



## **PUBLIC DISCLOSURE**

August 5, 2019

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

First National Bank of Beardstown  
Charter Number 3640

300 Washington Street  
Beardstown, Illinois 62618

Office of the Comptroller of the Currency

211 Fulton Street  
Suite 604  
Peoria, Illinois 61602

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

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## **Overall CRA Rating**

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the State of Illinois rating.
- The borrower distribution of loans reflects reasonable penetration in the assessment area (AA).
- The geographic distribution reflects excellent dispersion in the AA.
- A majority of loans are to customers within the AA.
- The loan-to-deposit (LTD) ratio is reasonable.

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit ratio is reasonable.

The quarterly average LTD ratio was 78.4 percent for the 20 quarter period between September 30, 2014, and June 30, 2019, with a low of 73.0 percent and a high of 83.2 percent.

The bank ranked sixth of 12 similarly situated FDIC insured financial institutions that compete with the bank for deposits in the AA. The comparable institutions ranged in size from \$52.4 million to \$254.5 million and reported quarterly average LTD ratios from 50.1 percent to 88.6 percent. The LTD ratio is calculated on a bank-wide basis.

### **Lending in Assessment Area**

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

The bank originated and purchased 85.0 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$ (000s)				Total \$ (000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Farm	18	90.0	2	10.0	20	5,437	99.3	36	0.7	5,473
Consumer	16	80.0	4	20.0	20	136	90.7	13	9.3	149
Total	34	85.0	6	15.0	40	5,573	99.1	50	0.9	5,623

Source: Sample of agriculture and consumer loans originated or purchased from 1/1/2016 to 12/31/2018.

## Description of Institution

First National Bank of Beardstown (FNB or bank) is a community bank headquartered in Beardstown, Illinois, along the Illinois River in Cass County, with assets of \$126.4 million as of June 30, 2019. The bank is wholly owned by Mascouten Bancorp, Inc., a one bank holding company with assets of \$126.4 million. Mascouten Bancorp, Inc. does not negatively affect the bank's ability to meet the credit needs of the community.

The CRA evaluation has one rating area for the one AA in West Central Illinois. The AA includes portions of Brown, Cass, Greene, Morgan, Pike, Schuyler, and Scott counties. Please refer to the public file for additional information.

The bank's three branches and four ATMs are located in Beardstown, Winchester, and Murrayville, Illinois. In 2016, one branch and one ATM were located in a moderate-income CT, while in 2017 and 2018, one ATM was located in a moderate-income CT. The decline in branches in moderate-income CTs was due to changes from the 2015 American Community Survey Census data, and not a change in branch locations. There have been no new or closed branches during the review period. All branch lobby and drive-through facilities offer Saturday banking services. Customers also have access to banking services through online and mobile platforms.

The bank's lending strategy is primarily focused on agriculture, but also offers additional lending products to meet the credit needs of its customers, including commercial, residential, and consumer loans products.

Agriculture lending represents the largest portfolio at \$46.9 million, followed by residential at \$15.6 million, commercial at \$12.0 million, and consumer at \$8.1 million, per Call Report data as of June 30, 2019. The bank originated or purchased over 2,800 loans from January 1, 2016, through December 31, 2018, per bank data.

FNB held a net loans and leases to total assets ratio of 64.6 percent and a tier 1 leverage capital ratio of 12.0 percent, at June 30, 2019.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AA.

The previous CRA rating, which the OCC determined using the Small Bank criterion, was Satisfactory, as detailed in the CRA Performance Evaluation (PE) dated August 25, 2014.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated FNB under the Small Bank criterion, which includes a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The evaluation period is from the previous CRA evaluation date of August 25, 2014, through August 5, 2019. The Lending Test evaluated loans originated or purchased from January 1, 2016, through December 31, 2018.

FNB's primary loan products are agriculture and consumer loans. Agriculture lending is a strategic focus and consumer lending represents a high volume of loan originations. These lending categories accounted for 86.0 percent of loans, by number, originated or purchased from January 1, 2016, to December 31, 2018. We used these lending products for the analysis of this evaluation.

We utilized random sampling to obtain data for agriculture loans, as well as consumer loans. We obtained the gross revenues of agriculture borrowers and gross income of consumer borrowers. We also geocoded each loan sampled. Performance conclusions for lending between January 1, 2016, and December 31, 2016, are based on 2010 US Census data. Performance conclusions for lending between January 1, 2017, and December 31, 2018, are based on 2015 American Community Survey data.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected 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) 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.

