



## **PUBLIC DISCLOSURE**

April 1, 2024

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Northern Interstate Bank, National Association  
Charter Number 6863

501 W. US 2  
Norway, MI 49870

Office of the Comptroller of the Currency  
1200 N Mayfair Rd., Suite 200  
Wauwatosa, WI 53226

**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 bank's loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment area (AA).
- A substantial majority of the bank's loans are inside its AA.
- The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes.
- The geographic distribution of home mortgages reflects reasonable distribution among borrowers of different geographies.

### 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 bank's quarterly LTD ratio averaged 45.47 percent over the last 12 quarters from December 31, 2020, to December 31, 2022. The bank ranks fourth in a peer group that includes three other similarly situated banks with peer banks average LTD ratios ranging from 64.11 percent to 50.66 percent in the specified period. The other banks in this peer group have total assets ranging from \$139 million to \$569 million.

### Lending in Assessment Area

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

#### **2020-2021**

The bank originated and purchased 95 percent of its total loans by number and 96.8 percent of its total loans by dollar amount 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. See chart below for additional detail.

<b>Lending Inside and Outside of the Assessment Area – 2020 &amp; 2021</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	38	95	2	5	40	\$ 5,711	96.8	\$ 189	3.2	\$ 5,900
Total	38	95	2	5	40	\$ 5,711	96.8	\$ 189	3.2	\$ 5,900

**2022**

The bank originated and purchased 100 percent of its total loans by number and 100 percent of its loans by dollar amount 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. See chart below for additional detail.

<b>Lending Inside and Outside of the Assessment Area – 2022</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	20	100	--	--	20	\$ 3,508	100	--	--	\$ 3,508
Total	20	100	--	--	20	\$ 3,508	100	--	--	\$ 3,508

**Description of Institution**

Northern Interstate Bank (NIB) is a \$180 million federally chartered bank headquartered in Norway, Michigan. NIB is a subsidiary of Northern Interstate Financial, Inc., and was formed through the merger of the First National Bank of Norway and First National Bank of Crystal Falls in April 2017. Since then, there have been no other merger or acquisitions. NIB is a full-service financial institution, offering traditional banking products and services.

NIB has one AA and one rating area. The AA does not lie within a metropolitan statistical area (MSA) and is contiguous. The AA is a non-MSA AA covering 18 census tracts (CTs) located in Michigan. There are no CTs listed as distressed or underserved. The bank currently has locations in the following areas: Powers, Iron Mountain, Sagola, Crystal Falls, Norway, all of which are located in Michigan. The bank operates six ATMs and three Interactive Teller Machines (ITMs) which are all located in the bank's AA.

There are no legal or financial impediments limiting the bank's ability to meet the credit needs of the AA. NIB's last CRA evaluation was dated March 23, 2020. Using Small Bank procedures, the bank received a Satisfactory rating.

## **Scope of the Evaluation**

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

We evaluated NIB's performance using the Small Bank procedures. The lending test assesses the bank's record of meeting the credit needs of its AA through lending activities during the evaluation period of January 1, 2020, through December 31, 2022. We reviewed the data for the bank's primary loan product, residential loans, to evaluate the bank's lending performance.

To assess lending, we used data from the bank reports and a random sample of loans for the primary loan product originated or purchased in the bank's AA. Our lending analysis used the most recent available demographic and aggregate peer lending data.

To provide more current and accurate demographic data, the federal banking agencies are now updating census data every five years instead of ten, beginning with the Census Bureau's 2015 American Community Survey (ACS). The most recent update was in 2020. NIB's AAs were affected by this change, and the data from 2020 through 2021 lending data received a separate analysis from the 2022 lending data. As a result, performance tables have been separated and include 2020 through 2021 combined and 2022 separately. Data is discussed in the applicable narrative sections of the evaluation.

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

Given the bank has one AA, we reviewed this non-MSA using full-scope procedures.

### **Ratings**

The bank's overall rating is based entirely on its performance in this single AA.

## **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 Michigan

**CRA rating for the State of Michigan:** Satisfactory

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes.
- The geographic distribution of home mortgages loans reflects reasonable distribution among borrowers of different geographies.
- There were no CRA-related complaints during the evaluation period.
- A substantial majority of loan originations are made within the institution's AA.

## Description of Institution's Operations in Michigan

The bank has one AA located in the state of Michigan. The AA includes Dickinson, Eastern Iron, Southwestern Marquette, and Menominee counties. The AA does not lie in an MSA and is contiguous. According to the Census Bureau's 2015 ACS, the AA includes zero low-income CTs, four moderate-income CTs, 13 middle-income CTs, and one upper-income CT. The AA complies with regulatory requirements and does not arbitrarily exclude any low- or moderate-income geographies.

