

## **PUBLIC DISCLOSURE**

**December 3, 2018**

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

**NobleBank & Trust**  
**1509 Quintard Avenue**  
**Anniston, Alabama 36201**

**RSSD ID NUMBER: 3385744**

**FEDERAL RESERVE BANK OF ATLANTA**  
**1000 Peachtree Street, N.E.**  
**Atlanta, Georgia 30309-4470**

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the 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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## INSTITUTION'S CRA RATING

**INSTITUTION'S CRA RATING: This institution is rated Outstanding.**

Major factors supporting the institution's rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- The geographic distribution of HMDA-reportable loans and small business loans reflects reasonable dispersion.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- A majority of loans are made in the assessment area.
- The bank's record of providing investments and services in its assessment areas improves credit availability.
- The bank did not receive any consumer complaints regarding CRA performance during the evaluation period.

## **INSTITUTION**

### **SCOPE OF EXAMINATION**

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, and the economic and demographic characteristics of its defined assessment area. NobleBank & Trust's CRA performance evaluation was based on the bank's lending performance in its assessment area using the Interagency Small Institution Examination Procedures. The rating was assessed using the following core criteria developed for evaluating CRA lending performance for small banks:

- Net LTD Ratio
- Lending Inside the Assessment Area
- Lending to Borrowers of Different Incomes and Businesses of Different Sizes
- Geographic Distribution of Loans
- The bank's responsiveness to complaints it has received regarding its CRA activities, if applicable

A full scope review was conducted on one of the bank's two assessment areas. When determining the overall rating, the greatest weight was placed on the bank's performance in the Anniston assessment area because a majority of branches, deposits and lending is in this assessment area.

The evaluation included an analysis of loans reportable under the Home Mortgage Disclosure Act (HMDA) and small business loans originated from January 1, 2014 through December 31, 2017. A HMDA loan, as defined by Regulation C, is a loan that can be categorized as a home purchase, home refinance, or a home improvement loan; multi-family loans are also reportable under the HMDA. Small business loans were also reviewed during this evaluation because they represent the bank's major product line. Small business lending exceeded HMDA lending in both number of loans and dollar amount of loans. As a result, small business lending was given more weight than HMDA lending in evaluating the bank's lending test performance.

At the option of bank management, and in accordance with the Interagency Small Bank CRA Examination Procedures, NobleBank submitted community development activities completed during the review period to be considered for an enhanced rating. The community development test evaluates the innovativeness of bank investments and responsiveness of retail and other services to meet identified community needs within its assessment areas.

As part of this evaluation, three community contacts were made with local community, governmental and economic development representatives who are familiar with the economic and demographic characteristics in the assessment area as well as community development opportunities in Anniston, Alabama. Information obtained from these contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the applicable section of the evaluation. All of the contacts identified community development needs in the community.

### **DESCRIPTION OF INSTITUTION**

NobleBank & Trust is an independent, locally owned community bank established in 2005 and headquartered in Anniston, Alabama. The bank became a state member bank in 2014, and in 2017 received approval to form a bank holding company, Noble Bancshares, Inc. The bank provides traditional retail and commercial banking

services principally to customers in Calhoun County, and portions of southwest Cleburne and northeast Talladega counties. As of 2015, the assessment area also included portions of Jefferson, Shelby, and St. Clair counties in the Birmingham-Hoover, AL MSA. Both the Anniston-Oxford-Jacksonville, AL MSA and the Birmingham-Hoover, AL MSA are considered highly competitive banking environments. The bank promotes its personal and commercial product and service offerings on its website at [www.noblebank.com](http://www.noblebank.com). Featured products include personal deposit and loan products, online and mobile banking, and commercial deposit and loan products.

### Branch Offices

NobleBank & Trust operates five branch offices in its assessment areas. The main office is located in Anniston, Alabama, the county seat of Calhoun County. Three additional full service branches are nearby in Oxford, Piedmont, and Alexandria, Alabama (all in the Anniston MSA). In 2015, the bank opened a fifth branch in Birmingham. The bank also operates two full service and three cash-only ATMs in Anniston, and two full service ATMs in Birmingham. Since the previous evaluation, the bank did not close any branches in its assessment areas.

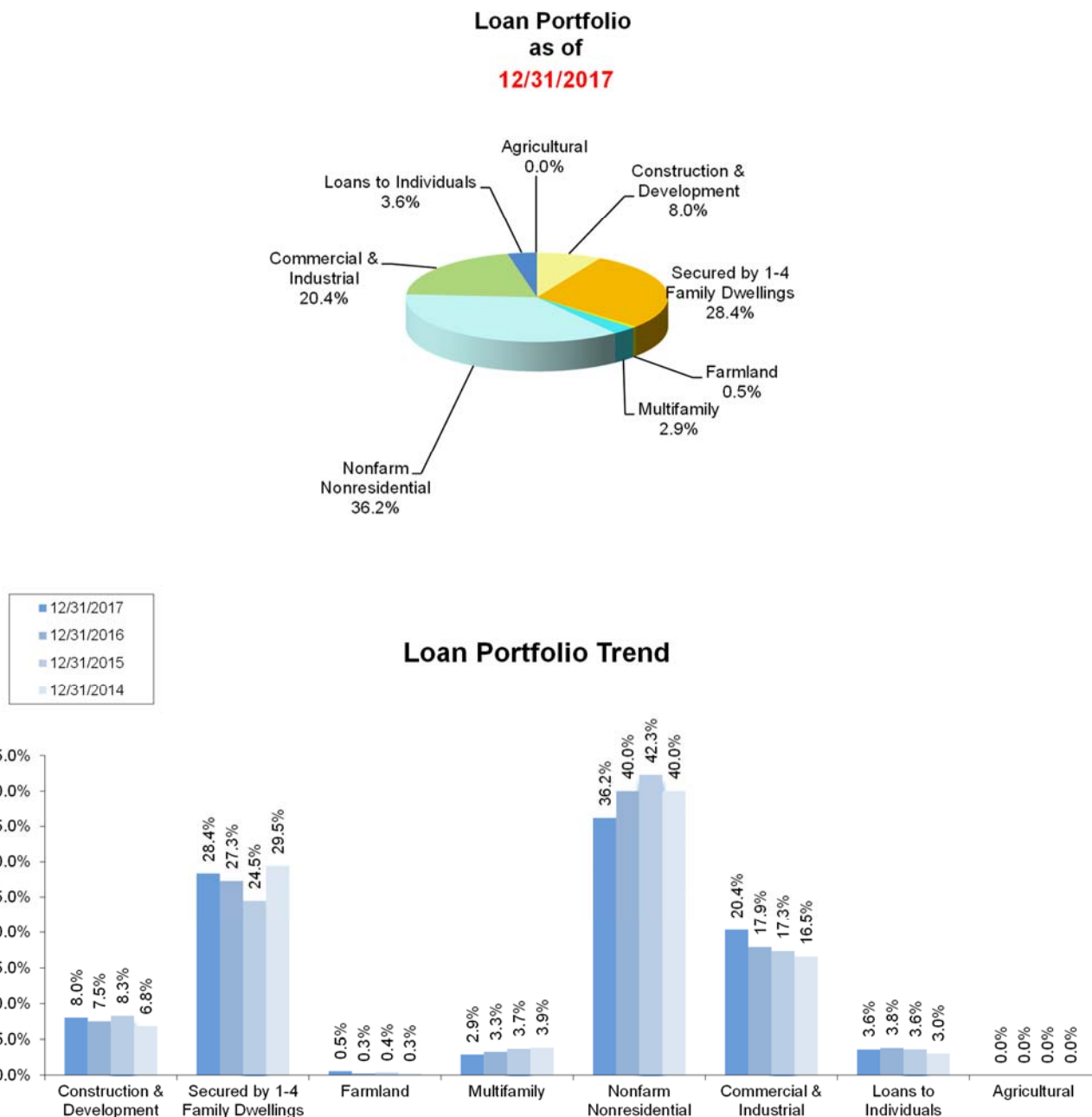
### Loan Portfolio

According to the December 31, 2017 Report of Conditions (ROC), the bank had total assets of \$252.5 million, an increase of approximately \$76.4 million since the bank's previous CRA evaluation conducted in September 2014.

The following table and charts show the composition of the loan portfolio according to the Consolidated Reports of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO								
Loan Type	12/31/2017		12/31/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	10,373	8.0%	9,319	7.5%	9,728	8.3%	6,950	6.8%
Secured by One- to Four- Family Dwellings	36,639	28.4%	33,909	27.3%	28,811	24.5%	29,949	29.5%
Other Real Estate: Farmland	706	0.5%	325	0.3%	422	0.4%	264	0.3%
Multifamily	3,760	2.9%	4,044	3.3%	4,329	3.7%	3,933	3.9%
Nonfarm nonresidential	46,782	36.2%	49,699	40.0%	49,745	42.3%	40,679	40.0%
Commercial and Industrial	26,304	20.4%	22,216	17.9%	20,377	17.3%	16,813	16.5%
Loans to Individuals	4,643	3.6%	4,753	3.8%	4,275	3.6%	3,101	3.0%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>\$129,207</b>	<b>100.00%</b>	<b>\$124,265</b>	<b>100.00%</b>	<b>\$117,687</b>	<b>100.00%</b>	<b>\$101,689</b>	<b>100.00%</b>

\* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



As illustrated by the table and charts above, the bank is focused on commercial lending, particularly nonfarm nonresidential lending which makes up the largest percentage of the loan portfolio at 36.2 percent, followed by commercial and industrial loans at 20.4 percent. Loans secured by one-to-four family dwellings comprise 28.4 percent of the loan portfolio. The composition of loan portfolio remained relatively stable during the review period, with a 15.0 percent increase by dollar amount in the bank's primary credit product, nonfarm nonresidential loans, from year-end 2014 to year-end 2017; however, these loans decreased approximately 6.0 percent from year-end 2015. The loan portfolio increased 27.0 percent from year-end 2014 to year-end 2017.

#### Credit Products

The bank offers a variety of credit products to meet community needs including commercial, agricultural, residential real estate, and home equity loans. While commercial loans are the primary business line, the bank offers fixed and adjustable rate residential mortgage loans.

### Assessment Area

For purposes of the CRA, NobleBank & Trust has defined two assessment areas, which are described below.

- Anniston: All of Calhoun County, portions of southwest Cleburne and northeast Talladega counties.
- Birmingham: Portions of Jefferson, Shelby, and St. Clair counties (added as of 2015).

### CRA Compliance

NobleBank & Trust complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of the assessment areas. The bank received a Satisfactory CRA rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated September 15, 2014, under the Small Bank Examination procedures.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

### Overview

NobleBank's lending performance is satisfactory. The bank's lending performance was evaluated by an analysis of residential and small business loans originated between January 1, 2014 and December 31, 2017. The LTD ratio is reasonable given the institution's size, financial condition, and assessment area credit needs. A majority of loans were originated in the assessment areas. The geographic distribution of loans reflects reasonable dispersion, and the distribution of borrowers also reflects reasonable penetration among customers of different income levels and businesses of different sizes. Also, the bank's record of providing branches and other services enhances credit availability in the assessment area. Performance context information, such as competition and demographic and economic conditions, was also considered in the evaluation of the bank's lending performance. Lending in the limited-scope assessment area was generally consistent with the overall performance of the full-scope assessment area.

Given the bank's asset size and offices located in a metropolitan statistical area (MSA), it submits annual reports about its residential real estate loan originations and applications, pursuant to the Home Mortgage Disclosure Act (HMDA). These loans are referred to as "HMDA" loans in this evaluation.

A small business loan is defined as a business loan with an original amount of \$1 million or less and typically is either secured by nonfarm or nonresidential real estate or classified as commercial loans. A small farm loan is defined as a farm loan with an original amount of \$500,000 or less and is either secured by farmland or classified as loans to finance agricultural production and other loans to farmers.

