



**PUBLIC DISCLOSURE**

January 19, 2021

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Thomasville National Bank  
Charter Number 22883

301 North Broad Street, Thomasville, GA 31792

Office of the Comptroller of the Currency

Three Ravinia Drive, Suite 1950, Atlanta, GA 30346

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 community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is more than reasonable given the bank's size, financial condition, and business strategy.
- The bank originated a substantial majority of its loans within its assessment area (AA).
- The geographic distribution of loans reflects a reasonable distribution throughout the bank's AA.
- Overall, lending activities represent a reasonable distribution to individuals of different income levels and businesses of different sizes.
- The bank's community development activities demonstrate an adequate level of responsiveness based upon available opportunities in the AA during the evaluation period.

### Loan-to-Deposit Ratio

Thomasville National Bank's (TNB) LTD ratio is more than reasonable given the bank's size, financial condition, and credit needs of the AA. TNB's average LTD ratio was 96 percent over the evaluation period. During this time, the bank's LTD ratio ranged from a high of 101 percent at June 30, 2018, to a low of 87 percent at March 31, 2019.

While TNB has several competitors, none are considered similarly situated in terms of asset size, loan portfolio composition and business strategy. TNB's primary loan products are business and home loans. At \$1.2 billion in total assets, TNB is significantly larger than one other bank headquartered in Thomasville. TNB is the largest bank with a main office in the Thomas County AA. The bank's business strategy includes fiduciary products and services, which are not offered by other financial institutions headquartered in the AA.

Based on the December 31, 2019, Uniform Bank Performance Report, the bank's loan-to-deposit ratio compares favorably with the peer group averages. The peer group consisted of 1,183 banks with total assets between \$300 million and \$1 billion. TNB's loan-to-deposit ratio of 97 percent was above the peer group average of 82 percent.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. Seventy four percent of the bank's lending by number of loans and 53 percent of the dollar volume was within the AA.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
All Loans	1237	74.16	431	25.84	1668	244,443	52.61	220,216	47.39	464,659

Source: Bank reported all loan originations from January 1, 2017 to December 31, 2019.

## Description of Institution

Thomasville National Bank is an intrastate community bank headquartered in Thomasville, Thomas County, GA. Chartered in 1995, the bank is wholly owned by Thomasville Bancshares, Inc., a one-bank holding company. At December 31, 2019, in addition to the main office, TNB operated two full-service branches. The two branches are located in Thomasville, GA, and in Saint Simons Island, GA. The main office and the branch in Thomasville are located in middle-income nonmetropolitan distressed or underserved geographies. In April 2020, the bank opened a branch in Tallahassee, FL. No branches were closed since the last CRA review. At December 31, 2019, TNB reported total assets of \$955 billion, net loans of \$791.5 million, and total deposits of \$818.8 million. Net loans represented 83 percent of total assets. Tier-one capital totaled \$99.4 million.

There have not been any significant changes to TNB's corporate structure. TNB offers a full range of deposit, loan, and asset management products and services. Automatic Teller Machines (ATMs) at the Thomasville locations do not accept deposits. The Saint Simons Island branch does not have an ATM. All offices provide a night depository for deposits after business hours. TNB offers trust services through TNB Financial Services, which offers fiduciary and fiduciary-related products and services. The bank's business plan has commercial lending as a primary focus.

There are no legal or financial impediments that hinder the bank's ability to meet the credit needs of the community. Thomasville received an overall "Satisfactory" rating at its prior CRA review dated June 20, 2017.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The performance evaluation is an assessment of TNB's performance in meeting the credit needs of the community in which it operates. To determine the bank's performance, examiners utilized the Intermediate Small Bank CRA examination procedures, which consider the bank's lending and community development activities. The evaluation period is January 1, 2017 to December 31, 2019.

To determine the bank's primary lending product, we assessed the composition of TNB's loan originations during the evaluation period. Two primary products were identified for assessment under both the geographic and borrower distribution of lending tests: residential mortgage loans and business loans. Residential mortgage loans accounted for 42 percent by number of loans and 32 percent by dollar volume. Business loans represented 31 percent by number of loans and 51 percent of dollar volume.

TNB collects and reports data under the requirements of the Home Mortgage Disclosure Act (HMDA) regarding loan originations for home purchase, home refinance, and home improvement. To evaluate the

bank's lending performance for mortgage loans, examiners used HMDA loan origination data. For business loans, examiners selected a random sample of 20 loans from each full calendar year of the evaluation period. Therefore, the business loan sample encompassed 60 loan originations. For geographic and borrower distribution analyses, loans originated in 2017 through 2019 are compared to the 2015 American Community Survey (ACS) Census data for mortgages and the 2019 Dun & Bradstreet (D&B) Data for loans to small businesses.

The evaluation period for the CD test is January 1, 2017, through December 31, 2019. We reviewed CD loans, investments, donations, and services submitted by bank management. Activities meeting the CD definition are included in this evaluation.

