



PUBLIC DISCLOSURE

June 11, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Citizens National Bank
Charter Number 5263

200-206 West Court Street
Dyersburg, Tennessee 38025

Office of the Comptroller of the Currency

Victory Building
1401 West Capitol Avenue
Suite 350
Little Rock, AR 72201

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.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the Investment Test in Tennessee is rated "High Satisfactory." Based on the full-scope reviews, the Bank's performance in the TN Non-MSA is adequate and excellent in the Memphis MSA. Refer to Table 14 of Appendix D for the facts and data used to evaluate the Bank's level of qualified investments.

Investments were not considered innovative or complex but demonstrated good responsiveness to the credit and community economic development needs critical needs of the AA. The investments supported community development services targeted towards low-and moderate-income individuals in the Bank's AA's.

TN Non-MSA

Investment performance in the TN Non-MSA is good when considering the limited opportunities in the AA and the responsiveness of current and prior period investments. The Bank's current period investments included a CRAIX Qualified Investment Fund-Community Capital Management investment totaling \$500,000 and \$126,360 in qualifying donations. The 13 donations include the following: United Way, Dyer County High School and Dyersburg Community College, Public Library, YMCA, "Teach Banzai financial literacy toolkits, Senior Housing Crime Prevention Foundation (SHCPF) and The Bridge. The United Way provides community services for low-to-moderate income people. The High School and Community College scholarships provide scholarships to low-to-moderate income people. The Public Library provides educational services to low- and moderate-income (LMI) individuals. In addition to offering access to books and publications, the Library also provides area residents with access to computers and the Internet. The YMCA provides a Summer Feeding Program for low income areas, membership scholarships, and after school programs targeted at LMI youth. FCNB teamed up with "Teach Banzai" to provide a financial literacy toolkit to teachers and students. Teachers can go to the Banzai website, order the teaching materials and student handbooks. Each student will register for the class they are in and will go through the handbook guided by the teacher to learn budgeting and financial skills, including the importance of saving. After they complete the course, the student can be reset to use the Banzai toolkit to track their spending plan for years to come. The Bank provided 2100 literacy toolkits, valued at \$7,594 to schools in the TN Non-MSA AA. The SHCPF provides funding for local Housing and Urban Development (HUD) facilities housing low-to-moderate income people providing security services for valuables and personal items of local nursing home residents. The SHCPF also maintains a 24/7 tips hot line for reporting crimes and / or abuses of nursing home residents. The mission of "The Bridge" is to provide temporary housing to at risk women and their children from abusive situations by providing housing, food and ministry until they are able to sustain on their own.

The prior period investments include a general obligation bond, the proceeds were used to finance the acquisition of land for an industrial park; thus, creating jobs for low-to-moderate individuals. Seven out of 10 Census Tracts in Obion County was classified in June 2017 as "Distressed Nonmetropolitan Middle Income Geographies" due to the high unemployment rate. Another prior period investment included a City of Dyersburg School Bond. The bonds were issued for the acquisition of land for schools, and the construction, improvements, renovations and equipping schools. Three of the four schools located in the City of Dyersburg are located in moderate income census tracts. Over 50% of students in all four schools qualify for Free and Reduced Meals. Two additional investments were