



## **PUBLIC DISCLOSURE**

August 9, 2021

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

Mountain Valley Bank, National Association  
Charter Number 9610

317 Davis Avenue  
Elkins, West Virginia 26241

Office of the Comptroller of the Currency

Pittsburgh Field Office  
Corporate One Office Park  
4075 Monroeville Boulevard  
Building 2, Suite 430  
Monroeville, PA 15146

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.

## Table of Contents

Overall CRA Rating.....	1
Description of Institution.....	2
Scope of the Evaluation.....	5
Discriminatory or Other Illegal Credit Practices Review.....	6
State Rating.....	7
State of West Virginia.....	7
Community Development.....	9
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

## Overall CRA Rating

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

**The lending test is rated: Outstanding**

**The community development test is rated: Outstanding**

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio was more than reasonable.
- A majority of the bank's loans were made inside the assessment area (AA).
- The bank exhibited a reasonable geographic distribution of loans during the evaluation period.
- The bank exhibited an excellent distribution of loans to individuals of different income levels during the evaluation period.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable. The bank's quarterly LTD ratio over the evaluation period averaged 74.7 percent. The bank's LTD ranged from a low of 67.5 percent to a high of 79.4 percent during the evaluation period. The LTD is calculated on a bank-wide basis.

The bank's LTD was compared to four peer institutions of similar asset size (ranging from \$63 million to \$200 million, with an average asset size of \$155 million), location, and product offerings. The peer group includes institutions inside and outside of the bank's AA due to the rural nature of MVB, and the lack of sufficient peer data within the AA. The peer group average LTD during the evaluation period was 69.7 percent. The peer group low and high LTD during the assessment period was 32.9 percent and 96.6 percent, respectively.

### Lending in Assessment Area

A majority of the bank's loans are inside its AA. The bank originated and/or purchased 83.3 percent and 79.0 percent of loans within their AA by number of loans and dollar amount, respectively during the evaluation period. This analysis is performed at the bank level, rather than the AA level.

<b>Lending Inside and Outside of the Assessment Area: 2018-2020</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	50	83.3%	10	16.7%	60	\$4,745	79.0%	\$1,264	21.0%	\$6,008
<b>Total</b>	<b>50</b>	<b>83.3%</b>	<b>10</b>	<b>16.7%</b>	<b>60</b>	<b>\$4,745</b>	<b>79.0%</b>	<b>\$1,264</b>	<b>21.0%</b>	<b>\$6,008</b>

## **Description of Institution**

Mountain Valley Bank National Association (Mountain Valley, MVB, or the bank) is a \$172.2 million single state institution headquartered in Elkins, W.Va. Mountain Valley is wholly owned by Mountain-Valley Bancshares, Inc, a one bank holding company located in Elkins, W.Va. The bank does not operate any affiliates and there has been no merger or acquisition activity since the previous CRA evaluation.

Mountain Valley's business strategy remains primarily focused on making residential and non-complex commercial loans in its market area. Mountain Valley offers a full range of loan and deposits services as well as online and telephone banking. Additional information on Mountain Valley's product offerings can be found on its website: [www.mountainvalleybank.com](http://www.mountainvalleybank.com). As of December 31, 2020, the bank reported net loans of \$101.9 million, total deposits of \$148 million, and tier one capital of \$21.6 million. Net loans comprised 59 percent of total assets. Loans were comprised 55 percent of commercial loans and 45 percent of consumer loans. Real estate loans comprised 81 percent of net loans and leases.

Mountain Valley operates four full-service branch offices. The main office (headquarters) is located in Elkins, W.Va. The other three branch offices are located in Elkins, Mill Creek, and Parsons, W.Va. All four branches have the same lobby hours: 9:00 a.m. – 3:00 p.m. Monday to Thursday, and 9:00 a.m. - 5:00 p.m. on Friday. All lobbies are closed on Saturday and Sunday. The bank operates extended drive through hours in all four location. The main office operates the drive through from 8:00 a.m. – 5:00 p.m. Monday to Thursday, 8:00 a.m. – 6:00 p.m. on Friday, and 8:00 a.m. – 12:00 p.m. on Saturday. The remaining three locations operate the drive through 8:30 a.m. - 4:30 p.m. Monday to Thursday, 8:30 a.m. – 6:00 p.m. on Friday, and 8:30 a.m. -12:00 p.m. on Saturday. The bank also operates four automated teller machines (ATMs). Three of the ATMs are located at the Elkins, Parsons, and Mill Creek offices. The fourth ATM is located offsite at the Super Splash Car Wash in Elkins, W.Va.