There is strong competition in the area from several other financial institutions. The bank ranks seventh for deposit market share when compared to 11 financial institutions in the AA. The bank's deposit market share was 7.53 percent. Other competing financial institutions had deposit market shares ranging from 0.85 percent (Upper Peninsula State Bank) to 16.36 percent (Range Bank).

The bank received positive consideration for its response to the COVID-19 pandemic in 2020 through the origination of SBA Paycheck Protection Program (PPP) loans. These loans helped stabilize small business in communities in the AA. The bank originated 75 PPP loans totaling \$6,354,646 in 2020, and 39 PPP loans totaling \$1,628,855 in 2021.

### Employment and Economic Factors

Major employers in the AA include industries focused in manufacturing, health, engineering, and retail. Some of the major employers in the area are Billerud Americas Corporation, Boss Snowplow, MJ Electric, Marshfield Clinic, and the Veterans Administrative Hospital. Unemployment in the bank's AA is in line with statewide unemployment data. Overall, the local and state economies are characterized as stable.

<b>Table A – Demographic Information</b>						
<b>Metropolitan Statistical Area: 2020 &amp; 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	18	0.0	11.1	77.8	11.1	0.0
Population by Geography	59,100	0.0	10.8	78.0	11.2	0.0
Housing Units by Geography	36,203	0.0	10.0	79.5	10.5	0.0
Owner-Occupied Units by Geography	20,929	0.0	10.4	76.9	12.6	0.0
Occupied Rental Units by Geography	5,062	0.0	15.3	75.8	9.0	0.0
Vacant Units by Geography	10,212	0.0	6.6	86.5	6.9	0.0
Businesses by Geography	3,605	0.0	7.9	84.7	7.4	0.0
Farms by Geography	143	0.0	4.9	81.8	13.3	0.0
Family Distribution by Income Level	16,339	19.1	19.2	24.2	37.6	0.0
Household Distribution by Income Level	25,991	25.6	17.6	18.0	38.8	0.0
Median Family Income Non-MSA AA		\$53,628	Median Housing Value			\$94,712
			Median Gross Rent			\$587
			Families Below Poverty Level			9.8%
<i>Source: 20XX ACS Census and 20XX 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>						

<b>Table A – Demographic Information</b>						
<b>Metropolitan Statistical Area: 2022</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	18	0.0	22.2	72.2	5.6	0.0
Population by Geography	58,835	0.0	21.5	71.3	7.2	0.0
Housing Units by Geography	36,405	0.0	19.5	72.8	7.6	0.0
Owner-Occupied Units by Geography	20,784	0.0	20.5	70.6	8.9	0.0
Occupied Rental Units by Geography	5,231	0.0	26.9	70.4	2.7	0.0
Vacant Units by Geography	10,390	0.0	13.8	78.5	7.6	0.0
Businesses by Geography	3,626	0.0	25.7	68.3	5.9	0.0
Farms by Geography	147	0.0	19.0	70.1	10.9	0.0
Family Distribution by Income Level	15,931	17.1	21.4	22.4	39.0	0.0
Household Distribution by Income Level	26,015	23.3	17.6	20.7	38.5	0.0
Median Family Income Non-MSA AA		\$64,965	Median Housing Value			\$111,851
			Median Gross Rent			\$615
			Families Below Poverty Level			7.0%
<i>Source: 20XX ACS Census and 20XX 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 Michigan**

The Michigan state rating is based on the results of the full-scope review of the non-MSA AA.

## **LENDING TEST**

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

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

Based on a full-scope review, the bank's performance in the Michigan 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 of Michigan.

*2020 - 2021*

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

Refer to table O in the MMSA 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.

The geographic distribution of home mortgages loans reflects reasonable distribution among borrowers of different geographies. There are no low-income CTs located in the AA. Based on our random sample, the bank originated 13.8 percent of loans in the moderate-income CT which was below the peer lending data which showed 76.9 percent of home mortgage loans originated in moderate-income geographies.

The geographic distribution of home mortgage loans in the middle-income CTs was 71.8 percent in our random sample, which was below the demographic data of 100 percent and above the aggregate peer lending data which showed 12.6 percent. This would support that the AA is comprised of mainly middle income CTs.

*2022*

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

Refer to table O in the MMSA 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.

The geographic distribution of home mortgage loans reflects reasonable distribution among borrowers of different geographies. There are no low-income CTs located in the AA. Based on our random sample, the bank originated 20.4 percent of home mortgage loans in moderate-income geographies. This is above the demographic data which shows 0.0 percent of owner-occupied housing units are in moderate income geographies, and below the aggregate peer lending data of 70.6 percent of home mortgage loans originated in moderate-income geographies.



