PUBLIC DISCLOSURE

February 8, 2021

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Comerica Bank
RSSD # 60143

1717 Main Street
Dallas, Texas 75201

Federal Reserve Bank of Dallas
2200 North Pearl Street
Dallas, Texas 75201

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including LMI 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 this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

Institution's CRA Rating: Comerica Bank is rated Satisfactory.

Table of Performance Ratings

The following table indicates the performance level of Comerica Bank (bank or institution) with respect to the Lending, Investment, and Service Tests.

Performance Levels	Comerica Bank Performance Tests		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Non Compliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to the assessment areas' credit needs.
- A substantial majority of loans are made in the bank's assessment areas.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of Home Mortgage Disclosure Act (HMDA) lending reflects good penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among businesses of different revenue sizes.
- A good record of servicing the credit needs of low-income individuals and areas and very small businesses.
- The bank extends a relatively high level of community development loans and services.
- Innovative and flexible lending practices are used to serving credit needs.
- The institution has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors and is often in a leadership position.
- The bank exhibits good responsiveness to credit and community development needs.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or individuals.
- Services offered by the bank do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or individuals.
- The bank provides a relatively high level of community development services.

Institution

Description of the Institution

Business Structure

Comerica Bank (Comerica or bank), a wholly owned subsidiary of Comerica Incorporated (CMA), is a multistate commercial bank headquartered in Dallas, Texas. As of December 31, 2020, it operated 432 branch offices and 578 full-service automatic teller machines (ATMs) and 78 cash-only ATMs in the states of Arizona, California, Florida, Michigan, and Texas. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas.

At the time of this review, the bank delineated the 27 assessment areas listed below. Descriptions of the assessment areas are found in the applicable assessment area sections of this report.

Arizona
- Phoenix, AZ Assessment Area
  - Maricopa County – part of the Phoenix-Mesa-Chandler, AZ Metropolitan Statistical Area (MSA)

California
- Greater Los Angeles, CA Assessment Area
  - Los Angeles and Orange counties – Los Angeles-Long Beach-Anaheim, CA MSA
    - As of January 1, 2020, assessment area expanded to include entire counties.
- Inland Empire Assessment Area
  - San Bernardino and Riverside counties – Riverside-San Bernardino-Ontario, CA MSA
    - As of January 1, 2020, assessment area expanded to include entire counties.
- Salinas, CA Assessment Area
  - Monterey County – Salinas, CA MSA
    - As of January 1, 2020, assessment area expanded to include the entire county.
- San Diego, CA Assessment Area
  - San Diego County – San Diego-Chula Vista-Carlsbad, CA MSA
    - As of January 1, 2020, assessment area expanded to include the entire county.
- San Francisco Bay, CA Assessment Area
  - Alameda, Contra Costa, San Francisco, and San Mateo counties – part of the San Francisco-Oakland-Berkeley, CA MSA
    - As of January 1, 2020, assessment area expanded to include entire counties.
- San Jose, CA Assessment Area
  - Santa Clara County – part of the San Jose-Sunnyvale-Santa Clara, CA MSA
    - As of January 1, 2018, one census tract added to the assessment area to include entire county.
- Santa Cruz, CA Assessment Area
  - Santa Cruz County – Santa Cruz-Watsonville, CA MSA
- Ventura County, CA Assessment Area
  - Ventura County – Oxnard-Thousand Oaks-Ventura, CA MSA
    - As of January 1, 2020, assessment area expanded to include the entire county.

Florida
- Fort Lauderdale – West Palm Beach, FL Assessment Area
  - Broward and Palm Beach counties – part of the Miami-Fort Lauderdale-Pompano Beach, FL MSA
    - As of January 1, 2020, assessment area expanded to include entire counties.
- Naples, FL Assessment Area
  - Collier County – Naples-Marco Island, FL MSA

Michigan
- Ann Arbor, MI Assessment Area
  - Washtenaw County – Ann Arbor, MI MSA
- Battle Creek, MI Assessment Area
  - Calhoun County – Battle Creek, MI MSA
- Fenton, MI Assessment Area
  - Genesee County – Flint, MI, MSA
    - As of January 1, 2018, assessment area expanded to include the entire counties.
- Grand Rapids – Wyoming Assessment Area
  - Ottawa and Kent counties – part of the Grand Rapids-Kentwood, MI MSA
- Jackson, MI Assessment Area
  - Jackson County - Jackson, MI MSA
- Kalamazoo, MI Assessment Area
  - Kalamazoo County – Kalamazoo-Portage, MI MSA
- Lansing – East Lansing, MI Assessment Area
  - Clinton, Eaton, and Ingham counties – part of the Lansing-East Lansing, MI MSA
    - As of January 1, 2018, assessment area expanded to include the entire counties.
- Lenawee County, MI Assessment Area
  - Lenawee County – non-MSA
    - New assessment area since the previous evaluation. Assessment area includes entire county.
- Midland, MI Assessment Area
  - Midland County – Midland, MI MSA
- Muskegon, MI Assessment Area
  - Muskegon County – Muskegon, MI MSA
- Southeast Michigan Assessment Area
  - Livingston, Macomb, Oakland, and Wayne counties – part of the Detroit-Warren-Dearborn, MI MSA

Texas
- Austin, TX Assessment Area
  - Travis and Williamson counties – part of the Austin-Round Rock-Georgetown, TX MSA
    - As of January 1, 2020, assessment area expanded to include entire counties.
- Kerr County, TX Assessment Area
  - Kerr County – non-MSA
- Dallas – Fort Worth Metroplex Assessment Area
  - Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties – part of the Dallas-Fort Worth-Arlington, TX MSA
    - As of January 1, 2020, assessment area expanded to include entire counties.

- Houston, TX Assessment Area
  - Brazoria, Fort Bend, Galveston, Harris, and Montgomery counties – part of the Houston-The Woodlands-Sugar Land, TX MSA
    - As of January 1, 2020, assessment area expanded to include entire counties.
- San Antonio, TX Assessment Area
  - Bexar and Kendall counties – part of the San Antonio-New Braunfels, TX MSA

Loan Portfolio

As of December 31, 2020, the bank reported total assets of approximately $88.1 billion, gross loans of $52.3 billion, and a net loan-to-deposit ratio of 68.9 percent. The following table reflects the loan portfolio mix.