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

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

At December 31, 2019, TNB delineated Thomas County, GA and Saint Simons Island (SSI) as the bank's AAs. Thomas County is not located in a Metropolitan Statistical Area (MSA). Examiners selected Thomas County for a full-scope review, given the majority of TNB's lending, deposit and community development activity is within this AA. There are no limited-scope AAs for this evaluation. The SSI AA comprises four upper-income census tracts; therefore, does not provide a meaningful analysis of the geographic distribution of the bank's loans.

Refer to Appendix A, Scope of Examination, for more information regarding the full-scope review of the Thomas County AA.

### **Ratings**

The bank's overall rating is for the state of Georgia and is based on the bank's performance in the Thomas County AA. The OCC placed equal weight on the bank's primary loan products: small business and home mortgage loans. However, in assessing the bank's distribution of home mortgage loans to low- and moderate-income (LMI) borrowers, we placed more weight on the bank's performance compared to aggregate industry data (aggregate data) and less weight on performance compared to demographic data. The AA is comprised of 11 census tracts (CTs), with zero low-income, three moderate-income, seven middle-income (all designated distressed or underserved), and one upper-income geography. Additionally, the AA has an elevated number of families living below the poverty line, which limits lending ability.

Refer to the "Scope" section under the State of Georgia 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 Georgia

**CRA rating for the State of Georgia 1:** Satisfactory.

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

**The Community Development Test is rated:** Satisfactory.

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the bank's AA.
- Lending activities represent a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The level of CD activities is satisfactory in relation to the bank's performance context and reflects adequate responsiveness to AA credit needs.

### Description of Institution's Operations in Georgia.

At December 31, 2019, TNB operated three branches in Georgia including the main office and one full-service branch in Thomasville, Thomas County, GA, and a full-service branch in Saint Simons Island, Glynn County, GA, which operates as St. Simons Bank and Trust (SSBT). Automatic Teller Machines (ATMs) at the Thomasville locations do not accept deposits. The Saint Simons Island branch does not have an ATM. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as June 30, 2019, TNB had deposits of \$735 million, which represented 51 percent of deposit market share. The bank's primary business focus is commercial lending. The Office of Management and Budget designates Thomasville as a Micropolitan Statistical Area, a growing population center removed from larger cities that draws workers and shoppers from a wide local area. Thomasville's historic downtown offers unique retail shops, antiques, specialty stores and restaurants.

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

Thomasville is the county seat and the largest city in the county. The city is located 45 miles west of Valdosta, GA and 35 miles northeast of Tallahassee, FL. Thomas County comprises eleven CTs including three moderate-, seven middle- and one upper-income tract. All middle-income geographies are designated distressed or underserved CTs. According to the 2015 ACS, the population of Thomas County was 44,824. Approximately 17,385 households and 11,520 families reside in the county. The medium household income was \$36,815. Approximately 19.5 percent of families live below the poverty line. Unemployment was approximately 6 percent. The largest employers in Thomas County include Flowers Foods, Archbold Memorial Hospital, Cleaver-Brooks and Hurst Boiler.

This evaluation considered responses from representatives of community, governmental or economic development organizations. Examiners interviewed the director of a local business organization which focuses on economic development through job creation and business development, networking and education. The director noted that TNB is responsive to the needs of new businesses in the area. The director identified TNB as leading the way for other local banks to participate in the economic development of the local community.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Thomas County AA (Non-MSA)</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)	11	0.0	27.3	63.6	9.1	0.0
Population by Geography	44,824	0.0	30.3	60.8	8.9	0.0
Housing Units by Geography	20,306	0.0	30.0	61.5	8.5	0.0
Owner-Occupied Units by Geography	10,420	0.0	26.1	63.1	10.8	0.0
Occupied Rental Units by Geography	6,965	0.0	33.5	60.1	6.3	0.0
Vacant Units by Geography	2,921	0.0	35.5	59.2	5.3	0.0
Businesses by Geography	3,450	0.0	32.3	61.5	6.2	0.0
Farms by Geography	200	0.0	18.5	73.0	8.5	0.0
Family Distribution by Income Level	11,520	23.8	16.7	19.3	40.2	0.0
Household Distribution by Income Level	17,385	26.1	15.1	16.1	42.7	0.0
Median Family Income Non-MSAs - GA		\$45,886	Median Housing Value			\$122,613
			Median Gross Rent			\$720
			Families Below Poverty Level			19.5%
<i>Source: 2015 ACS and 2019 D&amp;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>						

## Scope of Evaluation in Georgia

This analysis reflects a full-scope review of TNB's Thomas County AA.

Refer to the table in Appendix A: Scope of Examination for additional information on the AA.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

## **LENDING TEST**

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

Based on a full-scope review, TNB's lending performance in the state of Georgia is reasonable. We compared the bank's performance with both demographic data and aggregate industry data.

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

The bank exhibits reasonable geographic distribution of loans in the state of Georgia.

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

The geographic distribution of loans during the evaluation period reflects reasonable dispersion within the moderate and middle-income tracts located within TNB's AA. There are no low-income CTs in the AA. The level of home mortgage lending was compared to the aggregate peer mortgage data. Approximately 63 percent of owner-occupied housing units in the AA are located in a distressed or underserved middle-income CT. Sixty-eight percent of TNB's home mortgages originated within those CTs.

