



## **PUBLIC DISCLOSURE**

September 19, 2022

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

Citizens Bank, National Associations  
Charter Number 23834

4201 South Treadaway Boulevard  
Abilene, TX 79602

Office of the Comptroller of the Currency

Fort Worth Office  
225 E. John Carpenter Freeway Suite 900  
Irving, TX 75062-2326

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 performance in the Abilene MSA assessment area (AA).
- The bank's loan-to-deposit ratio is more than reasonable.
- The majority of the bank's loans were originated inside the AA.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- There were no Community Reinvestment Act (CRA) related complaints during the evaluation period.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is more than reasonable. The LTD is calculated on a bank-wide basis. The bank's quarterly LTD ratio since the previous CRA evaluation averaged 78.25 percent, with quarterly averages ranging from a high of 94.95 percent to a low of 54.07 percent. We compared the bank's LTD ratio to five similarly situated banks in the area ranging in asset size from \$34 million to \$261 million. The quarterly average LTD ratio for this peer group was 49.83 percent, with a high of 69.33 percent and a low of 35.14 percent.

## Lending in Assessment Area

A majority of the bank's loans are inside its assessment area(s) (AAs).

Our analysis relied on a sample of 52 loans consisting of commercial and home mortgage loans. The bank originated and purchased 76.9 percent by number and 73.1 percent by dollar volume 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.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	20	74.0	7	25.9	27	3,679	69.7	1,598	30.2	5,277
Commercial RE	20	80.0	5	20.0	25	7,209	74.9	2,404	25.0	9,613
Total	40	76.9	12	23.0	52	10,888	73.1	4,002	26.8	14,890

## Description of Institution

Citizens Bank NA (CBNA) is a full-service community bank located in Abilene, Texas. CBNA is wholly owned by Big Country Bancshares, Inc. (BCBI), a one-bank holding company also located in Abilene. We did not consider the activities of affiliates in this evaluation.

CBNA's headquarters are in Abilene, Texas with one branch located in Knox City, Texas, approximately 75 miles north of Abilene. The bank offers a full range of loan and deposit products, as well as online and telephone banking for individuals and businesses. Their physical offices serve as the primary delivery system for products and services. Both bank locations are situated in middle-income census-tracts. Main office lobby hours are from 9:00 am to 3:00 pm Monday through Thursday and 9:00 am to 5:00 pm on Fridays. The main office also has a drive-up facility with extended weekday hours from 8:00 am to 6:00 pm Monday through Friday and 9:00 am to 1:00 pm on Saturday. The Knox City branch lobby hours are from 9:00 am to 3:00 pm Monday through Friday with extended drive-up hours of 8:30 am to 4:00 pm on weekdays. The main office has an automated teller machine (ATM) and another ATM is located in a convenience store in Knox City. CBNA did not open or close any branches during the evaluation period or engage in any merger or acquisition activity.

The bank operates in two AAs, the Abilene MSA AA comprised of Taylor, Jones, and Callahan counties and the Knox City non-MSA AA comprised of Knox, Haskell, and Runnels counties. Both AAs meet the requirements of the CRA regulation and do not arbitrarily exclude low-or moderate-income geographies. According to 2015 ACS data there were no low-income census tracts located in either of the AAs. CBNA's major competition in both AAs is First Financial Bank of Abilene, Texas which leads the market in deposits and mortgage lending. Additional competitors include other local community banks such as the First National Bank of Anson headquartered in Anson, Texas, Haskell National Bank headquartered in Haskell, Texas with a branch operating in Abilene, Texas, The First National Bank of Ballinger headquartered in Ballinger, Texas and the First State Bank of Texas which operates in Abilene, Texas.

As of December 31, 2021, the bank had total assets of \$132 million, with net loans representing 51 percent of total assets and Tier One Capital of \$10.9 million. CBNA has a diverse loan portfolio consisting of commercial and residential real estate loans, commercial and industrial loans, consumer loans and agricultural loans. As a percentage of the overall loan portfolio lending breaks down as follows: commercial real estate (CRE) loans represent 51 percent; one-to-four family residential loans represent 25 percent; commercial loans represent 10 percent; consumer loans represent 7 percent and agricultural loans represent 7 percent.

CBNA's business strategy is to provide a wide range of services designed to meet the lending needs of the communities located within their AAs at fair and competitive prices. The bank continues to focus on meeting the credit needs of the Abilene MSA AA through commercial, CRE and one-to-four family residential lending, and the Knox City non-MSA AA through consumer and agricultural lending. As identified in the preceding paragraph, CRE and residential mortgage loans remain the bank's primary lending product and the focus of our evaluation, with more weight given to CRE lending.

The previous CRA evaluation dated August 14, 2017, assigned a "Satisfactory" rating under the Small Bank Performance Standards. There are no legal or financial impediments to CNB's ability to meet the credit needs of its AAs.