Product	12/31/2020 $(000s)	% of Loans	12/31/2018 $(000s)	% of Loans
Real Estate Secured				
1-4 Family Residential Construction Loans	160,000	0.3	354,412	0.7
Other Construction Loans & Land Development & Other	4,268,000	8.2	3,104,760	6.2
Farmland	7,000	0.0	6,449	0.0
1-4 Family-Revolving	1,685,000	3.2	1,807,181	3.6
1-4 Family Residential Secured by First Liens	1,968,000	3.8	2,136,514	4.3
1-4 Family Residential Secured by Junior Liens	22,000	0.0	44,391	0.1
Multifamily	968,000	1.9	550,988	1.1
Nonfarm Nonresidential				
Loans Secured Owner-Occupied Non-Farm Non-Residential	5,019,000	9.6	5,126,001	10.2
Loans Secured by Other Non-Farm Non-Residential	3,037,000	5.8	2,591,438	5.2
Total Real Estate Loans	17,137,000	32.8	15,743,073	31.4
Agricultural	31,000	0.1	32,194	0.1
Commercial and Industrial	25,290,000	48.4	27,039,773	53.9
Consumer	609,000	1.2	576,736	1.1
State and Political Subdivisions	172,000	0.3	145,475	0.3
Other	8,460,000	16.2	6,116,453	12.2
Lease Financing	594,000	1.1	506,977	1.0
Gross Loans	**52,296,000**		**50,165,673**	

Product Offerings

Comerica offers a wide array of traditional consumer and commercial products and services throughout its footprint. Commercial and industrial loans comprised the largest portion of the bank's loan portfolio by dollar volume, as indicated by the table above. The majority of the bank's business originated from the California, Michigan, and Texas markets.

Commercial loan products include business term loans for various purposes such as equipment purchases, facility expansion, asset acquisition, leasehold improvements, commercial real estate loans, Small Business Administration (SBA) loans, small business lines of credit, and equipment lease financing. Commercial loans also include business credit cards. Credit cards intended to meet the needs of small businesses are provided through a partnership with Elan Financial Services, Minneapolis, Minnesota. These loans are not reported by Comerica and are not reflected in the bank's CRA reportable loans. Additionally, as reflected in the table, Comerica did

not originate a material volume of agricultural loans during the review period; therefore, these loans are not discussed in this report.

Residential real estate lending is typically reported under HMDA. These loans represent approximately 9.2 percent of the bank's lending as of December 31, 2020. Home refinance and home improvement lending made up the largest portions of the bank's HMDA lending during the review period. Though the bank offers multi-family loans, Comerica made very few of these loans during the review period.

Previous Performance Evaluation

Comerica received a *Satisfactory* rating on its previous CRA performance evaluation dated August 13, 2018 performed by the Federal Reserve Bank of Dallas. The Lending Test was rated *Low Satisfactory*, the Investment Test was rated *High Satisfactory*, and the Service Test was rated *Low Satisfactory*.

Scope of Examination

The bank was evaluated using the Interagency Examination Procedures for Large Retail Institutions, developed by the Federal Financial Institution's Examination Council (FFIEC). All assessment areas were evaluated for Lending, Investment, and Service Test performance. Full-scope reviews using the FFIEC procedures were conducted for eight of the bank's 27 delineated assessment areas. The assessment areas were selected for full-scope reviews based on factors identified in the FFIEC procedures. These include, but are not limited to, the level of the institution's lending, investment, and service activity as well as opportunities for such in the assessment areas; comments received from community groups and the public regarding the institution's CRA performance; population density; the number of other institutions in the assessment areas; and the length of time since the most recent full-scope review. Overall, approximately 61.1 percent of lending activity (by number of loans), 75.3 percent of the total deposits, and 66.2 percent of total branches were evaluated through the full-scope reviews. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Arizona
  - Phoenix
- California
  - Greater Los Angeles
  - San Francisco Bay
- Florida
  - Fort Lauderdale – West Palm Beach
- Michigan
  - Lansing – East Lansing
  - Southeast Michigan
- Texas
  - Austin
  - Dallas – Fort Worth Metroplex

Ratings for the states of California, Michigan, and Texas were weighted more heavily when determining the overall ratings, as these states contain the significant majority of the bank's lending, investment, and service activity as well as branch locations.

Evaluation Review Period and Products Reviewed

This evaluation includes a review of the bank's HMDA and small business lending data for the period of January 1, 2018 to December 31, 2019. As the volume of HMDA lending and small business lending are similar (HMDA representing 48.4 percent and small business representing 51.4 percent during the review period), the products are generally given similar weight in determining conclusions. Product weighting varies in each assessment area depending upon volume and strategic focus and is discussed in the applicable assessment area sections of this report.

Community development loans, investments, and service activities from April 1, 2018 through December 31, 2020 were considered during this evaluation. In addition, the evaluation also considered prior period community development investments.

Evaluation Analysis

The evaluation of the bank's record of lending in the individual assessment areas includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are the 2015 U.S. Census and Dun & Bradstreet (D&B) data. Demographic characteristics of a particular assessment area are useful in analyzing the bank's record of lending as they provide a means of estimating loan demand and identifying lending opportunities. To understand small business and small farm loan demand, self-reported data of revenue size and geographical location from business and farm entities is collected and published by D&B. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The information is used to understand the bank's performance context and evaluate the institution's performance.

In conjunction with the assessment, contact was made with individuals, groups, and/or organizations located throughout the bank's assessment areas and included representatives of community-based organizations, municipalities, and quasi-government agencies.

Conclusions with Respect to Performance Tests

Lending Test

The bank's lending performance is *High Satisfactory*. Lending activity reflects good responsiveness to assessment areas' credit needs. The geographic distribution of loans reflects good penetration throughout the assessment areas. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans and services.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in Appendices F, G, and H.

Lending Activity

The bank's lending levels reflect good responsiveness to assessment areas' credit needs. The following table summarizes the lending activity from January 1, 2018 through December 31, 2019. As the data indicates, the bank makes slightly more small business loans than other types of loans.

