



## **PUBLIC DISCLOSURE**

September 24, 2018

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

Priority Bank  
Charter Number 711025

3401 East Mission Boulevard  
Fayetteville, Arkansas 72703

Office of the Comptroller of the Currency  
Tulsa Field Office  
8282 South Memorial Drive, Suite 300  
Tulsa, Oklahoma 74133

**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 Community Reinvestment Act (CRA) Rating

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

Priority Bank (Priority) has a satisfactory record of meeting the credit needs of the community.

- The loan-to-deposit (LTD) ratio is **more than reasonable** based on Priority's performance context and lending opportunities within their two designated Assessment Areas (AA).
- A **majority** of Priority's loans originated during the review period are inside their AA.
- Priority's distribution of loans reflects a **reasonable penetration** of loan originations among borrowers of different income levels.
- The geographic distribution of loans reflects a **reasonable dispersion** of loans throughout Priority's AAs.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation (PE), 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/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs 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. CTs 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 AA(s) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(s).

**Community Reinvestment Act:** 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 CT 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 refinancing, 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/AA.

**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 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 MFI 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 MFI 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 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

Priority is an \$82 million federally chartered stock thrift headquartered in Fayetteville, Arkansas, and a subsidiary of Priority One Holding Company (POHC), a single thrift holding company. Priority serves its two AAs with a main banking facility at 3401 East Mission Boulevard, Fayetteville, Arkansas, located in an upper-income CT within Washington County, and two full-service branch locations with Automated Teller Machines in middle-income CTs within Washington County and Franklin County. Despite intense competition for banking services, to meet the credit and deposit needs of the AAs, Priority offers a diverse line of loan and deposit products, including Kasasa brand savings and checking accounts, during reasonable hours Monday through Friday. Priority also offers an internet banking product that provides customers with deposit, transfer, and bill payment opportunities when a bank facility is not convenient. Additionally, some employees of Priority are members of the Advisory Board of Credit Counseling of Arkansas. Established in 1995, this non-profit corporation assists people with personal finances through free financial budgeting, credit report reviews and counseling, and a Debt Management Program.

Priority's strategic focus remains real estate purchase, construction, refinance, and improvement lending. However, they also offer a selection of secured consumer, commercial, and commercial real estate loans. Priority sells many of the residential real estate loans originated to secondary market investors with servicing rights released.

The following table describes the composition of Priority's loan portfolio as of December 31, 2017, which represents 90 percent of total assets. Management does not anticipate any significant changes to the composition of the loan portfolio in the near future.

<b>Loan Portfolio Composition as of December 31, 2017</b>			
<b>Loan Type</b>	<b>Amount (000s)</b>	<b>Percent of Total Gross Loans</b>	<b>Percent of Total Assets</b>
Construction and Land Development	\$3,919	5%	5%
Farmland	\$936	1%	1%
1-4 Family Residential	\$64,822	88%	79%
Multifamily (5 or more) Residential	\$0	0%	0%
Commercial (nonfarm, nonresidential)	\$1,450	2%	2%
<b>Total Real Estate Loans</b>	<b>\$71,127</b>	<b>96%</b>	<b>87%</b>
Agriculture	\$827	1%	1%
Commercial and Industrial	\$1,173	2%	1%
Consumer Loans	\$695	1%	1%
Other Loans	\$8	0%	0%
<b>Total Gross Loans</b>	<b>\$73,830</b>	<b>100%</b>	<b>90%</b>

Source: December 31, 2017 Consolidated Reports of Condition and Income



Competition for banking services within both AAs is intense and includes nearly 200 commercial state-chartered banks and branches of non-local banks of different sizes. Based on the June 30, 2018 Federal Deposit Market Share Report, Priority's presence in each AA is low, as they have less than 1 percent of the deposit market share in the Washington County and Benton County AA and 9 percent of the deposit market share in the Franklin County AA.

A CRA PE was last prepared August 26, 2013, and a "Satisfactory" rating was assigned. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AA.

