# PUBLIC DISCLOSURE

April 26, 2021

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Dozier Charter Number 9681

> 7825 South Main Street Dozier, AL 36028

Office of the Comptroller of the Currency Nashville/Birmingham Field Office 3595 Grandview Parkway Suite 655 Birmingham, AL 35243

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

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## **Overall CRA Rating**

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

### The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on a full-scope review of the bank's sole assessment area (AA) in the state of Alabama.
- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A substantial majority of loans were originated or purchased inside the bank's AA.
- The distribution of consumer loans to individuals of different income is reasonable.
- The geographic distribution of consumer loans throughout the bank's AA is reasonable.
- The Bank did not receive any Community Reinvestment Act (CRA) related complaints during this evaluation period.

#### Loan-to-Deposit (LTD) Ratio

The First National Bank of Dozier's (FNBD or bank) LTD ratio is reasonable given the bank's size, location, and AA credit needs. The LTD ratio is calculated on a bank-wide basis. FNBD's LTD ratio averaged 26.5 percent over the 17 quarters since the preceding CRA examination with a quarterly high of 33.0 percent and a quarterly low of 22.1 percent and ending at 29.9 percent.

We compared the bank's LTD ratio to four similarly situated institutions of comparable size with similar product offerings ranging in asset size from \$17.1 million to \$49.8 million. FNBD's LTD was low in comparison to these institutions that had an average LTD ratio of 41.6 percent with a high average of 49.6 percent and a low average of 36.5 percent. While the FNBD's LTD ratio is lower than similarly situated institutions, FNBD's LTD ratio has trended up since our previous review. Since 2016 total deposits grew approximately \$3.8 million and total loans grew approximately \$3.3 million, which resulted in 87 percent of deposits funding new loan growth.

Also, Crenshaw and Covington counties are rural communities with low loan demand. FNBD has a history of low loan demand due to the area's large population of elderly individuals with limited credit needs. FNBD strives to serve the needs of its local community through small dollar lending, which protects customers from high cost payday lenders. During the assessment period, the bank originated 102 loans of \$5,000 or less totaling \$181 thousand.

#### Lending in Assessment Area

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

The bank originated and purchased 83 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. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This conclusion is based on a random sample of 75 consumer loans made in 2018, 2019, and 2020. The following table depicts the institution's lending in the AA during the evaluation period.

Lending Inside and Out	tside of the	e Assessi	ment Area							
Loan Category	N	lumber o	of Loans		_	Dollar .				
	Inside Outside			de	Total	Insid	e	Outsid	le	Total
	#	%	#	%	# \$ %	%	\$	%	\$(000s)	
Consumer	62	82.67	13	17.33	75	1,364	91.85	121	8.15	1,485
Total	62	82.67	13	17.33	75	1,364	91.85	121	8.15	1,485

## **Description of Institution**

FNBD is an intrastate financial institution with only one location. As of December 31, 2020, FNBD had total assets of \$38.7 million and deposits of \$32.2 million. FNBD's one location does not have an automated teller machine (ATM). The bank is open Monday through Wednesday from 8 am to 4 pm, Thursday from 8 am to 11 am, and Friday from 8 am to 5 pm with no Saturday or Sunday operations.

FNBD is wholly owned by First Dozier Bancshares, Inc., a one bank holding company also headquartered in Dozier, Alabama. The holding company has no CRA impact on FNBD's performance. During this evaluation period, FNBD had no merger or acquisition activity. There were no branch openings or branch closings.

FNBD's business strategy focuses on serving the needs of its primarily rural, local community. A breakdown of FNBD's December 31, 2020 portfolio shows commercial loans \$3.8 million (38.6 percent), residential real estate \$3.4 million (35.4 percent), construction and land development \$771 thousand (7.9 percent), consumer loans \$1 million (10.5 percent), farm loans \$541 thousand (5.5 percent), other obligations \$165 thousand (1.7 percent), and other revolving credit plans \$36 thousand (0.4 percent). Total loans of \$9.7 million represented 25.1 percent of total assets. Net loans total \$9.6 million and represent 24.8 percent of total assets. Tier 1 capital was \$5.8 million.

