### THE CITIZENS NATIONAL BANK OF QUITMAN CRA PUBLIC FILE

### ASSESSMENT AREA

The Citizens National Bank of Quitman's management and board of directors have determined that the area of Brooks and Lowndes County are the bank's assessment area. In the event of further bank expansion, the board and management will reconsider this assessment area to determine if it continues to be appropriate. (A map of the bank's current assessment area including Lending Area information is attached as Exhibit 1.)

### PUBLIC COMMENTS

The Citizens National Bank of Quitman has not received any public comment concerning the bank's CRA performance for the current year or either of the prior two calendar years.

### CRA PUBLIC EVALUATION

The Citizens National Bank of Quitman's most recent Public Evaluation, prepared by the OCC is attached as Exhibit 2.

### **BRANCH LOCATIONS**

The Citizens National Bank of Quitman currently operates only from its main office at the following location.

The Citizens National Bank of Quitman Main Office 100 East Stephens Street Quitman, Georgia 31643 Census Tract No. 9604.00

### BRANCH OPENINGS AND CLOSINGS

The Citizens National Bank of Quitman has not opened any offices during the current year or the prior two calendar years. The only ATM machine was installed at the bank's location in April 1999.

The Citizens National Bank of Quitman closed its Super Market Branch located at Harvey's Supermarket, 1203 West Screven Street, Quitman, Georgia 31643 in June 1999.

# LIST OF SERVICES AND HOURS

The Citizens National Bank of Quitman's hours are as follows:

MONDAY 8:30 A.M. – 4:30 P.M. (drive-in)	9:00 A.M. – 4:00 P.M. (lobby)
TUESDAY 8:30 A.M. – 4:30 P.M. (drive-in)	9:00 A.M. – 4:00 P.M. (lobby)
WEDNESDAY 8:30 A.M. – 4:30 P.M. (drive-in)	9:00 A.M. – 4:00 P.M. (lobby)
THURSDAY 8:30 A.M. – 4:30 P.M. (drive-in)	9:00 A.M 4:00 P.M. (lobby)
FRIDAY 8:30 A.M. – 5:30 P.M. (drive-in)	9:00 A.M. – 5:30 P.M. (lobby)
SATURDAY	8:30 A.M. – 12:00 NOON (drive-in)

Night Depository and an ATM is available at the bank's Office. On-Line banking is available via Internet (<u>www.cnbquitman.com</u>) and a mobile banking app is available for download in the GooglePlay Store and Apple App Store.

The Citizens National Bank of Quitman offers the following credit products:

- Automobile (new and used)
- Boat and Recreational Vehicles
- Personal unsecured and secured
- Property Improvements
- Residential Mortgages (purchase, refinance, and renewals)
- Vacant Residential Property Loans
- Second Mortgage Loans
- Construction
- Construction/Permanent
- Commercial Mortgage Loans
- Farm Loans
- Small Business Loans
- Commercial Term Loans
- Federal Home Loan Bank Affordable Housing Program: Homeowner Assistance Products

The Citizens National Bank of Quitman offers the following deposit account products:

- Personal and Business Checking
- Savings Accounts
- Money Market Accounts
- Now Accounts
- Certificate of Deposits
- IRA Accounts

For your information, the fees and service charges associated with these products and services are included in this file.

For more information concerning The Citizens National Bank of Quitman's products, please see any of our loan officers or Customer Service Representatives concerning specific loan and deposit product features including any fees we may charge. The officers and directors of the bank are in constant contact with city and county officials as well as other leaders in the community.

The bank has worked very closely with the Brooks County Development Authority and The Quitman-Brooks County Chamber of Commerce in determining and assisting in the development of industry within the county. We have financed or participated in the financing of several new or expanding facilities for local industry.

Some of our officers, directors and employees serve on boards and committees involved in the promotion and improvement of the quality of life for citizens of Quitman and Brooks County.

The bank advertises daily on local radio stations and regularly in the local newspaper in order to keep the community familiar with the services offered by our bank.

We have cooperated with the local schools in providing educational programs for the students to familiarize them with the functions and services of the banking industry.

