



PUBLIC DISCLOSURE

July 16, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank and Trust Company of Miami
Charter Number 5252

2 North Main Street
Miami, Ok 74354

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

The Lending Test is rated: Satisfactory

The major factors supporting the institution's rating include the following:

- The loan-to-deposit ratio is **reasonable** and meets the standards for satisfactory performance.
- A **substantial majority** of the bank's loans originated during the review period are inside the bank's assessment area (AA), and exceeds the standard for satisfactory performance.
- The geographic distribution of loans reflects a **reasonable dispersion** of loans in census tracts throughout the bank's AA, and meets the standard for satisfactory performance.
- The bank's distribution of loans reflects **reasonable penetration** of loan originations among borrowers of different income levels and businesses of different sizes, and meets the standard for satisfactory performance.

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

First National Bank and Trust Company of Miami (FNB) is a \$145 million community bank located in Miami, Oklahoma, and a subsidiary of First Miami Bancshares, Inc., a two-bank holding company. Miami, Oklahoma is the county seat of Ottawa County. The bank provides a variety of loan and deposit services from its main facility in Miami, and two branch facilities (one in Miami and one in Fairland, OK). The main bank and branches provide deposit and loan services during reasonable hours Monday through Friday. The bank provides three automated teller machines (ATM) in Miami and one in Fairland. Based on the June 30, 2017 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank's presence in the Ottawa County assessment area (AA) is significant, as they have 31 percent of the deposit market share in the AA. The main bank and two ATM's are located in moderate-income census tracts. The branches and other ATM are located in middle-income census tracts.

A CRA Performance Evaluation (PE) was last completed February 21, 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 in the AA.

The bank's primary business strategy is to provide banking services to customers in Ottawa County. To accomplish this, FNB offers a variety of loan and deposit products, including internet and mobile banking, and other financial services.

The table below illustrates the composition of the bank's loan portfolio as of December 31, 2017, which represents 59 percent of total assets, based on the data presented in the 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.

Loan Category	\$ (000's)	% of Portfolio
Construction and Land Development	1,461	1.68%
Farmland	21,769	25.05%
1-4 Family Real Estate	22,937	26.39%
Commercial Real Estate	10,427	12.00%
Multifamily Residential	2,108	2.43%
Agricultural Production	14,440	16.62%
Commercial and Industrial	7,556	8.69%
Consumer Loans	6,207	7.14%
Total Loan Portfolio	86,905	100.00%

Source: December 31, 2017 Consolidated Reports of Condition and Income

Scope of the Evaluation

We evaluated FNB using the small bank standards for assessing performance. The lending test evaluates the bank's record of meeting the credit needs of its AA. We assessed the bank's performance under the lending test using a loan sample comprising 40 home mortgage loans and 25 agriculture/farm loans originated from January 2, 2015 through December 31, 2017. FNB is not required to report under the HMDA. The sample is representative of the bank's business strategy since the last CRA PE.

Description of the Assessment Area

FNB has designated the entire Ottawa County as its AA. The AA meets the requirements of the regulation and does not arbitrarily exclude low-or-moderate income geographies. The AA consists of nine whole CT(s). Three are moderate-income tracts and six are middle-income tracts. The AA is not located in a MSA.

Economic conditions in the AA are generally stable. The 2015 census reported a population of 32,085 for the AA, and has seen limited growth since the previous CRA PE at which time the approximate population was 31,848. The county's major employers include Art/Entertainment/Recreation, manufacturing, healthcare and social assistance, education services, and retail trade. According to data published by The Bureau of Labor Statistics as of December 31, 2017, the unemployment rate for Ottawa County is 4.0 percent and matches the rate for the state of Oklahoma as of the same date. The unemployment rate for the county has declined since the previous CRA PE, when the rate was 5.7 percent. The county unemployment rate is comparable to the neighboring two counties of Craig (4.1 percent) and Delaware (4.4 percent).

FNB's primary banking competition includes two community banks with branches or main bank facilities in the Ottawa County AA, ranging in total assets from \$13 million to \$89 million. However, there are also six other branches of financial institutions with headquarters outside the AA (two are multi-billion dollar institutions that have 21 percent of deposit market share). Financial institutions in the AA provide significant competition for loans and deposits.

The tables in Appendix B illustrate the key demographic and economic characteristics of the AA based on the 2010 and 2015 U.S. Census data.

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 PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

Conclusions with Respect to Performance Tests

The institution's CRA performance is *satisfactory*. This is based on the following performance criteria.

LENDING TEST

The Lending Test is rated: **Satisfactory**

Loan-to-Deposit Ratio

FNB's Loan to Deposit (LTD) ratio is *reasonable* and meets the standard for satisfactory performance given the bank's size, financial condition, level of local banking competition, and credit needs of the AA. Overall, loan demand in this AA is moderate. Since the previous CRA PE, the bank's quarterly average LTD ratio averaged 69 percent, compared to a LTD ratio of 53 percent and 61 percent during the same time period for the two primary competing institutions with main banking locations within the AA.