The bank originated 75.5 loans to middle-income CTs. This is below the demographic data of 79.7 percent and above the aggregate peer lending data of 8.9 percent. This would support that there are no low-income CTs and only four moderate-income CTs in the AA.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels.

2020-2021

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

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

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. Based on our random sample the bank originated 6.4 percent of its home mortgages to low-income borrowers. This percentage is higher than the demographic data, which shows 5.6 percent of families in the AA are low-income, and aggregate peer lending data of 19.2 percent originated to low-income borrowers. The bank originated 20.1 percent of its home mortgages to moderate-income borrowers. This percentage is higher than the demographic data which shows 7.8 percent and lower than the aggregate peer lending data of 24.2 percent.

2022

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

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

The borrower distribution of home mortgage loans within the AA reflects reasonable distribution among borrowers of different incomes. Based on our random sample, the bank originated 10.9 percent of its home mortgage loans to low-income borrowers. This percentage is above the demographic data which shows 6.9 percent of families in the AA are low-income, and below the aggregate peer lending data of 21.4 percent. The bank originated 24.4 percent of its home mortgages to moderate-income borrowers. This percentage is higher than both the demographic data which shows 8.1 percent and the aggregate peer lending data of 22.4 percent originated to moderate-income borrowers.

### **Responses to Complaints**

There were no consumer complaints regarding the bank's CRA performance, nor any indicating illegal or discriminatory lending practice within this evaluation period.

## 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>	January 1, 2020 through December 31, 2022	
<b>Bank Products Reviewed:</b>	Home Mortgage	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Northern Interstate Financial, Inc.	Holding Company	None
<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>MMSA(s)</b>		
Michigan Non-MSA	Full-scope	Full counties of Dickinson and Menominee and the eastern portion of Iron County and the southwestern portion of Marquette County.

# Appendix B: Summary of MMSA and State Ratings

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RATINGS Northern Interstate Bank, National Association	
Overall Bank:	Lending Test Rating
Satisfactory	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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.



- 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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2020-2021</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$(000s)</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Non-MSA	40	5,900	100	0.0	0.0	0.0	10.4	0.0	13.8	76.9	100	71.8	12.6	0.0	14.4	0.0	0.0	0.0	
<b>Total</b>	<b>40</b>	<b>5,900</b>	<b>100</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>10.4</b>	<b>0.0</b>	<b>13.8</b>	<b>76.9</b>	<b>100</b>	<b>71.8</b>	<b>12.6</b>	<b>0.0</b>	<b>14.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	
<i>Source: 20XX U.S Census; 01/01/20XX - 01/01/20XX Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>																			
<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																	<b>2022</b>		
<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$(000s)</b>	<b>% of Total</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Non-MSA	20	3,508	100	0.0	0.0	0.0	20.5	0.0	20.4	70.6	79.7	75.5	8.9	20.3	4.2	0.0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>3,508</b>	<b>100</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>20.5</b>	<b>0.0</b>	<b>20.4</b>	<b>70.6</b>	<b>79.7</b>	<b>75.5</b>	<b>8.9</b>	<b>20.3</b>	<b>4.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	
<i>Source: 20XX U.S Census; 01/01/20XX - 01/01/20XX Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2020 - 2021</b>		
Total Home Mortgage Loans					Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Non-MSA	40	5,900	100	19	19.0	7.9	7.7	19.2	13.2	20.1	24.2	23.7	23.4	37.6	55.2	33.9	0.00	0.00	14.9		
<b>Total</b>	<b>40</b>	<b>5,900</b>	<b>100</b>	<b>19</b>	<b>19.0</b>	<b>7.9</b>	<b>7.7</b>	<b>19.2</b>	<b>13.2</b>	<b>20.1</b>	<b>24.2</b>	<b>23.7</b>	<b>23.4</b>	<b>37.6</b>	<b>55.2</b>	<b>33.9</b>	<b>0.00</b>	<b>0.00</b>	<b>14.9</b>		

*Source: 2015 ACS ; 01/01/2020 - 12/31/2020 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>2022</b>	
Total Home Mortgage Loans					Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Non-MSA	20	3,508	100	17	6.9	10.9	21.4	8.1	24.4	22.4	23.7	22.3	39.0	61.3	33.1	0.0	0.0	9.3	9.3	
<b>Total</b>	<b>20</b>	<b>3,508</b>	<b>100</b>	<b>17</b>	<b>6.9</b>	<b>10.9</b>	<b>21.4</b>	<b>8.1</b>	<b>24.4</b>	<b>22.4</b>	<b>23.7</b>	<b>22.3</b>	<b>39.0</b>	<b>61.3</b>	<b>33.1</b>	<b>0.0</b>	<b>0.0</b>	<b>9.3</b>	<b>9.3</b>	

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.