# <u>LOAN – TO – DEPOSIT RATIOS</u>

The bank's loan-to-deposit ratio for each quarter of the prior calendar year are as follows:

December 2023	65.94%
September 2023	66.41%
June 2023	60.77%
March 2023	59.02%

# SERVICE CHARGES, FEES AND RENTAL POLICY FOR THE CITIZENS NATIONAL BANK OF QUITMAN QUITMAN, GEORGIA

The following policies will prevail relative to charges for services offered by the bank:

### **REGULAR PERSONAL CHECKING ACCOUNTS:**

There is no service charge for accounts that maintain a minimum daily balance of \$350.00. Accounts not meeting this requirement will be service charged as follows: Maintenance charge of \$5.00 plus an activity charge of \$.15 for each automatic debit/check item per statement cycle. There is no charge for point-of-sale or ATM transactions. \$100.00 minimum deposit required to open an account. Senior citizens (55 and over) and full time students will have no service charge on regular personal checking accounts.

### **BUSINESS CHECKING ACCOUNTS:**

There is no service charge for accounts that maintain a minimum daily balance of \$1,500.00. Accounts not meeting this requirement will be service charged as follows: Maintenance charge of \$10.00 plus an activity charge of \$.15 for each automatic debit/check item per statement cycle. There is no charge for point-of-sale or ATM transactions. \$100.00 minimum deposit required to open an account.

### **SAVINGS ACCOUNTS:**

Interest will be paid on savings accounts monthly. There is a \$100.00 minimum deposit required to open an account. No interest accrues on a balance of less than \$50.00. All withdrawals over three (3) during a statement cycle period will assessed an excess withdrawal charge at the rate of \$2.00 per withdrawal. Any account closed prior to being six months old will be charged a \$5.00 closing fee. Any withdrawal made within 30 days of opening the account will be charged \$5.00 per withdrawal.

### N.O.W. ACCOUNTS:

To qualify as a NOW account, the account must maintain a minimum daily balance of \$1,000.00 during a statement cycle. No interest will be paid on the days the account falls below the minimum required balance.

Interest will be paid on a simple interest basis and will be paid on the daily balance.

Service charges will be assessed for N.O.W. accounts that fail to meet the minimum daily balance requirement. There will be a maintenance charge of \$10.00 for the first ten (10) automatic debits/checks written and a \$.15 activity charge for each automatic debit/check item thereafter during a statement cycle. There is no charge for point-of-sale transactions.

### **MONEY MARKET ACCOUNTS:**

Money market accounts are offered with minimum deposits of \$1,000.00. Interest is credited monthly and varies according to the market. If minimum balance is not maintained, no interest will be paid and a service charge of \$10.00 per month will be imposed to the account.

### **CASHIER'S CHECKS**

Customer - \$ 3.00 Non-Customer - \$ 10.00

### **STOP PAYMENT ORDERS:**

\$25.00 per stop payment order

The \$25.00 service charge waived only by officer approval with circumstances being considered.

### **RETURN ITEMS (NSF) AND OVERDRAFTS:**

NSF fees may be charged for the following items: checks, electronic checks, electronic transfers, recurring point-of-sale (POS) transactions and ACH items. No NSF Fee will be assessed for transactions that are \$10.00 or less. In a business day, credits/deposits are considered first then; debits/payments are paid starting with the smallest to the largest amounts as funds are available in your account. Point-of-Sale (POS) credits received after 3:00 PM Eastern will post on the next business day. In the event of the representment for a previously returned NSF item, the Bank will make reasonable efforts to refrain from imposing an additional NSF Return Charge, irrespective of the number of times the item is re-presented.

NSF Charge/NSF Service Chg (each paid item)	\$35.00
NSF Return Charge/NSF Return Chg (each return item)	\$35.00

#### WIRE TRANSFER:

There is a \$20.00 charge per domestic transaction and a \$55.00 charge per international transaction. Customers are not charged for incoming wires. Non-customers are charged for incoming and outgoing.

### ATM CHARGES

We will charge \$5.00 to replace a lost ATM, debit card or PIN.

If you use an automated teller machine that is not operated by us, you may be charged a fee by the operator of the machine and/or by an automated transfer network.

We will charge \$3.00 for non-customers to use ATM.

### **INVESTMENT:**

Assistance in purchasing and redeeming stocks and bonds through correspondent banks and brokers:

There is a \$25.00 charge per transaction plus postage and any other costs.

### **COLLECTION ITEMS:**

1% with minimum of \$5.00 and maximum of \$15.00.

### **SAFE DEPOSIT BOXES:**

Annual Rental

3" x 5" boxes \$30.00 5" x 5" boxes \$35.00 3" x 10" boxes \$40.00 5" x 10" boxes \$45.00 10" x 10" boxes \$75.00

Charge for drilling boxes – cost plus \$10.00 \$10.00 charge if only one (1) key returned when box is surrendered. \$10.00 late charge fee if the rent is past due more than one (1) month.