FNBD has one AA, which consists of three contiguous census tracts (CTs), one in northern Covington County, Alabama (CT 9616) and two in southern Crenshaw County, Alabama (CTs 9638 and 9639).

FNBD offers a limited range of traditional deposit and loan products, including commercial and commercial real estate, consumer, agricultural/timber, and real estate loans. Internet banking services includes bill pay. FNBD is not a Home Mortgage Disclosure Act (HMDA) reporter.

FNBD's CRA performance was last evaluated as of January 3, 2017 and performance was assessed as "Satisfactory" at that time. There are no legal, financial, or other factors that impede FNBD from meeting the credit needs of the community.

## **Scope of the Evaluation**

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

The evaluation period for this assessment is January 1, 2018 through December 31, 2020. We evaluated the bank's performance using the Small Bank performance criteria, which consists of a Lending Test This performance evaluation is an assessment of FNBD's ability to meet the credit needs of its AA. We assessed the bank's lending performance based on a sample of consumer loans since consumer loans are FNBD's primary loan product.

For Geographic and Borrower Distribution analyses, FNBD's loan originations are compared to the 2015 American Community Survey (ACS) Census data.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a fullscope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

FNBD has one AA consisting of three contiguous non-MSA CTs in the State of Alabama. We performed a full-scope review of this AA.

#### Ratings

FNBD's overall rating is based solely on the State of Alabama rating as this is the only rating area. Consumer loans are FNBD's primary product.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 CFR 25.28(c), "Community Reinvestment Act and Interstate Deposit Production Regulations" or 195.28(c), "Community Reinvestment Act," 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 Alabama**

### CRA rating for the State of Alabama: Satisfactory.

### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank originated a substantial majority of loans inside its AA.
- The bank exhibits reasonable geographic distribution of loans in the State.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.
- The bank did not receive any CRA-related complaints during this evaluation period.

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

FNBD is primarily a small community lender. FNBD is an intrastate financial institution with only one location and no ATMs. Competition in the AA is moderate given the presence of several large institutions, including Regions Bank and Wells Fargo Bank. Only two banks hold the AAs deposit market share, FNBD holds the second highest deposit market share with 36.9 percent of the AA's deposit share. The AA is impacted by elevated poverty levels. According to 2015 American Community Survey and 2020 Dun and Bradstreet Data, 11.3 percent of all AA households live below the poverty level and median family income for the AA is \$45,454.

Two community contacts, who have been extensively involved in local and state government, were obtained. The contacts identified a need affordable housing and small business lending.

## Non-MSA AA

As	sessment	Area: Nor	n-MSA AA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	7,225	0.0	0.0	44.0	56.0	0.0
Housing Units by Geography	4,026	0.0	0.0	40.0	60.0	0.0
Owner-Occupied Units by Geography	2,439	0.0	0.0	39.6	60.4	0.0
Occupied Rental Units by Geography	568	0.0	0.0	56.0	44.0	0.0
Vacant Units by Geography	1,019	0.0	0.0	32.1	67.9	0.0
Businesses by Geography	248	0.0	0.0	44.0	56.0	0.0
Farms by Geography	25	0.0	0.0	52.0	48.0	0.0
Family Distribution by Income Level	2,011	15.1	16.3	20.3	48.3	0.0
Household Distribution by Income Level	3,007	18.4	14.5	16.1	50.9	0.0
Median Family Income MSA – Non- MSA AL		\$45,454	Median Hous	ing Value		\$123,207
			Median Gros	s Rent		\$539
			Families Belo	ow Poverty L	level	11.3%

(\*) The NA category consists of geographies that have not been assigned an income classification.