### Loan-to-Deposit (LTD) Ratio

The bank's net LTD ratio reflects its level of lending activity, and its lending levels show a reasonable responsiveness to meeting the overall assessment areas' credit needs. The bank's average net LTD ratio for the previous sixteen quarters, ending December 31, 2017, was 64.8 percent. The bank's LTD ratio ranged from a high of 69.2 percent as of December 31, 2015, to a low of 60.2 percent as of March 31, 2014. Consideration was given for the bank's size, financial condition, assessment area credit needs, and the bank's average LTD ratio compared to the average LTD ratios of four other financial institutions with offices in its assessment areas. The bank's average net LTD exceeded all similarly situated banks with offices in its assessment areas. The average LTD ratios for these four financial institutions ranged from 38.7 percent to 63.4 percent.

### Assessment Area Concentration

From 2014 to 2018, the bank originated the majority of its total loans to borrowers and businesses located within the bank's assessment areas. The table below shows, by product type, the number and percentage of loans reviewed that were located inside and outside of the bank's assessment area.

**Lending Inside and Outside the Assessment Area 2014-2018**

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	18	90.0	\$743	93.1	2	10.0	\$55	6.9
Home Purchase - Conventional	81	80.2	\$8,773	68.7	20	19.8	\$3,999	31.3
Multi-Family Housing	5	100.0	\$871	100.0	0	0.0	\$0	0.0
Refinancing	57	91.9	\$8,530	88.7	5	8.1	\$1,083	11.3
<b>Total HMDA related</b>	<b>161</b>	<b>85.6</b>	<b>\$18,917</b>	<b>78.6</b>	<b>27</b>	<b>14.4</b>	<b>\$5,137</b>	<b>21.4</b>
Small Business	471	75.7	\$121,600	72.2	151	24.3	\$46,873	27.8
<b>Total Small Bus. related</b>	<b>471</b>	<b>75.7</b>	<b>\$121,600</b>	<b>72.2</b>	<b>151</b>	<b>24.3</b>	<b>\$46,873</b>	<b>27.8</b>
<b>TOTAL LOANS</b>	<b>632</b>	<b>78.0</b>	<b>\$140,517</b>	<b>73.0</b>	<b>178</b>	<b>22.0</b>	<b>\$52,010</b>	<b>27.0</b>

Note: Affiliate loans not included

As shown above, 78.0 percent of total loans were to borrowers and businesses inside the bank's assessment area. Inside the assessment area, HMDA-reportable loans represented 85.6 percent by number of loans and 78.6 percent by dollar amount, and small business loans represented 75.7 percent by number of loans and 72.2 percent by dollar by dollar amount. The high level of lending within the assessment area demonstrates the bank's willingness to originate loans that meet the credit needs of the assessment area.

Distribution of Lending by Geography, Borrower Income, and Business Size

The geographic distribution of HMDA-reportable loans and small business loans reflects reasonable dispersion throughout the assessment areas. Given the product lines offered, the overall distribution of lending to borrowers of different income levels and to businesses of different revenue sizes reflects reasonable penetration. The analysis of HMDA-reportable lending and small business lending within each assessment area is discussed in detail later in this report.

Responsiveness to the Credit Needs of Low- and Moderate-Income Individuals and to Small Businesses

Considering the geographic distribution of loans and the distribution of loans by borrower income and business revenue, the bank exhibits a reasonable record of serving the credit needs of low- and moderate-income individuals, geographies, and small businesses. Additionally, the bank's performance in making qualified investments and contributions, and providing retail branches and other services, supplemented its performance in the five core lending criteria and contributed to its outstanding performance.

**RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS**

The bank has not received any CRA-related complaints since the previous evaluation.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

No evidence of prohibited discrimination or the use of other illegal credit practices was noted during the examination. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations.

## METROPOLITAN AREA FULL-SCOPE REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ANNISTON ASSESSMENT AREA

#### Overview

The assessment area includes all of Calhoun County, which makes up the Anniston-Oxford-Jacksonville, AL MSA, as well as portions of Talladega and Cleburne counties. The bank's main office serves as a branch along with three additional full service branches in the assessment area. Of the 301 small business loans used in the analysis, 220 (73.0 percent by number) were in the Anniston assessment area. Additionally, of the 156 HMDA loans used in the analysis, 139 (89.1 percent by number) were also in this assessment area.

#### Population Information

According to the 2015 US Census Bureau, the population of the assessment area was 141,756, a 1.7 percent decrease since the 2010 census. The number represents 2.9 percent of the state of Alabama's population of 4,830,620. According to The University of Alabama Center for Business and Research, from 2010 to 2017, Calhoun County experienced the highest population decrease in its region at 3.2 percent, while the state and national populations increased by 2.0 percent and 5.5 percent, respectively.<sup>1</sup> During the same period, the City of Anniston within Calhoun County experienced a 5.8 percent population decline.<sup>2</sup>

#### Income Characteristics

For purposes of classifying borrower income, this evaluation uses the American Community Survey (ACS) estimated median family income for the relevant areas. The following table sets forth the estimated median family income for 2014 to 2017 for the Anniston-Oxford-Jacksonville, AL MSA. The table also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). The median family income for the Anniston-Oxford-Jacksonville, AL MSA was \$51,600 in 2014, dropped two consecutive years to \$49,400 in 2015 and \$46,700 in 2016, and finally increased to \$53,000 in 2017.<sup>3</sup>

**Borrower Income Levels**  
**Anniston-Oxford-Jacksonville, AL MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
<b>2014</b>	<b>\$51,600</b>	0	- \$25,799	\$25,800	- \$41,279	\$41,280	- \$61,919	\$61,920	- & above
<b>2015</b>	<b>\$49,400</b>	0	- \$24,699	\$24,700	- \$39,519	\$39,520	- \$59,279	\$59,280	- & above
<b>2016</b>	<b>\$46,700</b>	0	- \$31,249	\$31,250	- \$49,999	\$50,000	- \$74,999	\$75,000	- & above
<b>2017</b>	<b>\$53,000</b>	0	- \$26,499	\$26,500	- \$42,399	\$42,400	- \$63,599	\$63,600	- & above

According to the 2017 census data, there were 37,336 families in the assessment area. Of those families, 21.5 percent were low-income, 16.1 percent were moderate-income, 20.5 percent were middle-income, and 41.8 percent were upper-income. Of the total families, 15.7 percent had incomes below the poverty level.

<sup>1</sup> "State of the Workforce Report: East Alabama Works." The University of Alabama Center for Business and Economic Research. U.S. Census Bureau, n.d. Web. December 13, 2018. <<http://www2.labor.alabama.gov/WorkforceDev/WorkforceReports/REgion2.pdf>>.

<sup>2</sup> "QuickFacts: Calhoun County, Anniston". U.S. Census Bureau, n.d. Web. 13 December 2018. <<https://www.census.gov/quickfacts>>.

<sup>3</sup> "QuickFacts: Calhoun County, Anniston". U.S. Census Bureau, n.d. Web. 13 December 2018. <<https://www.census.gov/quickfacts>>.

Additionally, 57.5 percent of families in low-income tracts and 25.8 percent of families in moderate-income tracts had incomes below the poverty level.

Between the periods of 2008-2012 and 2013-2017, the percent change in the number of families living in poverty declined in Calhoun County by 6.7 percent, which is more than the state of Alabama 3.1 percent decline.<sup>4</sup> However, while most cities in Calhoun County experienced a double-digit decline, the percent change in the number of families living in poverty in the City of Anniston increased by 10.3 percent and by 31.8 percent in the City of Piedmont. These cities are the locations of the bank's two moderate-income branches. Therefore, increasing family poverty rates makes lending in these geographies more challenging.

#### Assessment Area Demographics

The following tables provide demographic characteristics of the bank's assessment area. The first table is based on 2016 FFIEC census data<sup>5</sup> along with 2016 Dun & Bradstreet (D&B) information and used to analyze the bank's 2014 to 2016 lending performance. The second table is based on the 2017 FFIEC census data and 2017 D&B information and is used to analyze the bank's 2017 lending performance.<sup>6</sup> The release of the 2017 FFIEC census data resulted in the reclassification of the income level of some census tracts. During the examination period, the number of moderate-income tracts in the Anniston assessment area decreased by one. There were no changes in the number of census tracts in the Anniston assessment area during the examination period.

Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

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<sup>4</sup> "Calhoun County, Alabama (Census)." *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. Web. 13, December 2018. <<https://www.policymap.com>>.

<sup>5</sup> The 2016 FFIEC census data is derived from the 2010 census data and the 2006-2010 American Community Survey (ACS) five-year estimates.

<sup>6</sup> The 2017 FFIEC census data is derived from the 2011-2015 ACS five-year estimates.

## Combined Demographics Report

Assessment Area: Anniston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	8.1	1,625	4.3	767	47.2	8,456	22.2
Moderate-income	8	21.6	5,333	14.0	935	17.5	6,728	17.7
Middle-income	16	43.2	20,078	52.7	2,808	14.0	7,120	18.7
Upper-income	7	18.9	11,018	28.9	1,080	9.8	15,775	41.4
Unknown-income	3	8.1	25	0.1	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>37</b>	<b>100.0</b>	<b>38,079</b>	<b>100.0</b>	<b>5,590</b>	<b>14.7</b>	<b>38,079</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	3,802	1,280	3.2	33.7	1,589	41.8	933	24.5
Moderate-income	11,482	5,490	13.6	47.8	3,825	33.3	2,167	18.9
Middle-income	32,446	21,488	53.3	66.2	7,055	21.7	3,903	12.0
Upper-income	16,566	12,007	29.8	72.5	3,196	19.3	1,363	8.2
Unknown-income	25	25	0.1	100.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>64,321</b>	<b>40,290</b>	<b>100.0</b>	<b>62.6</b>	<b>15,665</b>	<b>24.4</b>	<b>8,366</b>	<b>13.0</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	%	#	%	#	%
Low-income	185	4.1	168	4.1	14	3.7	3	5.7
Moderate-income	1,091	24.1	948	23.1	135	35.7	8	15.1
Middle-income	2,199	48.5	2,003	48.8	162	42.9	34	64.2
Upper-income	1,053	23.2	979	23.8	66	17.5	8	15.1
Unknown-income	8	0.2	7	0.2	1	0.3	0	0.0
<b>Total Assessment Area</b>	<b>4,536</b>	<b>100.0</b>	<b>4,105</b>	<b>100.0</b>	<b>378</b>	<b>100.0</b>	<b>53</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>90.5</b>		<b>8.3</b>		<b>1.2</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>			<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
		#	%	%	#	%	#	%
Low-income	1	0.9	1	0.9	0	0.0	0	0.0
Moderate-income	7	6.2	7	6.2	0	0.0	0	0.0
Middle-income	67	59.3	67	59.3	0	0.0	0	0.0
Upper-income	38	33.6	38	33.6	0	0.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>113</b>	<b>100.0</b>	<b>113</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>100.0</b>		<b>.0</b>		<b>.0</b>

2016 FFIEC Census Data and 2016 D&B Information

## Combined Demographics Report

### Assessment Area: Anniston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	8.1	1,248	3.3	717	57.5	8,042	21.5
Moderate-income	7	18.9	4,888	13.1	1,262	25.8	6,006	16.1
Middle-income	17	45.9	23,868	63.9	3,002	12.6	7,665	20.5
Upper-income	6	16.2	7,025	18.8	785	11.2	15,623	41.8
Unknown-income	4	10.8	307	0.8	79	25.7	0	0.0
<b>Total Assessment Area</b>	<b>37</b>	<b>100.0</b>	<b>37,336</b>	<b>100.0</b>	<b>5,845</b>	<b>15.7</b>	<b>37,336</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,560	983	2.5	27.6	1,449	40.7	1,128	31.7
Moderate-income	10,235	4,731	12.2	46.2	3,716	36.3	1,788	17.5
Middle-income	37,998	25,138	65.0	66.2	8,052	21.2	4,808	12.7
Upper-income	11,562	7,679	19.9	66.4	2,019	17.5	1,864	16.1
Unknown-income	1,426	153	0.4	10.7	952	66.8	321	22.5
<b>Total Assessment Area</b>	<b>64,781</b>	<b>38,684</b>	<b>100.0</b>	<b>59.7</b>	<b>16,188</b>	<b>25.0</b>	<b>9,909</b>	<b>15.3</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	170	4.3	153	4.3	14	3.7	3	5.7
Moderate-income	1,041	26.3	885	25.0	144	38.5	12	22.6
Middle-income	2,089	52.7	1,891	53.5	170	45.5	28	52.8
Upper-income	587	14.8	542	15.3	37	9.9	8	15.1
Unknown-income	75	1.9	64	1.8	9	2.4	2	3.8
<b>Total Assessment Area</b>	<b>3,962</b>	<b>100.0</b>	<b>3,535</b>	<b>100.0</b>	<b>374</b>	<b>100.0</b>	<b>53</b>	<b>100.0</b>
	Percentage of Total Businesses:			<b>89.2</b>		<b>9.4</b>		<b>1.3</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	1	1.1	1	1.1	0	0.0	0	0.0
Moderate-income	8	8.5	8	8.5	0	0.0	0	0.0
Middle-income	68	72.3	68	72.3	0	0.0	0	0.0
Upper-income	16	17.0	16	17.0	0	0.0	0	0.0
Unknown-income	1	1.1	1	1.1	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>94</b>	<b>100.0</b>	<b>94</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>	<b>0</b>	<b>.0</b>
	Percentage of Total Farms:			<b>100.0</b>		<b>.0</b>		<b>.0</b>