Institution	Assets (as of December 31, 2017)	Average LTD Ratio
The First National Bank of Miami	\$147 Million	66%
Security Bank & Trust Company	\$89 Million	61%
The Bank of Wyandotte	\$13 Million	53%

Source: December 31, 2017 Consolidated Reports of Condition and Income; Uniform Bank Performance Report.

Lending in Assessment Area

A *substantial majority* of loans originated within the AA and exceeds the standard for satisfactory performance. This conclusion was drawn from an analysis of 40 home mortgage loans and 20 small business/farm loans originated within the sample period. The table below reflects the number and dollar amount of loans and the percentages originated within and outside the AA. As depicted by the table, a majority of loans originated by FNB are to consumers and businesses that reside within the bank's AA. The dollar amount of home mortgage is somewhat skewed due to two large loans over \$250 thousand that originated in neighboring counties.

Table A1 - Lending Inside and Outside of the Assessment Area for 2015-2016										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	21	78%	6	22%	27	\$995	54%	\$850	46%	\$1,845
Agriculture/Farms	13	87%	2	13%	15	\$1,303	77%	\$392	23%	\$1,695
Total	34	81%	8	19%	42	\$2,298	65%	\$1,242	35%	\$3,540
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2016 Bank Data Due to rounding, totals may not equal 100.0</i>										

Table A2 - Lending Inside and Outside of the Assessment Area for 2017										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	11	85%	2	15%	13	\$714	67%	\$356	33%	\$1,070
Agriculture/Farms	7	70%	3	30%	10	\$795	87%	\$115	13%	\$910
Total	18	78%	5	22%	23	\$1,509	76%	\$471	24%	\$1,980
<i>Source: Evaluation Period: 1/1/2017 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>										

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

The distribution of loans reflects **reasonable penetration** of loan originations among borrowers of different income levels and farms of different sizes, and meets the standard for satisfactory performance. Census income information for 2010 and 2015 was used to reflect current family income levels that are used for residential real estate and consumer loan comparisons. Income information for farms was derived from the 2016 and 2017 Dun and Bradstreet data.

Please refer to Tables C1, C2, D1, and D2 in Appendix C for a distribution of home mortgage and small farm loans in our sample compared to borrower income levels and farm revenue within the bank's AA.

Geographic Distribution of Loans

An analysis of the distribution of loans by income level of the CTs revealed ***reasonable dispersion*** and meets the standards for satisfactory performance. Three of the nine CTs are moderate-income. There are no low-income tracts in the AA. The banking facilities are located in the moderate-income areas. A substantial majority of the bank's lending is in the CT where the banking offices are located. This has contributed to the favorable performance regarding this rating element.

Please refer to Tables E1, E2, F1, and F2 in Appendix C for a geographic analysis of home mortgage and small farm loans in our sample compared to demographic data relative to the income level of the CTs in the AA.

Responses to Complaints

There have been no consumer complaints regarding the bank's performance under the CRA during the evaluation period. The bank's CRA Public File contains all of the required information and is readily available for review.

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 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”).

Time Period Reviewed	Lending Test (excludes CD loans): (02/21/14 to 12/31/17)	
Financial Institution		Products Reviewed
The First National Bank and Trust Company of Miami 2 North Main Street Miami, OK 74133		Home mortgage Lending Agriculture/Farms
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Ottawa County	Full Scope	

Appendix B: Community Profiles for Full-Scope Areas

Table B1 – Demographic Information of the Assessment Area						
Assessment Area: FNBTC Miami OK AA Ottawa						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	22.2	77.8	0.0	0.0
Population by Geography	31,848	0.0	17.8	82.2	0.0	0.0
Housing Units by Geography	14,253	0.0	17.6	82.4	0.0	0.0
Owner-Occupied Units by Geography	9,121	0.0	14.6	85.4	0.0	0.0
Occupied Rental Units by Geography	3,043	0.0	27.9	72.1	0.0	0.0
Vacant Units by Geography	2,089	0.0	16.0	84.0	0.0	0.0
Businesses by Geography	1,365	0.0	32.0	68.0	0.0	0.0
Farms by Geography	121	0.0	5.8	94.2	0.0	0.0
Family Distribution by Income Level	8,496	23.2	20.0	23.4	33.5	0.0
Household Distribution by Income Level	12,164	25.2	18.3	20.3	36.2	0.0
Median Family Income Non-MSAs - OK		\$47,749	Median Housing Value			\$79,609
<small>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.</small>			Median Gross Rent			\$516
			Families Below Poverty Level			13.8%
Table B2 - Demographic Information of the Assessment Area						
Assessment Area: FNBTC Miami OK AA Ottawa						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	33.3	66.7	0.0	0.0
Population by Geography	32,085	0.0	25.5	74.5	0.0	0.0
Housing Units by Geography	14,067	0.0	27.4	72.6	0.0	0.0
Owner-Occupied Units by Geography	8,433	0.0	21.0	79.0	0.0	0.0
Occupied Rental Units by Geography	3,628	0.0	38.6	61.4	0.0	0.0
Vacant Units by Geography	2,006	0.0	34.1	65.9	0.0	0.0
Businesses by Geography	1,351	0.0	32.3	67.7	0.0	0.0
Farms by Geography	97	0.0	5.2	94.8	0.0	0.0
Family Distribution by Income Level	8,200	26.2	19.9	21.6	32.2	0.0
Household Distribution by Income Level	12,061	28.7	17.4	18.6	35.3	0.0
Median Family Income Non-MSAs - OK		\$51,698	Median Housing Value			\$84,387
<small>Source: 2015 ACS 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.</small>			Median Gross Rent			\$617
			Families Below Poverty Level			17.8%

