



## **PUBLIC DISCLOSURE**

January 28, 2019

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

The First National Bank of Nevada, Missouri  
Charter Number 3959

100 West Walnut Street  
Nevada, Missouri 64772

Office of the Comptroller of the Currency  
1027 South Main Street, Suite 405  
Joplin, Missouri 64801

**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: Satisfactory**

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

The major factors supporting the First National Bank of Nevada's ("FNB's" or "bank") rating include:

- The average loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of FNB's lending activity by number and dollar is inside its assessment area (AA).
- FNB's distribution of loans to borrowers of different income levels within its AA is reasonable, considering the reasonable distribution of consumer loans and excellent distribution of loans to small farms.
- FNB's geographic distribution of loans within its AA is reasonable, considering the reasonable distribution of consumer loans and small farm loans.

## Definitions and Common Abbreviations

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

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area (MA)/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. CTs are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AA(s) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(s).

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

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

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

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

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

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

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

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

**Metropolitan Area (MA):** Any metropolitan statistical area (MSA) or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

**Metropolitan Statistical Area (MSA):** 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 MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

**Rated Area:** A rated area is a state or multi-state MA. 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 MA, the institution will receive a rating for the multi-state MA.

**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.

## Description of Institution

FNB is a \$97 million, rural community bank headquartered in Nevada, Missouri. FNB is a wholly owned subsidiary of 1889 Bancshares, a one-bank holding company. In addition to the main office, FNB operates two non-deposit taking ATMs offsite. FNB has not opened or closed any branches since the prior CRA examination. There have not been any significant changes to FNB's corporate structure, including merger or acquisition activities.

FNB has one AA that consist of six CTs located in Vernon County, Missouri. The AA does not include an MSA. During the 2015-16 period, FNB's AA included moderate-income tracts and four middle-income tracts. Due to changes in CTs in 2017, all tracts in the AA are middle- and upper-income tracts.

The bank offers a full range of deposit and loan products and services. FNB's primary business focus is consumer, agricultural, and residential lending. As of September 30, 2018, the loan portfolio totaled \$56.3 million or 58 percent of total assets. FNB's loan portfolio, by dollar, consisted of 71 percent real estate loans, 16 percent agricultural loans, 11 percent commercial loans, and 3 percent consumer loans. Tier 1 capital is \$14.5 million and total deposits are \$83.3 million.

FNB holds 26 percent of the deposit market share, which ranks first out of the seven financial institutions in Vernon County. Primary competitors include Metz Banking Company, Heritage State Bank, and Great Southern Bank.

There are no legal, financial, or other factors impeding FNB's ability to meet credit needs in its communities. FNB is not required to file Home Mortgage Disclosure information. FNB received a "Satisfactory" rating at its last CRA examination dated November 10, 2014.



## **Scope of the Evaluation**

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

The scope of the evaluation included evaluating FNB based on the small bank CRA examination procedures and focused primarily on the lending test. Our objective was to assess the bank's ability to serve and meet the community's needs within its AA.

We analyzed a sample of consumer and agricultural loans for the period from January 1, 2015 through December 31, 2017. FNB's primary lending products for the evaluation period, by number and dollar, are consumer and agriculture loans, respectively. The consumer loan samples include 30 loans originated between January 1, 2015 and December 31, 2016 (2015-16) and 30 loans originated between January 1, 2017 and December 31, 2017. The agriculture loan samples include 30 loans originated in 2015-16 and 30 loans originated in 2017. The OCC placed greater weight on the performance in 2015-16 since this period represents two full years and a majority of the evaluation period.

### **Data Integrity**

The OCC based this evaluation on accurate data. FNB is not required to collect and maintain data on consumer and agricultural loans. Therefore, we used random sampling to obtain data on these loans, including income, revenue, and geographic information.

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

The OCC completed a full-scope review of FNB's one AA. Refer to appendix A for details.

### **Ratings**

FNB's overall rating is based primarily on the full-scope review of FNB's one 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] 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.

