



PUBLIC DISCLOSURE

November 13, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Bank, National Association
Charter Number 13770

201 East Carl Albert Parkway
McAlester, Oklahoma 74502

Office of the Comptroller of the Currency
Tulsa Field Office
8282 South Memorial Drive, Suite 300
Tulsa, Oklahoma 74133

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

This institution is rated Satisfactory.

The Lending Test is rated Satisfactory.

The Community Development (CD) Test is rated Satisfactory.

The Bank, National Association (TBNA) has a satisfactory record of meeting the credit needs of the community.

- The loan-to-deposit (LTD) ratio is **reasonable** based on TBNA's performance context and lending opportunities within their designated assessment area (AA).
- TBNA's distribution of residential and commercial real estate loans reflects a **reasonable penetration** of loan originations among borrowers of different income levels and businesses with different levels of gross annual revenues (GAR).
- The geographic distribution of residential and commercial real estate loans reflects a **reasonable dispersion** of loans throughout TBNA's AA.
- A **substantial majority** of TBNA's residential and commercial real estate loans originated during the evaluation period are inside of their AA.
- TBNA's performance under the CD test demonstrates **adequate responsiveness** to the CD needs of its AA.

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 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 (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 GAR 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 CD 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 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: 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.

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 CD.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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

TBNA is a \$369 million national bank headquartered in McAlester, Oklahoma, and a subsidiary of NBM Corporation, a single bank holding company. Within Pittsburg County TBNA serves its AA with a main banking facility at 201 Carl Albert Parkway, McAlester, Oklahoma, located in a middle-income CT (previously designated as a moderate-income tract); a full-service branch location in Walmart at 432 South George Nigh Expressway, located in an upper-income CT; and a limited teller-only service with an automated teller machine (ATM) at 1706 East Carl Albert Parkway, also located in an upper-income CT. Within Payne County TBNA serves its AA with two full-service branch facilities at 800 West 6th Avenue, located in a low-income CT (previously designated as a middle-income tract); and 1020 North Boomer Road, located in a distressed or underserved middle-income CT.

Despite strong competition for banking services, to meet the credit and deposit needs of the AA, TBNA offers a diverse line of loan and deposit products during reasonable hours Monday through Saturday. TBNA also offers an internet banking product that provides customers with deposit, transfer, and bill payment opportunities when a bank facility is not convenient. TBNA's strategic lending focus remains on originating real estate purchase, construction, refinance, general commercial, commercial real estate (CRE), and consumer loans. The following table describes the composition of TBNA's loan portfolio as of December 31, 2017, which represents 55 percent of total assets. Management does not anticipate significant changes to the composition of the loan portfolio in the near future.

Loan Portfolio Composition as of December 31, 2017			
Loan Type	Amount (000s)	Percent of Total Gross Loans	Percent of Total Assets
Construction and Land Development	\$9,566	5%	3%
Farmland	\$11,949	6%	3%
1-4 Family Residential	\$60,665	30%	16%
Multifamily (5 or more) Residential	\$3,346	2%	1%
Commercial (nonfarm, nonresidential)	\$81,469	40%	22%
Total Real Estate Loans	\$166,995	83%	45%
Agriculture	\$5,116	2%	1%
Commercial and Industrial	\$18,568	9%	5%
Consumer Loans	\$11,761	6%	3%
Other Loans	\$43	0%	0%
Total Gross Loans	\$202,483	100%	55%

Source: December 31, 2017 Call Report

Based on the June 30, 2017 Federal Deposit Market Share Report, TBNA's presence within the AA is moderate as they have 29 percent of the deposit market share in Pittsburg County, and 3 percent of the deposit market share in Payne County. A CRA Performance Evaluation (PE) was last prepared February 2, 2015, and a "Satisfactory" rating was assigned. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated TBNA using the Intermediate Small Bank standards for assessing performance. TBNA's primary loan products include first lien residential real estate loans and CRE loans. The lending test evaluates TBNA's record of meeting the credit needs of its AA. We assessed the bank's performance under this test using a sample of 60 residential real estate loans and 60 CRE loans originated from January 2, 2015 through December 31, 2017. The comprehensive sample is representative of TBNA's business strategy since the last CRA PE.