## **Scope of the Evaluation**

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

We evaluated Priority using the Small Bank standards for assessing performance. Priority's primary loan product is residential real estate loans, and the review includes a separate analysis for each of the two designated AAs, the Washington County and Benton County AA and the Franklin County AA. The lending test evaluates Priority's record of meeting the credit needs of its AAs. We assessed the bank's performance under this test using all residential real estate loan originations reported under the HMDA from January 2, 2015 through December 31, 2017. The comprehensive sample is representative of the bank's business strategy since the last CRA PE.

### **Data Integrity**

In July 2018 we completed a comprehensive HMDA Data Integrity review for residential real estate loans reported in 2015, 2016, and 2017. We found data for all years to be reliable. As a result, we relied on filed HMDA data for this CRA examination to assess Priority's lending performance.

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

Priority has designated two AAs comprising three complete counties in Arkansas. We completed a full-scope review for each of the AAs. The AAs meet the requirements of the regulation and do not arbitrarily exclude low- and moderate-income geographies. Please refer to Appendix A and Appendix B of this Public Disclosure for additional information.

### **Ratings**

Priority's overall **Satisfactory** CRA rating is based equally on both full-scope reviews.

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

Pursuant to 12 C.F.R. §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 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

Priority's performance under the Lending Test is **Satisfactory**. This assessment is based on HMDA data for residential mortgage lending activity beginning January 2, 2015 through December 31, 2017.

#### Loan-to-Deposit Ratio

Priority has a **more than reasonable** LTD ratio relative to their financial condition, local banking competition, and credit needs of the AAs. Since the previous CRA PE, the bank's quarterly average LTD ratio averaged 147 percent, compared to a 70 percent aggregate average by three other competing banks within or near Priority's AAs during the same period. Priority sells many residential real estate loans on the secondary market.

Institution	Total Assets (as of December 31, 2017)	Average LTD Ratio
<b>Priority Bank</b>	<b>\$82 Million</b>	<b>147%</b>
First State Bank	\$255 Million	86%
Petit Jean State Bank	\$187 Million	51%
Bank of Gravett	\$112 Million	74%

Source: December 31, 2017 Consolidated Reports of Condition and Income; Uniform Bank Performance Report

#### Lending in Assessment Area

Our review disclosed that a **majority** of the number and dollar of loans originated during the review period are inside the bank's combined AAs. The following tables present a more specific identification of this lending performance for 2015, 2016, and 2017.

**Table D - Lending Inside and Outside of the Assessment Areas**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage 2015	270	63	159	37	429	38,917	60	25,603	40	64,520
Home Mortgage 2016	360	70	153	30	513	54,852	68	26,285	32	81,137
Home Mortgage 2017	349	69	159	31	508	53,460	66	27,220	34	80,680
<b>Total</b>	<b>979</b>	<b>68</b>	<b>471</b>	<b>32</b>	<b>1450</b>	<b>147,229</b>	<b>65</b>	<b>79,108</b>	<b>35</b>	<b>226,337</b>

Source: 01/02/2015-12/31/2016 HMDA Data & 01/02/2017-12/31/2017 HMDA Data

## **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

Lending patterns during the review period indicate a **reasonable penetration** of loan originations within Priority's AAs, and among borrowers of different income levels, particularly moderate-income borrowers. Management attributes the lower residential lending activity to low-income borrowers within the AAs to two key factors. First, Priority faces intense competition for these potential real estate loan applicants from numerous local and regional financial institutions with a much larger branch network and marketing area. This further reduces the number of potential loan applicants available for Priority to gain as bank customers. This difficulty is magnified with Priority not having a branch presence in Benton County. Second, and further supported by the community contact, one significant community need is for more affordable rental and ownership housing. This results in the general inability of low-income borrowers to afford reasonable housing and meet the bank's credit standards, consistent with safe and sound lending. To combat this, Priority recently became an active participant with two external lending programs designed to increase lending opportunities for low- and moderate-income borrowers. Please refer to Table P in Appendix C for a more specific identification of residential real estate loan distribution patterns among borrowers within each AA.