Refer to Table O of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

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

Overall, the distribution of loans during the evaluation period reflects reasonable dispersion within the moderate and middle-income tracts located within TNB's AA. The bank's small business loans in moderate-income geographies was significantly below the proportion of businesses and the aggregate in those geographies. However, in the distressed and underserved middle-income geographies, the proportion of loans significantly exceeded the proportion of businesses and the aggregate in those geographies. The lending in the middle-income geographies was weighted more given the level of businesses within those CTs, and the location of the bank's branches.

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

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

TNB's overall distribution of lending among borrowers of different income levels reflects reasonable penetration, given local AA competition and demographic characteristics of the AA.

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

The percentage of home mortgage lending to both low-and moderate-income borrowers during the evaluation period falls within a reasonable range compared to peer, when considering performance context. We considered the large percentage of borrowers below the poverty level who are likely unable to afford the traditional products offered by the bank. Approximately, 41 percent of families, reported low- and moderate-income levels, with 19 percent of families living below the poverty line.

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

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

The bank's originations of loans to small businesses by revenue reflect reasonable penetration. The proportion of bank loans to small businesses was comparable to the proportion of small businesses in the assessment area and exceeded the aggregate industry percentage of loans to small businesses.

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

### **Responses to Complaints**

Neither TNB nor the OCC received complaints related to the bank's CRA performance since the prior CRA examination.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Georgia is rated Satisfactory.

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

Based on a full-scope review, TNB exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

### **Number and Amount of Community Development Loans**

TNB originated or renewed three CD loans, totaling \$4.0 million, in the AA during this evaluation period. Two of these qualified loans promote economic development and one loan supports revitalization and stabilization of the AA.

### **Number and Amount of Qualified Investments**

TNB provided an adequate level of CD donations in its AA. We identified twenty-three donations totaling \$1.6 million to community service organizations within the AA.

### **Extent to Which the Bank Provides Community Development Services**

TNB provided qualified CD services to four organizations within its AA that consisted of approximately 167 service hours. Bank officers and personnel presented financial literacy classes, provided financial expertise, and skills training to LMI individuals.

## 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 non-MSA that received comprehensive examination review, designated by the term “full-scope,”.

<b>Time Period Reviewed:</b>	January 1, 2017 to December 1, 2019	
<b>Bank Products Reviewed:</b>	Home mortgage and small business loans Community development loans, qualified investments, community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA	NA	NA
<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>State: Georgia</b>		
Thomas County AA (Non-MSA)	Full-scope	All census tracts in Thomas County, GA.

## Appendix B: Summary of State Rating

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RATINGS Thomasville National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State Rating
Thomasville National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Georgia	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## 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.

AA	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Thomas County	424	66,239	91.0	1,111	0.0	0.0	0.0	26.1	21.9	21.2	63.1	68.4	70.2	10.8	9.7	8.6	0.0	0.0	0.0
<b>Total</b>	<b>424</b>	<b>66,239</b>	<b>91.0</b>	<b>1,111</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>26.1</b>	<b>21.9</b>	<b>21.2</b>	<b>63.1</b>	<b>68.4</b>	<b>70.2</b>	<b>10.8</b>	<b>9.7</b>	<b>8.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

AA	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Thomas County	424	66,239	91.0	1,111	23.8	2.8	3.6	16.7	8.5	9.1	19.3	13.9	18.4	40.2	42.7	47.1	0.0	32.1	21.9
<b>Total</b>	<b>424</b>	<b>66,239</b>	<b>91.0</b>	<b>1,111</b>	<b>23.8</b>	<b>2.8</b>	<b>3.6</b>	<b>16.7</b>	<b>8.5</b>	<b>9.1</b>	<b>19.3</b>	<b>13.9</b>	<b>18.4</b>	<b>40.2</b>	<b>42.7</b>	<b>47.1</b>	<b>0.0</b>	<b>32.1</b>	<b>21.9</b>

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-19</b>	
AA	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available Income Tracts			
	#	\$ 000's	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Thomas County	60	16,847	100.0	820	0.0	0.0	0.0	32.3	15.0	30.1	61.5	83.3	61.5	6.2	1.7	8.4	0.0	0.0	0.0	
<b>Total</b>	<b>60</b>	<b>16,847</b>	<b>100.0</b>	<b>820</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>32.3</b>	<b>15.0</b>	<b>30.1</b>	<b>61.5</b>	<b>83.3</b>	<b>61.5</b>	<b>6.2</b>	<b>1.7</b>	<b>8.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-19</b>	
AA	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$ 000's	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Thomas County	60	16,847	100.0	820	81.8	78.3	45.5	5.8	21.7	12.3	0.0		
<b>Total</b>	<b>60</b>	<b>16,847</b>	<b>100.0</b>	<b>820</b>	<b>81.8</b>	<b>78.3</b>	<b>45.5</b>	<b>5.8</b>	<b>21.7</b>	<b>12.3</b>	<b>0.0</b>		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data Due to rounding, totals may not equal 100.0%*