



## **PUBLIC DISCLOSURE**

November 28, 2022

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

The First National Bank of Manchester  
Charter Number 7605

120 Town Square  
Manchester, Kentucky 40962

Office of the Comptroller of the Currency

10200 Forest Green Boulevard  
Suite 501  
Louisville, Kentucky 40223

**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 major factors that support this rating include:

- A substantial majority of The First National Bank of Manchester's (FNB or bank) loans are originated within its assessment area (AA).
- The overall geographic distribution of loans reflected excellent dispersion in the AA.
- The bank's distribution of loans to small businesses was excellent.
- The loan-to-deposit (LTD) ratio is reasonable given FNB's size, financial condition, and the credit needs of the bank's AA.
- FNB's distribution of loans to borrowers of different income levels was reasonable.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. FNB's LTD ratio averaged 52.5 percent across 18 quarters, with a quarterly high of 59.4 percent and a quarterly low of 45.1 percent. The average LTD increased compared to the previous CRA performance evaluation of 42.9 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. The bank originated and purchased 92.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. The following table details the bank's lending within the AA by number and dollar volume during the evaluation period for each loan category.

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		
	#	%	#	%		\$	%	\$	%	
Small Business	17	85.0	3	15.0	20	2,972	92.5	240	7.5	3,212
Consumer	20	100.0	0	0.0	20	194	100	0	0	194
Total	37	92.5	3	7.5	40	3,166	93.0	240	7.0	3,407

*Source: Random Sample of business and consumer loans from bank records that were originated and purchased between January 1, 2019, and December 31, 2021. Totals may reflect negligible variances due to rounding.*

### Description of Institution

FNB is an intrastate bank headquartered in Manchester, Kentucky. FNB is wholly owned by First National Financial Corporation, a one-bank holding company. The bank has three full-service offices in middle-income census tracts, which are accessible to all segments of the community. The main office and one additional branch are located in Clay County, within the city of Manchester, Kentucky. Since the previous evaluation, the bank closed one location in Manchester on September 30, 2020. This did

not negatively impact accessibility for low- and moderate-income (LMI) individuals in the area. One branch<sup>1</sup> is located in Laurel County, within the city of London, Kentucky.

FNB offers traditional banking products and services for individual consumers and businesses. Its retail products include checking accounts, savings accounts, and certificates of deposit (CDs). Its lending products include residential and commercial real estate loans; loans for construction, home improvement, and vehicles; stock- and deposit- secured loans, and unsecured personal loans. Many of the bank's services can be accessed through mobile and online banking platforms. Each branch has full-service automated teller machines (ATMs), which offer 24-hour availability. There are four additional ATMs in Laurel County at local businesses in London.

As of the December 31, 2021, call report, FNB reported \$166.4 million in total deposits, \$100.5 million in total loans, and \$18.7 million in tier 1 capital. The loan portfolio breakdown was as follows:

<b>Loan Portfolio Summary by Loan Type</b>		
<b>December 31, 2021</b>		
<b>Loan Category</b>	<b>\$ (000)</b>	<b>% of total loans</b>
Loans Secured by Real Estate	83,728	83.3
Consumer Loans	7,453	7.4
Commercial Loans	6,562	6.5
Agriculture Loans	0	0.0
Other Loans	2,794	2.8
<b>Total Loans</b>	<b>100,537</b>	<b>100.0</b>

FNB has designated one AA for CRA purposes. The AA includes all of Clay and Laurel Counties in Kentucky, which are not part of a metropolitan statistical area (MSA). The AA includes 19 complete census tracts (CTs). FNB's AA does not arbitrarily exclude any low- or moderate-income CTs, nor does it reflect illegal discrimination.

FNB faces strong competition for banking services within its AA. Including FNB, there are 13 Federal Deposit Insurance Corporation (FDIC)-insured institutions operating one or more branches in Clay and Laurel Counties. According to the June 30, 2021, FDIC Market Share Report, FNB ranked fourth in deposit market share holding 12.1 percent of deposits in the AA. This share was behind Cumberland Valley National Bank & Trust Company (21.9 percent), Commercial Bank (18.9 percent), and PNC Bank, National Association (18.0 percent).