Summary of Lending Activity				
Loan Type	#	%	$ (000s)	%
Home Improvement	3,649	-	$488,601	-
Home Purchase	1,247	-	$437,658	-
Multi-Family Housing	35	-	$316,682	-
Refinancing	4,879	-	$1,165,651	-
Loan Purpose Not Applicable	22	-	$3,279	-
Other Purpose Closed-End	121	-	$103,716	-
Other Purpose LOC	3,178	-	$519,445	-
Total HMDA	**13,131**	**48.4**	**$3,035,032**	**45.2**
Total Small Business	**13,919**	**51.4**	**$3,671,049**	**54.7**
Total Small Farm	**53**	**0.2**	**$10,229**	**0.1**
TOTAL LOANS	**27,103**	**100.0**	**$6,716,310**	**100.0**

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

The table below shows the distribution of loans inside and outside the bank's assessment areas.

Lending Inside and Outside of the Assessment Areas								
Loan Types	Inside				Outside			
	#	%	$ (000s)	%	#	%	$ (000s)	%
Home Improvement	3,398	93.1	$457,841	93.7	251	6.9	$30,760	6.3
Home Purchase - Conventional	1,054	85.9	$336,126	77.2	173	14.1	$99,284	22.8
Home Purchase – FHA	20	100.0	$2,248	100.0	0	0.0	$0	0.0
Loan Purpose Not Applicable	22	100.0	$3,279	100.0	0	0.0	$0	0.0
Multi-Family Housing	23	65.7	$145,937	46.1	12	34.3	$170,745	53.9
Other Purpose Closed-End	94	77.7	$74,517	71.8	27	22.3	$29,199	28.2
Other Purpose LOC	2,966	93.3	$483,989	93.2	212	6.7	$35,456	6.8
Refinancing	4,634	95.0	$1,063,488	91.2	245	5.0	$102,163	8.8
Total HMDA	**12,211**	**93.0**	**$2,567,425**	**84.6**	**920**	**7.0**	**$467,607**	**15.4**
Total Small Business	**12,234**	**87.9**	**$3,164,642**	**86.2**	**1,685**	**12.1**	**$506,407**	**13.8**
Total Small Farm	**36**	**67.9**	**$6,522**	**63.8**	**17**	**32.1**	**$3,707**	**36.2**
TOTAL LOANS	**24,481**	**90.3**	**$5,738,589**	**85.4**	**2,622**	**9.7**	**$977,721**	**14.6**

Note: Affiliate loans not included

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

Consistent with the performance standards for a large bank, conclusions about Comerica's distribution of lending within its assessment areas considers the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans to low-, moderate-, middle-, and upper-income individuals; small-business loans to businesses with gross annual revenues of $1 million or less; and small-business loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects

adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. Of the eight full-scope assessment areas, three are good and five are adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

The geographic distribution of loans reflects good penetration throughout the assessment areas. Of the eight full-scope assessment areas, two are rated as excellent, five are good, and one is adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

The bank makes use of some flexible lending practices in its assessment areas, including the HomeReady™ by Fannie Mae, a Small Business Micro Lending Program, and Government Insured Loan Programs.

- HomeReady™ by Fannie Mae is a flexible mortgage product designed for creditworthy, LMI borrowers, with expanded eligibility for financing homes in low-income communities. The bank's HomeReady™ by Fannie Mae originations increased significantly from the previous examination, though originations were only made in Comerica's Michigan and Texas assessment areas.
- The bank's Micro Business Lending program offers secured business lines of credit and term loans in smaller dollar amounts. This product uses flexible lending practices to better serve the credit needs of small businesses within the bank's assessment areas. This program has remained steady since the previous evaluation and is offered throughout the bank's footprint.
- The bank also offers a variety of government-insured loan programs to help meet the credit needs of LMI borrowers and small businesses. These include Veteran Administration (VA) and Federal Housing Administration (FHA) loan products, which the bank originated in its Michigan and Texas assessment areas during the review period, as well as SBA-insured loans, which were originated throughout the entirety of the bank's markets. Comerica's SBA lending saw significant increase in 2020 due to SBA-secured programs implemented in response to the COVID-19 pandemic.

Community Development Lending

The bank makes a relatively high level of community development loans. The community development loan originations during the evaluation period were extended for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending All Assessment Areas		
Purpose	**Number**	**$(000s)**
Affordable Housing	90	218,265
Community Services	200	386,214
Economic Development	78	214,393
Revitalize and Stabilize	607	1,076,804
Institution Total	**975**	**1,895,676**
Pro Rata Share of Third-Party CD Loans		4,929
CD Lending Total		**1,900,605**

Investment Test

The bank's overall Investment Test rating is *High Satisfactory*. The bank has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors. Comerica is often in a leadership position. The table below summarizes the bank's community development investments, grants, and donations by assessment area during the review period. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Investments and Donations All Assessment Areas								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	$000s	#	$000s	#	$000s	#	$000s
Full-Scope Review:								
Phoenix	26	13,627	11	12,376	54	442	91	26,445
Greater Los Angeles	17	29,199	41	28,700	283	2,975	341	60,873
San Francisco Bay	16	21,023	43	22,223	169	2,088	228	45,334
Fort Lauderdale - West Palm Beach	18	16,555	9	10,961	114	536	141	28,052
Lansing - East Lansing	4	3,209	10	7,974	41	112	55	11,295
Southeast Michigan	51	56,589	36	54,623	637	4,799	724	116,010
Austin	12	7,091	4	2,570	21	95	37	9,756
Dallas - Fort Worth Metroplex	20	19,405	10	12,132	223	2,263	253	33,801
Limited-Scope Review:								
Inland Empire	11	3,701	2	497	27	243	40	4,441
Salinas	2	773	2	824	9	29	13	1,625
San Diego	6	10,977	12	10,087	62	286	80	21,350
San Jose	10	20,733	24	25,512	65	471	99	46,716
Santa Cruz	3	8,500	1	2,576	18	154	22	11,230
Ventura County	1	1,000	3	1,577	17	79	21	2,656
Naples	3	526	1	12	15	64	19	602
Ann Arbor	3	2,342	6	6,177	39	138	48	8,656
Battle Creek	-	-	4	1,490	21	48	25	1,538
Fenton	1	2,000	1	548	14	54	16	2,602
Grand Rapids, Wyoming	7	9,463	12	9,978	110	333	129	19,774
Jackson	2	5,126	3	3,463	25	91	30	8,681
Kalamazoo	3	6,332	2	5	38	81	43	6,418
Lenawee County	-	-	1	142	3	9	4	150
Midland	-	-	1	315	23	36	24	351
Muskegon	1	2,000	1	2,088	22	53	24	4,142
Bank of the Hills	-	-	-	-	13	52	13	52
Houston	20	20,805	19	18,611	189	1,259	228	40,674
San Antonio	7	9,371	5	8,044	17	273	29	17,688
Total	**244**	**270,344**	**264**	**243,504**	**2,269**	**17,062**	**2,777**	**530,911**

