



PUBLIC DISCLOSURE

November 26, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Assumption
Charter Number 5316

141 North Chestnut Street
Assumption, IL 62510

Office of the Comptroller of the Currency

Harris Center
3001 Research Road
Champaign, IL 61822-1089

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

The Lending Test is rated: **Satisfactory.**

- The distribution of loans reflects reasonable penetration among households of different income levels.
- The geographic distribution of consumer loans reflects reasonable dispersion among different income tracts throughout the AA.
- The loan-to-deposit ratio is reasonable based on the bank's size, financial condition, AA credit needs, and local competition.

Definitions and Common Abbreviations

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

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

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

Geography: A 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

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

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

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

Description of Institution

The First National Bank of Assumption (FNBA) is a \$22 million intrastate financial bank with its main office in Assumption, IL. The bank is 100 percent owned by the Hall and Corzine families. The bank has no branch facilities or automated teller machines (ATMs). FNBA’s assessment area (AA) consists of four census tracts (CTs) in Christian County, IL and two CTs in Shelby County, IL.

FNBA is a full service bank that offers conventional deposit and loan products. The bank ceased originating home loans in October 2016. The bank has no online or mobile banking presence. No affiliate data was utilized in this analysis. There have been no mergers or acquisitions affecting the bank’s CRA performance since the last evaluation.

As of December 31, 2017, FNBA’s gross loan portfolio totaled \$6 million, or 36 percent of total assets. Tier 1 capital is \$2 million. The following table represents the loan portfolio mix:

Loan Portfolio Summary by Loan Product	
Loan Category	% of Outstanding Dollars
Home loans, including Multi-Family	37.0%
Business loans, including Commercial RE	20.2%
Farm loans, including Farm Land	28.0%
Consumer loans	14.8%

Source: December 31, 2017 Uniform Bank Performance Report (UBPR)

There are no known impediments limiting FNBA’s ability to help meet the credit needs of its local community, including those of low- and moderate-income (LMI) families and neighborhoods. FNBA’s business strategy focuses on serving the community to the best of its ability. FNBA’s deposit market share in the Christian and Shelby County, IL AA, at 1.46 percent, ranks 16th out of 20 banks in the AA. FNBA received a “Satisfactory” rating during the June 12, 2014 evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FNBA’s CRA performance using Small Bank examination procedures. We reviewed the bank’s record of meeting the credit needs of its AA through lending activities. The evaluation period for this review is from January 1, 2015 to December 31, 2017. We sampled primary product loans originated during this period for the lending test.

Based on both the number and dollar volume of loan origination data supplied by the bank, FNBA's primary lending product is consumer loans.

For analysis purposes, we compared the bank's lending performance with demographic data from the 2010 United States (U.S.) Census, the 2015 American Community Survey (ACS) U.S. Census, and 2016 and 2017 Dun and Bradstreet (D & B) Business Geodemographic data. The income designation of some CTs in the AA changed in 2017, based on 2015 ACS. Therefore, we reviewed the 2015 and 2016 loan samples separately from the 2017 loan samples.

Refer to the table in Appendix A for more information on the scope of the review.

Selection of Areas for Full-Scope Review

A full-scope review of the bank's AA in Christian and Shelby Counties, IL was performed. FNBA has no additional assessment areas.

Refer to the table in appendix A for more information.

Ratings

The bank's overall rating is based on those areas that received full-scope reviews.

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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

Conclusions with Respect to Performance Tests

LENDING TEST

FNBA's performance under the lending test is satisfactory. The bank's loan-to-deposit ratio is reasonable based on its size, financial condition, AA credit needs, local competition, and other performance context data. The bank originated a substantial majority of its primary loan products within the AA. The distribution of consumer loans reflects reasonable penetration among households of different income levels, and reasonable dispersion among different income tracts throughout the AA.

Loan-to-Deposit Ratio

FNBA's loan-to-deposit ratio is reasonable based on its size, financial condition, AA credit needs, local competition, and other performance context data. The loan-to-deposit ratio averaged 31.9 percent over the past 14 quarters. The timeframe used for this calculation represents the first quarter-end after the start of the last CRA evaluation through December 31, 2017.

Over the past 14 quarters, the bank's highest loan-to-deposit ratio was 39.2 percent and the lowest was 28.4 percent. The bank's loan-to-deposit ratio is below the average of eight similarly situated banks with total assets of less than \$50 million, and headquartered in non-MSA towns in central Illinois with populations of 2,000 or less. This group of similarly situated banks averaged a loan-to-deposit ratio of 62.2 percent.