## Conclusions with Respect to Performance Tests

### LENDING TEST

FNB's performance under the Lending test is rated "Satisfactory." Lending volumes are reasonable given the bank's size and financial condition. A substantial majority of FNB's loans are originated in its AA. The overall distribution of loans to borrowers of different income levels and the dispersion of loans in different income CTs is reasonable.

#### Loan-to-Deposit Ratio

FNB's LTD ratio is reasonable, given the bank's asset size, resources, and lending opportunities available in the AA. Since the last CRA evaluation, FNB's average quarterly LTD ratio is 55.2 percent. The average quarterly LTD ratio for four similarly situated institutions over the same period is 63.3 percent with a range from a low of 49.6 percent to a high of 79.1 percent. FNB ranked third out of the peer group. These institutions ranged in asset size from \$72.7 million to \$101.3 million with an average asset size of \$91.5 million.

#### Lending in Assessment Area

FNB originated a substantial majority of its loans inside its AA. Agriculture and consumer loans are FNB's primary products. FNB originated a substantial majority of small loans to farms by both number and dollar amount inside the AA at 96.7 percent and 98.8 percent, respectively. FNB originated a substantial majority of consumer loans by number and dollar amount in its AA at 96.7 percent and 96.8 percent, respectively.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Farm	58	96.7	2	3.3	60	4,639	98.8	56	1.2	4,694
Consumer	58	96.7	2	3.3	60	600	96.8	20	3.2	620
Total	116	96.7	4	3.3	120	5,239	98.6	76	1.4	5,314

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

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

The overall borrower distribution of consumer loans and small loans to farms demonstrates reasonable penetration.

Refer to Table T and V in appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

### **Consumer Loans**

The distribution of consumer loans to low- and moderate- income borrowers reflects reasonable penetration.

Refer to Table V in appendix C for the facts and data used to evaluate the distribution of consumer loans to low- and moderate- income borrowers in the AA.

Overall, FNB's distribution of loans to low- income borrowers was poor. While the percentage of the bank's loans to low-income borrowers, for the 2015-16 and 2017 evaluation periods, was below demographics, 20.0 percent of the households in the AA were below the poverty level during 2015-16. Of these households below the poverty level, 2.6 percent of households receive public assistance. In addition, the downsizing of the local hospitals contributed to an elevated poverty level for the AA. This decreased slightly to 15.0 percent of households below the poverty level in 2017. In addition, 15.9 percent of the AA population is 65 or older. Of this population of elderly people, 24.6 percent are retired and 38.3 percent receive social security.

Overall, FNB's distribution of loans to moderate-income borrowers is excellent. The percent of FNB's consumer loans to moderate-income individuals exceeds the percentage of moderate-income households in the AA in 2015-16. The bank's 2017 consumer loan distribution is not inconsistent with the performance noted in 2015-2016.

### **Small Loans to Farms**

The distribution of small loans to farms in the AA reflects excellent penetration.

Refer to Table T in appendix C for facts and data used to evaluate the distribution of loans to small farms in the AA.

FNB's percentage of small loans to farms with revenues of \$1 million or less within the AA for 2015-16 is 100 percent exceeding demographic data and reflects excellent penetration. The bank's 2017 agriculture loan distribution is not inconsistent with the performance noted in 2015-2016.

## **Geographic Distribution of Loans**

The overall geographic distribution of loans is reasonable.

Refer to Table S and U in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

We only evaluated the bank's performance in 2015-16. An analysis of 2017 performance is not meaningful since there are no low- or moderate-income CTs.

## **Consumer Loans**

The overall geographic distribution of consumer loans reflects reasonable dispersion.

Refer to Table U in appendix C for the facts and data used to evaluate the geographic distribution of FNB's origination and purchase of consumer loans in its AA.

Overall performance in 2015-16 was reasonable. The performance in moderate-income CTs was slightly lower at 32.1 percent compared to the percentage of households at 33.0 percent located in moderate-income CTs. However, there is strong competition in the AA. In addition, 20.0 percent of the households in the AA were below the poverty level during 2015-16.

