



## **PUBLIC DISCLOSURE**

May 13, 2019

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

First Community National Bank  
Charter Number 17694

407 N Franklin  
Cuba, MO 65453

Office of the Comptroller of the Currency  
500 N. Broadway St. Suite 1700  
St. Louis, MO 63102

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

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## Overall CRA Rating

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

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

The Lending Test rating is based on First Community National Bank's (FCNB or bank) performance in the state of Missouri. The major factors that support this rating include:

- FCNB's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A substantial majority of the bank's loans are inside its assessment areas (AAs).
- The bank has an excellent distribution of loans to individuals of different income levels throughout its AAs.
- The bank has an excellent distribution of loans across geographies of different income levels throughout its AAs.

### Loan-to-Deposit Ratio

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

As of December 31, 2018, the bank's LTD ratio was 57.9 percent. FCNB's average LTD ratio over the evaluation period of 23 quarters was 76 percent. Over the same evaluation period, the bank's LTD ratio ranged from a low of 57.9 percent to a high of 84.7 percent. When reviewing FCNB's LTD ratio over the evaluation period, we considered the number of fixed-rate home mortgage loans originated and subsequently sold out of the bank's loan portfolio into the secondary loan market.

We analyzed the LTD ratio of six similarly situated institutions based on a combination of their size, location, and lending opportunities. These institutions ranged in size from \$117.7 million to \$197.3 million, with a combined average LTD ratio of 81.5 percent over the same evaluation period. The lowest individual average was 59.4 percent, while the highest individual average was 105.8 percent. FCNB ranked fifth out of seven when comparing the average LTD ratios. The table below lists the similarly situated institutions (including FCNB) with the corresponding average LTD ratios.

Institution	Total Assets (\$000s) as of 12/31/2018	Average Quarterly LTD Ratio
Fortune Bank	\$193,459	94.1%
Meramec Valley Bank	\$117,691	86.5%
Farmers and Merchants Bank of St. Clair	\$191,723	86.2%
Bank Star	\$137,858	80.9%
<b>First Community National Bank</b>	<b>\$127,192</b>	<b>76.0%</b>
Citizens Bank of Newburg	\$149,826	74.3%
Commercial Bank	\$197,330	66.7%

*Source: Quarterly Call Reports from June 30, 2013 to December 31, 2018.  
Note: The LTD ratio was calculated and evaluated on a bank-wide basis.*

## Lending in Assessment Area

A substantial majority of FCNB's loans are inside its (AAs).

The bank originated and purchased 83.4 percent of its total loans inside the bank's AAs during the evaluation period. This ratio is a bank-wide calculation and not calculated by individual rating area or AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2016	75	79.8	19	20.2	94	7,577	77.4	2,213	22.6	9,790
2017	40	85.1	7	14.9	47	2,173	67.9	1,027	32.1	3,200
2018	12	85.7	2	14.3	14	1,020	88.9	127	11.1	1,146
<b>Subtotal</b>	<b>127</b>	<b>81.9</b>	<b>28</b>	<b>18.1</b>	<b>155</b>	<b>10,770</b>	<b>76.2</b>	<b>3,367</b>	<b>23.8</b>	<b>14,136</b>
Consumer	19	95.0	1	5.0	20	211	95.5	10	4.5	221
<b>Total</b>	<b>146</b>	<b>83.4</b>	<b>29</b>	<b>16.6</b>	<b>175</b>	<b>10,981</b>	<b>76.5</b>	<b>3,377</b>	<b>23.5</b>	<b>14,357</b>
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data            Due to rounding, totals may not equal 100.0</i>										

## Description of Institution

FCNB is an intrastate bank headquartered in Cuba, Missouri, and wholly owned by Steelville Community Banc-Shares, Inc. (SCB), a one-bank holding company headquartered in Steelville, Missouri. As of December 31, 2018, SCB had total assets of approximately \$11 million. FCNB operates two subsidiaries, including FCNB Insurance Services, Inc. and FCNB Investments; however, these were not included in this evaluation.

The bank currently operates six branch offices and six deposit-taking automated teller machines (ATMs) located in the following cities in Missouri: Cuba, Eureka, Rolla, Steelville, and Sullivan. FCNB closed two branches during the evaluation period: one located in Viburnum, Missouri (April 2017) and one in Vienna, Missouri (August 2017). The bank did not open any new branches or engage in any acquisition or merger activities during the evaluation period.