## **Geographic Distribution of Loans**

Lending patterns during the review period indicate a **reasonable dispersion** of loans throughout most CTs within Priority's AAs. Management attributes the slightly lower residential lending activity in low- and moderate-income CTs of the Washington County and Benton County AAs to the same two key factors noted above. There are no low- and moderate-income CTs in the Franklin County AA. Please refer to Table O in Appendix C for a more specific identification of the geographic distribution of residential real estate loans relative to the income level of the CTs within the AAs.

## **Responses to Complaints**

Priority did not receive any consumer complaints regarding their performance under the CRA during the 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 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”).

<b>Time Period Reviewed</b>	Lending Test : (01/02/2015 through 12/31/2017)	
<b>Financial Institution</b>		<b>Products Reviewed</b>
Priority Bank (Priority) Fayetteville, Arkansas		Residential Mortgage Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>[Instructions: Provide only if affiliate products are reviewed.]</i>  N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Washington County and Benton County AA.	Full-Scope	
Franklin County AA	Full-Scope	

## Appendix B: Community Profiles for Full-Scope Areas

### Washington County and Benton County AA

This AA comprises 81 complete CTs throughout both counties. In aggregate, one is designated as a low-income CT, 13 are designated as moderate-income tracts, 41 are designated as middle-income tracts, and 26 are designated as upper-income tracts. The population of the low-income CT is less than 1 percent of the total population of the AA, as is the number of vacant housing units. Local economic conditions are stable. The level of banking competition in the AA is very high and includes nearly 190 commercial state-chartered banks and branches of non-local banks of different sizes. The only noted material changes in demographics since the 2010 census is the change in two CTs from a low-income designation to moderate-income, and the change in three CTs from a middle-income designation to upper-income.

**Table A - Demographic Information of the Assessment Area**  
**Assessment Area: Washington County and Benton County 2015 Census**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	1.2	16.0	50.6	32.1	0.0
Population by Geography	454,630	0.8	19.4	45.9	33.8	0.0
Housing Units by Geography	185,720	0.9	19.1	45.5	34.6	0.0
Owner-Occupied Units by Geography	102,054	0.4	13.0	47.2	39.4	0.0
Occupied Rental Units by Geography	65,338	1.6	29.1	41.6	27.6	0.0
Vacant Units by Geography	18,328	0.7	17.1	49.9	32.2	0.0
Businesses by Geography	23,940	1.1	16.2	48.5	34.1	0.0
Farms by Geography	871	1.0	10.4	55.2	33.3	0.0
Family Distribution by Income Level	114,420	19.5	18.2	20.2	42.0	0.0
Household Distribution by Income Level	167,392	22.3	16.5	18.4	42.7	0.0
Median Family Income MSAs – 22220 Fayetteville-Springdale-Rogers, AR-MO MSA		\$60,032	Median Housing Value			\$157,293
			Median Gross Rent			\$757
			Families Below Poverty Level			10.9%

Source: 2015 United States 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.

## Franklin County

This AA consists of three complete CTs within the county. In aggregate, all CTs are designated as middle-income tracts. Local economic conditions are stable. The level of banking competition in this relatively low population area is high and includes nine commercial state-chartered banks and branches of non-local banks of different sizes. The only noted material change in demographics since the 2010 census is the change in one CT from an upper-income designation to middle-income.

**Table B - Demographic Information of the Assessment Area**  
**Assessment Area: Franklin County 2015 Census**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	100.0	0.0	0.0
Population by Geography	17,866	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	8,024	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,818	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,966	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	1,240	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	717	0.0	0.0	100.0	0.0	0.0
Farms by Geography	56	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	4,763					
Household Distribution by Income Level	6,784					
Median Family Income Non-MSAs - AR		\$45,060	Median Housing Value			\$92,396
			Median Gross Rent			\$575
			Families Below Poverty Level			17.2%

*Source: 2015 United States 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.

