

PUBLIC DISCLOSURE

August 23, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Eufaula RSSD# 343051

102 North Main Street Eufaula, Oklahoma 74432

Federal Reserve Bank of Kansas City 1 Memorial Drive Kansas City, Missouri 64198

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, nor should it 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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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Bank of Eufaula (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- An excellent dispersion of loans occurs throughout the bank's AA.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income, and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed within the bank's Eastern Oklahoma AA. Due to the makeup of the bank's loan portfolio and strategic focus, home mortgage loans were weighted more heavily for purposes of the CRA evaluation. The following data was reviewed:

- The bank's 18-quarter average NLTD ratio,
- A statistical sample of 55 home mortgage loans from a universe of 75 loans and 45 small business loans from a universe of 58 loans all originated between March 13, 2017 and December 31, 2020.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Eufaula, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of SNB Bancshares, Inc.
- The bank has total assets of \$109.4 million (MM) as of March 31, 2021.
- The bank operates its main office and one drive-through facility, both located in Eufaula, Oklahoma.
- The bank operates two automated teller machines (ATMs), including a deposit taking ATM located at the bank's drive-through facility and a cash-only ATM located inside a convenience store in Eufaula, Oklahoma.
- The bank's primary business strategy is home mortgage lending, with commercial and consumer lending also representing key business lines.

TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF MARCH 31, 2021					
Loan Type	\$(000)	%			
Residential Real Estate	12,959	46.8			
Commercial	7,112	25.7			
Consumer	5,104	18.4			
Agriculture	1,997	7.2			
Other	534	1.9			
Gross Loans	27,706	100.0			
Note: Percentages may not total 100.0 percent due to rounding.					

The bank was rated Satisfactory under the CRA at its March 13, 2017 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank's AA is comprised of McIntosh County, in its entirety, and portions of Haskell, Muskogee, and Pittsburg Counties in Oklahoma (see Appendix A for an AA map).

- The AA is comprised of three moderate- and seven middle- income census tracts. Although
 the number of census tracts has not changed, the composition of the AA at the previous
 evaluation consisted of five moderate- and five middle-income tracts.
- According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank had a deposit market share of 3.0 percent which ranked 12th out of 15 FDIC-insured institutions operating in the counties that make up the AA.
- An interview with a community member was conducted to ascertain the credit needs of the
 communities within the bank's AA, the responsiveness of area banks in meeting those credit
 needs, and local economic conditions. The contact represents an economic development
 organization. Additionally, the evaluation considered information from one community
 contact that was previously conducted for a different institution operating in the AA. The
 community member represented a local government agency.

TABLE 2 POPULATION CHANGE							
Area 2010 Population 2015 Population Percent Change							
Eastern Oklahoma AA	149,848	148,315	(1.0)				
Haskell County, OK	12,769	12,850	0.6				
McIntosh County, OK	20,252	20,280	0.1				
Muskogee County, OK	70,990	70,224	(1.1)				
Pittsburg County, OK	45,837	44,961	(1.9)				
NonMSA Oklahoma	1,327,624	1,333,350	0.4				
State of Oklahoma	3,751,351	3,849,733	2.6				

Source: 2010 U.S. Census Bureau Decennial Census

2011-2015 U.S. Census Bureau: American Community Survey

Note: All data presented is at the county level and some values may be different than expected for AAs with partial counties

- Of note, due to the bank taking only portions of Haskell, Muskogee, and Pittsburg Counties as part of its AA, the actual population of the bank's designated AA was 37,665 in 2015.
- A community member stated McIntosh County, specifically Eufaula, has experienced an increase in retirement-aged population due to the presence of the lake.