There are no legal or financial impediments affecting FNB's ability to meet the credit needs of its community. However, the COVID-19 pandemic, beginning in 2020, impacted the local economy, including unemployment. The U.S. Small Business Administration (SBA) Paycheck Protection Program (PPP) provided loans to help businesses keep their workforce employed during the pandemic. FNB participated in this program and originated 82 loans, or \$3.0 million, to businesses and farms within their AA to support community needs. The last CRA evaluation was performed by the Office of the Comptroller of the Currency (OCC) on June 5, 2018. The bank received a Satisfactory rating.

<sup>1</sup> The London Branch was moved to a new location within two miles of the old location and within the same census tract. The old location was closed on December 21, 2021.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We conducted an evaluation of the bank's CRA performance using the OCC's Small Bank CRA examination procedures. These procedures assess an institution's record of meeting credit needs through its lending activities. Conclusions regarding the bank's lending performance were based on a random sample of the bank's primary lending products originated between January 1, 2019, and December 31, 2021.

Our determination of primary lending products was based on both the number and dollar volume of loans originated and purchased during the evaluation period. FNB's primary loan products are business and consumer loans. Business loans represented 64.0 percent of dollar volume and 19.7 percent of the number of loans originated during the evaluation period. Consumer loans represented 9.2 percent of dollar volume and 66.0 percent of the number of loans originated during the same period.

### Selection of Areas for Full-Scope Review

FNB has a single AA, the entirety of Clay and Laurel counties in Kentucky, which received a full-scope review. Refer to *Appendix A: Scope of Examination*, for more information.

### Ratings

The bank's overall rating is based on the State of Kentucky rating. The State rating is based on the full-scope review of FNB's single AA. In assessing performance, we placed equal weight to all components of the lending test.

## 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 Kentucky

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

**The Lending Test is rated:** Outstanding

The major factors that support this rating include:

- The geographic dispersion of small business and consumer loans throughout the bank's AA is excellent.
- FNB's distribution of loans to businesses of different sizes is excellent.
- FNB's lending reflected reasonable distribution of consumer loans to LMI households.

### Description of Institution's Operations in Kentucky

FNB's sole AA consists of Clay and Laurel counties. The AA is appropriate and does not arbitrarily exclude low- or moderate-income CTs. Clay and Laurel counties are adjacent and located in the Eastern Kentucky Coal Fields Region. The largest city in Clay County is Manchester. The largest city in Laurel County is London.

The total population for the AA is 81,051. The two counties consist of 19 CTs with one low-income tract, six moderate-income tracts, 10 middle-income tracts, and two upper-income tracts. All middle-income tracts in Clay County were designated as *distressed* and *underserved* by the Board of Governors of the Federal Reserve System, FDIC, and the OCC in 2019, 2020, and 2021. All middle-income tracts in Laurel County were designated as *distressed* in all three years of the review period. Annual designations of *distressed* or *underserved* nonmetropolitan middle-income geographies are determined based on rates of poverty, unemployment, and population loss or population size, density, and dispersion.

Economic conditions of the AA prior to the COVID-19 pandemic were distressed compared to the State of Kentucky, especially in Clay County. The unemployment level at the beginning of 2020 for Clay County was 6.8 percent and was declining compared to the high of 7.7 percent in 2019. Laurel County was consistent with the state at 4.6 percent and remaining relatively stable through 2019. The state of Kentucky was at 4.4 percent going into the pandemic. At the peak of the pandemic in April 2020, the unemployment rates were 16.7 and 17.5 percent for Clay and Laurel counties, respectively. The state of Kentucky peaked at 16.7 percent. The December 2021 unemployment rate improved significantly for both Clay and Laurel counties to 5.4 and 3.7 percent, respectively.

Clay County is one of the poorest counties in the U.S. with 37.3 percent of the population living below poverty level. The median household income was \$30,230, this level was 46 percent less than the state average median household income and 56 percent less than the national average. With the average household expenditures of \$38,869 per year, this fact further broadens the gap for households driving the need for financial assistance.

The leading industries in Clay and Laurel counties are education, health care and social services, retail, and manufacturing. The AA is in rural Appalachia and many individuals in Clay County commute to jobs outside their local area. Opportunities in Laurel County are growing as it is located on Interstate 75, allowing easy access for transportation of manufactured goods.

Opportunities for reinvestment include support of organizations that provide services for low- and moderate-income families. As part of this evaluation, we contacted Daniel Boone Community Action Agency. The most significant need for the local area is the need for affordable home repairs as the housing stock is aging quicker than new homes are built. While the agency does not have a direct relationship with this bank, the agency is aware of the bank’s presence for future opportunities. The community contact indicated local banks are generally active in meeting community credit needs.