There are no financial or legal circumstances impeding the bank's ability to help meet the credit needs in its assessment area. The last Public Evaluation (PE) dated April 4, 2016 for the period ending December 31, 2015, Mountain Valley was rated "Outstanding".

## **Description of Assessment Area**

### **Tucker/Randolph County Non-MSA Assessment Area**

Mountain Valley's AA consists of two, whole, contiguous counties in West Virginia: Tucker and Randolph. Neither county is located within a Metropolitan Statistical Area (MSA). Tucker and Randolph counties are comprised of 10 census tracts combined. There are no low- or moderate-income geographies in Mountain Valley's AA. Two of the census tracts (CTs) in Tucker County are middle income and one is upper income. Six of the CTs in Randolph County are middle income and one is upper income. All six middle-income CTs in Randolph County and both middle-income CTs in Tucker County are designated as distressed or underserved middle-income CTs. Mountain Valley's AA meets the CRA regulatory requirements.

The chart below describes the Tucker/Randolph County Non-MSA AA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 2020 MVB WV Non MSA AA</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)	10	0.0	0.0	80.0	20.0	0.0
Population by Geography	36,337	0.0	0.0	82.4	17.6	0.0
Housing Units by Geography	19,519	0.0	0.0	76.1	23.9	0.0
Owner-Occupied Units by Geography	10,817	0.0	0.0	81.6	18.4	0.0
Occupied Rental Units by Geography	3,756	0.0	0.0	80.3	19.7	0.0
Vacant Units by Geography	4,946	0.0	0.0	61.0	39.0	0.0
Businesses by Geography	2,039	0.0	0.0	78.1	21.9	0.0
Farms by Geography	87	0.0	0.0	79.3	20.7	0.0
Family Distribution by Income Level	9,772	20.1	15.5	23.3	41.1	0.0
Household Distribution by Income Level	14,573	23.9	16.2	16.8	43.1	0.0
Median Family Income Non-MSAs - WV		\$48,107	Median Housing Value			\$106,519
			Median Gross Rent			\$557
			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS and 2020 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>						

The AA is primarily rural in nature. The 2020 census data reports total population of 36,337 in the AA, with 9,772 total families and 14,573 total households. The median family income reported for 2020 is \$48,107 for the AA. Of the total families in the AA, 20.1 percent are classified as low-income, 15.5 percent are moderate-income, 23.3 percent are middle-income, and 41.1 percent are upper-income. The median housing value is \$106.5 thousand, or 2.2 times the median family income.

Based on information from the US Bureau of Labor Statistics (BLS), unemployment in Tucker County as of December 2020 was 7.1 percent, largely in line with that of the previous CRA exam of 7 percent and the unemployment rate for the state of West Virginia of 6.7 percent as of December 2020. The top ten employers in Tucker County include Regency West Virginia Ventures, Mettiki Coal, Tucker County Board of Education, Cortland Acres Nursing Home, Kingsford Manufacturing Company, Tucker County Senior Citizens, West Virginia Division of Natural Resources, West Virginia Division of Juvenile Services, Tucker County Commission, and Shop and Save. The largest industries in Tucker County continue to be leisure and hospitality, manufacturing, and health.

For Randolph County, the BLS states that the unemployment rate as of December 2020 was 8 percent, slightly elevated from the state of West Virginia's rate of 6.7 percent and in line with the previous CRA exam rate of 7.8 percent. The top ten employers in Randolph County as of March 2020 are Davis Health System, Randolph County Board of Education, Armstrong Hardwood Flooring Company, Wal-Mart, Davis and Elkins College, Huttonsville Correctional Center, West Virginia's Choice Inc, West Virginia Department of Highways, United Coal Company, and Elkins Regional Convalescent Center. The largest industries in Randolph County are education, manufacturing, and health.