#### **NIGHT DEPOSITORY RENT:**

The fee is \$20.00 per year for  $1^{st}$  bag plus \$10.00 per year for each additional bag. \$10.00 charge if only one (1) bag key returned or head key not returned. There is a \$10.00 late charge fee if the rent is past due more than one (1) month.

### **COPYING SERVICE:**

Copies on copier - \$.25 each.

### FAX SERVICE:

An outgoing fax will be 2.00 for the 1<sup>st</sup> page, and 1.00 for each additional page. Incoming fax will be 1.00 for the 1<sup>st</sup> page and 5.0 for each additional page.

#### ACCOUNT ASSISTANCE:

The charge for account assistance (balancing customer checkbook, reproducing lost or misplaced statement and other related services), will be *\$25.00* per hour, plus copy service. There will be a \$5.00 minimum charge.

Telephone transfer of funds from one account to another - \$2.00 per transfer.

#### **ONLINE/MOBILE BANKING:**

Online banking is available at <u>www.cnbquitman.com</u>. CNBQ Mobile app is available in the Goole Play and Apple App Store. Services include Bill Pay, eStatements, Person-to-Person (P2P) Payments, account transfers, and account research. Online banking and mobile app services are offered complementary to Bank customers.

#### **CERTIFICATES OF DEPOSIT & IRA:**

The bank offers a variety of certificates with interest, usually being compounded monthly. Interest can be compounded back to the certificate or paid monthly, quarterly, semi-annually, annually or at maturity. Minimum deposit is \$1,000.00.

# **NON-CUSTOMER CHECK CASHING FEES:**

\$ .00 - \$300.00 - \$5.00	\$ 600.01 - \$ 700.00 - \$ 14.00
300.01 - 400.00 - 8.00	700.01 - 800.00 - 16.00
400.01 - 500.00 - 10.00	800.01 - 900.00 - 18.00
500.01 - 600.00 - 12.00	900.01 - 1,000.00 - 20.00

Above \$1,000 will be 2%, rounded up to the next \$100.00.

### **LOAN FEES AND CHARGES:**

Payment by Phone Appraisal Fee Extension Fee Modification Fee Loan Origination Fees:	.1% of loa	n balance with a min of	\$25.00 up to a max of	\$12.00 \$250.00 \$250.00 \$100.00
Consumer Loans	Tier I		\$0 - \$5,000.00	= \$100.00
	Tier II	\$	5,000.01 - \$15,000.00	= \$200.00
	Tier III	[	\$15,000.01 - \$50,000	= \$250.00
	Tier IV	7	Greater Than \$50,	000 = .5%
Commercial Loans / Farm		Loans Under 250K = Loans Over 250K =	= .75% with minimum = .5%	of \$250.00
Replacement Coupon Book	Fee			\$15.00
Real Estate Loans / Constru	iction	Loans Under 250K = Loans Over 250K =	.75% with minimum .5%	of \$250.00
Lender's Construction Insp	ection Fee		\$50.00 pe	er inspection
Electronic Filing Fee – Wh	en Applicab	le, Not to Be Duplicated		\$10.00

### **ADDITIONAL FEES AND LIMITS:**

See attachment for additional fees and limits not included above.