The following table shows demographic information covering FNB’s AA of Clay and Laurel Counties.

### Non-MSA Including Clay and Laurel Counties

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 - Non-MSA - Clay and Laurel						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	31.6	52.6	10.5	0.0
Population by Geography	81,051	3.8	27.4	62.2	6.6	0.0
Housing Units by Geography	34,313	4.6	27.8	60.8	6.8	0.0
Owner-Occupied Units by Geography	21,809	5.0	28.4	58.8	7.8	0.0
Occupied Rental Units by Geography	9,062	2.8	25.2	68.8	3.2	0.0
Vacant Units by Geography	3,442	6.5	30.9	52.6	9.9	0.0
Businesses by Geography	5,077	1.2	17.7	75.8	5.3	0.0
Farms by Geography	176	1.1	21.0	67.6	10.2	0.0
Family Distribution by Income Level	21,572	29.0	17.0	18.1	36.0	0.0
Household Distribution by Income Level	30,871	29.2	15.7	17.2	37.9	0.0
Median Family Income Non-MSAs - KY		\$45,986	Median Housing Value			\$88,899
			Median Gross Rent			\$571
			Families Below Poverty Level			22.9%
<i>Source: 2015 ACS and 2021 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>						

### LENDING TEST

The bank’s performance under the Lending Test in Kentucky is rated Outstanding

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

The bank exhibits excellent geographic distribution of loans in the State.

### ***Small Loans to Businesses***

Refer to Table Q in *Appendix D: Tables of Performance Data* for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

FNB's lending reflected excellent dispersion of loans to small business across geographies in the bank's AA. The bank originated 4.0 percent of small business loans in low-income CTs and 32.0 percent of loans in moderate-income CTs. This exceeded both the demographic comparator and aggregate data. The bank also originated 64.0 percent of loans in the middle-income CTs, all of which are distressed, underserved, or both. This figure includes consideration of the PPP loans originated by the bank during the evaluation period.

### ***Consumer Loans***

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

FNB's lending reflected excellent dispersion of loans to consumers across geographies in the bank's AA. The bank originated 4.0 percent of consumer loans in low-income CTs and 68.0 percent of loans in moderate-income CTs. This was on par with the percentage of households in low-income CTs, while it exceeded the percent of households in moderate-income CTs. The bank also originated 28.0 percent of loans to distressed or underserved middle-income CTs.

## **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 of different sizes, given the product lines offered by the bank.

### ***Small Loans to Businesses***

Refer to Table R in *Appendix D: Tables of Performance* for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

FNB's lending reflected excellent distribution of loans to businesses of different sizes. The bank originated 84.0 percent of loans to businesses with annual revenues of \$1.0 million or less. This exceeded both the percentages of small businesses in the AA and the aggregate comparator.

### ***Consumer Loans***

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

FNB's lending reflected reasonable distribution of consumer loans to LMI households. The bank originated 20.0 percent of loans to both low- and moderate-income households in the AA. This was slightly less than the percentage of low-income households but exceeded the percentage of moderate-income households in the AA.



## **Responses to Complaints**

FNB did not receive any written complaints regarding its CRA performance during the evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	January 1, 2019, through December 31, 2021	
<b>Bank Products Reviewed:</b>	Small business loans and consumer loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
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>Kentucky</b>		
Clay and Laurel Counties	Full-Scope	

# Appendix B: Summary of MMSA and State Ratings

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RATINGS	(BANK NAME)
Overall Bank:	Lending Test Rating
The First National Bank of Manchester	Outstanding
MMSA or State:	
Kentucky	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 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 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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																<b>2019-2021</b>		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA AA	25	3,665	100.0	1.2	4.0	0.6	17.7	32.0	18.9	75.8	64.0	74.5	5.3	0.0	6.0	0.0	0.0	0.0
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data                      Due to rounding, totals may not equal 100.0</i>																		

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Non-MSA AA	25	3,665	100.0	1,042	83.6	84.0	26.6	4.4	8.0	12.1	8.0		
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data                      Due to rounding, totals may not equal 100.0%</i>													

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>												<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Non-MSA AA	25	279	100.0	4.4	4.0	27.5	68.0	61.8	28.0	6.4	0.0	0.0	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Non-MSA AA	25	279	100.0	29.2	20.0	15.7	20.0	17.2	20.0	37.9	40.0	0.0	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*