TABLE 3 MEDIAN FAMILY INCOME CHANGE							
Area 2010 Median Family 2015 Median Family Income Income Percent Chan							
Eastern Oklahoma AA	50,336	50,032	(0.6)				
Haskell County, OK	52,950	46,044	(13.0)				
McIntosh County, OK	39,825	46,359	16.4				
Muskogee County, OK	50,983	49,682	(2.6)				
Pittsburg County, OK	53,683	53,670	0.0				
NonMSA Oklahoma	51,664	51,491	(0.3)				
State of Oklahoma	58,375	58,029	(0.6)				

Source: 2006-2010 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey

Note: All data presented is at the county level and some values may be different than expected for AAs with partial counties

Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- A community member stated that incoming retired residents are typically in upper-income brackets, likely contributing to the rise in median family income for McIntosh County.
- A community member stated that many residents of McIntosh County commute to cities with larger populations outside of the county for higher paying jobs.

TABLE 4 HOUSING COST BURDEN								
Cost Burden – Renters Cost Burden – Owners								
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners		
Eastern Oklahoma AA	63.8	37.6	39.3	54.4	24.6	18.2		
Haskell County, OK	63.2	30.7	36.6	48.4	12.6	17.2		
McIntosh County, OK	56.5	24.0	35.8	52.1	20.0	18.4		
Muskogee County, OK	68.2	45.4	43.8	58.0	31.3	19.5		
Pittsburg County, OK	57.9	34.0	33.6	53.2	21.8	16.6		
NonMSA Oklahoma	65.0	29.2	36.1	50.5	23.2	16.8		
State of Oklahoma	71.5	32.9	39.5	54.6	29.2	17.9		

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy Note: All data presented is at the county level and some values may be different than expected for AAs with partial counties

- The median housing value within the AA at \$83,506 is below the median housing value for statewide nonmetropolitan areas at \$91,490.
- A community member stated that home prices in McIntosh County have been rising due to increasing demand for lakefront property.

TABLE 5 UNEMPLOYMENT RATES							
Region 2016 2017 2018 2019 2020							
Eastern Oklahoma AA	6.1	5.3	4.1	4.1	6.9		
Haskell County, OK	8.0	6.2	4.9	5.0	7.8		
McIntosh County, OK	8.6	7.3	5.6	5.5	8.4		
Muskogee County, OK	5.3	4.8	3.8	3.7	6.0		
Pittsburg County, OK	5.9	5.0	3.7	3.9	7.6		
NonMSA Oklahoma	5.2	4.3	3.4	3.4	5.9		
State of Oklahoma 4.6 4.0 3.3 3.1 6.1							
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics Note: All data presented is at the county level and some values may be different than expected for AAs with partial counties							

- A community member stated that circumstances associated with the Coronavirus Disease 2019 pandemic increased unemployment rates throughout the AA in 2020, specifically in the tourism and food service industries.
- Major industries in the AA, by number of employees, include health care/social assistance, retail trade, manufacturing, government, and food services. A few specific major employers include Epic Medical Center and Eufaula public schools, according to a community member.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on location, asset size, product offerings, and loan portfolio composition.

The bank's NLTD ratio is reasonable. The bank's NLTD ratio is below the ratios of the three similarly situated institutions used for this evaluation and has decreased since the previous examination. However, the bank's NLTD ratio is comparable to the ratios of two of the three similarly situated institutions used in the comparison. A community member indicated that there is increased banking competition within the AA, coupled with limited availability of houses available for purchase. A community member also stated that many working residents commute to two larger population centers located outside the AA for employment and obtain banking services from institutions located in those cities instead. Additionally, the bank has a considerable volume of public deposits which reduces the amount of funds available for lending. Finally, a community member noted that banks in the AA are meeting the credit needs of the area and are willing to provide loans to the local community.

TABLE 6 COMPARATIVE NLTD RATIOS							
Institution Location Asset Size (\$000s) NLTD Ratio (% 18 Quarter Aver							
Bank of Eufaula	Eufaula, OK	109,409	36.7				
The First National Bank of Stigler	Stigler, OK	142,672	37.1				
The Farmers State Bank	Quinton, OK	141,342	60.3				
The Peoples National Bank of Checotah	Checotah, OK	164,451	37.8				

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A majority of the bank's loans, by number and dollar, are originated inside the AA.