As of December 31, 2018, the bank had total assets of \$127.2 million, total deposits of \$115.7 million, and Tier 1 Capital of \$11.4 million, or 13.1 percent of total risk weighted assets. FCNB's net loans and leases totaled \$67 million, representing 52.6 percent of total assets. Loan portfolio composition as of December 31, 2018, includes the following:

<b>Loan Type</b>	<b>Dollars (000)</b>	<b>Percentage of Loan Portfolio</b>
Residential Loans	\$32,425	46.2%
Commercial Loans	\$27,262	38.8%
Agriculture Loans	\$7,486	10.7%
Consumer Loans	\$2,961	4.2%
Other Loans	\$49	<1.0%
<b>Total Loans</b>	<b>\$70,183</b>	<b>100%</b>
<i>Source: 12/31/2018 FFIEC Call Report</i>		

FCNB is a full-service financial institution that offers a comprehensive array of banking, investment, mortgage, insurance, and cash management products and services to consumers and commercial enterprises of all sizes. The bank's primary focus is retail banking with an emphasis on home mortgage and small dollar consumer lending.

FCNB competes with many national banks, state banks, and credit unions for deposit market share. The bank offers a variety of deposit products to businesses and consumers. Deposit products consist of checking (including a Fresh Start<sup>1</sup> account), savings, and money market deposit accounts, certificates of deposit, and other time deposits. The bank offers additional retail services including check cashing, direct deposit, overdraft protection, online bill payment and funds transfer, mobile banking, and telephone banking.

Consumer loan products include conventional mortgages, home equity loans, lines of credit, personal loans, and automobile loans. Business loan products include term loans, lines of credit, government guaranteed loans, and loans for equipment leases.

FCNB is currently operating under a formal agreement (FA) entered into with the Office of the Comptroller of the Currency (OCC) on January 20, 2016. Under the FA, the bank's total assets have decreased from \$203 million at March 31, 2016, to \$127.2 million as of December 31, 2018. While a reduction in lending activity was the primary driver for the decrease in total assets, it has not impeded the bank's ability during the evaluation period to help meet credit needs in its AAs. FCNB's CRA performance was rated "Satisfactory" in the last public evaluation dated April 23, 2013.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The scope of this evaluation includes an assessment of FCNB under the Small Bank performance criteria, which consists only of a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities.

The evaluation period for this examination is from April 24, 2013 to December 31, 2018. For the Lending Test, we determined that loan data from January 1, 2016 to December 31, 2018 was representative of the evaluation period.

<sup>1</sup> Fresh Start Checking provides consumers with an opportunity to qualify for and open a traditional checking account, even if the consumer has negative banking history with FCNB or another financial institution.

Based on discussions with bank management and our review of all loan originations and purchases from January 1, 2016 to December 31, 2018, we determined the bank’s primary lending products are home mortgage loans and consumer loans. Please refer to the following table for a summary of loan originations by loan type during the evaluation period:

<b>Loan Originations by Loan Type from January 1, 2016 through December 31, 2018</b>				
<b>Loan Category</b>	<b>Dollars (000s)</b>	<b>% of Dollars</b>	<b>Number of Loans</b>	<b>% of Number of Loans</b>
<b>Home Mortgage Loans</b>	<b>\$14,136</b>	<b>45.4%</b>	155	28.1%
Business Loans	\$10,808	34.7%	79	14.3%
<b>Consumer Loans</b>	<b>\$3,174</b>	<b>10.2%</b>	<b>302</b>	<b>54.8%</b>
Farm Loans	\$3,011	9.7%	15	2.7%
<b>Total Originations</b>	<b>\$31,129</b>	<b>100%</b>	<b>551</b>	<b>100%</b>
<i>Source: Bank Records January 1, 2016 – December 31, 2018</i>				

For CRA purposes, FCNB has identified two AAs in the state of Missouri, the Missouri Non-MSA and the St. Louis MO-IL (St. Louis) MSA.