Community Contact

The OCC contacted a leader of a local community organization in the AA to get a better understanding of general community credit and development needs, and discuss local economic conditions. The contact specifically referenced FNB as a leader in the community by supporting various civic organizations, education system, and small businesses. The contact indicated the community could benefit from additional small business opportunities, higher paying jobs, and retail development to increase business revenue and sales tax income. The contact also discussed strategies to address an aging population and need to retain younger business professionals. Affordable housing to assist lower income families is a continuing area of focus. The contact named FNB specifically as one of the local lending institutions that provides credit to meet the needs of the community. FNB's ownership also founded the Miami Home Plate Program to renovate downtown buildings, recruit businesses and refurbish homes.

Appendix C: Tables of Performance Data

This is a listing and brief description of the following tables to support rating conclusions.

- Table C. 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 assessment area. The table also presents aggregate peer data for the years the data is available.
- Table D. 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 E. 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 F. 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 C1: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Ottawa County 2010 Census	27	\$1,845	68.0	410	46.5	22.0	16.1	40.0	19.0	38.5	46.7	11.0	41.0	66.8	47.0	62.0	0.0	0.0	21.2	
Total	27	\$1,845	68.0	410	46.5	22.0	16.1	40.0	19.0	38.5	46.7	11.0	41.0	66.8	47.0	62.0	0.0	0.0	21.2	

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0

Table C2: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Ottawa County 2015 Census	13	\$1,069	32.0	406	26.2	23.0	11.1	19.9	23.0	21.4	21.6	15.0	19.2	32.2	38.0	28.1	0.0	0.0	20.2	
Total	13	\$1,069	32.0	406	26.2	23.0	11.1	19.9	23.0	21.4	21.6	15.0	19.2	32.2	38.0	28.1	0.0	0.0	20.2	

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

Table D1: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2015-16
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Ottawa County 2010 Census	15	\$1,695	60.0	71	97.3	100.0	74.6	1.3	0.0	1.3	0.0
Total	15	\$1,695	60.0	71	97.3	100.0	74.6	1.3	0.0	1.3	0.0
<i>Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0</i>											

Table D2: 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
Ottawa County 2015 Census	10	\$910	40.0	71	94.8	100.0	74.6	3.1	0.0	2.1	0.0
Total	10	\$910	40.0	71	94.8	100.0	74.6	3.1	0.0	2.1	0.0
<i>Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, Due to rounding, totals may not equal 100.0</i>											

Table E1 : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-16
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Ottawa County 2010 Census	27	\$1,845	68.0	410	0.0	0.0	0.0	14.6	19.0	15.4	85.4	81.0	84.6	0.0	0.0	0.0	0.0	0.0	0.0
Total	27	\$1,845	68.0	410	0.0	0.0	0.0	14.6	19.0	15.4	85.4	81.0	84.6	0.0	0.0	0.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table E2 : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Ottawa County 2015 Census	13	\$1,069	32.0	406	0.0	0.0	0.0	21.0	18.0	18.5	79.0	82.0	81.5	0.0	0.0	0.0	0.0	0.0	0.0
Total	13	\$1,069	32.0	406	0.0	0.0	0.0	21.0	18.0	18.5	79.0	82.0	81.5	0.0	0.0	0.0	0.0	0.0	0.0

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

Table F1 - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2015-16	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Ottawa County 2010 Census	15	\$1,695	60.0	71	0.0	0.0	0.0	4.3	15.0	4.2	95.7	85.0	95.8	0.0	0.0	0.0	0.0	0.0	0.0	
Total	15	\$1,695	60.0	71	0.0	0.0	0.0	4.3	15.0	4.2	95.7	85.0	95.8	0.0	0.0	0.0	0.0	0.0	0.0	

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

Table F2 - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Ottawa County 2015 Census	10	\$910	40.0	71	0.0	0.0	0.0	5.2	14.0	4.2	94.8	86.0	95.8	0.0	0.0	0.0	0.0	0.0	0.0	
Total	10	\$910	40.0	71	0.0	0.0	0.0	5.2	14.0	4.2	94.8	86.0	95.8	0.0	0.0	0.0	0.0	0.0	0.0	

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