## **Scope of the Evaluation**

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

CBNA was evaluated under the Small Bank CRA evaluation procedures, which includes a Lending Test. The objective of our review was to determine the bank's record of meeting its community's credit needs, including that of LMI borrowers. Our review included the bank's performance from January 1, 2019 through December 31, 2021. CRE and home mortgage lending are the bank's primary loans products and are included as part of this evaluation. To evaluate the bank's lending performance, we analyzed a sample of 20 CRE loans and 20 home mortgage loans originated inside the AA during the evaluation period.

The bank was not required to report home loan data pursuant to the Home Mortgage Disclosure Act (HMDA) since it did not originate the minimum number of home mortgage loans in any year of the evaluation period (2019-2021). Therefore, we relied on a sample of home mortgage loans to place the bank's performance in context with aggregate HMDA lending activity in the Abilene MSA AA.

### **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 full-scope 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.

CBNA has delineated two AAs in Texas comprised of one MSA and one non-MSA. For our full-scope review, we selected the Abilene MSA AA. We selected the full-scope after considering the number of loans originated or purchased in each AA and the volume of deposits in each AA. We found that 97 percent of the bank's loans were originated or purchased in the Abilene MSA AA and 66 percent of the bank's deposits are in the Abilene MSA AA. Therefore, we conducted a limit scope review for the Knox City non-MSA AA.

### **Ratings**

The bank's overall rating is based solely on performance in the State of Texas. The state rating is based on performance in the Abilene MSA AA. CBNA's primary loan products are CRE and home mortgage loans. The distribution of loans by the income level of small businesses were given the most weight because the bank's business model is focused primarily on commercial lending. The residential portfolio is largely comprised of loans to investors and existing commercial borrowers to finance personal properties. Analysis of geographic distribution was conducted but given less weight as 75.4 percent of businesses in the Abilene MSA are located in middle- and upper- income CTs.

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

Pursuant to 12 CFR 25.28(c), 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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Texas

**CRA rating for the State of Texas<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- CBNA's LTD ratio is more than reasonable, reflecting responsiveness to credit needs in the community
- CBNA originated a majority of loans, both by number and dollar amount, inside the AA
- CBNA exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes
- CBNA did not receive any CRA related complaints during this evaluation period

### Description of Institution's Operations in Texas

CBNA is an interstate bank that provides banking services to the public through its main office, one branch location and two ATMs. The bank operates in two AAs, the Abilene MSA and Knox City, a non-MSA. In the Abilene MSA AA CBNA has \$71 million or 1.44 percent of the deposit market share and ranks 12<sup>th</sup> out of 27 financial institutions. In the Knox City non-MSA AA the bank has \$36 million or 9.09 percent of the deposit market share and ranks 8<sup>th</sup> out of 10 financial institutions. Competing financial institutions in both markets included other community banks, and First Financial Bank, a large regional bank with the predominant deposit market share of 43.98 percent in the Abilene MSA and 17.44 percent in the Knox City non-MSA.

The bank's primary business model is focused on CRE lending to small business owners and real estate investors within the bank's AA and providing residential loans. Approximately 49 percent of CBNA's residential mortgages are secured by investment and income-producing properties and a significant number of owner-occupied residential properties are to existing commercial borrowers to finance personal properties. All other deposit and lending products are traditional and noncomplex.

There were two community contacts conducted in the Abilene MSA AA with representatives from a small business development center and an affordable housing organization that works with low-income families who would not otherwise be able to afford a home. The contacts indicated primary needs in the AA are lending for small and micro businesses, rehab programs to help preserve existing housing units in LMI areas, school aged financial literacy, increased bank participation in the Dallas Federal Home Loan Bank programs, and a program to acquire bank owned foreclosed single-family units.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

## Abilene MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Abilene MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.0	27.7	42.6	21.3	8.5
Population by Geography	167,945	0.0	23.1	41.3	30.4	5.2
Housing Units by Geography	70,396	0.0	22.6	47.2	30.2	0.0
Owner-Occupied Units by Geography	38,193	0.0	15.1	47.9	37.0	0.0
Occupied Rental Units by Geography	22,045	0.0	34.8	43.7	21.5	0.0
Vacant Units by Geography	10,158	0.0	24.2	52.5	23.2	0.0
Businesses by Geography	12,340	0.0	23.8	40.3	35.1	0.8
Farms by Geography	587	0.0	8.7	52.6	38.5	0.2
Family Distribution by Income Level	39,448	21.5	17.7	20.2	40.6	0.0
Household Distribution by Income Level	60,238	24.1	16.3	17.6	42.0	0.0
Median Family Income MSA - 10180 Abilene, TX MSA		\$56,448	Median Housing Value			\$95,509
			Median Gross Rent			\$790
			Families Below Poverty Level			12.7%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Texas

CBNA operates in one state and a full-scope review was performed on the bank's Abilene MSA AA for the evaluation period.

## Lending Test

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

## Conclusions for Area Receiving a Full-Scope Review.

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

## Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in the State.



### ***Home Mortgage Loans***

The bank did not make any home mortgage loans in low-or moderate-income census tracts during the evaluation period. In determining our ratings, we weighed demographic factors of the AA that could affect the bank's ability to lend. These factors included competition from larger institutions, no low-income CTs, and the location of the majority of owner-occupied housing.