# IMPORTANT ACCOUNT INFORMATION FOR OUR CUSTOMERS from

# The Citizens National Bank of Quitman P.O. Box 270 100 E. Stevens St Quitman, GA 31463-0270 (229)263-7575

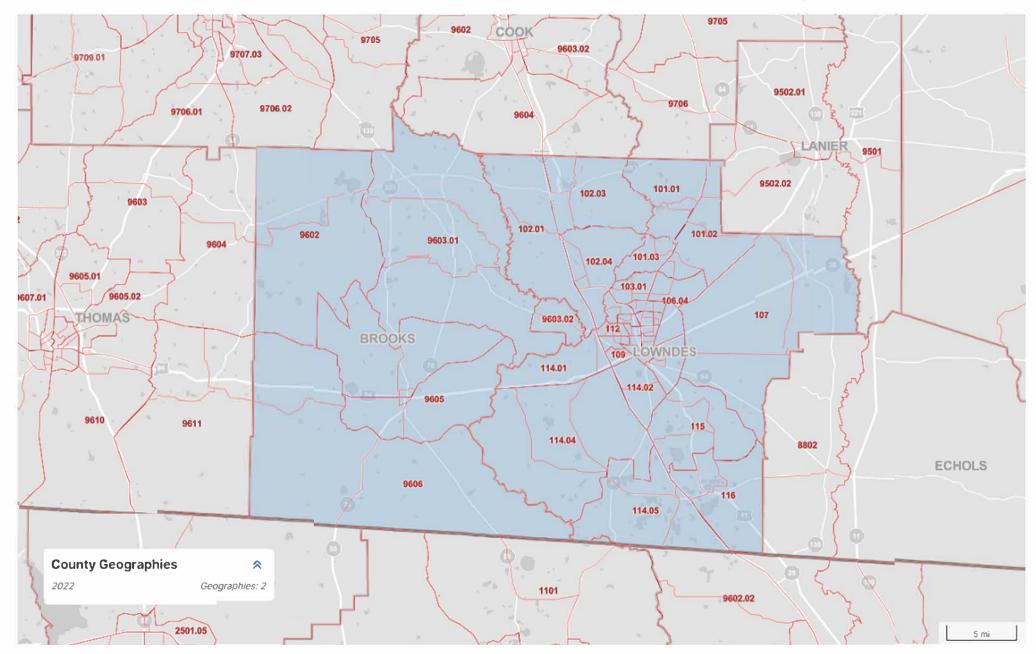
# **COMMON FEATURES**

**Limits and fees** – The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

Replace debit card or PIN	\$ 5.00
Cashier's check	\$ 3.00
Cashier's check – non-customer	\$10.00
NSF Charge/NSF Service Chg. (each item paid)*	\$35.00
NSF Return Charge/NSF Return Chg. (each item returned)	\$35.00
Account activity printout	\$ 1.00
Account research	\$25.00 per hour (min. \$5.00)
Account balancing assistance	\$25.00 per hour (min. \$5.00)
Telephone transfer from checking or savings	\$ 2.00 per transaction
Stop payment – all items	\$25.00
Wire transfer (outgoing domestic)	\$20.00
Wire transfer (outgoing international)	\$55.00
Garnishments	\$50.00
Levies	\$25.00

\* Note: NSF fees may be charged for the following items: checks, electronic checks, electronic transfers, recurring point-of-sale (POS) transactions and ACH items. No NSF fee will be assessed for transactions that are \$10.00 or less. In a business day, credits/deposits are considered first; then, debits/payments starting with the smallest to the largest amounts are paid as funds are available in your account. Important: Point-of-Sale (POS) credits received after 3:00 PM Eastern will post on the next business day.

# Assessment Area Brooks and Lowndes Counties, Georgia



# Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other institutions are also available online. For more information, visit the Consumer Financial Protection Bureau's website (www.consumerfinance.gov/hmda).

# **Public Comment**

At The Citizens National Bank of Quitman, our commitment to serving the credit needs of our communities is at the forefront of our operations. We believe in transparency, accountability, and the power of community feedback to guide our efforts in making meaningful contributions.

As part of our dedication to the Community Reinvestment Act (CRA), we maintain a detailed public file that reflects our endeavors and achievements in meeting the diverse financial needs of our community members. This file is a testament to our ongoing dialogue with the community and our responsive approach to its evolving needs.

### We Value Your Feedback

To date, we have not received written public comments regarding our performance under the CRA. However, we understand the importance of your voice and encourage you to share your experiences and perspectives. Your feedback is invaluable as it helps us evaluate our impact and identify areas for improvement.

Should you wish to contribute your thoughts or inquire more about our CRA efforts, please do not hesitate to reach out. We are committed to maintaining an open and constructive dialogue with all community members.

# **Accessing Our Public Files**

For those interested in a deeper understanding of our work and contributions, we invite you to explore our Public Relations and Charitable Contribution Files. These documents offer insights into our initiatives and the positive changes we aim to foster within our communities.

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7 To access these file or for any questions regarding our CRA activities, please contact our CRA Officer

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j '8°`'
" '# 'u '7
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We are here to provide you with the information you need and welcome your engagement.

Thank you for your interest in our community reinvestment efforts. Together, we can continue to build a stronger, more inclusive community.

# **Supervisory Office**

All institutions supervised by the Office of the Comptroller of the Currency (OCC) subject to CRA must provide in their public notices the address of the appropriate supervisory office for purposes of informing the public how to (1) obtain a list of institutions that are scheduled for CRA examination each quarter; (2) obtain an announcement of applications covered by the CRA filed with the OCC; or (3) send written comments about an institution's performance in helping to meet the community's credit needs.