## **Small Loans to Farms**

The overall geographic distribution of small loans to farms reflects reasonable dispersion.

Refer to Table S in appendix C for the facts and data used to evaluate the geographic distribution of FNB's origination of loans to small farms in its AA.

Overall performance in 2015-16 was reasonable. The performance in moderate-income CTs was lower at 28.6 percent compared to the percentage of farms at 34.5 percent located in moderate-income CTs. However, there is strong competition in the AA. In addition, based on demographic information, there is limited availability to lend to small farms in the bank's moderate-income CTs, as these tracts are primarily located in the county's industrial park.

## **Responses to Complaints**

FNB did not receive any written complaints to 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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (01/01/2015 to 12/31/17)	
<b>Financial Institution</b>		<b>Products Reviewed</b>
The First National Bank of Nevada Nevada, Missouri		Consumer and Agriculture
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
All of Vernon County	Full- Scope	See appendix B

## Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Vernon 2015-2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	33.3	66.7	0.0	0.0
Population by Geography	21,159	0.0	31.3	68.7	0.0	0.0
Housing Units by Geography	9,460	0.0	33.8	66.2	0.0	0.0
Owner-Occupied Units by Geography	5,830	0.0	29.0	71.0	0.0	0.0
Occupied Rental Units by Geography	2,499	0.0	42.3	57.7	0.0	0.0
Vacant Units by Geography	1,131	0.0	39.6	60.4	0.0	0.0
Businesses by Geography	1,150	0.0	50.2	49.8	0.0	0.0
Farms by Geography	118	0.0	26.3	73.7	0.0	0.0
Family Distribution by Income Level	5,499	22.5	20.6	20.8	36.0	0.0
Household Distribution by Income Level	8,329	26.2	15.7	20.1	38.0	0.0
Median Family Income Non-MSAs - MO		\$45,746	Median Housing Value			\$82,521
			Median Gross Rent			\$526
Households Below Poverty Level		20%	Families Below Poverty Level			16.4%

Source: 2010 U.S. Census and 2016 D&B Data  
 Due to rounding, totals may not equal 100.0  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Vernon County Non-MSA 2017						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	0.0	83.3	16.7	0.0
Population by Geography	20,878	0.0	0.0	85.4	14.6	0.0
Housing Units by Geography	9,477	0.0	0.0	86.2	13.8	0.0
Owner-Occupied Units by Geography	5,412	0.0	0.0	79.9	20.1	0.0
Occupied Rental Units by Geography	2,628	0.0	0.0	96.8	3.2	0.0
Vacant Units by Geography	1,437	0.0	0.0	90.7	9.3	0.0
Businesses by Geography	1,157	0.0	0.0	90.0	10.0	0.0
Farms by Geography	121	0.0	0.0	79.3	20.7	0.0
Family Distribution by Income Level	5,468	19.3	17.3	23.3	40.1	0.0
Household Distribution by Income Level	8,040	20.1	18.0	18.3	43.6	0.0
Median Family Income Non-MSAs - MO		\$48,553	Median Housing Value			\$95,162
			Median Gross Rent			\$618
Households Below Poverty Level		15%	Families Below Poverty Level			11.7%

Source: 2015 ACS Census and 2017 D&B Data  
 Due to rounding, totals may not equal 100.0  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

FNB operates one main office in Nevada, MO. The non-MSA KS AA consists of six CTs and encompasses all of Vernon County. Demographic data shows the 2015 MFI as \$45,746 and 16.4 percent of families in the AA reported income below the poverty level for the 2015-2016 evaluation period. This number dropped to 11.7 percent for the 2017 evaluation period.

Primary industries in the AA include agriculture, manufacturing, healthcare, and education. The AA's largest employers include 3-M, Walmart, hospitals, and the local school district. The majority of these employers are located in Nevada, MO, which is where the bank's main office is located. The unemployment rate in Vernon County is 2.3 percent compared to 2.3 percent in the state of Missouri and 3.7 percent nationally.