The CD test evaluates TBNA's responsiveness to meet the credit and development needs of its AA. We assessed the bank's performance under this test by reviewing qualified CD loans, CD investments, and CD service activities since the last CRA PE.

Data Integrity

As a part of our loan sample we verified the applicable data by reviewing each loan file maintained by bank management. We found the data in our loan sample to be reliable.

Selection of Areas for Full-Scope Review

TBNA's AA comprises two non-Metropolitan Statistical Area counties in Oklahoma. We completed a full-scope review for this entire AA. The AA, which includes Pittsburg County and Payne County, meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income geographies.

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 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 PE.

Conclusions with Respect to Performance Criteria

LENDING TEST

TBNA's performance under the lending test is **Satisfactory**. This assessment is based on our loan sample for residential mortgage and CRE lending activity beginning January 2, 2015 through December 31, 2017.

Loan-to-Deposit Ratio

TBNA has a **reasonable** LTD ratio relative to their financial condition, local banking competition, and credit needs of the AA. Since the previous CRA PE, the bank's quarterly average LTD ratio was 61 percent, compared to a 62 percent aggregate average by four other similarly situated banks during the same period.

Institution	Total Assets (as of December 31, 2017)	Average LTD Ratio
TBNA	\$369 Million	61%
First National Bank & Trust Company of McAlester	\$473 Million	61%
The First National Bank & Trust Company of Vinita	\$441 Million	62%
The Security National Bank of Enid	\$332 Million	60%
Shamrock Bank, National Association	\$312 Million	67%

Source: December 31, 2017 Call Report; Uniform Bank Performance Report

Lending in AA

Our review disclosed that a **substantial majority** of the number and dollar level of loans originated during the evaluation period are inside of TBNA's AA. The following table presents a more specific identification of this lending performance.

Table D - Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	57	95	3	5	60	5,300	93	397	7	5,697
Commercial Real Estate	55	92	5	8	60	11,299	92	970	8	12,269
Total	112	93	8	7	120	16,599	92	1,367	8	17,966

Source: 01/02/2015-12/31/2017 Bank Data

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

Lending patterns during the evaluation period indicate a **reasonable penetration** of loan originations within TBNA's AA, particularly among low- and moderate-income borrowers and businesses with GAR less than \$1 million. The penetration of loans strongly represents the income demographics of residents and businesses within each CT. Please refer to Tables P and R in Appendix C for a more specific identification of residential and commercial real estate loan penetration activity. Since the bank is a non-HMDA reporter, some table data fields are unavailable.

Geographic Distribution of Loans

Lending patterns during the evaluation period indicate a **reasonable dispersion** of loans throughout TBNA's AA, particularly CTs designated as low-income or moderate-income. The dispersion of loans strongly represents the income demographics of each CT in which the residents and businesses function. Please refer to Tables O and Q in Appendix C for a more specific identification of residential and commercial loan dispersion activity. Since the bank is a non-HMDA reporter, some table data fields are unavailable.

Responses to Complaints

TBNA did not receive any consumer complaints regarding their performance under the CRA during the evaluation period.

COMMUNITY DEVELOPMENT TEST

TBNA's performance under the CD Test is rated **Satisfactory** and demonstrates **adequate responsiveness** to the CD needs of its AA. This assessment is based on our review of TBNA's CD lending, CD investments, and CD service activity since the last CRA PE dated February 2, 2015.

Community Development Loans

TBNA's CD lending performance during the evaluation period demonstrates **adequate responsiveness** to the credit needs of its AA. TBNA originated six CD loans totaling \$307 thousand during the evaluation period which specifically created jobs for low- and moderate-income residents and assisted with the revitalization efforts of small businesses in accordance with the McAlester Main Street Revitalization Program. Also during the evaluation period TBNA originated slightly less than 300 single-family residential mortgage loans in the AA, and approximately 186, or 62 percent of these were for less than \$100 thousand.