To evaluate lending performance, we reviewed the bank submitted Home Mortgage Disclosure Act (HMDA) data for each of the bank’s AAs from 2016, 2017, and 2018 for home mortgage loans. Additionally, from each of the bank’s AAs, where possible, we selected a random sample of consumer loans originated during the same period (20 loans originated in 2016 and 20 loans originated during the period of 2017-2018). Refer to the “Scope” section under State Rating for further detail.

We completed two separate analyses of the bank’s lending performance. For FCNB’s performance in 2016, we used the comparators of demographic data from the 2010 United States (U.S.) Census and 2016 HMDA peer aggregate data. For the lending performance in 2017-2018, we used the comparators of demographic data from the 2015 American Community Survey (ACS) U.S. Census and 2017 HMDA peer aggregate data. The 2015 ACS provided an update to median family income, changing the income designation of some census tracts (CTs) in the AAs in 2017.

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

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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. Full-scope reviews consider quantitative and qualitative factors, as well as performance context factors. Limited-scope reviews consider quantitative factors only. Refer to the “Scope” section under State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A for a list of full- and limited-scope AAs.

### **Ratings**

The bank’s overall rating is based solely on its performance in the state of Missouri. The state of Missouri rating is derived from the bank’s performance under the CRA Small Bank Lending Test as well as related performance context information from the bank’s Non-MSA and St. Louis MO-IL MSA.

With the exception of the bank's LTD ratio (based on the bank's entire lending portfolio), all weight for performance under the CRA Small Bank Lending Test was based on the bank's lending performance in relation to its primary products of home mortgage loans and consumer loans in each of its AAs.

## **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 Missouri**

**CRA rating for the State of Missouri:** Outstanding

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- FCNB's LTD ratio is reasonable given the bank's size, financial condition, and level of local competition.
- A substantial majority of the bank's loans are inside its AA.
- The bank has an excellent distribution of loans to individuals of different income levels throughout its AA.
- The bank has an excellent distribution of loans across geographies of different income levels throughout its AA.

### **Description of Institution's Operations in Missouri**

FCNB's operations consisted of two AAs in the state of Missouri, the Missouri Non-MSA and the St. Louis MO-IL (St. Louis) MSA. At the beginning of the evaluation period, the Missouri Non-MSA was comprised of the counties of Crawford, Maries, and Phelps, and the northwest portion of Iron County (CT 9501). On April 28, 2017, the bank closed its branch located in Viburnum, Missouri and removed Iron County from the AA. Subsequently, on August 11, 2017, the bank closed its branch in Vienna, Missouri and removed Maries County from the AA. There were no other changes to the Missouri Non-MSA for the remainder of the evaluation period. The St. Louis MSA is comprised of southern Franklin County (CTs 8005, 8010, 8011.01, and 8011.02), the northwest corner of Jefferson County (CT 7004.02), and the southwest corner of St. Louis County (CTs 2215.02 and 2215.03). The bank's AAs meet the requirements of the regulation and do not arbitrarily exclude low- or moderate-income geographies.

### **Community Contacts**

We contacted a community-based development organization that serves several of the counties located in the bank's AA. The contact identified affordable housing and small business development and lending as the primary needs in the local communities.

**Missouri Non-MSA**

Demographic Information of the Assessment Area						
2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	15.0	70.0	15.0	0.0
Population by Geography	81,869	0.0	16.3	68.0	15.7	0.0
Housing Units by Geography	37,170	0.0	13.6	71.8	14.6	0.0
Owner-Occupied Units by Geography	21,941	0.0	9.0	72.7	18.4	0.0
Occupied Rental Units by Geography	9,063	0.0	26.7	64.1	9.2	0.0
Vacant Units by Geography	6,166	0.0	10.8	80.3	8.9	0.0
Businesses by Geography	4,377	0.0	27.1	58.4	14.5	0.0
Farms by Geography	248	0.0	6.9	79.0	14.1	0.0
Family Distribution by Income Level	20,393	18.1	16.9	22.8	42.2	0.0
Household Distribution by Income Level	31,004	22.3	17.4	17.1	43.2	0.0
Median Family Income Non-MSAs - MO		\$45,746	Median Housing Value			\$108,566
			Median Gross Rent			\$564
			Families Below Poverty Level			10.9%
<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>						

