

# **PUBLIC DISCLOSURE**

December 14, 2020

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Security National Bank Charter Number 13650

1 West Broadway, Witt, Illinois 62094

Office of the Comptroller of the Currency

211 Fulton Street Suite 604 Peoria, Illinois 61602

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 the performance in the state of Illinois.
- The borrower distribution is reasonable.
- The geographic distribution is reasonable.
- A majority of loans were originated inside the assessment area (AA).
- The loan-to-deposit (LTD) ratio is reasonable.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable.

The quarterly LTD averaged 75.1 percent over the 21 quarters from September 30, 2015, through September 30, 2020, with a low of 70.5 percent and a high of 81.0 percent.

The bank ranked 5<sup>th</sup> of 14 similarly sized and located community banks that compete with the bank for deposits in the AA. The comparable institutions ranged in size from \$24.1 million to \$225.3 million, at September 30, 2020. The quarterly averages for similarly situated banks over the same period ranged from 32.3 percent to 97.3 percent. The LTD ratio is calculated on a bank-wide basis.

#### **Lending in Assessment Area**

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

The bank originated and purchased 83.3 percent of its total loans inside the bank's AA 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.

Lending Inside and Outside of the Assessment Area												
	N	Number (	of Loans		Total	Dollar A						
Loan Category	Insi	de	Outsi	Outside		Insid	e	Outsio	Total			
	#	%	#	%	#	\$	%	\$	%	\$(000s)		
Small Farm	19	79.2	5	20.8	24	2,106	68.9	951	31.1	3,056		
Consumer	21	87.5	3	12.5	24	125	73.0	46	27.0	171		
Total	40	83.3	8	16.7	48	2,231	69.1	997	30.9	3,227		

Source: Random sample of Agriculture and Consumer loans originated or purchased from January 1, 2017 to December 31, 2019.

### **Description of Institution**

Security National Bank (SNB or bank) is an intrastate bank headquartered in Witt, Illinois, with total assets of \$90.5 million at September 30, 2020. The bank is owned by Security Bancshares, Inc, a one bank holding company headquarter in Witt, Illinois with total assets of \$90.5 million at September 30, 2020. The holding company does not negatively impact the bank's ability to meet the credit needs of the community.

The CRA evaluation has one rating area for the one AA. The NonMSA AA is composed of the southwest portion of Christian County, the northwest portion of Fayette County, and the eastern portion of Montgomery County. The AA does not reflect illegal discrimination or arbitrarily excluded LMI geographies.

All four branches are located in Montgomery County. The bank's branches offer drive-through services and provide banking services on Saturday. Customers also have banking access through online and mobile platforms. There were no branch closures or openings during the evaluation period.

SNB's mission is to be recognized by clients as a safe, sound institution possessing impeccable integrity and superb service quality, while providing consistently excellent returns on investments to shareholders, and to be a well-managed, highly compliant, and financially strong bank. The bank's lending is largely focused on agriculture and agriculture related businesses but also offers a range of products for residential and consumer purposes.

Agriculture loans represent the largest portfolio at \$24.3 million, followed by residential loans at \$15.3 million, commercial loans at \$11.6 million, and consumer loans at \$1.7 million, per Call Report data at September 30, 2020.

SNB reported a net loans and leases to total assets ratio of 57.60 percent and a tier 1 leverage capital ratio of 9.4 percent, at September 30, 2020.

There are no legal or financial circumstances that impede the bank's ability to meet the credit needs of its AAs.

The previous CRA rating, which the OCC determined using the Small Bank evaluation procedures, was Outstanding, as detailed in the PE dated September 29, 2015.

# **Scope of the Evaluation**

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

The evaluation period covers the period from the date of the previous CRA PE of September 29, 2015, through December 14, 2020. We evaluated SNB under the Small Bank evaluation procedures, which includes a Lending Test.

The Lending Test evaluated primary loan products originated or purchased between January 1, 2017, and December 31, 2019, and were compared to the 2015 American Community Survey Census Data.

The primary loan products for the evaluation were determined to be agriculture and consumer loans. The bank originated or purchased over 1,400 loans totaling \$59.3 million, with agriculture and consumer

loans accounting for 21.0 percent and 52.0 percent by number of originations and purchases, respectively, between January 1, 2017, and December 31, 2019, per bank data.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

#### **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 AAs 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.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

SNB's one AA is located within the state of Illinois.

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

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

Pursuant to 12 CFR 25.28(c) 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# **State Rating**

#### State of Illinois

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

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The borrower distribution is reasonable. The borrower distribution of farm loans is reasonable and consumer loans is excellent.
- The geographic distribution is reasonable. The geographic distribution of farm loans is reasonable and consumer loans is excellent.

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

The bank offers lending options for agriculture, business, consumer, and residential needs. The bank serves its AA credit and banking needs primarily through branches located in Montgomery County. Customers have additional banking access through internet and mobile platforms. Two branches are located in moderate-income geographies and two branches are located in distressed middle-income geographies. The geographies are distressed due to high levels of unemployment.

Competition for loans and deposits is moderate to high due to the number of banks in the AA. SNB competes with national banks, state banks, and farm credit institutions. SNB held a 3.3 percent deposit market share, and ranked 12<sup>th</sup> of 27 FDIC insured financial institutions competing for the areas \$2.2 billion in deposits, at June 30, 2020.

Large economic sectors include agriculture, retail trade and service businesses. Larger employers in the AA include local school districts, healthcare facilities, a correctional facility, and a nationwide discount department store.

The annual unemployment rate in the State of Illinois had been declining during the evaluation period. The unemployment rate was 4.9 percent in 2017, which declined to 4.3 percent in 2018, and further declined to 4.0 percent in 2019. All three counties in the AA had declining annual unemployment rates during the evaluation period but compared unfavorably to the State of Illinois in 2019 with Christian County at 4.8 percent, Fayette County at 4.4 percent, and Montgomery County at 5.2 percent.