In addition, the bank made 12 investments and donations, totaling $794 thousand benefitting more than one of its assessment areas, and 38 investments and donations (approximately $1.2 million) benefitting statewide regions including its assessment areas. During the review period, 27 community development qualified investments and donations, totaling approximately $9.4 million, were made by the bank in areas beyond its delineated assessment areas.

During the review period, the bank made occasional use of innovative or complex investments to support community development initiatives and exhibited good responsiveness to credit and community development needs of its assessment areas. The bank invested in the Detroit Home Mortgage Fund, which allows qualified borrowers the opportunity to get a mortgage for up to $75,000 above the appraised value of a home to help combat depressed appraisal values in the Detroit area. In response to the COVID-19 pandemic, which hit the United States during the review period, the bank significantly increased investments in Community Development Financial Institutions (CDFIs) to support strategic programs designed to meet the needs of small and micro businesses, which were disproportionately impacted by the pandemic.

Service Test

The bank's overall Service Test rating is *High Satisfactory*.

Retail Services

The bank's retail and community development services reflect good responsiveness to the needs of the assessment areas. The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment areas, particularly in LMI geographies or to LMI individuals.

Geographic Distribution of Branches and ATMs All Assessment Areas							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	10.9	9.6	6.9	32	7.4	50	8.6
Moderate	25.8	25.4	19.2	85	19.7	125	21.6
Middle	29.4	30.4	29.3	123	28.5	146	25.3
Upper	32.6	34.2	43.9	187	43.3	245	42.4
Unknown	1.3	0.4	0.7	5	1.1	12	2.1
Total	100.0	100.0	100.0	432	100.0	656	100.0

In most assessment areas, the bank offers extended and weekend hours, as well as low-cost basic checking accounts. In addition, the bank offers several alternative delivery systems, including online banking, mobile banking, on-the-job banking, and a credit card partnership with Elan Financial that focuses on providing services to small businesses.

Community Development Services

The bank provides a relatively high level of community development services. Comerica personnel provided 15,190 hours of qualified community development services during the review

period. Approximately 10,290 hours were in the bank's full-scope assessment areas. The level of community development services was considered relatively high in four of the five states in which the bank operates.

The bank's directors, officers, and staff members are involved in various capacities with numerous organizations and activities, providing community services for LMI individuals and in LMI geographies. Additionally, the bank participates in numerous financial literacy initiatives to help provide financial education to LMI school children throughout its assessment areas.

These initiatives are particularly responsive and were regularly stated by community contacts as a need throughout Comerica's footprint.

Fair Lending or Other Illegal Credit Practices Review

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary supervisory authority over insured depository institutions with total assets of more than $10 billion when assessing compliance with the requirements of Federal consumer financial laws. The Federal Reserve System retains authority to enforce compliance with the CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Federal Reserve Bank of Dallas did not cite violations involving illegal discrimination or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this evaluation, the Federal Reserve Bank of Dallas is unaware of any violations of the Equal Credit Opportunity Act or Regulation B, or any unfair, deceptive, or abusive acts or practices identified by the CFPB.

State of Arizona

CRA Rating for Arizona: Satisfactory
The Lending Test is Rated: Low Satisfactory
The Investment Test is Rated: Outstanding
The Service Test is Rated: Low Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Lending and community development activity reflects good responsiveness to assessment area credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment area.
- The distribution of HMDA lending reflects adequate penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- The bank makes a relatively high level of community development loans.
- Comerica has an excellent level of qualified community development investments and grants and is often in a leadership position.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.
- Services offered by the bank do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.
- The bank provides an adequate level of community development services.

Scope

The bank designates the Phoenix, AZ Assessment Area, as its single assessment area in the state of Arizona. As the Phoenix, AZ Assessment Area constitutes the only assessment area in Arizona, it is reviewed using full-scope procedures. Accordingly, the statewide rating will be based on the CRA activity within the assessment area and any other investment or services that are provided on a broader, statewide basis. The time period and products evaluated for this state are consistent with the scope discussed in the Institution section of this report.

Description of Institution's Operations in Arizona

Comerica operates 17 branch offices in the state of Arizona, representing 3.9 percent of the bank's total branches. As of June 30, 2020, the bank had $471.7 million in deposits in the state, representing 0.7 percent of total deposits. According to the June 30, 2020 FDIC Summary of Deposits, the bank had a deposit market share of 0.27 percent and ranked 25th out of 65 FDIC-insured financial institutions across the state. Of the 13,131 HMDA loans originated and purchased by the bank during the review period, 485 (3.7 percent) were in the state of Arizona. Of the 13,919 small business and small farm loans originated and purchased by the bank, 239 (1.7 percent) were in Arizona.

For a more detailed summary of the bank's operations in Arizona, see "Description of Operations in Phoenix," below.

METROPOLITAN AREAS (Full-Scope Review)

Description of Operations in Phoenix

The Phoenix, AZ Assessment Area is a single-county assessment area comprised solely of Maricopa County. This county, along with Pinal County, which is excluded from the assessment area, make up the Phoenix-Mesa-Chandler, AZ MSA. The Phoenix-Mesa-Chandler, AZ MSA is the 10th largest metropolitan area in the nation, and the largest in the state of Arizona, including approximately 66 percent of the state's population. The assessment area incorporates 88.9 percent of the MSA population. Major municipalities in the assessment area include Phoenix, Mesa, Glendale, Scottsdale, Tempe, Chandler, and Peoria.