Demographic Information of the Assessment Area						
Assessment Area: Missouri Non-MSA 2017-2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	0.0	5.0	75.0	20.0	0.0
Population by Geography	81,685	0.0	6.7	72.6	20.7	0.0
Housing Units by Geography	37,592	0.0	5.6	74.7	19.8	0.0
Owner-Occupied Units by Geography	20,543	0.0	2.2	75.7	22.1	0.0
Occupied Rental Units by Geography	10,233	0.0	11.5	70.8	17.7	0.0
Vacant Units by Geography	6,816	0.0	6.7	77.6	15.7	0.0
Businesses by Geography	4,437	0.0	7.3	64.3	28.3	0.0
Farms by Geography	262	0.0	2.3	76.0	21.8	0.0
Family Distribution by Income Level	19,940	18.8	18.0	20.6	42.6	0.0
Household Distribution by Income Level	30,776	23.3	15.5	18.1	43.1	0.0
Median Family Income Non-MSAs - MO		\$48,553	Median Housing Value			\$110,857
			Median Gross Rent			\$623
			Families Below Poverty Level			14.1%
<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>						

As of June 30, 2018, FCNB reported \$92.7 million in deposits in the Non-MSA, representing 70.6 of the bank's total deposits. The bank made 75.5 percent of its total evaluation period HMDA loans in the AA. According to FDIC market share information as of June 30, 2018, FCNB ranked 8<sup>th</sup> in deposit market share in the AA with a market share of 6.1 percent. The AA is very competitive with 15 other deposit-taking institutions operating 36 branches. Primary competitors include Phelps County Bank, which ranked first in deposit market share (21.8 percent) with four offices, The Maries County Bank, which ranked second in deposit market share (12.4 percent) with five offices, and Town & Country Bank, which ranked third in deposit market share (10.3 percent) with four offices.

FCNB provides a full-range of loan and deposit products and services in the AA through four full-service branches; one is located in a moderate-income CT, two are located in middle-income CTs, and one is located in an upper-income CT.

The 2010 U.S. Census recorded 20 CTs in the AA, consisting of three (15 percent) moderate-income tracts, 14 (70 percent) middle-income tracts, and three (15 percent) upper-income tracts. According to the 2010 census data, the area population was 81,869, with 13,345 (16.3 percent) residing in moderate-income CTs and the other 68,524 (83.7 percent) residing across the middle- and upper-income CTs of the AA.

The 2015 ACS Census recorded 20 CTs in the AA, consisting of one (five percent) moderate-income tract, 15 (75 percent) middle-income tracts, and four (20 percent) upper-income tracts. The population was slightly down from the 2010 census at 81,685 with 5,473 or 6.7 percent residing in moderate-income census tracts.

There were 19,940 families in the AA. The distribution of families by income level was 3,749 (18.8 percent) low-income, 3,589 (18 percent) moderate-income, 4,108 (20.6 percent) middle-income, and 8,494 (42.6 percent) upper-income. The percentage of households in the AA living below the poverty level was 14.1 percent.

The 2018 FFIEC adjusted median family income for the AA was \$53,100, up from \$48,200 in 2016. Low-income families earned annual income of \$26,550 or less, and moderate-income families earned annual income of \$26,550 to \$42,480.

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>MO Non-MSA Median Family Income (99999)</b>				
2016 (\$48,200)	<\$24,100	\$24,100 to <\$38,560	\$38,560 to <\$57,840	≥\$57,840
2017 (\$50,800)	<\$25,400	\$25,400 to <\$40,640	\$40,640 to <\$60,960	≥\$60,960
2018 (\$53,100)	<\$26,550	\$26,550 to <\$42,480	\$42,480 to <\$63,720	≥\$63,720
<i>Source FFIEC</i>				

## **Employment Factors**

According to the U.S. Department of Labor, Bureau of Labor Statistics (BLS) report, the unemployment rate across the AA ranged from a high of 7.2 percent in 2016 to a low of 3.1 percent in 2018. The

unemployment rate for the state of Missouri ranged from a high of 4.6 percent in 2016 to a low of 3.2 percent in 2018, slightly better than the national unemployment rate over the same period.