2017 FFIEC Census Data and 2017 D&B Information

According to the 2017 FFIEC census data, of the 37 tracts in the Anniston assessment area, 3 (8.1 percent) are low-income; 7 (18.9 percent) are moderate-income; 17 (45.9 percent) are middle-income; 6 (16.2 percent) are upper-income; and 4 (10.8 percent) are unknown-income tracts. Two middle-income tracts and one moderate-income tract in Talladega County in the Anniston assessment area were classified as distressed due to poverty levels during the examination period. Also, a 2,307-bed Federal Correctional Institution is located in Talladega County.<sup>7</sup>

<sup>7</sup> "Federal Correctional Institution (FCI) – Talladega." Federal Bureau of Prisons, n.d. Web. 13 December 2018.  
<<https://www.bop.gov/locations/institutions/tdg/>>

### Housing Characteristics

According to the 2017 FFIEC census data, there were 64,781 housing units in the assessment area. Of the total units, 59.7 percent were owner-occupied, 25.0 percent were rental units, and 15.3 percent were vacant. While a majority of units were owner-occupied, only 27.6 percent of the housing in the low-income tracts was owner-occupied, indicating reduced opportunities for mortgage origination in these geographies. The presence of a large university in Jacksonville, a Federal Correctional Institution in Talladega County, and the Army Depot and Fort McClellan Military Reservation in Anniston may further impact mortgage lending opportunities in the assessment area.

In 2016, the homeownership rate in Anniston assessment area was 62.6 percent. For comparison, the statewide homeownership rate is 60.4 percent.<sup>8</sup> The median housing value in the assessment area in 2015 was \$97,062, which was lower than the median housing value for the state of Alabama at \$117,600. The median housing value ranged from \$48,153 in low-income tracts to \$130,990 in upper-income tracts. The median age of the housing stock in the assessment area in 2015 was 43 years, ranging from 36 years in upper-income tracts to 61 years in low-income tracts.

The Alabama Center for Real Estate at The University of Alabama Culverhouse College of Business reports 1,646 homes sold in 2017. This is a 9.0 percent increase over the 1,510 homes sold in 2016 and 82.7 percent higher than sales during the economic downturn in 2009.<sup>9</sup> During the same time, average sales prices increased by 2.6 percent from 2016 to 2017 to \$138,034, while average days on the market decreased by 16.3 percent to 112 days, resulting in a reduction in inventory. Higher demand for single family homes and increasing home prices between 2016 and 2017 coupled with decreasing median incomes between 2014 and 2016 could indicate fewer opportunities for low- and moderate-income borrowers to purchase homes.

### General Economic and Business Characteristics

The City of Anniston sits at the foothills of the Appalachian Mountains and attracts eco-tourists.<sup>10</sup> Calhoun County is easily accessible to a major interstate, two international airports, and three large metropolitan cities: Atlanta, Birmingham, and Huntsville. The assessment area is anchored most prominently by military facilities and hospitals. Major employers include Anniston Army Depot, Honda Manufacturing, North East Alabama Regional Medical Center, and the Calhoun County School System. One community college and one university are located within the assessment area. The top industry sectors are Aerospace, Automotive, Department of Defense, Firearms, Food Manufacturing, and Logistics and Warehousing.<sup>11</sup>

Economic conditions in the assessment area are sluggish. Limited workforce availability and skill level impact the region's ability to attract businesses to the area to create jobs. An East Alabama Works report notes that in Region 2, where Calhoun County is the most populous, the highest earning occupations are management, healthcare, and engineering.<sup>12</sup> The health care sector has benefitted from corporate funded health facilities in the area to address chronic health ailments associated with prior environmental hazards impacting the area waterways,

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<sup>8</sup> 2016 FFIEC Census Data

<sup>9</sup> "Calhoun County Residential Real Estate: Annual Trends Report." The University of Alabama Culverhouse College of Commerce. Alabama Center for Real Estate, n.d. Web December 13, 2018. <[http://dlambw9zjiu0uw.cloudfront.net/market\\_annual/25.pdf?1540994854](http://dlambw9zjiu0uw.cloudfront.net/market_annual/25.pdf?1540994854)>

<sup>10</sup> "Welcome to Tour East Alabama." The University of Alabama Economic Development, n.d. Web 13 December 2018. <<https://toureastalabama.com/>>

<sup>11</sup> "Community Profile." Calhoun County Economic Development Council, n.d. Web. 3 December 2018. <<http://www.calhouncountyedc.org/wp-content/uploads/2017/01/Emailable-Calhoun-County-Profile.pdf>>

<sup>12</sup> "State of the Workforce Report: East Alabama Works." The University of Alabama Center for Business and Economic Research. U.S. Census Bureau, n.d. Web. December 13, 2018. <<http://www2.labor.alabama.gov/WorkforceDev/WorkforceReports/REgion2.pdf>>.

lands, and ecosystems.<sup>13 14</sup> The assessment area was also impacted by the Fort McClellan Military Reservation closing. According to bank management, the collective economic impact of these factors has influenced low loan-to-value (LTV) ratios, slow small business growth, and out-migration. According to The University of Alabama Center for Business and Economic Research projects, from 2005 to 2015 workforce shortfalls neared 50,000. Correspondingly there was a net rise in out-commuting as workers were willing to travel for better jobs.<sup>15</sup>

Revitalization designations provide tools and resources for stabilization. Anniston has been designated an Environmental Protection Agency (EPA) Superfund Redevelopment Site.<sup>16</sup> The Base Realignment and Closure (BRAC) process resulting in the closure of Fort McClellan has left property, buildings, infrastructure, and roads that qualify for economic development incentives.<sup>17</sup> The state and city have responded to small business growth needs with economic development incentives including financing through the State Small Business Credit Initiative<sup>18</sup> and grants through the Spirit of Anniston Main Street Alabama Program.<sup>19</sup> Within the assessment area there are three Opportunity Zones in Calhoun County and one in Cleburne County.<sup>20</sup>

### Employment Statistics

The following table shows the unemployment rates for 2014 through 2017 for the three counties included in the bank's assessment area during the review period and the state of Alabama. Although there is a limited workforce to fill higher skilled jobs, employment opportunities still exist in the assessment area. For instance, unemployment rates declined in Calhoun, Talladega, and Cleburne counties, respectively. Unemployment also declined in the state. The unemployment rate in each county was higher than the statewide rate, except in years 2014 and 2016 when the unemployment rate in Cleburne County was less than the state rate.

The U.S. Department of Labor's Bureau of Labor Statistics reports show that while the Anniston-Oxford-Jacksonville, AL MSA had a gain of 0.5 percent in nonagricultural employment from October 2017 to October 2018,<sup>21</sup> it ranked 11<sup>th</sup> of 12 metro areas in the state of Alabama in number of nonfarm jobs. Anniston has the highest unemployment rate of 12 metro areas in Alabama.<sup>22</sup>

<sup>13</sup> "New Federal Study Links Monsanto Chemicals to Widespread Liver Disease in Poisoned Southern Town (Anniston, Alabama)." Daily Health Post, n.d. Web. 11 December 2018. <<https://dailyhealthpost.com/anniston-alabama-monsanto/>>

<sup>14</sup> "History." West Anniston Foundation, n.d. Web. 13 December 2018. <<http://westannistonfdn.org/history/>>

<sup>15</sup> "State of the Workforce Report: East Alabama Works." The University of Alabama Center for Business and Economic Research. U.S. Census Bureau, n.d. Web. 13 December 2018. <<http://www2.labor.alabama.gov/WorkforceDev/WorkforceReports/REgion2.pdf>>

<sup>16</sup> "Anniston PCB Site (Monsanto CO): Superfund Site Profile." U.S. Environmental Protection Agency, n.d. Web. 13 December 2018. <<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0400123#bkgground>>

<sup>17</sup> "Closed Military Bases – What are they doing now?" DuoTech Services, Inc., n.d. Web. 13 December 2018. <<https://duotechservices.com/closed-military-bases-where-are-they-now>>

<sup>18</sup> "State Small Business Credit Initiative." Alabama Department of Economic and Community Affairs, n.d. Web. 13, December 2018. <<http://www.adeca.alabama.gov/Divisions/ced/cdp/Pages/SSBCI.aspx>>

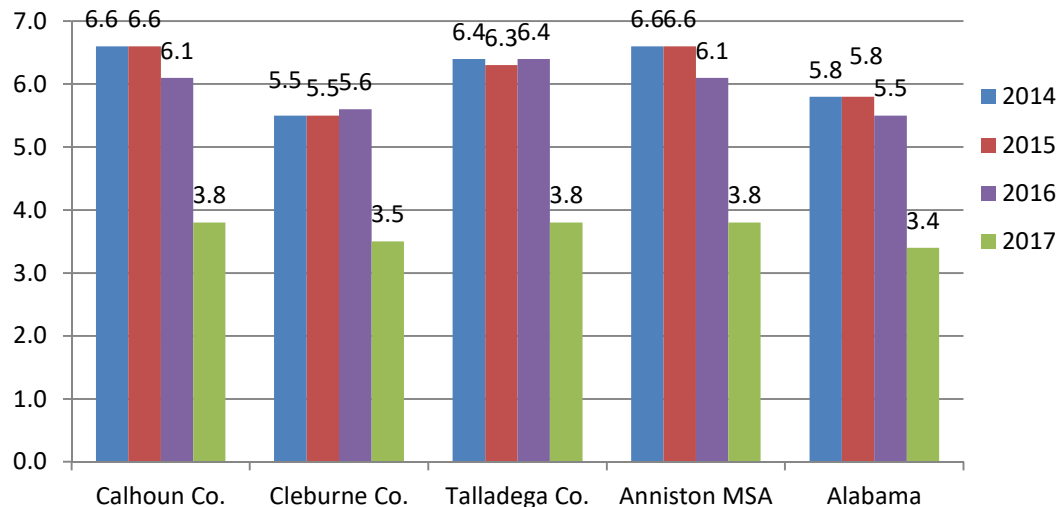
<sup>19</sup> "Spirit of Anniston". n.d. Web 13 December 2018. <<https://spiritofanniston.org/>>

<sup>20</sup> "Three Calhoun County areas qualify for federal economic development program." Anniston Star, June 2, 2018, n.d. Web. 11 December 2018. Retrieved from <[https://www.annistonstar.com/news/calhoun/three-calhoun-county-areas-qualify-for-federal-economic-development-program/article\\_27b1c20e-66ab-11e8-a932-17f5b5e6a3e6.html](https://www.annistonstar.com/news/calhoun/three-calhoun-county-areas-qualify-for-federal-economic-development-program/article_27b1c20e-66ab-11e8-a932-17f5b5e6a3e6.html)>

<sup>21</sup> "Nonagricultural Wage and Salary Employment for Alabama Metro Areas (MA's)1." United States Department of Labor, Bureau of Labor Statistics, n.d. Web. 13 December 2018. <<http://www2.labor.alabama.gov/Newsletter/LMI%20Newsletter.pdf>>

<sup>22</sup> "Metropolitan Areas October 2018 Unemployment Data." United States Department of Labor, Bureau of Labor Statistics, n.d. Web. 13 December 2018. <<http://www2.labor.alabama.gov/Newsletter/LMI%20Newsletter.pdf>>

### Unemployment Rates - Anniston



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

### Competition

According to the June 30, 2018 FDIC Summary of Deposits Report there are 17 financial institutions operating 53 offices inside the assessment area. Most of the financial institutions are community banks headquartered in Alabama. NobleBank & Trust has 7.6 percent deposit market share, or \$220.4 million in total deposits, in the Anniston assessment area. Regions Bank holds the largest deposit market share with 19.3 percent followed by The First Bank of Alabama with 11.6 percent.