## Scope of Evaluation in Alabama

FNBD has only one AA, which consists of three contiguous CTs, one in northern Covington County, Alabama (9616) and two in southern Crenshaw County, AL (9638 and 9639). FNBD's one location is in Crenshaw County, Alabama. Refer to Appendix A for the listing of the one AA. A review of the non-MSA AA included a sample of consumer loans as these were identified as the primary product.

## LENDING TEST

The bank's performance under the Lending Test in Alabama is rated Satisfactory.

## Conclusions for the Non-MSA AA Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the non-MSA AA is good.

## Distribution of Loans by Income Level of the Geography

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

### **Consumer Loans**

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

The bank's sole AA includes two middle-income CTs (9638 and 9639 in Crenshaw County) and one upper-income CT (9616 in Covington County). Although the AA has no low- or moderate-income CTs, the two middle-income CTs were designated as "distressed" in 2019, and our geographical analysis was based on lending to households within the middle-income CTs. The bank's geographic distribution of consumer loans within the AA reflects more than reasonable distribution of loans to borrowers in middle-income CTs. The percentage of the bank's loans in middle-income CTs exceeded the percentage of households in these CTs.

## Distribution of Loans by Income Level of the Borrower

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

#### **Consumer Loans**

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

The distribution of consumer loans to individuals of different income levels is reasonable. The bank's consumer lending to low-income borrowers exceeded the percent of households identified as low-income. The bank's consumer lending to moderate-income borrowers was somewhat lower than the percent of households identified as moderate-income.

#### **Responses to Complaints**

FNBD did not receive any CRA-related complaints during this evaluation period.

## COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the state of Alabama through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA. Performance related to CD activities had a positive effect on the bank's rating in the state.

### Number and Amount of Community Development (CD) Loan

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.

Community Devel	opm	ient Loans							
		Total							
Assessment Area	#	% of Total #	\$ (000's)	% of Total \$					
Non-MSA	3	100	918	100					

During the assessment period, FNBD originated three community development loans that consisted entirely of participations. The participation loans totaled \$918 thousand and ranged in purpose including renovations to nursing facilities and power line improvements.

FNBD originated 17 loans totaling \$1.74 million within its community under the Small Business Administration's Payroll Protection Program (PPP) during the assessment period. These PPP loans allowed businesses to pay employees and make rent payments during the height of the COVID-19 Pandemic.

#### Appendix A: Scope of Examination

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."

Time Period Reviewed:	01/01/2018 - 12/31/2020	
Bank Products Reviewed:	Consumer Loans	
	Community Development	Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		N/A
List of Assessment Areas and Typ	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
N/A	N/A	N/A
State of Alabama		
Non-MSA AA	Full scope	Crenshaw County Census Tracts: 9638 and 9639 Covington County Census Tract: 9616

# **Appendix B: Summary of MMSA and State Ratings**

RATINGS Th	e First National Bank of Dozier
Overall Bank:	Lending Test Rating
The First National Bank of Dozier	Satisfactory
State:	
State of Alabama	Satisfactory

## **Appendix C: Definitions and Common Abbreviations**

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.

## **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 U.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of households by income level in each MMSA/assessment area.

Assessment Area:	Tot	al Consumer L	oans	Low-Incom	e Tracts	Moderate-Inco	ome Tracts	Middle-Incor	ne Tracts	Upper-Incon	e Tracts	Not Availab Trac	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans						
Non-MSA AA	40	\$274,266	100.0	0.0	0.0	0.0	0.0	42.7	85.0	57.3	10.0	0.0	5.0

Assessment Area:	То	tal Consumer I	Loans	Low-Income	Borrowers	Moderate-In Borrowe		Middle-Incom	e Borrowers	Upper-Income	e Borrowers	Not Available Borrowe	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Banl Loans
Non-MSA AA	40	\$274,266	100.0	18.4	45.0	14.5	10.0	16.1	27.5	50.9	17.5	0.0	0.0
Total	40	\$274,266	100.0	18.4	45.0	14.5	10.0	16.1	27.5	50.9	17.5	0.0	0.0