<b>Annual Unemployment Rates 2016-2018</b>			
<b>Area</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Crawford County	5.4%	4.6%	3.9%
Iron County	7.2%	6.4%	5.4%
Maries County	5.1%	4.3%	3.3%
Phelps County	4.8%	3.7%	3.1%
State of Missouri	4.6%	3.8%	3.2%
National	4.9%	4.4%	3.9%

*Source: U.S. Department of Labor; Bureau of Labor Statistics. Rates are not seasonally adjusted.*

### **Housing Characteristics**

The 2010 U.S. Census reported total housing units of 37,170 in the AA. Of the total number of housing units, 21,941 or 59 percent were owner-occupied, 9,063 or 24.4 percent were renter-occupied, and 6,166 or 16.6 percent were vacant. There were no housing units located in low-income CTs. Nine percent (1,975) of owner-occupied units, 26.7 percent (2,420) of occupied rental units, and 10.8 percent (666) of vacant units, were located in moderate-income CTs, respectively. Additionally, 3,727 or 12.5 percent of all single family (1-4 units) homes and 814 or 44.9 percent of all multifamily housing units were located in moderate-income CTs. The 2010 U.S. Census indicates that the weighted average median housing value was \$108,566 and the weighted average monthly gross rent was \$564.

The 2015 ACS Census reported total housing units of 37,592 in the AA. Of the total number of housing units, 20,543 or 54.6 percent were owner-occupied, 10,233 or 27.2 percent were renter-occupied, and 6,816 or 18.1 percent were vacant. Of all owner occupied units, 1,975 or nine percent were located in moderate-income CTs. There were no housing units located in low-income CTs. 2.2 percent (452) of owner-occupied units, 11.5 percent (1,177) of occupied rental units, and 6.7 percent (457) of vacant units, were located in moderate-income CTs, respectively. Additionally, 1,149 or 3.8 percent of all single family (1-4 units) homes and 719 or 32.6 percent of all multifamily housing units were located in moderate-income CTs. The 2015 U.S. Census indicates that the weighted average median housing value was \$110,857 and the weighted average monthly gross rent was \$623.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$26,550 per year (or less than 50 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$123,644 mortgage with a payment of \$664 per month. A moderate-income borrower making \$42,480 per year (or less than 80 percent of the 2018 FFIEC adjusted median family income in the AA) could afford a \$197,831 mortgage with a payment of \$1,062 per month. According to Realtor.com data, the median housing value in the AA was \$111,950 and \$143,750 in 2016 and 2018, reflecting a percent change of 28.4 percent from 2016 to 2018. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$772.

## **Economic Conditions**

According to Moody's Analytics, *Missouri is on pace to churn out slightly more jobs this year than in 2018 and for the unemployment rate to hold near its current level of 3% as labor force growth accelerates. The factory sector will cool, but risks are weighted toward a stronger outcome for jobs in the short run. Longer term, below-average demographics and a reliance on manufacturing will cement MO as a national underperformer.* The top five employment sectors in the AA are Services, Retail Trade, Construction, Finance, Insurance and Real Estate, and Agriculture, Forestry and Fishing. The top employers in the AA include Missouri University of Science and Technology, Phelps County Regional Medical Center, Kingsford Manufacturing, The Doe Run Company, Diamond Pet Foods, and Paramount Apparel.

## **St. Louis MSA**

As of June 30, 2018, FCNB reported \$38.6 million in deposits in the St. Louis MSA, representing 29.4 percent of the bank's total deposits. The bank made 6.5 percent of its total evaluation period HMDA loans in the AA. According to FDIC market share information as of June 30, 2018, FCNB ranked 50<sup>th</sup> in deposit market share in the AA with a minimal market share of 0.1 percent. The AA is highly competitive with 65 other deposit-taking institutions operating 415 branches. The largest competitors in the AA include U.S. Bank, NA, which ranked first in deposit market share (14.8 percent) with 62 offices, Bank of America, NA, which ranked second in deposit market share (14.7 percent) with 29 offices, and Commerce Bank, which ranked third in deposit market share (13.2 percent) with 29 offices.

FCNB provides a full-range of loan and deposit products and services in the AA through two full-service branches; one is located in a moderate-income CT and one is located in an upper-income CT.

## **Scope of Evaluation in Missouri**

The Missouri Non-MSA was selected for analysis using full-scope procedures because the AA had the largest proportion of the bank's deposits (70.6 percent), HMDA loans (75.5 percent), and branches (75 percent prior to the Vienna and Viburnum branch closings and 66.7 percent after) within the rating area.