### Community Contacts

As part of the CRA examination, information was obtained from a local small business development organization, a workforce development organization, and an economic development organization to better understand local economic conditions, identified community development needs, and opportunities for financial institutions to be responsive to demands for housing and small business credit. Community contacts shared that while the assessment area's strategic location expands workforce opportunities, it also contributes to out-migration, further impacting the availability of a skilled workforce to fill employment and slows recovery from the economic downturn. Limited public transportation in rural areas further impacts workforce access to employment opportunities. The area needs more diverse industry sectors, higher wage jobs, and incentives to encourage college graduates to remain in Calhoun County. Existing small businesses are challenged to maintain a strong customer base, recruit quality workforce, and earn annual revenue higher than a moderate-income wage. Start-ups and existing businesses have resources through a small business development center at the local university and a small business incubator. While all size businesses have access to capital through state and city financing and grants, small businesses need personal financial coaching and business tax education. Community contacts generally perceived that community banks are responsive to housing and small business credit needs. Regional banks in the assessment area provide microloan products to finance small businesses. Community banks invest in housing rehabilitation and contribute to local school student and teacher scholarships as well as career and financial education.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### LENDING TEST

#### Overview

NobleBank's overall lending performance in the Anniston assessment area is satisfactory. The geographic distribution of loans reflects reasonable dispersion, and the distribution of loans by borrower income level and business revenue reflects reasonable penetration. The performance context information discussed earlier in this evaluation was considered in assessing the bank's lending performance. During the review period, the bank made 144 HMDA-reportable loans and 319 small business loans in the assessment area. Therefore, small business lending was given greater consideration than HMDA lending in evaluating the bank's performance.

Loans made in 2014-2016 were analyzed using 2016 FFIEC census data, while loans made in 2017 were analyzed using 2017 FFIEC census data. Therefore, in the discussions of the geographic distribution of loans and lending to borrowers of different income and businesses of different sizes, separate tables are presented depicting lending in 2014-2016 and lending in 2017.

#### Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA-reportable and small business loans, including both originations and purchases, was compared to available demographic data. HMDA-reportable lending was also compared with aggregate lending data. Based on the following analysis, the overall geographic distribution of the bank's HMDA and small business loans reflects reasonable dispersion throughout the bank's assessment area and does not reveal any unexplained gaps in lending patterns.

#### Residential Real Estate (HMDA) Lending

The following table shows the geographic distribution of NobleBank's HMDA reportable loans for 2014, 2015, and 2016 within its Anniston assessment area. It also includes a comparison to the number of owner-occupied units and to aggregate HMDA lenders within the assessment area. The HMDA aggregate lenders' data is the combined total of lending activity reported by all lenders subject to HMDA in the assessment area.

**Geographic Distribution of HMDA Loans**

Assessment Area: Anniston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison																	
		2014, 2015, 2016					2014						2015						2016					
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar			Count			Dollar		
		Count	Dollar		Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg					
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	#	%	\$ %		
HOME PURCHASE	Low	3	6.3%	\$59	1.5%	3.2%	0	0.0%	0.3%	\$0	0.0%	0.1%	2	10.0%	0.3%	\$49	3.7%	0.0%	1	5.9%	0.2%	\$10	1.0%	0.0%
	Moderate	4	8.3%	\$131	3.3%	13.6%	0	0.0%	9.5%	\$0	0.0%	6.4%	2	10.0%	8.5%	\$97	7.3%	6.1%	2	11.8%	6.6%	\$34	3.3%	4.6%
	Middle	26	54.2%	\$2,072	51.9%	53.3%	4	36.4%	54.1%	\$619	37.4%	52.3%	10	50.0%	54.9%	\$758	57.3%	54.8%	12	70.6%	54.8%	\$695	68.3%	54.7%
	Upper	15	31.3%	\$1,732	43.4%	29.8%	7	63.6%	36.1%	\$1,034	62.6%	41.3%	6	30.0%	36.3%	\$419	31.7%	39.1%	2	11.8%	38.4%	\$279	27.4%	40.7%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	48	100.0%	\$3,994	100.0%	100.0%	11	100.0%	100.0%	\$1,653	100.0%	100.0%	20	100.0%	100.0%	\$1,323	100.0%	100.0%	17	100.0%	100.0%	\$1,018	100.0%	100.0%
REFINANCE	Low	1	2.8%	\$143	3.0%	3.2%	0	0.0%	0.8%	\$0	0.0%	0.4%	1	10.0%	0.8%	\$143	12.8%	0.4%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Moderate	11	30.6%	\$862	17.8%	13.6%	4	23.5%	9.5%	\$114	4.0%	6.1%	4	40.0%	9.1%	\$522	46.7%	6.5%	3	33.3%	7.8%	\$226	26.4%	5.5%
	Middle	16	44.4%	\$1,927	39.9%	53.3%	9	52.9%	51.0%	\$1,179	41.2%	52.0%	4	40.0%	52.8%	\$386	34.5%	54.4%	3	33.3%	49.7%	\$362	42.2%	48.9%
	Upper	8	22.2%	\$1,903	39.4%	29.8%	4	23.5%	38.7%	\$1,567	54.8%	41.6%	1	10.0%	37.2%	\$67	6.0%	38.7%	3	33.3%	41.6%	\$269	31.4%	45.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	36	100.0%	\$4,835	100.0%	100.0%	17	100.0%	100.0%	\$2,860	100.0%	100.0%	10	100.0%	100.0%	\$1,118	100.0%	100.0%	9	100.0%	100.0%	\$857	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.2%	0	0.0%	3.0%	\$0	0.0%	0.7%	0	0.0%	2.4%	\$0	0.0%	1.2%	0	0.0%	2.8%	\$0	0.0%	0.5%
	Moderate	3	27.3%	\$60	14.2%	13.6%	0	0.0%	8.4%	\$0	0.0%	11.4%	2	50.0%	10.6%	\$20	30.8%	11.3%	1	25.0%	10.2%	\$40	17.9%	6.6%
	Middle	4	36.4%	\$155	36.6%	53.3%	3	100.0%	56.7%	\$135	100.0%	45.8%	1	25.0%	60.2%	\$20	30.8%	58.1%	0	0.0%	57.2%	\$0	0.0%	56.5%
	Upper	4	36.4%	\$208	49.2%	29.8%	0	0.0%	32.0%	\$0	0.0%	42.1%	1	25.0%	26.8%	\$25	38.5%	29.4%	3	75.0%	29.8%	\$183	82.1%	36.5%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$423	100.0%	100.0%	3	100.0%	100.0%	\$135	100.0%	100.0%	4	100.0%	100.0%	\$65	100.0%	100.0%	4	100.0%	100.0%	\$223	100.0%	100.0%
MULTIFAMILY	Multi-Family Units					0	0.0%	20.0%	\$0	0.0%	1.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Low	0	0.0%	\$0	0.0%	11.6%	0	0.0%	60.0%	\$0	0.0%	94.3%	0	0.0%	25.0%	\$0	0.0%	75.3%	1	50.0%	28.6%	\$130	70.3%	20.4%
	Moderate	1	25.0%	\$130	21.8%	41.0%	0	0.0%	20.0%	\$0	0.0%	3.9%	1	50.0%	37.5%	\$210	51.2%	8.7%	1	50.0%	42.9%	\$55	29.7%	59.2%
	Middle	2	50.0%	\$265	44.5%	27.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	50.0%	37.5%	\$200	48.8%	16.0%	0	0.0%	28.6%	\$0	0.0%	20.5%
	Upper	1	25.0%	\$200	33.6%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	4	100.0%	\$595	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$410	100.0%	100.0%	2	100.0%	100.0%	\$185	100.0%	100.0%	
HMDA TOTALS	Low	4	4.0%	\$202	2.1%	3.2%	0	0.0%	0.7%	\$0	0.0%	0.3%	3	8.3%	0.7%	\$192	6.6%	0.2%	1	3.1%	0.6%	\$10	0.4%	0.2%
	Moderate	19	19.2%	\$1,183	12.0%	13.6%	4	12.9%	9.5%	\$114	2.5%	9.1%	8	22.2%	9.0%	\$639	21.9%	8.1%	7	21.9%	7.4%	\$430	18.8%	5.6%
	Middle	48	48.5%	\$4,419	44.9%	53.3%	16	51.6%	52.9%	\$1,933	41.6%	50.5%	16	44.4%	54.4%	\$1,374	47.1%	53.5%	16	50.0%	52.9%	\$1,112	48.7%	52.4%
	Upper	28	28.3%	\$4,043	41.1%	29.8%	11	35.5%	36.8%	\$2,601	56.0%	40.1%	9	25.0%	35.9%	\$711	24.4%	38.2%	8	25.0%	39.1%	\$731	32.0%	41.9%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	99	100.0%	\$9,847	100.0%	100.0%	31	100.0%	100.0%	\$4,648	100.0%	100.0%	36	100.0%	100.0%	\$2,916	100.0%	100.0%	32	100.0%	100.0%	\$2,283	100.0%	100.0%

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data

The bank originated 99 HMDA loans during 2014-2016, with 4 (4.0 percent) in low-income tracts and 19 (19.2 percent) in moderate income tracts. By comparison, 3.2 percent of owner-occupied housing units were located in low-income tracts and 13.6 percent of owner-occupied units were located in moderate-income tracts. The bank's performance in low-income tracts was considered excellent as the percentage of loans in these tracts were higher than the percentage of owner-occupied units and greater than the aggregate lending in 2015 and 2016. The bank's lending performance in moderate-income tracts exceeded both the percentage of owner-occupied units in these tracts and aggregate lending.

The following table shows the geographic distribution of NobleBank's HMDA-reportable loans for 2017 within its Anniston assessment area.

