FNB’s performance under the Lending Test is **Satisfactory**.

This determination is based on our sampling of loans to finance agriculture production and other small loans, commercial real estate, and loans secured by farmland as these are the bank’s primary lending products.

### Loan-to-Deposit Ratio

FNB’s LTD ratio is reasonable. The bank’s quarterly LTD ratio since the previous CRA evaluation averaged 40.80 percent, with a high ratio of 42.21 percent during the fourth quarter of 2018. We compared the bank’s LTD ratio to three similarly situated banks (peer group banks) with footprints in Pawnee County and total assets in the range of \$209 million to \$1.1 billion, compared to subject bank with total assets of \$63 million. The peer group bank’s average 75.56 percent with a high average ratio of 91.88 percent and a low average ratio of 45.57 percent.

### Lending in Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Farm	23	67.65	11	32.35	34	\$511	75.53	\$165	24.47	\$676
Small Business	16	51.61	15	48.39	31	\$150	30.19	346	69.81	496
<b>Total</b>	39	<b>60%</b>	26	40%	65	\$660	<b>56.35%</b>	\$415	43.65%	\$1,172

*Source: 01/01/2015-12/31/2017 Loan Sample*

Lending in the AA is reasonable with the majority of loans originated inside the AA. Based on our sample of lending during the evaluation period, January 1, 2015 to December 31, 2017, FNB meets the standard for satisfactory performance of lending within the AA. Overall lending in the AA based on number of loans originated is 60 percent, compared to 40 percent outside of the AA. Overall lending in the AA based on dollar size of loans is over 56 percent compared to 43 percent outside the AA. This analysis is supported by the bank’s lending strategy to support small farms and small businesses within its AA.

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

The overall borrower distribution of loans by income level reflects excellent penetration among small business and small farm applicants. One-hundred percent of the small business and small farm loans sampled were originated to businesses and farms with gross revenue significantly below \$1 million. Please refer to Tables R and T in Appendix C for additional information and data used to evaluate borrower distribution of the bank's loan originations to small business and small farm applicants.

### **Geographic Distribution of Loans**

The overall geographic distribution of loans to small business and small farm loans reflects reasonable dispersion. There are no low-income CTs and only one moderate-income CT in the AA. All loans sampled during the assessment period were originated to borrowers in the moderate-income CT.

#### **Small Business Geography Distribution**

The overall geographic distribution of loans reflects reasonable dispersion amongst low-moderate income (LMI) CTs. Table Q in Appendix C for the assessment period in 2015-2016 reflects that 49 percent of all small businesses operate in the moderate-income CTs of the AA and that 100 percent of the small businesses loans in our sample were to small farmers.

Table Q in Appendix C for the assessment period in 2017 reflects that 25 percent of the small businesses operate in the moderate-income CTs of the AA and that 100 percent of the small business loans in our sample were to small farmers. Refer to Tables Q and S in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

#### **Small Farm Geography Distribution**

The overall geographic distribution of loans reflects reasonable dispersion amongst LMI CTs. Table S in Appendix C for the assessment period in 2015-2016 reflects that 84 percent of the small businesses operate in the moderate-income CTs of the AA and that 100 percent of the small business loans in our sample were to small farmers.

Table S in Appendix C for the assessment period in 2017 reflects that 16 percent of the small businesses operate in the moderate-income CTs of the AA and that 100 percent of the small business loans in our sample were to small farmers. Refer to Tables Q and S in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

### **Responses to Complaints**

The bank did not receive any CRA-related complaints during this evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test: (01/01/15 to 12/31/17)	
<b>Financial Institution</b>		<b>Products Reviewed</b>
The First National Bank of Pawnee (FNB) Pawnee, Oklahoma		Small Business and Small Farm Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Pawnee County, Oklahoma	Full-Scope	

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

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

Assessment Area: Pawnee County 2010 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	5	0.00	60.00	40.00	0.00	0.00
Population by Geography	16,577	0.00	51.40	48.60	0.00	0.00
Housing Units by Geography	7,732	0.00	51.10	48.90	0.00	0.00
Owner-Occupied Units by Geography	4,661	0.00	49.80	50.20	0.00	0.00
Occupied Rental Units by Geography	1,458	0.00	48.40	51.60	0.00	0.00
Vacant Units by Geography	1,613	0.00	57.30	42.70	0.00	0.00
Businesses by Geography	684	0.00	49.40	50.60	0.00	0.00
Farms by Geography	60	0.00	80.00	20.00	0.00	0.00
Family Distribution by Income Level	4,285	28.70	20.70	21.20	29.50	0.00
Household Distribution by Income Level	6,119	29.90	17.70	17.90	34.60	0.00
Median Family Income Non-MSAs - GA	58,038	Median Housing Value				\$82,977
		Median Gross Rent				\$583
		Families Below Poverty Level				12.80%

Source: 2010 U.S. Census and 2016 D&B Data

Due to rounding, totals may not equal 100.0

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

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

**Assessment Area: Pawnee County 2015 Census**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	5	0.00	20.00	80.00	0.00	0.00
Population by Geography	16,499	0.00	14.90	85.10	0.00	0.00
Housing Units by Geography	7,738	0.00	16.30	83.70	0.00	0.00
Owner-Occupied Units by Geography	4,781	0.00	12.60	87.40	0.00	0.00
Occupied Rental Units by Geography	1,497	0.00	26.70	73.30	0.00	0.00
Vacant Units by Geography	1,460	0.00	18.20	81.80	0.00	0.00
Businesses by Geography	689	0.00	24.80	75.20	0.00	0.00
Farms by Geography	54	0.00	16.70	83.30	0.00	0.00
Family Distribution by Income Level	4,548	25.70	19.70	21.20	33.40	0.00
Household Distribution by Income Level	6,278	26.50	16.30	19.00	38.20	0.00
Median Family Income Non-MSAs - GA		61,182	Median Housing Value			\$86,810
			Median Gross Rent			\$656
			Families Below Poverty Level			11.00%