FNB operates entirely within the State of Illinois. We weighed the performance of agriculture lending more than consumer lending due to the strategic focus of the bank. We gave more weight to the borrower distribution than the geographic distribution due to the limited number of moderate-income CTs in the AA.

The MMSA rating and state ratings are based on performance in all bank 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.

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

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

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

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

## State Rating

### State of Illinois

**CRA rating for the State of Illinois:** Satisfactory.

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

The major factors that support this rating include:

- The borrower distribution of loans reflects reasonable penetration in the AA.
- The geographic distribution reflects excellent dispersion in the AA.

### Description of Institution's Operations in State of Illinois

FNB's operations are entirely within the State of Illinois.

Competition for deposits is low to moderate in and around Beardstown, Illinois. Competition for loans has been increasing, particularly for agriculture and consumer products, due to an increased number of lenders with reach into the bank's AA. The bank competes with national and state banks, farm institutions, credit unions, and non-bank lending companies.

In the counties comprising the AA, FNB held a 4.4 percent deposit market share and ranked eighth of 29 FDIC insured institutions competing for \$2.4 billion in deposits, as of June 30, 2018. The top five institutions accounted for 39.1 percent of the deposit market share.

The AA is primarily rural. There were no low-income CTs in the AA during the evaluation period. The number of moderate-income CTs declined from three in 2016, to two in 2017 and 2018. Opportunities for agriculture lending in moderate-income CTs is very limited as there were 10 farms in 2016 and 13 farms in 2017 and 2018, per demographic data.

Major employment sectors in the AA are centered on agriculture and agriculture services. Additional large employment sectors include a large pork processing plant, health care services, and retail services.

Unemployment rates for two of the seven counties were below five percent and compared favorably to the State of Illinois at 5.8 percent in 2016, annualized. Elevated unemployment rates in 2016 may have limited lending opportunities. Unemployment rates in the counties declined in 2018 with six of the seven counties below five percent, annualized, which may have provided lending opportunities.

Higher rates of household poverty in 2016 may have limited opportunities for lending particularly to low-income households. The rate of household poverty declined in 2017 and 2018, which may have provided lending opportunities.

We conducted two community contact interviews for the full-scope AA. We contacted representatives of an economic development group and a not-for-profit organization that seeks to benefit farmers in the community. Both contacts identified the economic condition of the area to be stable and largely dependent on agriculture. One contact noted there to be a negatively trending outlook for farmers due to

trade tariff tensions. The contacts described the agriculture base as predominately involved in the production of corn and soybeans on large family farms and, to a much lesser extent, produce products.

The contacts spoke on the need to diversify the local economy with small businesses and need for assistance in helping small businesses and first generation farmers understand the types of financing opportunities that may be available to them. A contact also spoke on the need for better housing taking the form of rehabbing poor quality housing, more affordable housing, and increase in housing units to attract and retain workers. Additional needs were identified for financial literacy for individuals about to enter the workforce and college.

The contacts noted FNB Beardstown is generally receptive in participating in community projects and local events.

The contacts did not have any negative perceptions of FNB Beardstown.

## Non-MSA Illinois AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB Beardstown 2010 U.S. Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	21.4	71.4	7.1	0.0
Population by Geography	37,937	0.0	18.8	73.0	8.2	0.0
Housing Units by Geography	17,008	0.0	18.7	74.0	7.4	0.0
Owner-Occupied Units by Geography	11,251	0.0	15.4	75.4	9.2	0.0
Occupied Rental Units by Geography	3,318	0.0	32.5	63.9	3.5	0.0
Vacant Units by Geography	2,439	0.0	15.1	80.9	4.0	0.0
Businesses by Geography	1,392	0.0	17.0	75.2	7.8	0.0
Farms by Geography	379	0.0	2.6	91.0	6.3	0.0
Family Distribution by Income Level	10,376	20.0	18.5	21.9	39.6	0.0
Household Distribution by Income Level	14,569	21.7	18.0	17.0	43.3	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$79,583
			Median Gross Rent			\$567
			Families Below Poverty Level			10.8%
			Households Below Poverty Level			13.5%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						