According to the June 30, 2020 FDIC Summary of Deposits, there were 59 financial institutions operating in the assessment area, as of June 30, 2020. Comerica held $472 million in deposits in the Phoenix, AZ Assessment Area, which accounts for less than 1 percent the bank's total deposits. Comerica ranked 21st in the market, with 0.4 percent of the deposit market share. Market leaders include JPMorgan Chase Bank, with 25.3 percent of the deposit market share; Wells Fargo Bank, with 19.7 percent; and Bank of America, with 19.4 percent of the deposit market share. With the top three institutions holding 64.4 percent of deposits in the assessment area, there is a high level of competition for the remaining deposits.

The market for mortgage lending in the Phoenix, AZ Assessment Area is saturated and competitive, as noted by the large number of HMDA reporters in 2018 and 2019. In 2018, 814 institutions originated or purchased over 171,000 HMDA-reportable loans in the assessment area. Wells Fargo, JPMorgan Chase Bank, US Bank, and Quicken Loans led the market, with a combined 21.6 percent of the HMDA market share, while Comerica ranked 148th, with 0.08 percent of the market share. In 2019, 863 HMDA reporters originated or purchased over 232,000 HMDA loans. Market leaders, Quicken Loans, Wells Fargo, United Shore Financial Service, and JPMorgan Chase Bank, collectively shared 21.8 percent of the HMDA market share, indicating a high number of lenders competing in the market for mortgage loans. Comerica ranked 147th, with 0.08 percent of the HMDA market share. While Comerica originated mortgage loans during the review period, the bank is not a market leader in HMDA lending.

Comerica plays a role in small business lending in the assessment area, but it is not a market leader. In 2018, 196 CRA reporters originated or purchased over 102,000 small business loans in the assessment area. Market leaders in small business loans included JP Morgan Chase Bank, American Express, and CitiBank, which collectively held 50.7 percent of the market share. Comerica ranked 37th, with 0.13 percent of the market share. In 2019, 214 CRA reporters originated or purchased over 109,000 loans in the assessment area. JPMorgan Chase Bank, American Express, and CitiBank collectively held 52.6 percent of the CRA market share. Comerica ranked 47th, with 0.09 percent of the market share.

Demographic Characteristics

The Phoenix, AZ Assessment Area is made up of 893 census tracts. Of those, 104 (11.7 percent) are low-income, 202 (22.6 percent) are moderate-income, 279 (31.2 percent) are middle-income, 299 (33.5 percent) are upper-income, and nine (1.0 percent) are unknown income census tracts.

The Phoenix, AZ Assessment Area has a population of approximately 3.9 million based on the 2015 U.S. Census estimates. Of those, 11.3 percent lived in low-income census tracts, 23.0 percent in moderate-income, 31.2 percent in middle-income, 34.3 percent in upper-income, and 0.2 in unknown-income census tracts. Moreover, the region has experienced steady growth over the past decade, increasing by 13.4 percent since 2010. The city of Phoenix makes up the largest portion of the assessment area (approximately 37 percent), though the cities of Mesa, Chandler, and Scottsdale are also considered major municipalities in the area.

Income Characteristics

Per the 2015 American Community Survey (ACS) data, 12.7 percent of the families in the assessment area live below poverty. The following chart reflects the median family income for the Phoenix, AZ Assessment Area during the review period and a range of the annual family income for each income category (low, moderate, middle, and upper).

Median Family Income Phoenix, AZ Assessment Area		
Income Level	**2018**	**2019**
Median Family Income	$69,100	$72,900
Low-income	<$34,550	<$36,450
Moderate-income	$34,550 < $55,280	$36,450 < $58,320
Middle-income	$55,280 < $82,920	$58,320 < $87,480
Upper-income	≥ $82920	≥ $87,480

Housing Characteristics

According to the 2015 ACS, there are 1,622,387 housing units in the Phoenix AZ Assessment Area. Of these, 10.0 percent are located in low-income census tracts, 23.5 percent in moderate-income, 33.2 percent in middle-income, 33.2 percent in upper-income, and 0.1 percent in unknown-income census tracts. Of the available housing in the assessment area, 52.2 percent is owner-occupied, 34.5 percent is rental, and 13.3 percent is vacant. The majority (59.5 percent) of property in low-income census tracts is rental property, while only 24.3 percent is owner-occupied. This indicates a potential shortage of homes available for low-income families seeking to purchase a home. In moderate-income census tracts, 42.1 percent of housing units are owner-occupied, and 43.2 percent are rental.

The average monthly rental payment in the assessment area is $960. This amount is slightly less in LMI census tracts at $738 and $855, respectively. A mortgage payment would be more affordable in LMI areas based on the median housing value in these areas and a 30-year mortgage at 3.94 percent interest rate. However, barriers to home ownership, such as down payment, income qualification, and ongoing ownership expenses, are likely to prevent some LMI families from pursuing home ownership. In addition, there is likely to be a lack of housing units available for purchase due to the high percentage of rental units in low-income census tracts.

The median age of housing stock in the assessment area is 33 years old, and the median value of all homes is $185,718. The median age of houses in LMI census tracts is significantly older, at 45 and 43 years old, and the median value of homes in these areas is $76,484 and $107,111, respectively. The advanced age of homes in LMI areas may indicate an opportunity for home improvement lending to assist homeowners in these areas to maintain, upkeep, and update these older homes.

Employment and Economic Conditions

Annual Average Unemployment Rate Phoenix, AZ Assessment Area			
AREA	2018	2019	2020
Assessment Area	4.1	4.0	7.5
Phoenix-Mesa-Chandler, AZ MSA	4.1	4.1	7.5
State of Arizona	4.7	4.7	8.1
United States	3.9	3.7	8.1

The national unemployment rates for 2018 and 2019 are 3.9 percent and 3.7 percent, respectively. In 2020, the COVID-19 pandemic and subsequent measures taken to curb its spread caused the national unemployment rate to more than double to 8.1 percent. As shown in the table, unemployment in the assessment area was slightly higher than the national average for 2018 and 2019, but slightly lower than the unemployment rate for the state of Arizona. In 2020, the unemployment rate in the assessment area increased significantly, but less than the national and state increase.