## **Competition in Tucker/Randolph County Non-MSA AA**

Competition in the Tucker/Randolph County Non-MSA AA is strong. According to the FDIC Deposit Market Share Report as of December 31, 2020, Mountain Valley is ranked third in the AA with 19.14 percent of the deposit market share. Deposit competitors in the AA include: Citizens Bank of West Virginia, Davis Trust Company, The Huntington National Bank, The Grant County Bank, Miners & Merchants Bank, Freedom Bank, Inc, and Woodforest National Bank. There are eight deposit institutions in the AA. According to the Mortgage Market Share Report as of December 31, 2020, Mountain Valley did not rank within the top lenders in the AA and there are 109 total lenders in the AA. The top lenders include The Huntington National Bank, Quicken Loans, Movement Mortgage, LLC, and Vanderbilt Mortgage and Finance.

The analysis takes into consideration comments provided by two community organizations servicing the AA. Both contacts are with development authorities that focus on business retention, keeping employers in the area, helping local business grow, and helping new entrepreneurs start their business ventures. The contacts explained that the local economy is growing in the number of businesses but overall job growth in the area is likely flat as there is a transition from large employers to a growth in entrepreneurship. However, the overall AA is somewhat prosperous compared to other surrounding areas as a large portion of the employment opportunities are within the AA and workers commute from other counties to the AA to work. The area is experiencing a housing crisis as there is a large demand for housing but the housing stock is limited as the existing houses are old and in poor condition, are in a flood zone, or are unaffordable for the people in the area. It is not economical to rehabilitate the properties in poor condition and the properties in acceptable condition are being used as vacation rentals as a result of growth in the local tourism industry. The housing issue has created a situation where large organizations cannot employ local residents due to the limited nature of housing. The contact noted that there is opportunity for participation by local financial institutions as the primary credit needs of the community are housing related and access to capital for young entrepreneurs. The contact expressed desire to see more financial institutions participate in loan pools for workforce housing at or below market. The contact also noted that there is a non-profit in the area that partners with community banks to increase the funding available to start ups, small business, and borrowers without a down payment that would allow financial institutions the opportunity to reach the community. Both contacts noted that the banking needs of the community are being met and they were not aware of any discriminatory practices of financial institutions.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

Mountain Valley Bank was evaluated under the Small Bank Community Reinvestment Act evaluation procedures. The objective of our review was to determine the bank's record of meeting its community's credit needs, including that of low and moderate-income (LMI) borrowers. Our review included the bank's performance from January 1, 2018 through December 31, 2020. Residential mortgages are the bank's primary loan product and was the only product reviewed as part of this evaluation. We analyzed a sample of sixty (60) residential mortgage loans originated in 2018, 2019, and 2020. Twenty loans were chosen for each year in our review.

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

MVB has delineated one AA, the Tucker/Randolph County Non-MSA AA. We completed a full-scope review of the AA. The AA is not located within an MSA or combined statistical area (CSA).

### **Ratings**

The bank's overall rating is based entirely on the full scope review of the Tucker/Randolph County Non-MSA AA.

## **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 West Virginia

**CRA rating for the State of West Virginia: Outstanding**

**The Lending Test is rated: Outstanding**

**The Community Development Test is rated: Outstanding**

The major factors that support this rating include:

- MVB exhibits a reasonable geographic distribution of loans during the evaluation period.
- MVB exhibited an excellent distribution of loans to individuals of different income levels during the evaluation period.
- MVB exhibited excellent responsiveness to community development needs through community development loans made during the evaluation period.

### LENDING TEST

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

Based on a full-scope review, the bank's performance in the Tucker/Randolph County Non-MSA AA is excellent.

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

The bank exhibits a reasonable geographic distribution of loans in the Tucker/Randolph County Non-MSA AA. There are no low- or moderate-income geographies within the AA. However, six out of seven total CTs in Randolph County and two out of three total CTs in Tucker County are designated as distressed or underserved middle-income CTs. We found no conspicuous gaps or areas of low activity in the bank's lending patterns.