Source: 2015 U.S. Census and 2017 D&B Data

Due to rounding, totals may not equal 100.0

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

FNB has one AA, comprised of the entire Pawnee County, Oklahoma. This designation meets the technical requirements of the regulation. There are five CTs in Pawnee County, Oklahoma. According to the 2015 ACS Census and 2017 D&B Data, there is one moderate and four middle-income CTs. FNB operates from its main bank and drive thru facility both in Pawnee, Oklahoma. According to the June 30, 2017 market share data, FNB's total deposits of \$55,294 thousand represent 27.28 percent of total deposits in the AA. Cities located in the AA are Cleveland, Hallett, Jennings, Maramec, Pawnee, Terlton, and Ralston, Oklahoma. The economy in Pawnee County is strained. Eleven percent of the families in Pawnee County are below the poverty level. There are 1,460 vacant units in Pawnee County with 82 percent in middle-income tracts and 18 percent in moderate-income tracts.

The tables above summarize the demographic characteristics of FNB's AA. The first table reflects the demographic characteristics of the AA according to the 2010 Census Data, while the second table reflects identical characteristics based on 2015 Census Data. The population declined by 78 between the two periods. The number of businesses grew by five, while the number of small farms declined by six. The median family income based on the 2010 and 2015 Census data were \$58,038 and \$61,182, respectively. Families below the poverty level were 12.8 percent and 11 percent, respectively.

**Community Contact**

During the evaluation process, we contacted a community leader to gain a better understanding of the community credit needs within the AA. The contact identified a need for more residential housing lending products.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included in this PE:

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

**Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography : 2015-2016**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pawnee County	24	262	100	0.00	0.00	49.40	100.0	50.60	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>24</b>	<b>262</b>	<b>100</b>	<b>0.00</b>	<b>0.00</b>	<b>49.40</b>	<b>100.0</b>	<b>50.60</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Source: 2016 D&B Data; 01/01/2015 — 12/31/2016 Bank Data; Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography : 2017**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pawnee County	7	159	100	0.00	0.00	24.80	100.0	75.20	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>7</b>	<b>159</b>	<b>100</b>	<b>0.00</b>	<b>0.00</b>	<b>24.80</b>	<b>100.0</b>	<b>75.20</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Source: 2017 D&B Data; 01/01/2017 — 12/31/2017 Bank Data; Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2015**  
-  
**2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues		Businesses with Revenues Not	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pawnee County	24	262	100	107	77.40	100.00	100.00	4.90	0.00	17.70	0.00
<b>Total</b>	<b>24</b>	<b>262</b>	<b>100</b>	<b>107</b>	<b>77.40</b>	<b>100.00</b>	<b>100.00</b>	<b>4.90</b>	<b>0.00</b>	<b>17.70</b>	<b>0.00</b>

Source: 2016 D&B Data; 01/01/2015 — 12/31/2016 Bank Data; Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues		Businesses with Revenues Not	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Pawnee County	7	159	100	116	79.00	100.00	100.00	5.20	0.00	15.80	0.00
<b>Total</b>	<b>7</b>	<b>159</b>	<b>100</b>	<b>116</b>	<b>79.00</b>	<b>100.00</b>	<b>100.00</b>	<b>5.20</b>	<b>0.00</b>	<b>15.80</b>	<b>0.00</b>

Source: 2017 D&B Data; 01/01/2017 — 12/31/2017 Bank Data; Due to rounding, totals may not equal 100.0

**Table S — Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2015**  
-  
**2016**

Assessment Area:	Total Loans to Farms			Low-Income		Moderate-Income		Middle-Income		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Pawnee County	25	1,009	100	0.00	0.00	84.40	100.0	15.60	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>25</b>	<b>1,009</b>	<b>100</b>	<b>0.00</b>	<b>0.00</b>	<b>84.40</b>	<b>100.0</b>	<b>15.60</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

*Source: 2016 D&B Data; 01/01/2015 — 12/31/2016 Bank Data; Due to rounding, totals may not equal 100.0*

**Table S — Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2017**

Assessment Area:	Total Loans to Farms			Low-Income		Moderate-Income		Middle-Income		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Pawnee County	9	402	100	0.00	0.00	16.70	100.0	83.30	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>9</b>	<b>402</b>	<b>100</b>	<b>0.00</b>	<b>0.00</b>	<b>16.70</b>	<b>100.0</b>	<b>83.30</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

*Source: 2017 D&B Data; 01/01/2017 — 12/31/2017 Bank Data; Due to rounding, totals may not equal 100.0*

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

**2015  
-  
2016**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Pawnee County	25	1,009	100	20	100.00	100.00	100.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>25</b>	<b>1,009</b>	<b>100</b>	<b>20</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

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

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

**2017**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Pawnee County	9	402	100	20	100.00	100.00	100.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>9</b>	<b>402</b>	<b>100</b>	<b>20</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data;  
Due to rounding, totals may not equal 100.0