The St. Louis MSA was selected for a limited-scope review due to the bank's limited presence in the AA.

Refer to Appendix A for more information.

## **LENDING TEST**

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

Based on full-scope and limited-scope reviews, the bank's lending performance in the state of Missouri is excellent.

There was no analysis of geographic distribution or borrower distribution conducted in the St. Louis MSA for home mortgage loans in 2016 or 2017-2018, nor for consumer loans in 2016. In both cases, the bank did not originate enough loans for a meaningful analysis.

In evaluating the borrower distribution of home mortgage loans in the Missouri Non-MSA, we noted the number of families with incomes below the poverty level was 10.9 percent in 2016 and rose to 14.1 percent in 2018. People living in poverty, including LMI families, often have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs.

To provide some additional perspective, for 2016, 11 of 20 CTs that make up the AA were middle-income CTs distressed for poverty, for 2017, 11 of the 20 CTs remained distressed, and for 2018, one CT remained distressed. For a middle-income CT to receive a designation of distressed for poverty, the poverty rate for that CT must be at 20 percent or higher. While our focus is primarily on lending performance to LMI families and to LMI geographies, the bank's level of lending within the AA middle-income CTs distressed for poverty during the evaluation period was notable. For 2016, the bank originated 68 home mortgage loans in the AA totaling \$6.1 million in 2016, of which 56 loans (82.4 percent) totaling \$3.4 million (55.7 percent) were in the distressed middle-income CTs. For 2017-2018, the bank originated 49 home mortgage loans in the AA totaling \$2.9 million, of which 37 loans (75.5 percent) totaling \$1.8 million (62.1 percent) were in the distressed middle-income CTs.

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

The bank exhibits excellent geographic distribution of loans in the Missouri Non-MSA.

#### ***Home Mortgage Loans***

Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

#### **2016**

Geographic distribution of home mortgage loans in 2016 was excellent. FCNB originated 11.8 percent of its home mortgage loans in moderate-income CTs, which is above the percentage of owner-occupied housing units located in moderate-income CTs (9 percent) and the 2016 HMDA aggregate data for lending in the same moderate-income CTs (9.5 percent).

#### **2017-2018**

Geographic distribution of home mortgage loans in 2017-2018 was excellent. Due to the 2015 ACS updates, the number of moderate-income CTs reduced from three down to one, while the level of competition in the AA remained relatively the same. FCNB originated two percent of its home mortgage loans in the one remaining moderate-income CT, compared to the percentage of owner-occupied housing units at 2.2 percent. The bank's performance was favorable to the 2017 HMDA aggregate lending level of 1.5 percent.

#### ***Consumer Loans***

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

2016

Geographic distribution of consumer loans in 2016 was reasonable. FCNB originated 10 percent of its consumer loans in moderate-income CTs, which falls below the percentage of households located in moderate-income CTs (14.2 percent). Consideration was given for the additional competition the bank faces from payday lenders throughout the AA.

2017-2018

Geographic distribution of consumer loans in 2017-2018 was reasonable. Due to the 2015 ACS updates, the number of moderate-income CTs reduced from three down to one, while the level of competition in the AA remained relatively the same. FCNB originated five percent of its consumer loans in the one remaining moderate-income CT, compared to the percentage of households at 5.3 percent.

***Lending Gap Analysis***

We reviewed summary reports and maps, and analyzed FCNB's home mortgage and consumer lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

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

***Home Mortgage Loans***

Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

2016

The borrower distribution of FCNB's home mortgage loans for the 2016 evaluation period is excellent. The bank originated 10.3 percent of its home mortgage loans to low-income borrowers. While the bank's percentage is well below the percentage of low-income families (18.1 percent) in the AA, the bank's percentage significantly exceeds the 2016 HMDA aggregate data for home mortgage lending to low-income families in the same AA (5.6 percent).

The bank originated 17.6 percent of its home mortgage loans to moderate-income borrowers. This exceeds both the percentage of moderate-income families (16.9 percent) in the AA and the 2016 HMDA aggregate data for home mortgage lending to moderate-income families in the same AA (13.9 percent).