Peer Market Share data indicates strong competition for mortgage loans within the Abilene MSA AA. First Financial Bank is the predominate lender with 15.8 percent of the market share followed by PrimeLending with a 7.2 percent market share. There are a total of 238 financial institutions and mortgage companies vying for the remaining 77 percent of the mortgage market. CBNA ranks 19<sup>th</sup> with a 1.67 percent share of the mortgage market.

Better lending opportunities exist in upper- and middle-income CTs within the bank's AA, as according to the 2015 ACS those geographies contained 84.9 percent of owner-occupied housing units in the AA. There are no low-income CTs. The percentage of renter occupied housing units in moderate-income CTs is 34.8 percent and exceeds the percentage of owner-occupied units. In addition, vacant housing units account for 24.2 percent of units in moderate-income areas.

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

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

There are no low-income geographies in the Abilene MSA AA. The bank's lending to small businesses located in moderate-income geographies is near both the percentage of small businesses and the aggregate lending in these geographies.

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

### **Distribution of Loans by Income Level of the Borrower**

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

### ***Home Mortgage Loans***

The percentage of the bank's home loans to low-income borrowers is lower than the percentage of families identified as low-income but exceeds performance from aggregate lenders. The percent of the bank's home mortgage loans to moderate-income borrowers was lower than the percentage of moderate-income families and peer lending to moderate income families. One noteworthy challenge is the bank's AA has a 12.7 percent poverty rate, which likely limits the bank's ability to fully penetrate the LMI borrower demographic.

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

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

The percentage of loans to businesses with annual revenues of \$1 million or less is near the reported percentage of small businesses in the AA and exceeds aggregate lender performance in the AA.

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

### **Responses to Complaints**

CBNA and the OCC did not receive any complaints regarding CRA over the evaluation period.

### **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Knox City non-MSA is consistent with the bank's overall performance under the Lending Test in the full scope area.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/19 to 12/31/21	
<b>Bank Products Reviewed:</b>	Home mortgage and small business	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Texas</b>		
Abilene MSA	Full-scope	The entire counties of Taylor, Johns and Callahan consisting of 47 whole census tracts
Knox City non-MSA	Limited-scope	The entire counties of consisting of Knox, Haskell, and Runnells and 8 whole census tracts

## Appendix B: Summary of MMSA and State Ratings

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RATINGS	Citizens Bank
Overall Bank:	Lending Test Rating
Citizens Bank	Satisfactory
MMSA or State:	
Texas	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

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

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

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- Table O. Assessment Area 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. Assessment Area 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019-21</b>
Assessment Area:	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	
Citizens Bk MSA 2021	20	3,679	100	6,998	0.0	0.0	0.0	15.1	0.0	8.4	47.9	25.0	30.2	37.0	75.0	61.2	0.0	0.0	0.2	
<b>Total</b>	<b>20</b>	<b>3,679</b>	<b>100</b>	<b>6,998</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>15.1</b>	<b>0.0</b>	<b>8.4</b>	<b>47.9</b>	<b>25.0</b>	<b>30.2</b>	<b>37.0</b>	<b>75.0</b>	<b>61.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.2</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2019-21</b>
Assessment Area:	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	
Citizens Bk MSA 2021	20	3,679	100	6,998	21.5	5.0	2.8	17.7	5.0	12.2	20.2	15.0	18.3	40.6	75.0	43.9	0.0	0.0	22.8	
<b>Total</b>	<b>20</b>	<b>3,679</b>	<b>100</b>	<b>6,998</b>	<b>21.5</b>	<b>5.0</b>	<b>2.8</b>	<b>17.7</b>	<b>5.0</b>	<b>12.2</b>	<b>20.2</b>	<b>15.0</b>	<b>18.3</b>	<b>40.6</b>	<b>75.0</b>	<b>43.9</b>	<b>0.0</b>	<b>0.0</b>	<b>22.8</b>	

*Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2019-21</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Citizens Bk MSA 2021	20	7,209	100	3,909	0.0	0.0	0.0	23.8	20.0	23.0	40.3	35.0	41.4	35.1	45.0	35.4	0.8	0.0	0.2	
<b>Total</b>	<b>20</b>	<b>7,209</b>	<b>100</b>	<b>3,909</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>23.8</b>	<b>20.0</b>	<b>23.0</b>	<b>40.3</b>	<b>35.0</b>	<b>41.4</b>	<b>35.1</b>	<b>45.0</b>	<b>35.4</b>	<b>0.8</b>	<b>0.0</b>	<b>0.2</b>	

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2019-21</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Citizens Bk MSA 2021	20	7,209	100.0	3,909	82.7	75.0	33.2	4.7	25.0	12.6	0.0	
<b>Total</b>	<b>20</b>	<b>7,209</b>	<b>100.0</b>	<b>3,909</b>	<b>82.7</b>	<b>75.0</b>	<b>33.2</b>	<b>4.7</b>	<b>25.0</b>	<b>12.6</b>	<b>0.0</b>	

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*