TABLE 7 LENDING INSIDE AND OUTSIDE THE AA								
Loop Type	Inside			Outside				
Loan Type	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Mortgage Loans	45	3,908	81.8	83.3	10	781	18.2	16.7
Small Business Loans	39	2,827	86.7	92.2	6	240	13.3	7.8
Total Loans	84	6,735	84.0	86.8	16	1,021	16.0	13.2
Note: Percentages may not add to 100.0 percent due to rounding.								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts. The bank's geographic distribution of loans reflects excellent dispersion among the different census tracts within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. As noted in table 8, the bank's lending in moderate-income census tracts is above the percentage of owner-occupied units in moderate-income census tracts. No significant gaps were identified in the dispersion of home mortgage loans.

TABLE 8 DISTRIBUTION OF 2017-2020 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY								
Census Tract		Bank Loans % 0						
Income Level	#	\$(000)	#%	\$%	Units			
Low	0	0	0.0	0.0	0.0			
Moderate	16	1,764	35.6	45.1	20.3			
Middle	29	2,144	64.4	54.9	79.7			
Upper	0	0	0.0	0.0	0.0			
Unknown	0	0	0.0	0.0	0.0			
Not Reported	0	0	0.0	0.0	0.0			

Source 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. As noted in table 9, the bank's lending in moderate-income census tracts is comparable to the percentage of businesses operating in moderate-income census tracts. No significant gaps were identified in the dispersion of small business loans.

TABLE 9 DISTRIBUTION OF 2017-2020 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY						
Census Tract		Bank	Loans		% of	
Income Level	#	\$(000)	#%	\$%	Businesses	
Low	0	0	0.0	0.0	0.0	
Moderate	21	2,295	53.8	81.2	48.4	
Middle	18	532	46.2	18.8	51.6	
Upper	0	0	0.0	0.0	0.0	
Unknown	0	0	0.0	0.0	0.0	
Not Reported	0	0	0.0	0.0	0.0	

Source 2020 FFIEC Census Data 2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has a reasonable penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. As noted in table 10, the bank's lending to low-income borrowers is above the percentage of low-income families in the AA. The bank's lending to moderate-income borrowers is comparable to the demographic figure.

TABLE 10 DISTRIBUTION OF 2017-2020 HOME MORTGAGE LENDING BY BORROWER INCOME LEVEL							
Borrower		Families by					
Income Level	#	\$(000)	#%	\$%	Family Income %		
Low	14	766	31.1	19.6	23.7		
Moderate	6	534	13.3	13.7	18.6		
Middle	13	1,117	28.9	28.6	22.3		
Upper	12	1,492	26.7	38.2	35.3		
Unknown	0	0	0.0	0.0	0.0		

Source 2020 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with gross annual revenues of \$1MM or less is comparable to the percentage of total small businesses operating in the AA. A substantial majority of the bank's lending, including 32 of 36 loans made to businesses with revenues of less than \$1MM, were for amounts of \$100,000 or less, demonstrating the bank's willingness to support smaller credit needs of the community.

DI				NESS LENDING SSES	
		Banl	Loans		Total Businesses
	#	\$(000)	#%	\$%	%
		By Re	venue		
\$1 Million or Less	36	2,256	92.3	79.8	89.8
Over \$1 Million	3	571	7.7	20.2	6.6
Not Known	0	0	0.0	0	3.6
Total	39	2,827	100.0	100.0	100.0
		By Loa	ın Size		
\$100,000 or less	32	884	82.1	31.3	
\$100,001 - \$250,000	4	721	10.3	25.5	
\$250,001 – \$1 Million	3	1,222	7.7	43.2	
Total	39	2,827	100.0	100.0	
·	By Loa	an Size and Reve	enue \$1 Million o	r Less	
\$100,000 or less	32	884	88.9	39.2	
\$100,001 - \$250,000	1	150	2.8	6.6	
\$250,001 – \$1 Million	3	1,222	8.3	54.2	
Total	36	2,256	100.0	100.0	
Source: 2020 FFIEC Census	Data				

Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data

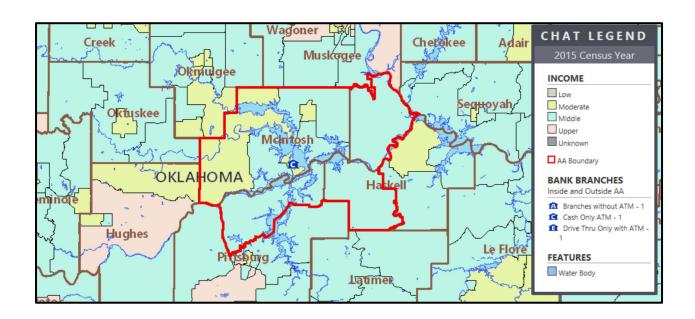
2011-2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A - MAP OF THE ASSESSMENT AREA



APPENDIX B - DEMOGRAPHIC INFORMATION

	202	0 EASTER	TAB	LE B-1 OMA AA D					
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	2,497	23.7	
Moderate	3	30.0	2,524	24.0	511	20.2	1,964	18.6	
Middle	7	70.0	8,011	76.0	1,088	13.6	2,353	22.3	
Upper	0	0.0	0	0.0	0	0.0	3,721	35.3	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	10	100.0	10,535	100.0	1,599	15.2	10,535	100.0	
	Housing			Housi	ng Type by	Tract			
	Units by	Ov	vner-occupi	ed	Rer	ntal	Vac	ant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	4,972	2,509	20.3	50.5	1,211	24.4	1,252	25.2	
Middle	18,716	9,880	79.7	52.8	1,976	10.6	6,860	36.7	
Upper	0	0	0.0	0.0	0	0.0	0	0.0	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	23,688	12,389	100.0	52.3	3,187	13.5	8,112	34.2	
	Total Businesses		Businesses by Tract & Revenue Size						
		by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	471	48.4	423	48.3	35	54.7	13	37.1	
Middle	503	51.6	452	51.7	29	45.3	22	62.9	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	974	100.0	875	100.0	64	100.0	35	100.0	
Percenta	ge of Total B	usinesses:		89.8		6.6		3.6	
Total Farms by Tract		ormo	Farms by Tract & Revenue Size						
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	14	28.6	14	29.2	0	0.0	0	0.0	
Middle	35	71.4	34	70.8	0	0.0	1	100.0	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	49	100.0	48	100.0	0	0.0	1	100.0	
Per	centage of To	otal Farms:		98.0		0.0		2.0	

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

2011 – 2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.

	201	9 EASTER		LE B-2 OMA AA D	EMOGRA	PHICS			
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	2,497	23.7	
Moderate	3	30.0	2,524	24.0	511	20.2	1,964	18.6	
Middle	7	70.0	8,011	76.0	1,088	13.6	2,353	22.3	
Upper	0	0.0	0	0.0	0	0.0	3,721	35.3	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	10	100.0	10,535	100.0	1,599	15.2	10,535	100.0	
				Housi	ng Type by	Гract			
	Housing Units by	Ov	wner-occupi	ed	Rer	ntal	Vac	ant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	4,972	2,509	20.3	50.5	1,211	24.4	1,252	25.2	
Middle	18,716	9,880	79.7	52.8	1,976	10.6	6,860	36.7	
Upper	0	, 0	0.0	0.0	0	0.0	, 0	0.0	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	23,688	12,389	100.0	52.3	3,187	13.5	8,112	34.2	
	Total Businesses		Businesses by Tract & Revenue Size						
	by T		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	464	49.6	417	49.7	34	54.8	13	37.1	
Middle	472	50.4	422	50.3	28	45.2	22	62.9	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	936	100.0	839	100.0	62	100.0	35	100.0	
Percentag	ge of Total B	usinesses:		89.6		6.6		3.7	
			Farms by Tract & Revenue Size						
		Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	12	25.0	12	25.5	0	0.0	0	0.0	
Middle	36	75.0	35	74.5	0	0.0	1	100.0	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	48	100.0	47	100.0	0	0.0	1	100.0	
	centage of To	otal Farms:		97.9		0.0		2.1	

Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Dat

2019 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

	201	8 EASTER		LE B-3 OMA AA D	EMOGRA	PHICS			
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	2,513	23.9	
Moderate	3	30.0	2,524	24.0	511	20.2	1,970	18.7	
Middle	7	70.0	8,011	76.0	1,088	13.6	2,349	22.3	
Upper	0	0.0	0	0.0	0	0.0	3,703	35.1	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	10	100.0	10,535	100.0	1,599	15.2	10,535	100.0	
	Harraina			Housir	ng Type by	Гract			
	Housing	Ov	vner-occupi	ed	Rer	ntal	Vac	ant	
	Units by Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	4,972	2,509	20.3	50.5	1,211	24.4	1,252	25.2	
Middle	18,716	9,880	79.7	52.8	1,976	10.6	6,860	36.7	
Upper	0	0	0.0	0.0	0	0.0	0	0.0	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	23,688	12,389	100.0	52.3	3,187	13.5	8,112	34.2	
	Total Businesses		Businesses by Tract & Revenue Size						
	by T		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	468	49.8	421	50.3	32	53.3	15	35.7	
Middle	471	50.2	416	49.7	28	46.7	27	64.3	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	939	100.0	837	100.0	60	100.0	42	100.0	
Percenta	ge of Total B	usinesses:		89.1		6.4		4.5	
	Total Farms		Farms by Tract & Revenue Size						
by Tra		-	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	16	30.2	16	30.8	0	0.0	0	0.0	
Middle	37	69.8	36	69.2	0	0.0	1	100.0	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	53	100.0	52	100.0	0	0.0	1	100.0	
Por	centage of To	stal Earme:		98.1		0.0		1.9	
1 610	centage of it	Jiai Faiilis.		30.1		0.0		1.9	

Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data

2018 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

	201	7 EASTER		LE B-4 OMA AA D	EMOGRA	PHICS			
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	2,513	23.9	
Moderate	3	30.0	2,524	24.0	511	20.2	1,970	18.7	
Middle	7	70.0	8,011	76.0	1,088	13.6	2,349	22.3	
Upper	0	0.0	0	0.0	0	0.0	3,703	35.1	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	10	100.0	10,535	100.0	1,599	15.2	10,535	100.0	
				Housir	ng Type by	·			
	Housing	Ov	vner-occupi	ed	Rer	ntal	Vac	ant	
	Units by Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	4,972	2,509	20.3	50.5	1,211	24.4	1,252	25.2	
Middle	18,716	9,880	79.7	52.8	1,976	10.6	6,860	36.7	
Upper	0	0	0.0	0.0	0	0.0	0	0.0	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	23,688	12,389	100.0	52.3	3,187	13.5	8,112	34.2	
	Total Businesses		Businesses by Tract & Revenue Size						
	by T		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	456	67.5	406	69.4	37	60.7	13	43.3	
Middle	220	32.5	179	30.6	24	39.3	17	56.7	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	676	100.0	585	100.0	61	100.0	30	100.0	
Percenta	ge of Total B	usinesses:		86.5		9.0		4.4	
	T-4-1 F		Farms by Tract & Revenue Size						
		Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	18	30.2	18	40.0	0	0.0	0	0.0	
Middle	27	69.8	27	60.0	0	0.0	0	0.0	
Upper	0	0.0	0	0.0	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	45	100.0	45	100.0	0	0.0	0	0.0	
Per	centage of To	otal Farms:		100.0		0.0		0.0	

Source: 2017 FFIEC Census Data 2017 Dun & Bradstreet Dat

2017 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

APPENDIX C - GLOSSARY

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/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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

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applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

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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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.