### Geographic Distribution of HMDA Loans

Assessment Area: Anniston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	1	4.3%	\$81	5.0%	2.5%	1	4.3%	0.4%	\$81	5.0%	0.2%
	Moderate	10	43.5%	\$698	43.3%	12.2%	10	43.5%	8.7%	\$698	43.3%	6.0%
	Middle	9	39.1%	\$605	37.5%	65.0%	9	39.1%	65.3%	\$605	37.5%	64.1%
	Upper	1	4.3%	\$155	9.6%	19.9%	1	4.3%	24.6%	\$155	9.6%	28.9%
	Unknown	2	8.7%	\$73	4.5%	0.4%	2	8.7%	1.1%	\$73	4.5%	0.7%
	Total	23	100.0%	\$1,612	100.0%	100.0%	23	100.0%	100.0%	\$1,612	100.0%	100.0%
REFINANCE	Low	1	6.3%	\$22	0.8%	2.5%	1	6.3%	0.8%	\$22	0.8%	0.3%
	Moderate	4	25.0%	\$184	6.7%	12.2%	4	25.0%	11.1%	\$184	6.7%	8.8%
	Middle	8	50.0%	\$2,041	74.5%	65.0%	8	50.0%	61.6%	\$2,041	74.5%	59.6%
	Upper	3	18.8%	\$492	18.0%	19.9%	3	18.8%	26.0%	\$492	18.0%	31.1%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Total	16	100.0%	\$2,739	100.0%	100.0%	16	100.0%	100.0%	\$2,739	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.0%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	9.8%	\$0	0.0%	8.2%
	Middle	4	80.0%	\$119	66.1%	65.0%	4	80.0%	61.5%	\$119	66.1%	60.7%
	Upper	1	20.0%	\$61	33.9%	19.9%	1	20.0%	27.3%	\$61	33.9%	30.1%
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.5%	\$0	0.0%	0.7%
	Total	5	100.0%	\$180	100.0%	100.0%	5	100.0%	100.0%	\$180	100.0%	100.0%
MULTIFAMILY	Multi-Family Units											
	Low	0	0.0%	\$0	0.0%	14.6%	0	0.0%	10.0%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	21.0%	0	0.0%	10.0%	\$0	0.0%	16.4%
	Middle	1	100.0%	\$276	100.0%	40.6%	1	100.0%	50.0%	\$276	100.0%	49.6%
	Upper	0	0.0%	\$0	0.0%	7.5%	0	0.0%	10.0%	\$0	0.0%	16.5%
	Unknown	0	0.0%	\$0	0.0%	16.4%	0	0.0%	20.0%	\$0	0.0%	14.7%
	Total	1	100.0%	\$276	100.0%	100.0%	1	100.0%	100.0%	\$276	100.0%	100.0%
HMDA TOTALS	Low	2	4.4%	\$103	2.1%	2.5%	2	4.4%	0.6%	\$103	2.1%	0.3%
	Moderate	14	31.1%	\$882	18.3%	12.2%	14	31.1%	9.6%	\$882	18.3%	7.2%
	Middle	22	48.9%	\$3,041	63.3%	65.0%	22	48.9%	63.8%	\$3,041	63.3%	62.3%
	Upper	5	11.1%	\$708	14.7%	19.9%	5	11.1%	25.2%	\$708	14.7%	29.6%
	Unknown	2	4.4%	\$73	1.5%	0.4%	2	4.4%	0.9%	\$73	1.5%	0.7%
	Total	45	100.0%	\$4,807	100.0%	100.0%	45	100.0%	100.0%	\$4,807	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

The bank originated 45 HMDA loans in 2017, with 2 loans (4.4 percent) in low-income tracts and 14 loans (31.1 percent) in moderate-income tracts. By comparison, 2.5 percent of owner-occupied housing units are located in low-income tracts and 12.2 percent of owner-occupied units are located in moderate-income tracts. The bank's performance in low-income tracts was considered excellent as the percentage of loans in these tracts was greater

than the percentage of owner-occupied units for the area and aggregate lending. The bank's lending performance in moderate-income tracts also exceeded the percentage of owner-occupied units and aggregate lending. The bank's home purchase and refinance lending in both low-income and moderate-income tracts were particularly strong relative to demographics and the aggregate.

The bank's lending performance and the performance context factors noted above support the conclusion that the geographic distribution of HMDA-reportable loans is excellent.

#### Small Business Lending

For this analysis, the geographic distribution of small business loans in the Anniston assessment area was compared to the geographic distribution of businesses in the area. Considering the demographic data and area competition, NobleBank's overall geographic distribution of small business loans reflects reasonable dispersion throughout the bank's assessment area.

The following table shows the geographic distribution of small business loans to businesses located within the assessment area in 2014, 2015, and 2016.

### Geographic Distribution of Small Business Loans

Assessment Area: Anniston

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2014, 2015, 2016				
	Bank				Small Businesses
	Count	Dollar			
	#	%	\$ (000s)	\$ %	%
Low	8	3.6%	\$425	1.0%	4.1%
Moderate	56	25.1%	\$6,525	15.4%	23.1%
Middle	87	39.0%	\$26,829	63.4%	48.8%
Upper	72	32.3%	\$8,507	20.1%	23.8%
Unknown	0	0.0%	\$0	0.0%	0.2%
Tr Unknown	0	0.0%	\$0	0.0%	
Total	223	100.0%	\$42,286	100.0%	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

From 2014 to 2016 the geographic distribution of small business loans reflected reasonable dispersion throughout the assessment area. Of the 223 small business loans in the Anniston assessment area, 3.6 percent were extended to businesses in low-income census tracts, which is slightly below the 4.1 percent of the small businesses located in these tracts. Additionally the bank originated 25.1 percent of its small business loans in moderate-income census tracts. This is greater than the 23.1 percent of small businesses in moderate-income census tracts.

The following table shows the geographic distribution of small business loans originated by NobleBank in the assessment area in 2017.

### Geographic Distribution of Small Business Loans

Assessment Area: Anniston

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Bank		Small		
	Count	Dollar	Businesses		
	#	%	\$ (000s)	\$ %	%
Low	2	2.1%	\$701	2.0%	4.3%
Moderate	19	19.8%	\$10,101	29.4%	25.0%
Middle	49	51.0%	\$20,355	59.3%	53.5%
Upper	24	25.0%	\$3,077	9.0%	15.3%
Unknown	2	2.1%	\$67	0.2%	1.8%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>96</i>	<i>100.0%</i>	<i>\$34,300</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

In 2017 the bank made 96 small business loans in the Anniston assessment area. Of the total loans, 2.1 percent were extended to businesses in low-income census tracts. This is less than the 4.3 percent of small businesses located in these tracts. The bank's performance in moderate-income tracts was better than in low-income tracts. It originated 19.8 percent of its small business loans in moderate-income census tracts, which is less than the 25.0 percent of small businesses in moderate-income tracts. Community contacts perceive that NobleBank provides credit to small businesses in the assessment area similar to competitor banks. The bank is a participating lender in small business credit programs to attract businesses to low- and moderate-income geographies. Considering these factors, the performance in the previous three years, the bank's size and market share, the overall distribution is reasonable.

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

For this analysis, the distribution of HMDA-reportable lending across borrower income levels and small business lending across business revenue sizes was compared to available demographic information. HMDA-reportable lending was also compared with aggregate lending data. Performance context issues were also considered. The bank's distribution of loans reflects reasonable penetration among borrowers of different income levels and to businesses of different sizes and does not reveal any unexplained gaps in lending patterns.

#### Residential Real Estate (HMDA) Lending

Considering economic conditions, competition, and bank capacity, the bank's HMDA-reportable lending distribution by borrower income is reasonable. The following table shows the distribution of the bank's HMDA-reportable loans by the income level of the borrower and aggregate lending comparisons for 2014 to 2016, respectively.

**Borrower Distribution of HMDA Loans**

Assessment Area: Anniston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison																	
		2014, 2015, 2016					2014						2015						2016					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
		#	%	\$ (000s)	\$ %														%	%	\$ (000s)	\$ %	\$ %	#
HOME PURCHASE	Low	3	6.3%	\$47	1.2%	22.2%	0	0.0%	6.6%	\$0	0.0%	3.5%	2	10.0%	4.7%	\$36	2.7%	2.3%	1	5.9%	4.1%	\$11	1.1%	2.0%
	Moderate	4	8.3%	\$157	3.9%	17.7%	0	0.0%	21.1%	\$0	0.0%	16.3%	2	10.0%	17.0%	\$97	7.3%	12.1%	2	11.8%	15.7%	\$60	5.9%	11.2%
	Middle	10	20.8%	\$767	19.2%	18.7%	1	9.1%	23.1%	\$8	0.5%	22.5%	6	30.0%	24.5%	\$545	41.2%	22.3%	3	17.6%	24.4%	\$214	21.0%	21.9%
	Upper	24	50.0%	\$2,289	57.3%	41.4%	10	90.9%	29.0%	\$1,645	99.5%	38.9%	8	40.0%	31.5%	\$422	31.9%	41.3%	6	35.3%	32.4%	\$222	21.8%	42.5%
	Unknown	7	14.6%	\$734	18.4%	0.0%	0	0.0%	20.2%	\$0	0.0%	18.7%	2	10.0%	22.3%	\$223	16.9%	22.0%	5	29.4%	23.4%	\$511	50.2%	22.4%
	Total	48	100.0%	\$3,994	100.0%	100.0%	11	100.0%	100.0%	\$1,653	100.0%	100.0%	20	100.0%	100.0%	\$1,323	100.0%	100.0%	17	100.0%	100.0%	\$1,018	100.0%	100.0%
REFINANCE	Low	2	5.6%	\$55	1.1%	22.2%	1	5.9%	6.7%	\$20	0.7%	4.0%	0	0.0%	4.5%	\$0	0.0%	2.8%	1	11.1%	4.0%	\$35	4.1%	1.9%
	Moderate	6	16.7%	\$400	8.3%	17.7%	3	17.6%	14.3%	\$307	10.7%	10.2%	1	10.0%	10.1%	\$59	5.3%	5.7%	2	22.2%	8.5%	\$34	4.0%	5.4%
	Middle	4	11.1%	\$239	4.9%	18.7%	4	23.5%	20.8%	\$239	8.4%	18.1%	0	0.0%	19.2%	\$0	0.0%	15.4%	0	0.0%	17.6%	\$0	0.0%	14.4%
	Upper	20	55.6%	\$2,890	59.8%	41.4%	8	47.1%	35.6%	\$1,329	46.5%	42.0%	6	60.0%	38.5%	\$773	69.1%	45.1%	6	66.7%	39.3%	\$788	91.9%	45.0%
	Unknown	4	11.1%	\$1,251	25.9%	0.0%	1	5.9%	22.6%	\$965	33.7%	25.6%	3	30.0%	27.7%	\$286	25.6%	31.0%	0	0.0%	30.6%	\$0	0.0%	33.3%
	Total	36	100.0%	\$4,835	100.0%	100.0%	17	100.0%	100.0%	\$2,860	100.0%	100.0%	10	100.0%	100.0%	\$1,118	100.0%	100.0%	9	100.0%	100.0%	\$857	100.0%	100.0%
HOME IMPROVEMENT	Low	1	9.1%	\$10	2.4%	22.2%	0	0.0%	10.8%	\$0	0.0%	2.9%	1	25.0%	8.5%	\$10	15.4%	3.4%	0	0.0%	7.9%	\$0	0.0%	2.5%
	Moderate	2	18.2%	\$51	12.1%	17.7%	0	0.0%	18.7%	\$0	0.0%	16.3%	1	25.0%	20.3%	\$10	15.4%	13.4%	1	25.0%	14.9%	\$41	18.4%	5.6%
	Middle	3	27.3%	\$80	18.9%	18.7%	1	33.3%	25.6%	\$30	22.2%	21.9%	1	25.0%	24.8%	\$20	30.8%	18.9%	1	25.0%	23.3%	\$30	13.5%	16.2%
	Upper	3	27.3%	\$130	30.7%	41.4%	2	66.7%	41.4%	\$105	77.8%	55.5%	1	25.0%	44.3%	\$25	38.5%	60.5%	0	0.0%	45.6%	\$0	0.0%	55.9%
	Unknown	2	18.2%	\$152	35.9%	0.0%	0	0.0%	3.4%	\$0	0.0%	3.5%	0	0.0%	2.0%	\$0	0.0%	3.8%	2	50.0%	8.4%	\$152	68.2%	19.8%
	Total	11	100.0%	\$423	100.0%	100.0%	3	100.0%	100.0%	\$135	100.0%	100.0%	4	100.0%	100.0%	\$65	100.0%	100.0%	4	100.0%	100.0%	\$223	100.0%	100.0%
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	4	100.0%	\$595	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$410	100.0%	100.0%	2	100.0%	100.0%	\$185	100.0%	100.0%
	Total	4	100.0%	\$595	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$410	100.0%	100.0%	2	100.0%	100.0%	\$185	100.0%	100.0%
HMDA TOTALS	Low	6	6.1%	\$112	1.1%	22.2%	1	3.2%	6.9%	\$20	0.4%	3.6%	3	8.3%	4.9%	\$46	1.6%	2.5%	2	6.3%	4.3%	\$46	2.0%	1.9%
	Moderate	12	12.1%	\$608	6.2%	17.7%	3	9.7%	18.0%	\$307	6.6%	13.2%	4	11.1%	14.5%	\$166	5.7%	9.1%	5	15.6%	12.7%	\$135	5.9%	8.2%
	Middle	17	17.2%	\$1,086	11.0%	18.7%	6	19.4%	22.3%	\$277	6.0%	19.9%	7	19.4%	22.4%	\$565	19.4%	18.7%	4	12.5%	21.5%	\$244	10.7%	17.8%
	Upper	47	47.5%	\$5,309	53.9%	41.4%	20	64.5%	32.7%	\$3,079	66.2%	39.4%	15	41.7%	35.2%	\$1,220	41.8%	42.3%	12	37.5%	36.0%	\$1,010	44.2%	42.4%
	Unknown	17	17.2%	\$2,732	27.7%	0.0%	1	3.2%	20.1%	\$965	20.8%	24.0%	7	19.4%	23.0%	\$919	31.5%	27.4%	9	28.1%	25.5%	\$848	37.1%	29.7%
	Total	99	100.0%	\$9,847	100.0%	100.0%	31	100.0%	100.0%	\$4,648	100.0%	100.0%	36	100.0%	100.0%	\$2,916	100.0%	100.0%	32	100.0%	100.0%	\$2,283	100.0%	100.0%