#### By Writing:

#### Southern District

Deputy Comptroller Southern District Office of the Comptroller of the Currency 500 North Akard Street Suite 1600 Dallas, TX 75201

#### By Emailing:

CRACOMMENTS@OCC.TREAS.GOV

# PUBLIC DISCLOSURE

July 24, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Citizens National Bank of Quitman Charter Number: 14255

> 100 East Stevens Street Quitman, GA 31643-0270

Office of the Comptroller of the Currency

Three Ravinia Drive Suite 400 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 Outstanding.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable, given the bank's size, financial condition, and credit needs of the assessment area (AA).
- The bank originated a majority of loans within its AA.
- The distribution of loans is excellent to borrowers of different geographic areas.
- The distribution of loans is excellent to borrowers of different income levels and businesses of different sizes.
- Community development (CD) activities demonstrate excellent responsiveness to the needs of AA and had a positive effect on the bank's overall rating.

# Loan-to-Deposit Ratio

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

The Citizens National Bank of Quitman's (CNBQ or bank) quarterly LTD ratio averaged 68.9 percent over the 17 quarters since the prior evaluation. The bank's LTD ratio ranged from an average quarterly high of 87.5 percent to an average quarterly low of 50.3 percent. CNBQ's average LTD ratio is slightly higher than the average LTD ratio of three other similarly situated banks operating in the AA. The average quarterly LTD ratio for competitor banks was 67.8 percent over the same time frame and ranged from an average quarterly high of 73.1 percent to an average quarterly low of 61.1 percent.

# Lending in Assessment Area

A majority of the bank's loans are inside its AA. The bank originated 58 percent of its total number of loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
		Numb	er of L	oans		Dolla	Total			
Loan Category	Loan Category Inside				Total	Inside				Outsi
	#	%	#	%	#	\$	%	\$	%	\$
Consumer	2	10.0	18	90.0	20	9,810	2.8	338,128	97.2	347,938
Small Business	15	75.0	5	25.0	20	1,999,286	91.8	177,969	8.2	2,177,255
Small Farm	18	90.0	2	10.0	20	1,820,389	89.2	220,850	10.8	2,041,239
Total	35	58.3	25	41.7	60	3,829,485	83.9	736,947	16.1	4,566,432

Source: 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%.

CNBQ originates indirect auto loans from a variety of dealerships primarily throughout Georgia, Alabama, and Florida. This type of relationship lending is difficult to establish in small rural communities with a limited number of auto dealerships. The bank's dealer finance department originated eighteen of the twenty consumer loans in our sample outside the AA.

# **Description of Institution**

CNBQ is a single state community bank that was chartered in August 1934. The bank has one full-service branch and an automated teller machine (ATM) located at 100 East Stevens Street, Quitman, Georgia. Since the last CRA examination, CNBQ reorganized to become a subsidiary of a bank holding company, Lowndes Banschares, Inc. in Valdosta, Georgia, effective March 1, 2022. In addition to CNBQ, Lowndes Bancshares is the parent company of state chartered Commercial Banking Company (CBC Bank) headquartered in Valdosta, Georgia.

CNBQ offers a full range of traditional deposit and loan products. The bank is a certified lender with the Farm Service Agency's Guarantee Lending Program through the US Department of Agricultural (USDA). In addition, the bank is an approved lender with the US Small Business Administration (SBA). During the COVID-19 pandemic, the bank originated loans through the SBA's Paycheck Protection Program (PPP). In 2020 and 2021, the bank originated 177 PPP loans totaling approximately \$4.7 million which provided financial relief to local businesses. CNBQ offers indirect automobile loans through from dealerships located in Georgia, Alabama, and Florida. The bank's business plan shows a continued commitment to offer farm/agriculture, small business, and indirect automobile loans.

The bank's AA is Brooks and Lowndes Counties which are part of the Valdosta Metropolitan Statistical Area (MSA). The Valdosta MSA contains four counties. In addition to Brooks and Lowndes Counties, the MSA includes Echols and Lanier Counties. The AA complies with the CRA regulation and does not arbitrarily exclude low- or moderate-income geographies. As of December 31, 2021, CNBQ reported total assets of \$126.9 million, net loans of \$68.7 million, and total deposits of \$110.3 million. The loan portfolio included loans secured by real estate of \$44.9 million or 65.4 percent of net loans, commercial loans totaling \$7.3 million or 10.6 percent of net loans, agriculture loans of \$5.2 million or 7.6 percent of net loans, and \$12.3 million in consumer loans or 17.9 percent of net loans. Net loans represented 54.1 percent of total assets. Tier one capital totaled \$14.6 million.