## **Community Contact**

The OCC relied on recent community contacts completed by the Federal Deposit Insurance Corporation (FDIC) within both AAs to gain a better understanding of the general community credit and development needs, and local economic conditions. Both contacts stated that due to the population growth in the Washington County and Benton County AA there is significant construction to meet housing expansion, however, housing and rental units are generally not affordable for low- and moderate-income loan applicants as increased demand for properties has resulted in increased listing and sales prices. The contacts also stated that financial education such as budgeting and credit counseling is needed.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. 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 this 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/AA. The table also presents aggregate peer data for the years the data is available.



<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2015-16</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Benton County + Washington County	536	84,544	85.1	19,978	1.7	04	1.3	8.7	3.9	7.6	57.2	59.9	51.6	32.4	35.8	39.5	0.0	0.0	0.0	
Franklin County	94	9,225	14.9	373	0.0	0.0	0.0	0.0	0.0	0.0	59.3	80.9	57.4	40.7	19.1	42.6	0.0	0.0	0.0	
<b>Total</b>	<b>630</b>	<b>93,769</b>	<b>100.0</b>	<b>20,351</b>	<b>1.6</b>	<b>0.3</b>	<b>1.2</b>	<b>8.2</b>	<b>3.3</b>	<b>7.4</b>	<b>57.3</b>	<b>63.0</b>	<b>51.8</b>	<b>32.8</b>	<b>33.3</b>	<b>39.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2010 United States; 01/02/2015 - 12/31/2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2017</b>	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Benton County + Washington County	308	49,014	88.3	308	0.4	0.0	0.0	13.0	9.7	9.7	47.2	35.4	35.4	39.5	54.9	54.9	0.0	0.0	0.0	
Franklin County	41	4,446	11.7	41	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>349</b>	<b>53,460</b>	<b>100.0</b>	<b>349</b>	<b>0.4</b>	<b>0.0</b>	<b>0.0</b>	<b>12.4</b>	<b>8.6</b>	<b>8.6</b>	<b>49.5</b>	<b>43.0</b>	<b>43.0</b>	<b>37.7</b>	<b>48.4</b>	<b>48.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS Census; 01/02/2017 - 12/31/2017 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>2015-16</b>	
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Washington County + Benton County	536	84,544	85.1	536	19.6	10.4	5.8	18.0	27.6	14.8	20.5	29.3	17.2	41.9	32.5	42.8	0.0	0.2	19.4	
Franklin County	94	9,225	14.9	94	19.2	14.9	7.2	22.1	19.1	10.2	16.8	36.2	23.1	41.9	29.8	38.3	0.0	0.0	21.2	
<b>Total</b>	<b>630</b>	<b>93,769</b>	<b>100.0</b>	<b>630</b>	<b>19.5</b>	<b>11.1</b>	<b>5.9</b>	<b>18.2</b>	<b>26.3</b>	<b>14.7</b>	<b>20.4</b>	<b>30.3</b>	<b>17.3</b>	<b>41.9</b>	<b>32.1</b>	<b>42.7</b>	<b>0.0</b>	<b>0.2</b>	<b>19.5</b>	

Source: 2010 United States Census; 01/02/2015 - 12/31/2016 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>2017</b>	
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>			
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Washington County + Benton County	308	49,014	88.3	308	19.5	5.8	5.8	18.2	26.0	26.0	20.2	33.4	33.4	42.0	32.1	32.1	0.0	2.6	2.6	
Franklin County	41	4,446	11.7	41	20.4	12.2	12.2	16.6	22.0	22.0	19.5	17.1	17.1	43.5	46.3	46.3	0.0	2.4	2.4	
<b>Total</b>	<b>349</b>	<b>53,460</b>	<b>100.0</b>	<b>349</b>	<b>19.6</b>	<b>6.6</b>	<b>6.6</b>	<b>18.1</b>	<b>25.5</b>	<b>25.5</b>	<b>20.2</b>	<b>31.5</b>	<b>31.5</b>	<b>42.1</b>	<b>33.8</b>	<b>33.8</b>	<b>0.0</b>	<b>2.6</b>	<b>2.6</b>	

Source: 2015 ACS Census; 01/02/2017 - 12/31/2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0