Originations & Purchases  
2016 FFIEC Census Data an 2010 ACS Data

During 2014 to 2016, the bank originated 6.1 percent of its HMDA loans to low-income borrowers, which was less than the 22.2 percent of families considered low-income. While in 2014 the bank's performance was less than aggregate with 3.2 percent of HMDA-reportable loans to low-income borrowers compared to 6.9 percent of aggregate loans, in subsequent years, bank performance improved significantly. In 2015 and 2016, the bank's performance exceeded aggregate with 8.3 percent and 6.3 percent of HMDA-reportable loans to low-income borrowers compared to 4.9 percent and 4.3 percent of aggregate loans to low-income borrowers, respectively. The bank originated 12.1 percent of its HMDA-reportable loans to moderate-income borrowers compared to 17.7 percent of the families considered moderate-income. When compared to aggregate, the bank's lending performance to moderate-income borrowers improved from 2014 to 2016. In 2014, the bank originated 9.7 percent of HMDA-reportable loans compared to 18.0 percent by aggregate. In 2015, the bank increased its percentage of lending to moderate-income borrowers to 11.1 percent compared to 14.5 percent of aggregate. In 2016, with 15.6 percent of loans to moderate-income borrowers, the bank exceeded aggregate of 12.7 percent.

The following tables shows the distribution of the bank's HMDA reportable loans by the income level of the borrowers for 2017.

### Borrower Distribution of HMDA Loans

Assessment Area: Anniston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.5%	0	0.0%	6.9%	\$0	0.0%	3.9%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	18.5%	\$0	0.0%	13.3%
	Middle	1	4.3%	\$64	4.0%	20.5%	1	4.3%	23.9%	\$64	4.0%	22.9%
	Upper	8	34.8%	\$624	38.7%	41.8%	8	34.8%	29.9%	\$624	38.7%	39.2%
	Unknown	14	60.9%	\$924	57.3%	0.0%	14	60.9%	20.8%	\$924	57.3%	20.7%
	Total	23	100.0%	\$1,612	100.0%	100.0%	23	100.0%	100.0%	\$1,612	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.5%	0	0.0%	4.5%	\$0	0.0%	2.4%
	Moderate	2	12.5%	\$82	3.0%	16.1%	2	12.5%	13.5%	\$82	3.0%	9.2%
	Middle	4	25.0%	\$125	4.6%	20.5%	4	25.0%	19.5%	\$125	4.6%	15.7%
	Upper	6	37.5%	\$735	26.8%	41.8%	6	37.5%	36.9%	\$735	26.8%	45.2%
	Unknown	4	25.0%	\$1,797	65.6%	0.0%	4	25.0%	25.6%	\$1,797	65.6%	27.5%
	Total	16	100.0%	\$2,739	100.0%	100.0%	16	100.0%	100.0%	\$2,739	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.5%	0	0.0%	9.3%	\$0	0.0%	6.7%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	16.1%	\$0	0.0%	6.5%
	Middle	3	60.0%	\$119	66.1%	20.5%	3	60.0%	23.9%	\$119	66.1%	27.9%
	Upper	2	40.0%	\$61	33.9%	41.8%	2	40.0%	44.9%	\$61	33.9%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	7.6%
	Total	5	100.0%	\$180	100.0%	100.0%	5	100.0%	100.0%	\$180	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$276	100.0%	0.0%	1	100.0%	100.0%	\$276	100.0%	100.0%
	Total	1	100.0%	\$276	100.0%	100.0%	1	100.0%	100.0%	\$276	100.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.5%	0	0.0%	6.3%	\$0	0.0%	3.4%
	Moderate	2	4.4%	\$82	1.7%	16.1%	2	4.4%	16.6%	\$82	1.7%	11.6%
	Middle	8	17.8%	\$308	6.4%	20.5%	8	17.8%	22.3%	\$308	6.4%	20.2%
	Upper	16	35.6%	\$1,420	29.5%	41.8%	16	35.6%	33.1%	\$1,420	29.5%	41.2%
	Unknown	19	42.2%	\$2,997	62.3%	0.0%	19	42.2%	21.7%	\$2,997	62.3%	23.6%
	Total	45	100.0%	\$4,807	100.0%	100.0%	45	100.0%	100.0%	\$4,807	100.0%	100.0%

Originations & Purchases  
2017 FFIEC Census Data and 2015 ACS Data

Overall in 2017, HMDA lending to low- and moderate-income borrowers was less than the percentage of low- and moderate-income families in the assessment area. The bank's lending to moderate-income borrowers was good in home refinance but weaker in home purchase and home improvement to both low- and moderate-income borrowers. Home improvement is an identified community need in the assessment area. The bank is a participant in the Federal Home Loan Bank Homeownership Set-Aside Program which provides grants for home rehabilitation for families earning less than 80.0 percent of the area median income. During the examination period, the program transitioned to serve only veterans, resulting in a decrease in this type of lending to low- and moderate-income borrowers in the assessment area. Additionally, loan officer attrition in 2017 impacted bank performance compared to aggregate.

### Small Business Lending

NobleBank's small business lending by business revenue size reflects reasonable penetration among businesses of different sizes.

For this analysis, the distribution of small business lending across business revenue size was compared with available demographic information. The following table shows, by loan size and business revenue, the number and dollar volume of small business loans for the review period of 2014 to 2016.

### Small Business Loans by Business Revenue & Loan Size

Assessment Area: Anniston

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2014, 2015, 2016				
		Bank		Total		Businesses
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	79	63.7%	\$8,563	35.0%	90.5%
	Over \$1 Million	45	36.3%	\$15,868	65.0%	8.3%
	Total Rev. available	124	100.0%	\$24,431	100.0%	98.8%
	Rev. Not Known	0	0.0%	\$0	0.0%	1.2%
	Total	124	100.0%	\$24,431	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	77	62.1%	\$2,896	11.9%	
	\$100,001 - \$250,000	29	23.4%	\$4,570	18.7%	
	\$250,001 - \$1 Million	12	9.7%	\$6,258	25.6%	
	Over \$1 Million	6	4.8%	\$10,708	43.8%	
	Total	124	100.0%	\$24,431	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	56	70.9%	\$2,149	25.1%	
	\$100,001 - \$250,000	16	20.3%	\$2,319	27.1%	
	\$250,001 - \$1 Million	6	7.6%	\$2,895	33.8%	
	Over \$1 Million	1	1.3%	\$1,200	14.0%	
	Total	79	100.0%	\$8,563	100.0%	

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

From 2014 to 2016, 63.7 percent of the bank's small business loans were originated to businesses with gross annual revenue of \$1 million or less, while small businesses represent 90.5 percent of total businesses in the assessment area. The percentage of the bank's loans to small businesses was significantly below the demographic; however, while a direct comparison is not used in this evaluation, a review of data from aggregate CRA reporters in the assessment area shows that the bank's performance in small business lending is good relative to other lenders, especially given the competitive banking market in Anniston. Larger regional banks offer competitive microloan products in the assessment area. The bank also offers business credit card services for small dollar loans through a third party vendor which are not captured in this lending analysis. Additionally, 85.5 percent of the bank's small business loans were in amounts of \$250,000 or less, which indicates the bank's willingness to make small dollar loans, which are typically requested by small businesses.

The following table shows, by business revenue and loan size, the number and dollar volume of small business loans originated by NobleBank in 2017.

### Small Business Loans by Business Revenue & Loan Size

Assessment Area: Anniston

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2017					
		Bank				Total Businesses	
		Count		\$ (000s)			
		#	%	\$	%	%	
BUSINESS REVENUE	\$1million or Less	27	61.4%	\$3,624	24.9%	89.2%	
	Over \$1 Million	17	38.6%	\$10,907	75.1%	9.4%	
	Total Rev. available	44	100.0%	\$14,531	100.0%	98.6%	
	Rev. Not Known	0	0.0%	\$0	0.0%	1.3%	
	Total	44	100.0%	\$14,531	100.0%	100.0%	
LOAN SIZE	\$100,000 or Less	26	59.1%	\$1,077	7.4%		
	\$100,001 - \$250,000	6	13.6%	\$914	6.3%		
	\$250,001 - \$1 Million	8	18.2%	\$3,678	25.3%		
	Over \$1 Million	4	9.1%	\$8,863	61.0%		
	Total	44	100.0%	\$14,531	100.0%		
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	20	74.1%	\$740	20.4%		
	\$100,001 - \$250,000	3	11.1%	\$537	14.8%		
	\$250,001 - \$1 Million	3	11.1%	\$1,165	32.2%		
	Over \$1 Million	1	3.7%	\$1,181	32.6%		
	Total	27	100.0%	\$3,624	100.0%		

Originations & Purchases  
2017 FFIEC Census Data and 2017 D&B Information

For 2017, 61.4 percent of the bank's small business loans were originated to businesses with gross annual revenue of \$1 million or less, while small businesses represent 89.2 percent of total businesses in the assessment area. The percentage of the bank's loans to small businesses was below the demographic. Additionally, 72.7 percent of the bank's small business loans were in amounts of \$250,000 or less, which indicates the bank's willingness

to make smaller loans that are typically requested by small businesses. Considering performance context, the bank's investment in small business development programs in the assessment area, the competitiveness of the market, and the bank's size, performance is reasonable.

#### Responsiveness to the Credit Needs of Low- and Moderate-Income Individuals and to Small Businesses

The bank was responsive to community development needs and enhanced credit availability in the assessment area through its investments as well as retail services and other services conducted from January 1, 2014 to June 30, 2018.

### **COMMUNITY DEVELOPMENT**

As noted earlier in this report, NobleBank elected to report its qualified community development investments and services for consideration as a possible enhancement to its CRA rating. After considering performance context factors such as the bank's capacity, the geographic characteristics of the assessment area, as well as the assessment area credit and community needs, examiners determined NobleBank's support of community development warrant an enhancement of its satisfactory retail lending record to Outstanding.

#### **Investments**

NobleBank's investment record enhances the credit availability in its assessment area. Notably, the bank continued its partnership with the state housing consortium and participated in financing \$871,000 for affordable multifamily housing development between 2014 and 2017. The bank also sustained its partnership with the Federal Home Loan Bank of Atlanta (FHLB) and a local non-profit housing agency to establish a guaranty loan program. These loans were not included in the HMDA-reportable or small business lending analyses. The FHLB program provides funding for low- and moderate-income homeowners, particularly veterans, to make weatherization improvements to their homes and funding to build homes for low-income and homeless people. The bank has established a foundation to make various charitable contributions to non-profits in the assessment area. During the examination, the bank provided 135 CRA qualified contributions in its assessment area, totaling over \$63,000, to local community organizations. The beneficiaries provided emergency housing assistance, micro entrepreneurship education, assistance to public schools located in low- and moderate-income geographies, healthcare grants for the under-insured, and support for disabled populations. Finally, the bank invested in eco-tourism and public arts revitalization efforts that are part of the Anniston and Piedmont city plans to attract businesses to the area and stabilize the economy.

#### **Services**

NobleBank's record of providing branches and/or other services enhances credit availability in its assessment area. As of 2017, two of the bank's four branches (50.0 percent) in the Anniston assessment area were located in low- or moderate-income tracts, exceeding the 27.0 percent of low- and moderate-income tracts located in the assessment area. Notably, during the examination period, the bank opened a branch in its Birmingham assessment area, expanding access to financial services. Hours and services at the bank's branches do not vary in a manner that inconveniences low- and moderate-income people or communities.