There was no merger, acquisition, or expansion activity since the prior CRA evaluation. There are no financial conditions, legal constraints, or other factors hindering the bank's ability to meet the credit needs of the community. CNBQ received an overall "Satisfactory" rating at its prior CRA review dated February 19, 2019.

# Scope of the Evaluation

# **Evaluation Period/Products Evaluated**

The Office of the Comptroller of the Currency (OCC) evaluated the CRA performance of CNBQ using Small Bank performance criteria, which includes the Lending Test, to determine the distribution of the bank's primary loan products among different geographies and borrower characteristics within the AA. The CRA does not require a small bank to make qualified investments or provide CD services. At the bank's request the OCC evaluated CD activities during the evaluation period. The evaluation period covered January 1, 2019, to December 31, 2021.

To determine CNBQ's primary lending products, examiners assessed the composition of loan originations during the three-year evaluation period. Small business, consumer, and small farm loans represented the bank's primary lending products. Small business loan originations represented 18 percent by number of originations and 33 percent by dollar volume of originations. Consumer loan originations represented 68 percent by number of originations and 27 percent by dollar volume of originations. Small farm loan originations represented 8 percent by number of originations and 22 percent by dollar volume of originations. Examiners selected a random sample of 60 loan originations, representing 20 for each loan type for each year in the evaluation period.

# Selection of Areas for Full-Scope Review

During this evaluation period, CNBQ delineated one AA consisting of Brooks and Lowndes Counties in the State of Georgia. Examiners conducted a full-scope review of this AA. There are no limited-scope areas. Refer to the "Scope" section for details.

### Ratings

CNBQ's overall rating is for the State of Georgia. This state rating is based on performance in the Brooks and Lowndes Counties AA. Refer to the "Scope" section for details regarding how the state rating was determined for this evaluation.

# **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 (or any affiliate whose loans have been considered as part of the institution's lending performance) 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: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits an excellent distribution of loans in moderate-income geographies.
- The bank exhibits an excellent distribution of lending to borrowers of different incomes and farms and businesses of different sizes.

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

CNBQ is a small community bank operating one full-service location in Quitman, Georgia. Quitman is located west of Valdosta in southwest Georgia, on the Florida border. Quitman is the county seat of Brooks County. The bank offers a variety of traditional deposit and loan products, with a primary lending focus of small business, consumer, and small farm loans. The bank is a certified lender with the Farm Service Agency's Guarantee Lending Program through the USDA. In addition, CNBQ is an approved lender with the SBA. During the evaluation period, the bank originated loans through the SBA's PPP which provided financial relief to businesses in the bank's AA. The bank's indirect dealer finance department originates automobile loans primarily from dealerships in Georgia, Alabama, and Florida. The bank's business plan identifies small business banking as a primary focus, along with consumer and agricultural lending.

CNBQ's only designated AA comprises Brooks and Lowndes counties. These adjoining counties are two of the four counties comprising the Valdosta MSA. The AA contains thirty census tracts comprising three low-, eight moderate-, ten middle- and nine-upper-income geographies.

Twenty-four percent of the families in the AA report low-income and 16.7 percent report moderateincome. Nineteen percent of families live below the poverty level. As of December 31, 2021, the Georgia Department of Labor reported the unemployment rate for Brooks and Lowndes counties was 3.8 and 4.1 percent, respectively. The unemployment rate for the state was 3.9 percent. Prominent industries in the AA are retail trade and healthcare. The largest employers include AG-Pro LLC a John Deere Dealership, Lowes Home Centers, Brooksco Dairy Farm, Packaging Corp of America, an international packaging manufacturer, and Crown Healthcare Laundry Services.

CNBQ is one of the few financial institutions headquartered in Brooks County. In addition to CNBQ, there are twenty other FDIC-insured financial institutions with branches the AA. As of June 30, 2022, CNBQ had the thirteenth highest market share with total deposits of \$106.4 million and 3.2 percent market share. Competition is strong from larger financial institutions. Synovus Bank was the leading competitor with \$570.7 million in deposits and 17.0 percent market share. Guardian Bank was ranked second with \$335.3 million deposits and 10.0 percent market share.

Examiners interviewed a non-profit organization which provides social service programs throughout the AA primarily serving low-to-moderate individuals. The representative expressed the need for more affordable rental housing for unhoused individuals and families.