We contacted three individuals representing an economic development group, a realty group, and a farm advocacy group. The contacts described the economic condition from declining to stagnant. While some new businesses have opened, business development is limited as many of the area's small towns suffer from empty storefronts, declines in real estate demand, and job losses from coal related industries. Agriculture remains an important industry in the area but the high cost barriers to entry create significant barriers to new farmers.

<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.

One contact spoke on the need for more fixed-rate financing. A second contact felt the credit and banking needs were being met. A third contact spoke on the need for SBA and USDA credit opportunities and need for small and micro lending to help small businesses. The contacts similarly discussed limited community development opportunities for bank involvement in the community.

The contacts did not have any negative perceptions of SNB.

#### Non-MSA

Table A – Demographic Information of the Assessment Area												
Assessment Area: Non-MSA AA, 2015 ACS US Census												
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	8	0.0	25.0	75.0	0.0	0.0						
Population by Geography	32,869	0.0	12.1	87.9	0.0	0.0						
Housing Units by Geography	12,717	0.0	15.3	84.7	0.0	0.0						
Owner-Occupied Units by Geography	8,608	0.0	13.6	86.4	0.0	0.0						
Occupied Rental Units by Geography	2,109	0.0	17.1	82.9	0.0	0.0						
Vacant Units by Geography	2,000	0.0	20.6	79.4	0.0	0.0						
Businesses by Geography	1,603	0.0	15.5	84.5	0.0	0.0						
Farms by Geography	216	0.0	24.1	75.9	0.0	0.0						
Family Distribution by Income Level	7,544	19.9	19.0	21.8	39.2	0.0						
Household Distribution by Income Level	10,717	22.6	15.3	18.9	43.2	0.0						
Median Family Income Non-MSAs - IL		\$59,323	Median Housi	ng Value		\$86,316						
			Median Gross Rent			\$603						
			Families Belo	w Poverty Le	vel	9.0%						

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

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

# **Scope of Evaluation in Illinois**

The Non-MSA AA received a full-scope review. More weight was placed on agriculture performance due to the strategic focus of the bank. More weight was placed on demographic performance than aggregate performance due to the limited number of banks in the AA reporting small farm data.

#### LENDING TEST

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

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

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

#### Distribution of Loans by Income Level of the Geography

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

The geographic distribution of farm loans is reasonable and consumer loans is excellent. There were no low-income geographies during the evaluation period.

#### Small Loans to Farms

Refer to Table S in the state of Illinois 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 farms.

The geographic distribution is reasonable.

The proportion of lending to farms in moderate-income geographies was near to the percentage of farms in moderate-income geographies and significantly exceeded the aggregate lending.

#### Consumer Loans

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

The geographic distribution is excellent.

The proportion of lending to borrowers in moderate-income geographies significantly exceeded the percentage of households in moderate-income geographies.

#### Lending Gap Analysis

We performed a lending gap analysis that included a review of geocoded sample of loans and compared the distribution to AA maps and location of branches. We did not identify any unexplained conspicuous gaps in lending.

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

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

#### Small Loans to Farms

Refer to Table T in the state of Illinois 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 farms.

The borrower distribution is reasonable.

The proportion of loans to small farms was near to the percentage of small farms and significantly exceeded the aggregate lending.

#### Consumer Loans

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

The borrower distribution is excellent.

The proportion of loans to low- and moderate-income borrowers exceeded both the percentage of low- and moderate-income households.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed:	January 1, 2017 to December	31, 2019
Bank Products Reviewed:	Small farm, Consumer loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of	of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
States		
Illinois		
Non-MSA	Full-Scope	Portions of Christian, Fayette, and Montgomery

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

RATINGS	Security National Bank
Overall Bank:	Lending Test Rating
Security National Bank	Satisfactory
State:	
Illinois	Satisfactory

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

family income that is at	least 120 percent,	in the case of a	geography.	nedian income, c	n a mediai

# **Appendix D: Tables of Performance Data**

#### **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 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.

Table S - Asse	able S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-19																		
		Total Loa	ıns to Fa	rms	Lov	v-Income	Tracts	ets Mode		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Non-MSA	20	2,121	100	43	0.0	0.0	0.0	24.1	20.0	11.6	75.9	75.0	88.4	0.0	5.0	0.0	0.0	0.0	0.0
Total	20	2,121	100	43	0.0	0.0	0.0	24.1	20.0	11.6	75.9	75.0	88.4	0.0	5.0	0.0	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table T: Assessment Area	Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-1													
		Total Loan	Total Loans to Farms Farms with Revenues <= 1MM Farms with Revenues > 1MM							Revenues Not ilable				
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans			
Non-MSA	20	2,120	100	43	99.5	85.0	39.5	0.0	10.0	0.5	5.0			
Total	20	2,120	100	43	99.5	85.0	39.5	0.0	10.0	0.5	5.0			

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table U: Assessm	Fable U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-19												
	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
Assessment Area:	#	\$ (000s)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	21	125	100	0.0	0.0	14.3	23.8	85.7	76.2	0.0	0.0	0.0	0.0
Total	21	125	100	0.0	0.0	14.3	23.8	85.7	76.2	0.0	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data.

Due to rounding, totals may not equal 100.0%

Table V - Assessm	Cable V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-19												
	Total Cor		Loans	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Non-MSA	21	125	100	22.6	33.3	15.3	33.3	18.9	9.5	43.2	14.3	0.0	9.5
Total	21	125	100	22.6	33.3	15.3	33.3	18.9	9.5	43.2	14.3	0.0	9.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%