2017-2018

The borrower distribution of FCNB's home mortgage loans for the 2017-2018 evaluation period is excellent. The bank originated 16.3 percent of its home mortgage loans to low-income borrowers. While the bank's percentage is slightly below the percentage of low-income families (18.8 percent) in the AA, the bank's percentage significantly exceeds the 2017 HMDA aggregate data for home mortgage lending to low-income families (7.8 percent).

The bank originated 26.5 percent of its home mortgage loans to moderate-income borrowers. This significantly exceeds both the percentage of moderate-income families (18 percent) in the AA and the 2017 HMDA aggregate data for home mortgage lending to moderate-income families in the same AA (18.7 percent).

### ***Consumer Loans***

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

#### 2016

The borrower distribution of FCNB's consumer loans for the 2016 evaluation period is excellent. The bank originated 30 percent of its consumer loans to low-income borrowers. This significantly exceeds the percentage of low-income households (22.3 percent) in the AA.

The bank originated 25 percent of its consumer loans to moderate-income borrowers. This significantly exceeds the percentage of moderate-income households (17.4 percent) in the AA.

#### 2017-2018

The borrower distribution of FCNB's consumer loans for the 2017-2018 evaluation period is excellent. The bank originated 25 percent of its consumer loans to low-income borrowers. This exceeds the percentage of low-income households (23.3 percent) in the AA.

The bank originated 45 percent of its consumer loans to moderate-income borrowers. This significantly exceeds the percentage of moderate-income households (15.5 percent) in the AA.

### **Responses to Complaints**

During the evaluation period, FCNB did not receive any complaints regarding its CRA performance.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the 2017-2018 consumer loan portion of the Lending Test in the St. Louis MSA was consistent with the bank's overall performance under the Lending Test in the full scope area. Performance under the 2016 and 2017-2018 home mortgage loan and the 2016 consumer loan portions of the Lending Test were not reviewed due to the number of bank loans being below the threshold for analysis, and did not have any impact on conclusions about the bank's performance in the state.

## 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>	01/01/16 to 12/31/18	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans, Consumer Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable	Not Applicable	Not Applicable
<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>Missouri</b>		
Missouri Non-MSA	Full-scope	Crawford County: CTs 4501.01, 4501.02, 4502, 4503.01, 4503.02 Iron County: CT 9501 Maries County: CTs 8801, 8803, 8802.98 Phelps County: CTs 8901-8910
St. Louis MO-IL MSA	Limited-scope	Franklin County: CTs 8005, 8010, 8011.01, 8011.02 Jefferson County: CT 7004.02 St. Louis County: CTs 2215.02, 2215.03

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS: First Community National Bank (FCNB)</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
FCNB	Outstanding
<b>State:</b>	
Missouri	Outstanding

## 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 O. 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 P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. 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** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2016</b>
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	
Missouri Non-MSA	68	6,086	90.7	1,649	0.0	0.0	0.0	9.0	11.8	9.5	72.7	85.3	69.9	18.4	2.9	20.6	0.0	0.0	0.0	
St. Louis MSA	7	1,491	9.3	1,850	0.0	0.0	0.0	22.3	28.6	9.9	32.2	14.3	20.4	45.5	57.1	69.7	0.0	0.0	0.0	
<b>Total</b>	<b>75</b>	<b>7,577</b>	<b>100.0</b>	<b>3,499</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>13.5</b>	<b>13.3</b>	<b>9.7</b>	<b>58.9</b>	<b>78.7</b>	<b>43.7</b>	<b>27.6</b>	<b>8.0</b>	<b>46.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2017-18</b>
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	
Missouri Non-MSA	49	2,874	94.2	1,237	0.0	0.0	0.0	2.2	2.0	1.5	75.7	98.0	78.0	22.1	0.0	20.5	0.0	0.0	0.0	
St. Louis MSA	3	319	7.5	1,554	0.0	0.0	0.0	8.2	0.0	7.7	41.9	33.3	29.8	49.8	66.7	62.5	0.0	0.0	0.0	
<b>Total</b>	<b>52</b>	<b>3,193</b>	<b>100.0</b>	<b>2,791</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>4.4</b>	<b>1.9</b>	<b>5.0</b>	<b>63.8</b>	<b>94.2</b>	<b>51.2</b>	<b>31.9</b>	<b>3.8</b>	<b>43.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Missouri Non-MSA	68	6,086	90.7	1,649	18.1	10.3	5.6	16.9	17.6	13.9	22.8	19.1	19.0	42.2	32.4	42.8	0.0	20.6	18.6
St. Louis MSA	7	1,491	9.3	1,850	17.6	0.0	4.9	15.7	14.3	13.5	21.4	28.6	16.8	45.2	28.6	44.9	0.0	28.6	20.0
<b>Total</b>	<b>75</b>	<b>7,577</b>	<b>100.0</b>	<b>3,499</b>	<b>18.0</b>	<b>9.3</b>	<b>5.2</b>	<b>16.5</b>	<b>17.3</b>	<b>13.7</b>	<b>22.4</b>	<b>20.0</b>	<b>17.8</b>	<b>43.2</b>	<b>32.0</b>	<b>43.9</b>	<b>0.0</b>	<b>21.3</b>	<b>19.3</b>