# CNBQ AA

	<u> </u>	ent Area: C	of the Assessn CNBQ			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	30	10.0	26.7	33.3	30.0	0.0
Population by Geography	128,840	8.4	27.5	33.2	30.9	0.0
Housing Units by Geography	53,059	8.9	28.9	33.2	29.0	0.0
Owner-Occupied Units by Geography	24,740	5.1	16.8	39.9	38.2	0.0
Occupied Rental Units by Geography	21,165	12.8	42.0	24.9	20.3	0.0
Vacant Units by Geography	7,154	10.5	32.3	34.4	22.9	0.0
Businesses by Geography	12,140	8.9	29.5	24.4	37.1	0.0
Farms by Geography	516	3.7	16.3	46.1	33.9	0.0
Family Distribution by Income Level	28,641	24.1	16.7	16.9	42.4	0.0
Household Distribution by Income Level	45,905	25.5	15.8	16.3	42.3	0.0
Median Family Income MSA - 46660 Valdosta, GA MSA		\$47,592	Median Housi	ng Value		\$119,989
			Median Gross	Rent		\$742
			Families Belov	w Poverty Lev	vel	19.2%

Due to rounding, totals may not equal 100.0%

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

# Scope of Evaluation in Georgia

This analysis reflects a full-scope review of the CNBQ AA. Examiners placed more weight on the bank's small business and consumer loans since these loans represented a higher percentage of loan originations during the evaluation period. Refer to the table in appendix A: Scope of Examination for additional information on the AA.

# LENDING TEST

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

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

Based on a full-scope review, the bank's performance in the CNBQ AA is excellent.

# Distribution of Loans by Income Level of the Geography

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

### Small Loans to Businesses

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

The geographic distribution of small loans to businesses in the AA during the evaluation period is excellent. The percentage of small loans to businesses in moderate-income geographies exceeded the number of small businesses and the aggregate performance reported by other lenders in these geographies. The bank made no loan originations in low-income geographies. This is reasonable considering the AA includes only three low-income census tracts and less than ten percent of businesses are in these geographies.

### Small Loans to Farms

Refer to Table S in appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to farms.

The geographic distribution of small loans to farms in the AA during the evaluation period is excellent. The percentage of small farm loans originated in moderate-income census tracts exceeded the number of small farms and significantly exceeded the aggregate performance reported by other lenders in these geographies. The bank had no loans originated in low-income census tracts. This is reasonable considering less than five percent of farms are in these geographies.

# **Consumer Loans**

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

The geographic distribution of consumer loans in the AA during the evaluation period is reasonable. The percentage of consumer loans originated in moderate-income geographies was near-to the percentage of households residing in moderate-income geographies. The bank had no consumer loans originated in low-income census tracts. Less than ten percent of households reside in low-income geographies.

# Lending Gap Analysis

Examiners did not identify any unexplained conspicuous lending gaps in the State of Georgia.

# Distribution of Loans by Income Level of the Borrower

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

### Small Loans to Businesses

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

The distribution of small loans to businesses is excellent. The percentage of bank loans is near-to the percentage of small businesses in the AA, and the percentage of bank loans significantly exceeds aggregate performance reported by other lenders in the AA.

### Small Loans to Farms

Refer to Table T in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations of small loans to farms.

The distribution of small loans to farms in the AA is excellent. The percentage of bank loans to farms with annual revenues of \$1 million or less is below the reported percentage of farms in the AA. However, the bank's percentage significantly exceeds the aggregate percentage reported by other lenders in the AA.

### **Consumer Loans**

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

The distribution of consumer loans to individuals of different income levels is excellent. The percentage of bank loans to low-income individuals significantly exceeds the reported percentage of low-income households in the AA. The percentage of bank loans to moderate-income individuals is equal to the reported percentage of moderate-income households in the AA.

### **Responses to Complaints**

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

# **COMMUNITY DEVELOPMENT**

Based on this full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through qualified CD investments and services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's assessment area. Performance related to CD activities had a positive effect on the bank's rating in the state.

### Number and Amount of Qualified Investments

CNBQ made twenty-three qualified donations totaling \$51 thousand to community organizations which serve low- and moderate-income (LMI) individuals and families. A noteworthy example is the bank's participation in the Community to Community Campaign providing \$45 thousand to the Boys and Girls Club of Brooks County.