Although the bank's loan-to-deposit ratio is lower than that of other comparable financial institutions, it is considered reasonable due to several factors. First, there are twenty banking offices in Christian and Shelby Counties. Second, based on AA demographics, a significant portion of the people, 46.3 percent, are not in the work force. These individuals tend to have limited borrowing needs and/or capacity. Further, area farm equipment dealers, as well as local auto dealers, offer zero percent financing on new equipment and automobiles. Individuals tend to obtain applicable loans from these dealers, taking advantage of the lower rates. Finally, the bank has a high volume of public funds, making up 20.1 percent to 38.6 percent of quarterly total deposits. Balances of these funds are impacted by seasonal tax collection and distribution and management keeps these funds liquid. The loan-to-deposit ratio is also impacted by management's decision to cease originations of home loans in 2016 due to regulatory complexities. Management is reconsidering this decision.

Lending in Assessment Area

FNBA originated a substantial majority of their primary loan products within the AA. Our sample showed 90.0 percent of the total number and 91.3 percent of the total dollar volume of consumer loans were originated within the AA.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Consumer Loans	36	90.0	4	10.0	40	\$219	91.3	\$21	8.7	\$240
<i>Source: 01/01/2015-12/31/2017 – 40 Loan Originations; Due to rounding, totals may not equal 100.0</i>										

Distribution of Loans by Income Level of the Borrower

Consumer Loans

The distribution of consumer loans reflects reasonable penetration among households of different income levels.

FNBA’s distribution of consumer loans in 2015 through 2016 is reasonable. The percent of loans originated to low-income households is poor and falls below the percent of low-income households in the AA. The percent of loans originated to moderate-income households is excellent and exceeds the percent of moderate-income households in the AA

FNBA’s distribution of consumer loans in 2017 is reasonable. The percent of loans originated to low-income households is close to the percent of low-income households in the AA. The percent of loans originated to moderate-income households is excellent and exceeds the percent of moderate-income households in the AA

Refer to Tables V in appendix C for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

Geographic Distribution of Loans

FNBA’s geographic distribution of consumer loans reflects reasonable dispersion among different income tracts throughout the AA. We weighed the 2017 analysis heavier, as it was the more recent performance. Dispersion analysis is based upon FNBA’s performance in the moderate-income geography. There are no low-income geographies within this AA.

The bank’s moderate-income geography is located 12 miles from Assumption, in Pana, IL. There are three banks and a local credit union located in Pana that serve that city.

We reviewed summary reports and maps, and analyzed FNBA's consumer lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps

FNBA's geographic distribution of consumer loans in 2015 through 2016 is poor. The bank made no consumer loans in the moderate-income geography. FNBA's geographic distribution of consumer loans in 2017 is reasonable. The percentage of consumer loans in the moderate-income geography is below the percentage of AA households in the moderate-income geography. Our conclusions do consider the location and competition within this geography.

Refer to Tables U in appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Responses to Complaints

FNBA did not receive any complaints regarding its CRA performance during the assessment period.

Appendix A: Scope of Examination

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

Time Period Reviewed	January 1, 2015 – December 31, 2017	
Financial Institution		Products Reviewed
First National Bank of Assumption, Assumption, IL		Consumer Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Christian County, IL (non-MSA) CT's (#9586 - #9589) and Shelby County, IL (non-MSA) CT's (#9591 and #9592)	Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area – 2015/2016						
Assessment Area: Assumption						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	83.3	0.0	0.0
Population by Geography	19,307	0.0	14.3	85.7	0.0	0.0
Housing Units by Geography	8,226	0.0	15.2	84.8	0.0	0.0
Owner-Occupied Units by Geography	5,818	0.0	12.7	87.3	0.0	0.0
Occupied Rental Units by Geography	1,585	0.0	23.7	76.3	0.0	0.0
Vacant Units by Geography	823	0.0	16.5	83.5	0.0	0.0
Businesses by Geography	800	0.0	12.1	87.9	0.0	0.0
Farms by Geography	179	0.0	3.4	96.6	0.0	0.0
Family Distribution by Income Level	5,220	22.1	15.8	27.4	34.7	0.0
Household Distribution by Income Level	7,403	25.8	13.5	19.1	41.5	0.0
Median Family Income Non-MSAs - IL		\$54,499	Median Housing Value			\$81,717
Median Household Income		\$43,969	Median Gross Rent			\$532
			Families Below Poverty Level			13.1%
<i>Source: 2010 U.S. Census and 2016 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.</i>						