The Phoenix, AZ Assessment Area hosts a variety of industries and employers. Major industries include health care, financial services, and retail. Health care providers such as Banner Health, Dignity Health, Phoenix Children's Hospital, the Mayo Clinic, United Health Group, and Honor Health rank in the top ten employers, as measured by number of employees in the area. Each of these employ between 4,000 and 10,000 employees. Financial service industry leaders, such as American Express, JP Morgan Chase Bank, Bank of America, Wells Fargo, USAA, and Charles Schwab, employ between 3,000 and 6,000 local employees. The retail industry continues to provide a significant number of jobs in the assessment area. Top retail employers include Amazon, Fry's Food Store, Walmart, and Safeway. Other notable employers include high tech manufacturer Honeywell, which employs approximately 6,000 workers, and Grand Canyon University, which adds approximately 3,600 jobs.

Community Contacts and Community Development Opportunities

As part of the evaluation of the Phoenix, AZ Assessment Area, representatives in local government departments focused on community development, affordable housing, and revitalization efforts of lower income areas were interviewed. The contacts highlighted a need for financial literacy education for individuals and small business owners, as well as a growing need for affordable low-income housing in the area. They indicated that in recent years the middle- and upper-income housing markets have thrived, resulting in some gentrification, and leading to a need for projects to provide affordable housing.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Combined Demographics Report

Assessment Area: AZ - Phoenix

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	104	11.6	84,543	9.2	36,093	42.7	201,508	21.9
Moderate-income	202	22.6	191,843	20.9	40,277	21	154,644	16.8
Middle-income	279	31.2	293,933	32	26,334	9	175,673	19.1
Upper-income	299	33.5	347,669	37.9	13,963	4	386,376	42.1
Unknown-income	9	1	213	0	40	18.8	0	0
Total Assessment Area	**893**	**100.0**	**918,201**	**100.0**	**116,707**	**12.7**	**918,201**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	162,646	39,453	4.7	24.3	96,806	59.5	26,387	16.2
Moderate-income	380,773	160,335	18.9	42.1	164,490	43.2	55,948	14.7
Middle-income	538,452	291,923	34.5	54.2	175,190	32.5	71,339	13.2
Upper-income	538,616	355,360	41.9	66	122,158	22.7	61,098	11.3
Unknown-income	1,900	135	0	7.1	1,480	77.9	285	15
Total Assessment Area	**1,622,387**	**847,206**	**100.0**	**52.2**	**560,124**	**34.5**	**215,057**	**13.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	14,766	7	12,681	6.5	1,903	13.8	182	8.6
Moderate-income	35,966	17	32,598	16.6	3,138	22.7	230	10.9
Middle-income	60,539	28.5	56,612	28.9	3,467	25.1	460	21.8
Upper-income	99,650	47	93,331	47.6	5,086	36.8	1,233	58.3
Unknown-income	1,227	0.6	985	0.5	233	1.7	9	0.4
Total Assessment Area	**212,148**	**100.0**	**196,207**	**100.0**	**13,827**	**100.0**	**2,114**	**100.0**
	Percentage of Total Businesses:			**92.5**		**6.5**		**1.0**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	53	3.3	48	3.1	5	7.1	0	0
Moderate-income	216	13.5	202	13.2	14	20	0	0
Middle-income	461	28.7	434	28.3	27	38.6	0	0
Upper-income	869	54.2	845	55.1	24	34.3	0	0
Unknown-income	5	0.3	5	0.3	0	0	0	0
Total Assessment Area	**1,604**	**100.0**	**1,534**	**100.0**	**70**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**95.6**		**4.4**		**.0**

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

The bank's lending performance in the Phoenix, AZ Assessment Area is *Low Satisfactory*. Lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans. Comerica's lending performance does not seem to have been negatively impacted by competition in the assessment area.

During the review period, the bank made limited use of innovative and flexible lending practices in serving assessment area credit needs. This included the bank's small business micro loan program, as well as the bank's participation in the Small Business Administration's Paycheck Protection Program. The bank originated 81 Small Business Micro Loans in the Phoenix, AZ Assessment Area during the review period, representing 2.5 percent of the total program originations. The bank also made use of its partnership with Elan Financial Services to offer business credit cards to address the credit needs of small business owners in the Phoenix, AZ Assessment Area.

The bank is both a small business and HMDA lender. During the review period, the bank reported 485 (67.0 percent) HMDA loans compared to 239 (33.0 percent) small business loans in the Phoenix, AZ Assessment Area. Based upon this, HMDA lending was given more weight than small business lending in determining the bank's Lending Test rating in the assessment area. However, in 2018 and 2019, the bank's articulated long-term business strategy in the state of Arizona involved a focus on commercial lending.

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

In 2018, the bank originated 5.9 percent by number (2.9 percent by dollar volume) of its total HMDA loans to low-income borrowers. Aggregate HMDA lenders originated 5.2 percent by number (2.5 percent by dollar volume) of loans to low-income borrowers. In 2019, the bank originated 4.3 percent by number (2.3 percent by dollar volume) of its total HMDA loans to low-income borrowers. Aggregate lenders originated 4.8 percent by number (2.4 percent by dollar

volume) of HMDA loans to low-income borrowers. During the review period, Comerica's HMDA lending to low-income borrowers was similar to that of aggregate HMDA lenders. However, 21.9 percent of families in the assessment area were classified as low-income during the review period, indicating that both the bank and aggregate HMDA lenders are unable to reach or assist a significant portion of low-income families.

In 2018, the bank originated 9.8 percent by number (5.6 percent by dollar volume) of its total HMDA loans to moderate-income borrowers. Aggregate HMDA lenders originated 16.0 percent by number (10.3 percent by dollar volume) of loans to moderate-income borrowers. In 2019, the bank originated 13.2 percent by number (7.7 percent by dollar volume) of its total HMDA loans to moderate-income borrowers. Aggregate lenders originated 15.3 percent by number (9.9 percent by dollar volume) of HMDA loans to moderate-income borrowers. During the review period, 16.8 percent of families in the assessment area were considered moderate-income families. While aggregate HMDA lenders performed comparable to the demographic, the bank's lending to moderate-income families was below the demographic. Although the bank performed below the demographic and aggregate lenders, other factors such as the high number of HMDA lenders and resulting competition should be acknowledged. In addition, the bank's performance improved significantly from 2018 to 2019, which reflects a strategic effort by the bank to improve lending to moderate-income borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate lenders, the borrower distribution of small business loans by revenue size of businesses is adequate.