Based on loan originations during the evaluation period, the primary products for the institution are consumer and agriculture loans. Competition for financial services is strong in the AA. According to the FDIC market share data, FNB's deposits in the AA totaled \$87.9 million with a market share of 26.4 percent, which ranks number one out of the seven similarly situated depository institutions. Major competitors include much larger banks operating in the AA with numerous bank locations throughout Missouri. The bank's top competitors are Metz Banking Company, Heritage State Bank, and Great Southern Bank.

During the examination, we reviewed one community contact. The contact was with a local non-profit dedicated to assisting low- and moderate-income families. The organization helps provide financial assistance, housing assistance, job training, and access to affordable pre-school learning programs. The contact indicated that many low-income families do not have the credit or resources to borrow from financial institutions and are reliant on payday lenders.



## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate MAs 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included in each set:

- 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. Because small farm data is not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table 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 throughout 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 MA/AA.

**Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2015-16**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Vernon 2015-2016	30	1,553,251	100.0	98	0.0	0.0	0.0	34.5	28.6	38.8	65.5	64.3	61.2	0.0	7.1	0.0	0.0	0.0	0.0
<b>Total</b>	<b>30</b>	<b>1,553,251</b>	<b>100.0</b>	<b>98</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>34.5</b>	<b>28.6</b>	<b>38.8</b>	<b>65.5</b>	<b>64.3</b>	<b>61.2</b>	<b>0.0</b>	<b>7.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2017**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Vernon 2017	30	3,141,055	100.0	131	0.0	0.0	0.0	0.0	0.0	0.0	79.3	73.3	83.2	20.7	26.7	16.8	0.0	0.0	0.0
<b>Total</b>	<b>30</b>	<b>3,141,055</b>	<b>100.0</b>	<b>131</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>79.3</b>	<b>73.3</b>	<b>83.2</b>	<b>20.7</b>	<b>26.7</b>	<b>16.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2015-16**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Vernon 2015-2016	30	1,553,251	100.0	98	98.8	100.0	54.1	0.0	--	1.2	--
<b>Total</b>	<b>30</b>	<b>1,553,251</b>	<b>100.0</b>	<b>98</b>	<b>98.8</b>	<b>100.0</b>	<b>54.1</b>	<b>0.0</b>	<b>--</b>	<b>1.2</b>	<b>--</b>

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

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Vernon 2017	30	3,141,055	100.0	131	98.3	100.0	64.1	0.8	0.0	0.8	0.0
<b>Total</b>	<b>30</b>	<b>3,141,055</b>	<b>100.0</b>	<b>131</b>	<b>98.3</b>	<b>100.0</b>	<b>64.1</b>	<b>0.8</b>	<b>0.0</b>	<b>0.8</b>	<b>0.0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

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
Vernon 2015-2016	30	277,265	100.0	0.0	0.0	33.0	32.1	67.0	57.1	0.0	10.7	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 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**

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
<b>Vernon 2017</b>	<b>30</b>	<b>342,604</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>85.4</b>	<b>83.3</b>	<b>14.6</b>	<b>16.7</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 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** **2015-16**

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
Vernon 2015-2016	30	277,265	100.0	26.2	7.14	15.7	21.4	20.1	21.4	38.0	39.3	0.0	10.7
<b>Total</b>	<b>30</b>	<b>277,625</b>	<b>100.0</b>	<b>26.2</b>	<b>7.14</b>	<b>15.7</b>	<b>21.4</b>	<b>20.1</b>	<b>21.4</b>	<b>38.0</b>	<b>39.3</b>	<b>0.0</b>	<b>10.7</b>

Source: 2010 U.S Census; 01/01/2015 - 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**

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
Vernon 2017	30	342,604	100.0	20.1	10.0	18.0	23.3	18.3	40.0	43.6	26.7	0.0	0.0
<b>Total</b>	<b>30</b>	<b>342,604</b>	<b>100.0</b>	<b>20.1</b>	<b>10.0</b>	<b>18.0</b>	<b>23.3</b>	<b>18.3</b>	<b>40.0</b>	<b>43.6</b>	<b>26.7</b>	<b>0.0</b>	<b>0.0</b>

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