Table A – Demographic Information of the Assessment Area - 2017

Assessment Area: Assumption						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	66.7	16.7	0.0
Population by Geography	19,054	0.0	13.7	74.4	11.9	0.0
Housing Units by Geography	8,607	0.0	16.5	72.8	10.7	0.0
Owner-Occupied Units by Geography	5,800	0.0	14.1	73.2	12.6	0.0
Occupied Rental Units by Geography	1,643	0.0	22.6	70.5	6.9	0.0
Vacant Units by Geography	1,164	0.0	19.5	74.2	6.3	0.0
Businesses by Geography	781	0.0	11.7	75.3	13.1	0.0
Farms by Geography	173	0.0	2.3	74.0	23.7	0.0
Family Distribution by Income Level	4,919	22.9	17.5	25.1	34.6	0.0
Household Distribution by Income Level	7,443	24.8	16.3	20.0	39.0	0.0
Median Family Income Non-MSAs - IL		\$59,121	Median Housing Value			\$84,495
Median Household Income		\$45,440	Median Gross Rent			\$567
			Families Below Poverty Level			11.4%

Source: 2015 ACS Census and 2017 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.*

The AA consists of four CTs (9586-9589) in Christian County, IL and two CTs (9591-9592) in Shelby County, IL. The AA is located in central IL, approximately 200 miles south of Chicago, IL, and approximately 42 miles southwest of Springfield, IL. Assumption, where the bank is located, is approximately 15 miles from Taylorville, IL, which is the county seat.

In 2016 and 2017 there were no low-income and only one moderate-income CT in the AA. The 2015 ACS updated median family income, and changed the income designations of one CT in the AA for 2017. (Between 2016 and 2017, one middle-income CT became an upper-income CT.)

Competition in the AA comes from 20 FDIC-insured depository institutions. As of June 30, 2017, FNBA’s deposits in the AA totaled \$18 million, which is 1.5 percent of the total deposits within the market. FNBA’s deposit market share ranks 16th out of 20 depository institutions. The top depository institution accounts for 16.1 percent of total deposits in the AA.

Employment and Economic Factors

According to the Bureau of Labor Statistics, unemployment in the AA was 4.8 percent in Christian County, IL and 4.2 percent in Shelby County, IL in December 2017, which is decreased from a peak of 7.1 percent in Christian County and 6.4 percent in Shelby County during this evaluation period. The state and national unemployment rates were 4.7 and 4.1 percent, respectively, in December 2017. Similarly, the state and national unemployment rates have fallen from 6.0 percent and 4.9 percent, respectively, in 2015.

Industries driving the local economy include services, agriculture, fishing and forestry, and retail trade. The largest employers in the AA are GSI, Sloan Implement, and Central A & M School. Many residents in the AA commute to Springfield, IL to work for the State and various medical facilities. Businesses in the AA are 78.6 percent small businesses with gross annual revenues of \$1 million or less, 4.7 percent businesses with gross annual revenues over \$1 million, and 16.7 percent where businesses did not report revenue information.

Households

Households located in low-income geographies (1,845) total 24.8 percent of total households in the AA. Households located in moderate-income geographies (1,213) total 16.3 percent of total households (7,443) in the AA. Households in the AA below poverty level total 14.6 percent. Median household income in 2015-2016 is \$43,969. Median household income in 2017 is \$45,440.

Community Contact

We performed one community contact with a community action agency serving six counties including Shelby and Christian Counties. It was noted that some financial institutions have partnered with them on community programs. The contact stated there is still a need for access to financial services for clients that are low- to moderate-income. Affordable housing is an identified credit need.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 MA/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 originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data is 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 Revenues – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2015 - 2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Assumption	20	134,304	100.0	0.0	0.0	15.0	0	85.0	95.0	0.0	5.0	0.0	0.0	
Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data - 20 loans; Due to rounding, totals may not equal 100.0														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2017	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Assumption	20	112,548	100.0	0.0	0.0	16.0	5.0	72.6	95.0	11.4	0.0	0.0	0.0	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data - 20 loans; Due to rounding, totals may not equal 100.0														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015 - 2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Assumption	20	134,304	100.0	25.8	5.0	13.5	55.0	19.1	40.0	41.5	0.0	0.0	0.0	
<i>Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data – 20 loans; Due to rounding, totals may not equal 100.0</i>														

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Assumption	20	112,548	100.0	24.8	20.0	16.3	35.0	20.0	20.0	39.0	25.0	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data – 20 loans; Due to rounding, totals may not equal 100.0</i>														