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2017-18**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Missouri Non-MSA	49	2,874	94.2	1,237	18.8	16.3	7.8	18.0	26.5	18.7	20.6	20.4	19.7	42.6	34.7	35.0	0.0	2.0	18.8
St. Louis MSA	3	319	7.5	1,554	17.5	0.0	7.7	19.4	33.3	16.7	19.4	0.0	19.9	43.7	0.0	37.8	0.0	66.7	18.0
<b>Total</b>	<b>52</b>	<b>3,193</b>	<b>100.0</b>	<b>2,791</b>	<b>18.4</b>	<b>15.4</b>	<b>7.7</b>	<b>18.4</b>	<b>26.9</b>	<b>17.6</b>	<b>20.2</b>	<b>19.2</b>	<b>19.8</b>	<b>43.0</b>	<b>32.7</b>	<b>36.5</b>	<b>0.0</b>	<b>5.8</b>	<b>18.3</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Missouri Non-MSA	20	278	74.1	0.0	0.0	14.2	10.0	70.1	85.0	15.7	5.0	0.0	0.0
St. Louis MSA	7	79	25.9	0.0	0.0	26.0	28.6	32.6	28.6	41.4	42.9	0.0	0.0
<b>Total</b>	<b>27</b>	<b>357</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>17.7</b>	<b>14.8</b>	<b>58.9</b>	<b>70.4</b>	<b>23.4</b>	<b>14.8</b>	<b>0.0</b>	<b>0.0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2017-18**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Missouri Non-MSA	20	218	50.0	0.0	0.0	5.3	5.0	74.1	90.0	20.6	5.0	0.0	0.0
St. Louis MSA	20	156	50.0	0.0	0.0	13.8	15.0	40.6	80.0	45.6	5.0	0.0	0.0
<b>Total</b>	<b>40</b>	<b>374</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>7.9</b>	<b>10.0</b>	<b>63.7</b>	<b>85.0</b>	<b>28.4</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Missouri Non-MSA	20	278	74.1	22.3	30.0	17.4	25.0	17.1	15.0	43.2	30.0	0.0	0.0	
St. Louis MSA	7	79	25.9	22.4	28.6	13.2	42.9	16.9	14.3	47.5	14.3	0.0	0.0	
<b>Total</b>	<b>27</b>	<b>357</b>	<b>100.0</b>	<b>22.3</b>	<b>29.6</b>	<b>16.1</b>	<b>29.6</b>	<b>17.0</b>	<b>14.8</b>	<b>44.5</b>	<b>25.9</b>	<b>0.0</b>	<b>0.0</b>	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017-18	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Missouri Non-MSA	20	218	50.0	23.3	25.0	15.5	45.0	18.1	25.0	43.1	5.0	0.0	0.0	
St. Louis MSA	20	156	50.0	19.1	55.0	16.9	25.0	16.7	15.0	47.3	5.0	0.0	0.0	
<b>Total</b>	<b>40</b>	<b>374</b>	<b>100.0</b>	<b>22.0</b>	<b>40.0</b>	<b>15.9</b>	<b>35.0</b>	<b>17.6</b>	<b>20.0</b>	<b>44.4</b>	<b>5.0</b>	<b>0.0</b>	<b>0.0</b>	

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