In 2018, Comerica originated 21.7 percent by number (15.7 percent by dollar volume) of small business loans to businesses with revenues of $1 million or less. Aggregate CRA lenders originated 46.0 percent by number (30.2 percent by dollar volume) of small business loans to businesses with revenues of $1 million or less. In 2019, Comerica originated 43.6 percent by number (28.0 percent by dollar volume) of small business loans to businesses with revenues of $1 million or less. Aggregate lenders originated 49.5 percent by number (31.5 percent by number) of small business loans to businesses with $1 million or less in revenues. Both the bank and aggregate CRA lenders fell well below the demographic (percent of businesses with revenues under $1 million in the assessment area), at 92.5 percent. Again, the bank's performance improved significantly from 2018 to 2019. This improvement reflects favorably on the bank's overall performance in lending to individuals of different income levels and businesses of different sizes. The bank's improvement is also reflective of the bank's CRA campaign, designed to reach small business owners with revenues of $1 million or less and increase awareness of Comerica's small business lending products.

A total 239 small business loans originated by the bank in the assessment area during the review period, 55 (23.0 percent) were reported as being to businesses with unknown revenues. The regulations do not require institutions to request or consider revenue information when making a loan; however, the material portion of small business loans without revenue information may impact overall distribution of loans. The institution indicated that many of the unknown revenue loans reported were from a commercial credit card product which are likely to be originated to borrowers with gross annual revenues over $1 million.

The bank offers a separate credit card product with exclusive features intended to benefit small businesses through a partnership with Elan Financial Services; a relatively high volume of small business credit cards are issued through this program to businesses with annual revenues of $1 million or less. However, as the bank is not the issuer of these cards, they are not reported by the institution as small busines lending.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that half of the bank's small business loans were made in loan amounts of $100,000 or less. In 2018, 50.0 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (compared to 95.2 percent of aggregate small business loans), with another 22.5 percent in loan amounts between $100,000 and $250,000 (2.3 percent of aggregate). In 2019, 49.5 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (95.5 percent of aggregate), and 21.8 percent in loan amounts between $100,000 and $250,000 (2.2 percent of aggregate).

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information.   Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. There are no conspicuous gaps or anomalies in the bank's lending patterns.

The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. The bank's performance in LMI areas improved between 2018 and 2019. Home improvement loans, and Other Purpose Lines of Credit comprise the majority of the bank's HMDA lending by number (44.3 percent and 32.0 percent of HMDA-reportable lending, respectively), therefore, these products were weighted more heavily in assessing the bank's overall performance. Additionally, during the review period, the bank originated only 20 home purchase loans (4.1 percent of HMDA lending in the assessment area), as a result, this product received the least weight in this analysis. The bank did not originate any multifamily loans during the review period; therefore, this product was not analyzed.

Home Purchase Lending

The bank's home purchase lending performance in the Phoenix, AZ Assessment Area is adequate, when compared to the performance of aggregate lenders and the distribution of assessment area owner-occupied units.

In 2018, the bank did not originate any home purchase loans in low-income census tracts. Aggregate HMDA lenders, by comparison, originated 4.7 percent by number (3.0 percent by

dollar) of home purchase loans in low-income census tracts. In 2019, Comerica originated 11.1 percent by number (0.5 percent by dollar volume) of home purchase loans in low-income census tracts. Aggregate lenders originated 5.0 percent by number (3.1 percent by dollar volume) of home purchase loans in low-income census tracts. During the review period, 4.7 percent of owner-occupied units in the assessment area were in low-income census tracts. While the bank did not originate any home purchase loans in low-income census tracts in 2018, it is notable that the bank's combined average performance during the review period is comparable to demographic data.

In 2018, the bank did not originate any home purchase loans in moderate-income census tracts. Aggregate HMDA lenders originated 16.4 percent by number (11.5 percent by dollar volume) of home purchase loans in moderate-income census tracts. In 2019, Comerica originated 22.2 percent by number (66.9 percent by dollar volume) of loans in moderate-income census tracts. Aggregate HMDA lenders originated 17.0 percent by number (12.0 percent by dollar volume) of home purchase loans in moderate-income census tracts. During the review period, 18.9 percent of owner-occupied units in the assessment area were in moderate-income census tracts.

Home Refinance Lending

The bank's home refinance lending performance in the Phoenix, AZ Assessment Area is good when compared to the performance of aggregate lenders and the distribution of assessment area owner-occupied units.

The bank outperformed both the demographics and aggregate HMDA lenders in originating home refinance loans in low-income census tracts. In 2018, the bank originated 4.9 percent by number (7.3 percent by dollar volume) of home refinance loans in low-income census tracts, which contained 4.7 percent of owner-occupied units. Aggregate HMDA lenders originated 3.5 percent by number (2.0 percent by dollar volume) of home refinance lending in low-income census tracts. In 2019, Comerica originated 5.6 percent by number (5.2 percent by dollar volume) of home refinance lending in low-income census tracts. Aggregate lenders originated 2.6 percent by number (1.6 percent by dollar volume) of home refinance lending in low-income census tracts.

In 2018, the bank originated 7.3 percent by number (5.0 percent by dollar volume) of home refinance loans in moderate-income census tracts. This was below aggregate lenders, which originated 15.9 percent by number (11.0 percent by dollar volume) of refinance lending in moderate-income census tracts. In 2019, Comerica originated 7.4 percent by number (4.6 percent by dollar volume) of refinance lending in moderate-income census tracts, which is below aggregate lenders at 12.9 percent by number (9.0 percent by dollar volume). The bank performed below demographics for both years in the review period (moderate-income tracts contained 18.9 percent of owner-occupied units), while aggregate lenders performed similar to the demographic in refinance lending in moderate-income census tracts. While the bank fell below both the demographic and aggregate lenders in refinance lending in moderate-income census tracts, the bank's performance is considered reasonable when other factors such as competition in the assessment area are taken into account.