#### *Home Mortgage Loans*

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

The bank exhibited reasonable geographic distribution of home mortgage loans inside the AA.

In the analysis for 2018-2020, Table O (Appendix D-2) reflects the percentages of bank loans in the middle-income tract(s) exceeds both the percentage of owner-occupied housing units and the peer aggregate level of lending. As noted, eight of the ten CTs in the AA are designated as distressed or underserved.

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

The bank exhibits an excellent distribution of loans to individuals of different income levels, given the demographics of the bank's AA, local economic conditions, and product lines offered by the bank.

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

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

The bank exhibited an excellent distribution of home mortgage loans to individuals of different income levels in the AA.

In the analysis for 2018-2020, Table P (Appendix D-2) reflects the percentage of home mortgage loans to low-income borrowers was slightly below the distribution of low-income families but well above the percentage of loans by all lenders to low-income families. The percentage of loans to moderate-income borrowers was above both the distribution of moderate-income families and the percentage of loans by all lenders to moderate-income families. The distribution is excellent given the banking competition in the AA and the rural nature of the AA.

### **Responses to Complaints**

MVB and the OCC have not received any complaints regarding CRA over the evaluation period.

## COMMUNITY DEVELOPMENT

The bank’s performance under the Community Development Test in the state of West Virginia is rated Outstanding.

Based on a full-scope review, the bank exhibits excellent responsiveness to community development (CD) needs in the state through community development loans, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s assessment area. Performance related to CD activities had a positive effect on the bank’s rating in the state.

### Number and Amount of Community Development Loans

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

The level of CD lending in the Tucker/Randolph County Non-MSA AA was excellent. Mountain Valley made 90 CD loans in the AA for a total of \$5.2 million, which represented 24.1 percent of tier 1 capital allocated to the AA. CD lending performance had a positive impact on the lending test rating. The CD loans provided exhibited excellent responsiveness to the needs of the community. Mountain Valley’s loans supported businesses to save jobs through the Small Business Administration (SBA) Paycheck Protection Program (PPP). The 90 PPP loans originated during 2020 contributed to the retention of approximately 907 jobs in the AA.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Tucker/Randolph County Non-MSA AA	90	100%	\$5,190	100%

## 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>	01/1/2018 to 12/31/2020	
<b>Bank Products Reviewed:</b>	Home mortgage Community development loans	
<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(s)</b>		
<b>West Virginia</b>		
<b>Non-MSA AA</b>	<b>Full-Scope</b>	<b>Full Counties:</b> Tucker, Randolph

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	Mountain Valley Bank, National Association
Overall Bank:	Lending Test Rating
Mountain Valley Bank, National Association	Outstanding
MMSA or State:	
West Virginia	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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-2020**

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
2020 Tucker/Randolph County Non-MSA AA	50	4,745	100	559	0.0	0.0	0.0	0.0	0.0	0.0	81.6	83.6	61.9	18.4	16.4	38.1	0.0	0.0	0.0
<b>Total</b>	<b>50</b>	<b>4,745</b>	<b>100</b>	<b>559</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>81.6</b>	<b>83.6</b>	<b>61.9</b>	<b>18.4</b>	<b>16.4</b>	<b>38.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.

Due to rounding, totals may not equal 100.0%

\*All eight of the middle-income CTs in Randolph and Tucker counties were distressed or underserved census tracts per FFIEC 2020 data.

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-2020**

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
2020 Tucker/Randolph County Non-MSA AA	50	4,745	100	559	20.1	18.0	3.6	15.5	22.0	10.2	23.3	12.0	20.9	41.1	48.0	53.0	0.0	0.0	12.3
<b>Total</b>	<b>50</b>	<b>4,745</b>	<b>100</b>	<b>559</b>	<b>20.1</b>	<b>18.0</b>	<b>3.6</b>	<b>15.5</b>	<b>22.0</b>	<b>10.2</b>	<b>23.3</b>	<b>12.0</b>	<b>20.9</b>	<b>41.1</b>	<b>48.0</b>	<b>53.0</b>	<b>0.0</b>	<b>0.0</b>	<b>12.3</b>

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%