TBNA also participates in several loan programs focused on improving access to affordable housing and funding for small businesses. These programs include:

- Department of Agriculture Housing Program
- Farm Service Agency
- Federal Housing Administration Title II
- United States Department of Agriculture 100 percent loan program
- Small Business Administration

- Veteran's Administration
- Section 184 Native American Home Loan Program

Qualified Investments

TBNA's CD investment performance during the evaluation period demonstrates **excellent responsiveness** to the development needs of its AA given the bank's size and capacity to contribute to such investments. TBNA participated in 15 qualified public school bond investments inside the AA totaling \$3.5 million for repair and improvement projects at schools located in low- and moderate income geographies, including those considered distressed or underserved. Also during the evaluation period TBNA participated in eight qualified municipal bond investments inside the AA totaling \$4.2 million. TBNA continues to hold two qualified investments from the Oklahoma Housing Finance Authority (OHFA) with a total remaining book value of \$1.2 million. The OHFA provides financial assistance to low-income families for the purchase of affordable housing.

Community Development Services

TBNA's CD services in the AA demonstrates **adequate responsiveness** in helping meet community needs given the bank's size and capacity to contribute. During the evaluation period bank staff members provided financial services and technical expertise to various local charitable organizations, and numerous CD service hours to qualified organizations. These include, but are not limited to:

- **Hope House of McAlester** – The organization provides shelter and training to temporarily homeless women. They also provide basic financial education for such things as financial planning, credit counseling, and job-related skills to help residents regain employment and locate affordable housing.
- **Southeast Oklahoma Red Cross** – The organization responds to fires and other natural disasters, and provides financial support to victims.
- **Payne County Youth Services** – The organization provides free services to improve the quality of life for children, adolescents, and adults and their families.
- **United Way of Southeast Oklahoma** and **Stillwater United Way** – Provides a variety of services to low- and moderate-income residents inside the bank's AA and across Oklahoma.

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 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”).

Time Period Reviewed	Lending Test: (01/02/2015 through 12/31/2017) Investment and Service Tests and CD Loans: (02/05/2015 to 12/31/2017)	
Financial Institution		Products Reviewed
The Bank, National Association (TBNA) McAlester, Oklahoma		First Lien Residential Mortgage Loans Commercial Real Estate
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Single, non-MSA comprising 2 counties in Oklahoma: Pittsburg County and Payne County.	Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

State of Oklahoma

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburg County and Payne County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	28	7.1	28.6	39.3	25.0	0.0
Population by Geography	99,361	3.3	25.9	37.2	33.6	0.0
Housing Units by Geography	46,593	5.1	27.6	38.0	29.2	0.0
Owner-Occupied Units by Geography	22,708	0.4	21.6	43.6	34.4	0.0
Occupied Rental Units by Geography	17,568	9.7	35.6	30.4	24.3	0.0
Vacant Units by Geography	6,317	9.4	26.7	39.3	24.6	0.0
Businesses by Geography	5,662	6.2	29.6	33.0	31.1	0.0
Farms by Geography	231	0.9	16.5	49.4	33.3	0.0
Family Distribution by Income Level	23,405	19.6	16.9	18.2	45.3	0.0
Household Distribution by Income Level	40,276	28.8	14.3	16.3	40.6	0.0
Median Family Income Non-MSAs - KS	51,698	Median Housing Value				129,267
		Median Gross Rent				755
		Families Below Poverty Level				14.0%
<i>Source: 2015 ACS Census and 2017 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA comprises 28 complete CTs throughout both counties. Local economic conditions are stable. The AA meets the requirements of the regulation and does not arbitrarily exclude low- and moderate-income geographies. In aggregate, two CTs are designated as low-income tracts, eight are designated as moderate-income tracts, 11 are designated as middle-income tracts, and seven are designated as upper-income tracts. The only significant change in demographics since the 2010 census is the change in one CT from a moderate-income designation to middle-income, one from a middle-income designation to low-income, eight from a middle-income designation to moderate-income, one from a middle-income designation to upper-income, and one from an “unknown” designation to upper-income. Competition for banking services within the AA is strong and includes approximately 23 commercial state-chartered banks, and branches of non-local banks of different sizes.