NobleBank provided 815 CRA qualified community development service hours to enhance access to financial services and credit availability in its assessment area. Board and committee service leadership comprised 53.3 percent of the qualified service hours. Service hours benefitted community organizations serving low- and moderate-income individuals and communities and small businesses. Community services provided grant technical assistance, coordination of hunger prevention programs, service on scholarship and loan committees, collaboration with credit unions, personal and business financial education workshop facilitation, and financial expertise to plan, market and execute city and county revitalization initiatives.

## **METROPOLITAN AREA LIMITED-SCOPE REVIEW**

The Birmingham assessment area was reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance were drawn from the review of available facts and data, including performance and demographic information. Please refer to the tables in Appendix D for additional information regarding this area.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BIRMINGHAM, ALABAMA ASSESSMENT AREA**

The Birmingham assessment area consists of portions of Jefferson, Shelby and St. Clair counties. Specifically, the assessment area is comprised of 143 census tracts in Jefferson County, 35 tracts in Shelby County, and 5 tracts in St. Clair County. These counties are part of the seven-county Birmingham-Hoover, Alabama MSA. NobleBank operates one branch office in the assessment area. According to the FDIC Deposit Market Share Report, as of June 30, 2018, the bank ranked 39<sup>th</sup> of 40 financial institutions in the market and 3.0 percent of the bank's deposits are in the assessment area. The bank has 0.02 percent deposit market share or \$7.5 million in deposits. Regions Bank held the largest deposit market share with 29.7 percent followed by Compass Bank with 23.4 percent.

According to the 2017 FFIEC census data, of the 183 census tracts in the Birmingham assessment area, 31 (16.9 percent) are low-income; 45 (24.6 percent) are moderate-income; 41 (22.4 percent) are middle-income; 64 (35.0 percent) are upper-income and 2 (1.1 percent) are unknown income. Of the families living in the assessment area, 38.2 percent are considered low- to moderate-income, with 39.6 percent of the families in low-income tracts living below the poverty level and 22.0 percent of the families in moderate-income tracts living below the poverty level. The proportion of owner-occupied homes in the assessment area is 56.1 percent.

### **CONCLUSION WITH RESPECT TO PERFORMANCE CRITERIA IN THE BIRMINGHAM, ALABAMA ASSESSMENT AREA**

Considering its very limited branch presence and new entry into the Birmingham assessment area during the review period, the bank's geographic distribution and borrower penetration of lending was reasonable, and is consistent with the bank's overall lending performance.

**APPENDIX A**

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b> January 1, 2014 to December 31, 2017 HMDA-reportable and CRA Small Business Lending January 1, 2014 to June 30, 2018 Community Development Investments and Services			
<b>FINANCIAL INSTITUTION</b> NobleBank & Trust, Anniston, Alabama		<b>PRODUCTS REVIEWED</b> HMDA-reportable loans and CRA small business loans	
<b>AFFILIATE(S)</b> NA	<b>AFFILIATE RELATIONSHIP</b> NA	<b>PRODUCTS REVIEWED</b> NA	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Anniston-Oxford-Jacksonville, Alabama MSA	Full-scope review	1	NA
Birmingham-Hoover, Alabama MSA	Limited-scope review	NA	The bank entered the assessment area in 2015.

## APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

### **Definitions**

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

### **Rounding Convention**

Because the percentages presented in tables were rounded to the nearest tenth in most cases, some columns may not total exactly 100 percent.

### **General Information**

The CRA requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of NobleBank & Trust prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of December 3, 2018. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

## APPENDIX C – GLOSSARY

**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 metropolitan area/assessment area.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of MSAs. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** All Agencies have adopted the following language. Affordable housing (including multi-family 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System (Board), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- I. Low-or moderate-income geographies;
- II. Designated disaster areas; or
- III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, FDIC, and OCC, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

## APPENDIX C – GLOSSARY (Continued)

**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 do business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**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 (for example, 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 metropolitan area/assessment area.

**Metropolitan area (MA):** A MSA or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

**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.

**Multi-family:** 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.

## APPENDIX C – GLOSSARY (Continued)

**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 multistate MA. 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 multistate MA, the institution will receive a rating for the multistate MA.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Call Report and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

**Upper-income:** Individual income that is 120 percent or more of the area median income, or a median family income if 120 percent or more, in the case of a geography.

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW**

**Combined Demographics Report**

Assessment Area: Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	25	13.7	17,911	9.6	5,928	33.1	40,658	21.7
Moderate-income	45	24.6	37,150	19.8	6,807	18.3	29,926	16.0
Middle-income	49	26.8	50,156	26.8	4,664	9.3	34,422	18.4
Upper-income	63	34.4	82,148	43.8	2,136	2.6	82,359	44.0
Unknown-income	1	0.5	0	0.0	0	0.0	0	0.0
Total Assessment Area	183	100.0	187,365	100.0	19,535	10.4	187,365	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	39,955	13,121	6.7	32.8	17,881	44.8	8,953	22.4
Moderate-income	74,943	33,606	17.3	44.8	28,146	37.6	13,191	17.6
Middle-income	89,593	54,477	28.0	60.8	25,437	28.4	9,679	10.8
Upper-income	125,436	93,581	48.0	74.6	22,865	18.2	8,990	7.2
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	329,927	194,785	100.0	59.0	94,329	28.6	40,813	12.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3,377	10.0	2,808	9.5	545	14.3	24	9.6
Moderate-income	5,941	17.6	5,121	17.3	769	20.2	51	20.3
Middle-income	8,067	23.9	7,150	24.1	863	22.7	54	21.5
Upper-income	16,299	48.4	14,552	49.1	1,625	42.7	122	48.6
Unknown-income	7	0.0	7	0.0	0	0.0	0	0.0
Total Assessment Area	33,691	100.0	29,638	100.0	3,802	100.0	251	100.0
	Percentage of Total Businesses:			88.0		11.3		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.6	1	0.7	0	0.0	0	0.0
Moderate-income	16	9.9	15	9.8	1	11.1	0	0.0
Middle-income	31	19.1	27	17.6	4	44.4	0	0.0
Upper-income	114	70.4	110	71.9	4	44.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	162	100.0	153	100.0	9	100.0	0	.0
	Percentage of Total Farms:			94.4		5.6		.0

2016 FFIEC Census Data and 2016 D&B Information

# APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES – LIMITED REVIEW (Continued)

## Geographic Distribution of HMDA Loans

Assessment Area: Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2015, 2016					2015					2016						
		Bank				Owner Occupied Units %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg		Bank	Agg		Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	6.7%	0	0.0%	1.2%	\$0	0.0%	0.5%	0	0.0%	0.9%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	6.3%	\$0	0.0%	3.4%	0	0.0%	6.7%	\$0	0.0%	3.5%
	Middle	0	0.0%	\$0	0.0%	28.0%	0	0.0%	27.4%	\$0	0.0%	19.4%	0	0.0%	28.2%	\$0	0.0%	20.6%
	Upper	6	100.0%	\$2,218	100.0%	48.0%	0	0.0%	65.2%	\$0	0.0%	76.7%	6	100.0%	64.2%	\$2,218	100.0%	75.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$2,218	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	6	100.0%	100.0%	\$2,218	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	6.7%	0	0.0%	1.6%	\$0	0.0%	0.6%	0	0.0%	1.5%	\$0	0.0%	0.6%
	Moderate	1	33.3%	\$87	17.2%	17.3%	0	0.0%	7.3%	\$0	0.0%	3.4%	1	100.0%	7.4%	\$87	100.0%	3.5%
	Middle	1	33.3%	\$220	43.5%	28.0%	1	50.0%	25.4%	\$220	52.5%	17.0%	0	0.0%	25.1%	\$0	0.0%	16.9%
	Upper	1	33.3%	\$199	39.3%	48.0%	1	50.0%	65.7%	\$199	47.5%	79.0%	0	0.0%	66.1%	\$0	0.0%	79.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	3	100.0%	\$506	100.0%	100.0%	2	100.0%	100.0%	\$419	100.0%	100.0%	1	100.0%	100.0%	\$87	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	6.7%	0	0.0%	5.3%	\$0	0.0%	1.6%	0	0.0%	5.4%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	17.3%	0	0.0%	12.8%	\$0	0.0%	5.5%	0	0.0%	12.1%	\$0	0.0%	3.3%
	Middle	1	50.0%	\$50	35.7%	28.0%	0	0.0%	27.3%	\$0	0.0%	20.8%	1	50.0%	27.2%	\$50	35.7%	18.6%
	Upper	1	50.0%	\$90	64.3%	48.0%	0	0.0%	54.5%	\$0	0.0%	72.1%	1	50.0%	55.3%	\$90	64.3%	76.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$140	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	100.0%	\$140	100.0%	100.0%
MULTI-FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	14.3%	0	0.0%	14.7%	\$0	0.0%	4.5%	0	0.0%	20.5%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	28.7%	0	0.0%	18.7%	\$0	0.0%	16.0%	0	0.0%	24.7%	\$0	0.0%	20.3%
	Middle	0	0.0%	\$0	0.0%	29.4%	0	0.0%	40.0%	\$0	0.0%	41.2%	0	0.0%	32.9%	\$0	0.0%	17.1%
	Upper	0	0.0%	\$0	0.0%	27.6%	0	0.0%	26.7%	\$0	0.0%	38.2%	0	0.0%	21.9%	\$0	0.0%	59.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	6.7%	0	0.0%	1.6%	\$0	0.0%	0.9%	0	0.0%	1.4%	\$0	0.0%	0.7%
	Moderate	1	9.1%	\$87	3.0%	17.3%	0	0.0%	7.0%	\$0	0.0%	4.6%	1	11.1%	7.2%	\$87	3.6%	4.7%
	Middle	2	18.2%	\$270	9.4%	28.0%	1	50.0%	26.7%	\$220	52.5%	20.6%	1	11.1%	27.0%	\$50	2.0%	19.0%
	Upper	8	72.7%	\$2,507	87.5%	48.0%	1	50.0%	64.8%	\$199	47.5%	73.9%	7	77.8%	64.4%	\$2,308	94.4%	75.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$2,864	100.0%	100.0%	2	100.0%	100.0%	\$419	100.0%	100.0%	9	100.0%	100.0%	\$2,445	100.0%	100.0%

Originations & Purchases  
2016 FFIEC Census Data and 2010 ACS Data

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW (Continued)**

**Geographic Distribution of Small Business Loans**

Assessment Area: Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	9.5%
Moderate	15	14.6%	\$2,166	7.2%	17.3%
Middle	26	25.2%	\$3,701	12.3%	24.1%
Upper	62	60.2%	\$24,225	80.5%	49.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>103</i>	<i>100.0%</i>	<i>\$30,091</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2016 FFIEC Census Data and 2016 D&B Information

## APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES – LIMITED REVIEW (Continued)

### Borrower Distribution of HMDA Loans

Assessment Area: Birmingham

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison									
		2015, 2016					2015					2016				
		Bank		Families by Family Income			Count		Dollar			Count		Dollar		
		Count	Dollar		%		Bank	Agg	Bank	\$ %	\$ %	Bank	Agg	Bank	\$ %	Agg
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	5.1%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	17.3%	\$0	0.0%	11.4%	0	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	19.9%	\$0	0.0%	16.9%	0	0.0%	\$0	0.0%
	Upper	3	50.0%	\$1,293	58.3%	44.0%	0	0.0%	39.0%	\$0	0.0%	52.7%	3	50.0%	\$1,293	58.3%
	Unknown	3	50.0%	\$925	41.7%	0.0%	0	0.0%	18.6%	\$0	0.0%	16.6%	3	50.0%	\$925	41.7%
	Total	6	100.0%	\$2,218	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	6	100.0%	\$2,218	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	5.2%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	10.0%	\$0	0.0%	6.0%	0	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	16.6%	\$0	0.0%	12.4%	0	0.0%	\$0	0.0%
	Upper	1	33.3%	\$87	17.2%	44.0%	0	0.0%	40.9%	\$0	0.0%	54.8%	1	100.0%	\$87	100.0%
	Unknown	2	66.7%	\$419	82.8%	0.0%	2	100.0%	27.1%	\$419	100.0%	24.5%	0	0.0%	\$0	0.0%
	Total	3	100.0%	\$506	100.0%	100.0%	2	100.0%	100.0%	\$419	100.0%	100.0%	1	100.0%	\$87	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	8.9%	\$0	0.0%	2.3%	0	0.0%	\$0	0.0%
	Moderate	1	50.0%	\$50	35.7%	16.0%	0	0.0%	15.2%	\$0	0.0%	7.4%	1	50.0%	\$50	35.7%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	24.0%	\$0	0.0%	19.1%	0	0.0%	\$0	0.0%
	Upper	1	50.0%	\$90	64.3%	44.0%	0	0.0%	44.9%	\$0	0.0%	57.8%	1	50.0%	\$90	64.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.0%	\$0	0.0%	13.4%	0	0.0%	\$0	0.0%
	Total	2	100.0%	\$140	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	2	100.0%	\$140	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	\$0	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	\$0	0.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	5.3%	\$0	0.0%	2.1%	0	0.0%	\$0	0.0%
	Moderate	1	9.1%	\$50	1.7%	16.0%	0	0.0%	14.4%	\$0	0.0%	8.4%	1	11.1%	\$50	2.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	18.8%	\$0	0.0%	13.8%	0	0.0%	\$0	0.0%
	Upper	5	45.5%	\$1,470	51.3%	44.0%	0	0.0%	39.9%	\$0	0.0%	48.6%	5	55.6%	\$1,470	60.1%
	Unknown	5	45.5%	\$1,344	46.9%	0.0%	2	100.0%	21.6%	\$419	100.0%	27.1%	3	33.3%	\$925	37.8%
	Total	11	100.0%	\$2,864	100.0%	100.0%	2	100.0%	100.0%	\$419	100.0%	100.0%	9	100.0%	\$2,445	100.0%

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW (Continued)**

**Small Business Loans by Business Revenue & Loan Size**

Assessment Area: Birmingham

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2015, 2016					
		Bank				Total Businesses	
		Count		\$ (000s)			
		#	%	\$	%		
BUSINESS REVENUE	\$1million or Less	26	46.4%	\$8,839	50.4%	88.0%	
	Over \$1 Million	30	53.6%	\$8,706	49.6%	11.3%	
	Total Rev. available	56	100.0%	\$17,545	100.0%	99.3%	
	Rev. Not Known	0	0.0%	\$0	0.0%	0.7%	
	Total	56	100.0%	\$17,545	100.0%	100.0%	
LOAN SIZE	\$100,000 or Less	23	41.1%	\$1,074	6.1%		
	\$100,001 - \$250,000	12	21.4%	\$2,274	13.0%		
	\$250,001 - \$1 Million	18	32.1%	\$9,599	54.7%		
	Over \$1 Million	3	5.4%	\$4,598	26.2%		
	Total	56	100.0%	\$17,545	100.0%		
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	7	26.9%	\$288	3.3%		
	\$100,001 - \$250,000	6	23.1%	\$1,071	12.1%		
	\$250,001 - \$1 Million	12	46.2%	\$6,220	70.4%		
	Over \$1 Million	1	3.8%	\$1,260	14.3%		
	Total	26	100.0%	\$8,839	100.0%		

Originations & Purchases  
2016 FFIEC Census Data and 2016 D&B Information

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW (Continued)**

**Combined Demographics Report**

Assessment Area: Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	31	16.9	21,614	11.4	8,559	39.6	44,797	23.6
Moderate-income	45	24.6	38,880	20.5	8,566	22.0	27,713	14.6
Middle-income	41	22.4	42,333	22.3	4,345	10.3	32,686	17.3
Upper-income	64	35.0	86,238	45.5	3,369	3.9	84,281	44.5
Unknown-income	2	1.1	412	0.2	343	83.3	0	0.0
Total Assessment Area	183	100.0	189,477	100.0	25,182	13.3	189,477	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	49,012	14,468	7.6	29.5	23,222	47.4	11,322	23.1
Moderate-income	79,988	35,398	18.6	44.3	29,901	37.4	14,689	18.4
Middle-income	73,919	43,987	23.2	59.5	22,138	29.9	7,794	10.5
Upper-income	133,920	95,914	50.5	71.6	28,542	21.3	9,464	7.1
Unknown-income	1,585	112	0.1	7.1	1,193	75.3	280	17.7
Total Assessment Area	338,424	189,879	100.0	56.1	104,996	31.0	43,549	12.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,553	8.6	2,080	8.1	453	12.0	20	8.7
Moderate-income	5,631	19.0	4,805	18.7	769	20.4	57	24.7
Middle-income	6,726	22.7	5,776	22.5	909	24.1	41	17.7
Upper-income	14,232	48.0	12,564	49.0	1,557	41.3	111	48.1
Unknown-income	489	1.7	402	1.6	85	2.3	2	0.9
Total Assessment Area	29,631	100.0	25,627	100.0	3,773	100.0	231	100.0
	Percentage of Total Businesses:			86.5		12.7		.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.7	1	0.7	0	0.0	0	0.0
Moderate-income	15	10.4	15	11.1	0	0.0	0	0.0
Middle-income	23	16.0	18	13.3	5	55.6	0	0.0
Upper-income	105	72.9	101	74.8	4	44.4	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	144	100.0	135	100.0	9	100.0	0	.0
	Percentage of Total Farms:			93.8		6.3		.0

2017 FFIEC Census Data and 2017 D&B Information

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW (Continued)**

**Geographic Distribution of HMDA Loans**

Assessment Area: Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank		Owner Occupied Units			Count		Dollar			
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	7.6%	0	0.0%	1.7%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	9.6%	\$0	0.0%	4.9%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	24.2%	\$0	0.0%	18.2%
	Upper	4	100.0%	\$949	100.0%	50.5%	4	100.0%	64.5%	\$949	100.0%	75.9%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	4	100.0%	\$949	100.0%	100.0%	4	100.0%	100.0%	\$949	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	7.6%	0	0.0%	3.3%	\$0	0.0%	6.6%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	11.6%	\$0	0.0%	4.8%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	21.9%	\$0	0.0%	19.4%
	Upper	2	100.0%	\$450	100.0%	50.5%	2	100.0%	63.3%	\$450	100.0%	69.2%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$450	100.0%	100.0%	2	100.0%	100.0%	\$450	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	7.6%	0	0.0%	6.2%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	15.2%	\$0	0.0%	5.7%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	20.1%	\$0	0.0%	12.6%
	Upper	0	0.0%	\$0	0.0%	50.5%	0	0.0%	58.4%	\$0	0.0%	80.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	19.8%	0	0.0%	32.0%	\$0	0.0%	83.2%
	Moderate	0	0.0%	\$0	0.0%	25.6%	0	0.0%	20.0%	\$0	0.0%	2.8%
	Middle	0	0.0%	\$0	0.0%	23.3%	0	0.0%	26.0%	\$0	0.0%	4.2%
	Upper	0	0.0%	\$0	0.0%	29.1%	0	0.0%	22.0%	\$0	0.0%	9.8%
	Unknown	0	0.0%	\$0	0.0%	2.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	7.6%	0	0.0%	2.4%	\$0	0.0%	13.5%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	10.4%	\$0	0.0%	4.6%
	Middle	0	0.0%	\$0	0.0%	23.2%	0	0.0%	23.3%	\$0	0.0%	16.6%
	Upper	6	100.0%	\$1,399	100.0%	50.5%	6	100.0%	63.8%	\$1,399	100.0%	65.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$1,399	100.0%	100.0%	6	100.0%	100.0%	\$1,399	100.0%	100.0%

Originations & Purchases  
2017 FFIEC Census Data and 2015 ACS Data

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW (Continued)**

**Geographic Distribution of Small Business Loans**

Assessment Area: Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Bank		Small		
	Count	Dollar	Businesses		
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	8.1%
Moderate	0	0.0%	\$0	0.0%	18.7%
Middle	9	18.4%	\$790	5.3%	22.5%
Upper	40	81.6%	\$14,133	94.7%	49.0%
Unknown	0	0.0%	\$0	0.0%	1.6%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>49</i>	<i>100.0%</i>	<i>\$14,923</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2017 FFIEC Census Data and 2017 D&B Information

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW (Continued)**

**Borrower Distribution of HMDA Loans**

Assessment Area: Birmingham

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2017					2017					
		Bank				Families by Family Income	Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$(000s)		\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	5.3%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	14.6%	0	0.0%	15.6%	\$0	0.0%	9.9%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	19.3%	\$0	0.0%	16.3%
	Upper	3	75.0%	\$794	83.7%	44.5%	3	75.0%	41.8%	\$794	83.7%	55.0%
	Unknown	1	25.0%	\$155	16.3%	0.0%	1	25.0%	18.0%	\$155	16.3%	15.8%
	Total	4	100.0%	\$949	100.0%	100.0%	4	100.0%	100.0%	\$949	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	5.2%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	14.6%	0	0.0%	11.8%	\$0	0.0%	6.1%
	Middle	1	50.0%	\$150	33.3%	17.3%	1	50.0%	16.3%	\$150	33.3%	10.9%
	Upper	0	0.0%	\$0	0.0%	44.5%	0	0.0%	42.9%	\$0	0.0%	51.4%
	Unknown	1	50.0%	\$300	66.7%	0.0%	1	50.0%	23.7%	\$300	66.7%	29.5%
	Total	2	100.0%	\$450	100.0%	100.0%	2	100.0%	100.0%	\$450	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	9.6%	\$0	0.0%	7.2%
	Moderate	0	0.0%	\$0	0.0%	14.6%	0	0.0%	16.4%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	19.6%	\$0	0.0%	13.5%
	Upper	0	0.0%	\$0	0.0%	44.5%	0	0.0%	47.6%	\$0	0.0%	65.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.8%	\$0	0.0%	5.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	44.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.6%	0	0.0%	5.5%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	14.6%	0	0.0%	14.5%	\$0	0.0%	7.5%
	Middle	1	16.7%	\$150	10.7%	17.3%	1	16.7%	18.4%	\$150	10.7%	12.6%
	Upper	3	50.0%	\$794	56.8%	44.5%	3	50.0%	42.3%	\$794	56.8%	46.9%
	Unknown	2	33.3%	\$455	32.5%	0.0%	2	33.3%	19.4%	\$455	32.5%	30.6%
	Total	6	100.0%	\$1,399	100.0%	100.0%	6	100.0%	100.0%	\$1,399	100.0%	100.0%

Originations & Purchases

2017 FFIEC Census Data and 2015 ACS Data

**APPENDIX D – COMBINED DEMOGRAPHIC REPORTS AND LENDING TABLES –  
LIMITED REVIEW (Continued)**

**Small Business Loans by Business Revenue & Loan Size**

Assessment Area: Birmingham

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2017					
		Bank				Total Businesses	
		Count		\$ (000s)			
		#	%	\$	%		
BUSINESS REVENUE	\$1million or Less	16	64.0%	\$5,264	52.7%	86.5%	
	Over \$1 Million	9	36.0%	\$4,729	47.3%	12.7%	
	<i>Total Rev. available</i>	25	100.0%	\$9,994	100.0%	99.2%	
	Rev. Not Known	0	0.0%	\$0	0.0%	0.8%	
	<i>Total</i>	25	100.0%	\$9,994	100.0%	100.0%	
LOAN SIZE	\$100,000 or Less	9	36.0%	\$336	3.4%		
	\$100,001 - \$250,000	8	32.0%	\$1,565	15.7%		
	\$250,001 - \$1 Million	4	16.0%	\$1,467	14.7%		
	Over \$1 Million	4	16.0%	\$6,626	66.3%		
	<i>Total</i>	25	100.0%	\$9,994	100.0%		
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	7	43.8%	\$206	3.9%		
	\$100,001 - \$250,000	4	25.0%	\$765	14.5%		
	\$250,001 - \$1 Million	3	18.8%	\$1,167	22.2%		
	Over \$1 Million	2	12.5%	\$3,126	59.4%		
	<i>Total</i>	16	100.0%	\$5,264	100.0%		

Originations & Purchases  
2017 FFIEC Census Data and 2017 D&B Information