<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNB Beardstown 2015 ACS Census</b>						
<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)	14	0.0	14.3	71.4	14.3	0.0
Population by Geography	36,774	0.0	11.9	72.2	15.9	0.0
Housing Units by Geography	17,223	0.0	12.0	72.1	15.9	0.0
Owner-Occupied Units by Geography	11,452	0.0	10.1	73.1	16.7	0.0
Occupied Rental Units by Geography	3,390	0.0	18.1	67.5	14.4	0.0
Vacant Units by Geography	2,381	0.0	12.4	73.5	14.1	0.0
Businesses by Geography	1,361	0.0	8.4	79.0	12.6	0.0
Farms by Geography	334	0.0	3.9	80.5	15.6	0.0
Family Distribution by Income Level	10,001	20.8	18.4	21.1	39.7	0.0
Household Distribution by Income Level	14,842	22.1	17.1	17.8	42.9	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$81,714
			Median Gross Rent			\$591
			Families Below Poverty Level			9.8%
			Households Below Poverty Level			12.4%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## **Scope of Evaluation in State of Illinois**

FNB's one AA received a full scope review.

## **LENDING TEST**

The bank's performance under the Lending Test in the State of Illinois is rated Satisfactory.

Based on full-scope review, the bank's lending performance in the State of Illinois is reasonable.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the AA. This analysis is based solely on the performance of consumer lending in moderate-income geographies.

### ***Small Loans to Farms***

For 2016, and 2017 and 2018, the analysis did not result in a meaningful analysis, as there were no low-income CTs and too few farms in the moderate-income CTs, per demographic data.

### ***Consumer Loans***

Refer to Table U in the State of Illinois 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 distribution of consumer loans reflects excellent penetration.

For 2016, the distribution of consumer loans was excellent. The proportion of lending to moderate-income households exceeded the percentage of moderate-income households in the AA. There were no low-income CTs in the AA.

For 2017 and 2018, the distribution of consumer loans was excellent. The proportion of lending in moderate-income CTs significantly exceeded the number of households in moderate-income CTs in the AA. There were no low-income CTs in the AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits reasonable distribution of loans to individuals of different income levels and farms of different sizes, given the product lines offered by the bank.

### ***Small Loans to Farms***

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

The distribution of farm loans reflects reasonable penetration in the AA.

For 2016, the distribution of farms loans reflected reasonable penetration to farms of different sizes. The proportion of lending to farms in the AA was near to the percentage of small farms in the AA and was slightly weaker than the aggregate distribution.

For 2017 and 2018, the distribution of farm loans reflected reasonable penetration to farms of different sizes. The proportion of lending to farms was near to the percentage of small farms in the AA and weaker than the aggregate distribution.

### ***Consumer Loans***

Refer to Table V in the State of Illinois 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 distribution of consumer loans reflects excellent penetration in the AA.

For 2016, the distribution of consumer loans reflected excellent penetration to households of different incomes. The proportion of lending to both low- and moderate-income households exceeded the percentage of both low- and moderate-income households in the AA.

For 2017 and 2018, the distribution of consumer loans reflected excellent penetration to households of different incomes. The proportion of lending to both low- and moderate-income households exceeded the percentage of both low- and moderate-income households in the AA.

### **Responses to Complaints**

FNB did not receive any complaints about its performance in helping to meet the credit needs of its AA during the 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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	Lending Test - January 1, 2016 to December 31, 2018	
<b>Bank Products Reviewed:</b>	Farm loans, Consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Illinois</b>		
Non-MSA AA	Full-scope	Portions of Cass, Brown, Greene, Morgan, Pike, Schuyler, and Scott county.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	First National Bank of Beardstown
Overall Bank:	Lending Test Rating
FNB of Beardstown	Satisfactory
MMSA or State:	
State of Illinois	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low-Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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

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

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

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

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

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

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

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

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

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

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



**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2016</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Non-MSA	20	3,854	100	272	98.2	75.0	77.2	1.1	25.0	0.8	0.0
<i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data Sample; 2016 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>											

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2017-2018</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Non-MSA	32	8,057	100	337	98.2	71.9	76.9	1.2	28.1	0.6	0.0
<i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data Sample; 2017 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>											

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2016</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA	21	282	100	0.0	0.0	19.3	47.6	72.8	47.6	7.9	4.8	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data Sample.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2017-2018</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA	28	253	100	0.0	0.0	12.0	35.7	71.8	57.1	16.2	7.1	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data Sample.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2016</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA	21	282	100	21.7	42.9	18.0	23.8	17.0	23.8	43.3	9.5	0.0	0.0	
<i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data Sample.                      Due to rounding, totals may not equal 100.0</i>														

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2017-2018</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Non-MSA	28	253	100	22.1	32.1	17.1	25.0	17.8	28.6	42.9	14.3	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data Sample.                      Due to rounding, totals may not equal 100.0</i>														