Community Contact

The OCC contacted members of the local community within the AA to get a better understanding of the general community credit and development needs, and discuss local economic conditions. The contacts stated that housing and rental units are generally not affordable for low- and moderate-income residents. The contacts also stated that financial education such as budgeting and credit counseling is needed.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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 are compiled by the FDIC and are available as of June 30th of each year.

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

- Table O. AA Distribution of Home Mortgage Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. AA Distribution of Home Mortgage Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. AA 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 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) throughout those geographies. Because 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 AA.
- Table R. AA Distribution of Loans to Small Businesses by Gross Annual Revenue -** Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. Additionally, 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 business. The table also presents aggregate peer data for the years the data is available.

Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography **2015-16**

AA:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Home Mortgage	--	--	--	2,107	0.0	0.0	0.0	2.1	13.5	1.7	67.5	76.6	59.4	30.3	9.9	38.9	0.1	0.0	0.0
Total	--	--	--	2,107	0.0	0.0	0.0	2.1	13.5	1.7	67.5	76.6	59.4	30.3	9.9	38.9	0.1	0.0	0.0

Source: 2010 United States Census; 01/02/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: AA Distribution of Home Mortgage Loans by Income Category of the Geography **2017**

AA:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Home Mortgage	--	--	--	2,075	0.4	1.7	0.7	21.6	10.0	23.1	43.6	47.7	32.6	34.4	40.6	41.0	0.0	0.0	0.0
Total	--	--	--	2,075	0.4	1.7	0.7	21.6	10.0	23.1	43.6	47.7	32.6	34.4	40.6	41.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/02/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower **2015-16**

AA:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Home Mortgage	--	--	--	2,107	18.0	10.8	2.1	16.5	13.5	10.9	17.8	29.8	18.6	47.7	45.9	49.5	0.0	0.0	18.9
Total	--	--	--	2,107	18.0	10.8	2.1	16.5	13.5	10.9	17.8	29.7	18.6	47.7	45.9	49.5	0.0	0.0	18.9

Source: 2010 United States Census; 01/02/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: AA Distribution of Home Mortgage Loans by Income Category of the Borrower **2017**

AA:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Home Mortgage	--	--	--	2,075	19.6	15.0	2.8	16.9	15.0	11.0	18.2	25.0	17.3	45.3	45.0	50.8	0.0	0.0	18.0
Total	--	--	--	2,075	19.6	15.0	2.8	16.9	15.0	11.0	18.2	25.0	17.3	45.3	45.0	50.8	0.0	0.0	18.0

Source: 2015 ACS Census; 01/02/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography **2015-16**

AA:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CRE	--	--	--	1,373	0.0	0.0	0.0	9.6	35.0	7.9	63.7	40.0	63.1	26.6	25.0	29.0	0.1	0.0	0.0
Total	--	--	--	1,373	0.0	0.0	0.0	9.6	35.0	7.9	63.7	40.0	63.1	26.6	25.0	29.0	0.1	0.0	0.0

Source: 2016 D&B Data; 01/02/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography **2017**

AA:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
CRE	--	--	--	1,373	6.2	6.8	7.4	29.6	13.3	22.9	33.0	60.0	34.2	31.1	35.4	20.0	0.0	0.0	0.0
Total	--	--	--	1,373	6.2	6.7	7.4	29.6	13.3	22.9	33.0	60.0	34.2	31.1	35.4	20.0	0.0	0.0	0.0

Source: 2017 D&B Data; 01/02/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: AA Distribution of Loans to Small Businesses by GAR **2015-16**

AA:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
CRE	--	--	--	1,373	79.5	80.0	52.7	5.3	20.0	15.2	0
Total	--	--	--	1,373	79.5	80.0	52.7	5.3	20.0	15.2	0

Source: 2016 D&B Data; 01/02/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data"--" data not available.
Due to rounding, totals may not equal 100.0

Table R: AA Distribution of Loans to Small Businesses by GAR **2017**

AA:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
CRE	--	--	--	1,373	79.8	80.0	52.7	5.5	20.0	14.7	0
Total	--	--	--	1,373	79.8	80.0	52.7	5.5	20.0	14.7	0

Source: 2017 D&B Data; 01/02/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data"--" data not available.
Due to rounding, totals may not equal 100.0