# Extent to Which the Bank Provides Community Development Services

CNBQ demonstrated effective responsiveness to its AA through CD services during this evaluation period. Five employees volunteered approximately 500 hours to various organizations in the AA to support LMI individuals. Bank employees provide financial expertise and leadership as directors, officers, and board members of these organizations. CNBQ officers and employees also work with local schools providing financial workshops.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed:	January 1, 2019 through December 31, 2021.								
<b>Bank Products Reviewed:</b>	-	l farm, and consumer loans nent qualified investments and community s							
Affiliate(s)	Affiliate Relationship	Products Reviewed							
NA	NA	NA							
List of Assessment Areas and Typ	e of Examination								
Rating and Assessment Areas	Type of Exam	Other Information							
State of Georgia									
CNBQ AA	Full-scope	Brooks and Lowndes Counties which are part of the Valdosta MSA							

# **Appendix B: Summary of State Rating**

<b>RATINGS – The First National Bank of Quitman</b>						
Overall Bank: Lending Test Rating						
The Citizens National Bank of Quitman	Outstanding					
State:						
Georgia	Outstanding					

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

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

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

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

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

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

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

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

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

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

**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.

# **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 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<br/>- Compares the percentage distribution of the number of small loans (loans less than or equal<br/>to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million<br/>or less to: 1) the percentage distribution of businesses with revenues of greater than \$1<br/>million; and, 2) the percentage distribution of businesses for which revenues are not<br/>available. The table also presents aggregate peer small business data for the years the data is<br/>available.
- Table S.Assessment Area Distribution of Loans to Farms by Income Category of the Geography<br/>- The percentage distribution of the number of small loans (less than or equal to \$500,000)<br/>to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income<br/>geographies compared to the percentage distribution of farms (regardless of revenue size)<br/>throughout those geographies. The table also presents aggregate peer data for the years the<br/>data is available. Because aggregate small farm data are not available for geographic areas<br/>smaller than counties, it may be necessary to use geographic areas larger than the bank's<br/>assessment area.
- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares<br/>the percentage distribution of the number of small loans (loans less than or equal to \$500<br/>thousand) originated and purchased by the bank to farms with revenues of \$1 million or less<br/>to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2)

the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

- Table U.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the Borrower<br/>- Compares the percentage distribution of the number of loans originated and purchased by<br/>the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage<br/>distribution of households by income level in each MMSA/assessment area.

	Tot	al Loans to Sm	all Busin	esses	Low-	Income T	racts	Modera	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ible-Inco	me Tracts
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate												
CNBQ	20	2,592,410	100.0	3,003	8.9	0.0	8.9	29.5	35.0	27.8	24.4	65.0	28.0	37.1	0.0	35.3	0.0	0.0	0.0
Total	20	2,592,410	100.0	3,003	8.9	0.0	8.9	29.5	35.0	27.8	24.4	65.0	28.0	37.1	0.0	35.3	0.0	0.0	0.0

Assessment Area:		Total Loans to S	Small Business	es	Businesses	with Revenue	s <= 1MM	Businesses wi > 1N		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
CNBQ	20	2,592,410	100.0	3,003	87.3	80.0	43.9	3.4	20.0	9.3	0.0
Total	20	2,592,410	100.0	3,003	87.3	80.0	43.9	3.4	20.0	9.3	0.0

		Total Loans to Farms			Low-Income Tracts			Mode	ate-Inco	me Tracts	Midd	le-Incom	e Tracts	Uppe	er-Incom	e Tracts	Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
CNBQ	20	2,097,293	100.0	85	3.7	0.0	0.0	16.3	20.0	12.9	46.1	75.0	57.6	33.9	5.0	29.4	0.0	0.0	0.0
Total	20	2,097,293	100.0	85	3.7	0.0	0.0	16.3	20.0	12.9	46.1	75.0	57.6	33.9	5.0	29.4	0.0	0.0	0.0

Table T: Assessme	nt Area	Distributi	ion of Lo	ans to Fa	arms by G	ross Annu	al Revenu	es			2019-21
		Total Loan	is to Farms		Farms	with Revenues <	≔1MM		Revenues > IM	Farms with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
CNBQ	20	2,097,293	100.0	85	96.3	75.0	54.1	2.5	25.0	1.2	0.0
Total	20	2,097,293	100.0	85	96.3	75.0	54.1	2.5	25.0	1.2	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

	Tota	ll Consumer 1	Loans	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Incor	ne Tracts	Not Available-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
CNBQ	20	195,101	100.0	8.6	0.0	28.4	25.0	33.0	60.0	30.0	15.0	0.0	0.0
Total	20	195,101	100.0	8.6	0.0	28.4	25.0	33.0	60.0	30.0	15.0	0.0	0.0

Assessment Area:	Tot	al 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
CNBQ	20	195,101	100.0	25.5	55.0	15.8	15.0	16.3	20.0	42.3	10.0	0.0	0.0
Total	20	195,101	100.0	25.5	55.0	15.8	15.0	16.3	20.0	42.3	10.0	0.0	0.0