Home Improvement Lending

The bank's home improvement lending performance in the assessment area is adequate when compared to that of aggregate lenders and the distribution of owner-occupied units.

Home improvement is the bank's biggest HMDA product, as measured by number of loans. While the bank's performance was slightly below demographics, it was comparable to aggregate lender's performance during the review period. In 2018, the bank originated 1.2 percent by number (0.6 percent by dollar volume) of home improvement loans in low-income census tracts. Aggregate lenders originated 2.3 percent by number (1.7 percent by dollar volume) of home improvement loans in low-income census tracts. In 2019, Comerica originated 3.0 percent by number, (3.2 percent by dollar volume) of home improvement loans in low-income census tracts. Aggregate lenders originated 2.6 percent by number (2.0 percent by dollar volume) of home improvement loans in low-income census tracts. Both the bank and aggregate lenders fell below demographics, as 4.7 percent of assessment area owner-occupied units were in low-income tracts. Low demand for home improvement lending in low-income census tracts is expected as less than a quarter (only 24.3 percent) of units in low-income census tracts are owner-occupied.

Comerica's performance was slightly below aggregate lenders in the assessment area, although both the bank and aggregate lenders fell well below the demographic data (18.9 percent) during the review period. In 2018, the bank originated 6.0 percent by number (5.1 percent by dollar volume) of home improvement loans in moderate-income census tracts. Aggregate lenders originated 11.7 percent by number (9.1 percent by dollar volume) of home improvement loans in moderate-income census tracts. In 2019, the bank's performance improved, originating 12.1 percent by number (7.4 percent by dollar volume) of home improvement loans in moderate-income census tracts. Aggregate lenders originated 12.5 percent by number (9.6 percent by dollar volume) of home improvement loans in moderate-income census tracts. Here again the bank's strategic efforts to improve lending performance in moderate-income areas is noted in the significant improvement between 2018 and 2019.

Other Purpose Line of Credit

The bank's performance in originating other purpose lines of credit in the Phoenix, AZ Assessment Area is good when compared to the performance of aggregate lenders and the distribution of assessment area owner-occupied units.

Comerica's origination of other lines of credit in low-income census tracts is good. In 2018, the bank originated 1.4 percent by number (0.4 percent by dollar volume) of other lines of credit to borrowers in low-income census tracts. Similarly, aggregate lenders originated 1.5 percent by number (0.7 percent by dollar volume). In 2019, Comerica originated 3.5 percent by number (1.7 percent by dollar volume) of other lines of credit to borrowers in low-income census tracts, which is higher than aggregate lenders at 1.2 percent by number (0.8 percent by dollar volume). During the review period, 4.7 percent of the owner-occupied units in the assessment area were located within low-income census tracts, though neither the bank nor aggregate lenders performed to this level, the bank's performance is favorable when compared to that of aggregate lenders.

Other purpose line of credit lending in moderate-income census tracts is good. In 2018, the bank significantly outperformed aggregate lenders, originating 18.6 percent by number (16.1 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. Aggregate lenders originated 10.0 percent by number (5.5 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. In 2019, Comerica's lending in moderate-income census tracts dropped to 9.4 percent by number (6.1 percent by dollar volume), which is comparable to aggregate lenders at 9.6 percent by number (5.7 percent by dollar volume). During

the review period, 18.9 percent of owner-occupied units were located in moderate-income census tracts. The bank's combined performance during the review period is better than aggregate lenders, which reflects favorably on the bank's efforts; however, lending in moderate-income census tracts is still lower than the demographic.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

In 2018, the bank originated 10.9 percent by number (9.4 percent by dollar volume) of small business loans in low-income census tracts. Aggregate lenders originated 7.0 percent by number (11.7 percent by dollar volume) of small business loans in low-income census tracts. In 2019, Comerica originated 13.9 percent by number (18.3 percent by dollar volume) of small business loans in low-income census tracts. Aggregate lenders originated 6.9 percent by number (10.5 percent by dollar volume) of small business loans in low-income census tracts. The banks performance in low-income census tracts exceeded both aggregate performance during the review period and available demographic data, as 7.0 percent of assessment area businesses located in low-income census tracts.

The bank again outperformed the demographics (17.0 percent of assessment area businesses were in these tracts) as well as aggregate lenders during the review period. In 2018, the bank originated 21.0 percent by number (23.2 percent by dollar volume) of small business loans in moderate-income census tracts. Aggregate lenders originated 16.5 percent by number (18.6 percent by dollar volume) to small businesses in moderate-income census tracts. In 2019, Comerica originated 22.8 percent by number (23.0 percent by dollar volume) of small business loans in moderate-income census tracts. Aggregate lenders originated 16.5 percent by number (18.6 percent by dollar volume) of small business loans in moderate-income census tracts.

The increase in small business lending to LMI geographies between 2018 and 2019 may be reflective of the bank's CRA campaign which included efforts to reach small businesses located in LMI geographies in the Phoenix, AZ Assessment Area.

Community Development Lending

The bank makes a relatively high level of community development loans in the assessment area. During the review period, the bank originated 19 community development loans for $21.6 million in its Phoenix, AZ Assessment Area representing 1.9 percent of the bank's total community development loans and 1.1 percent by total dollar amount.

Community Development Lending Phoenix, AZ Assessment Area		
Purpose	**Number**	**$(000s)**
Community Services	6	9,510
Economic Development	1	2,500
Revitalize and Stabilize	12	9,546
Total	**19**	**21,556**

Additionally, investments made by the institution to third-party community development organizations enabled those organizations to make qualified community development loans benefitting the state of Arizona. The bank's the pro-rata share of those third-party loans credited to the institution total $2.6 million. As the bank is considered to have sufficiently met the needs of its delineated assessment area, community development loans made by the institution benefitting a broader statewide or regional area including the Phoenix, AZ Assessment Area were also considered. During the review period, the bank made two qualifying loans in the broader regional area totaling $3.4 million.

The bank's community development lending performance in the state of Arizona represented a material increase since the previous evaluation. This is attributed to the bank's articulated CRA Strategy which included a focus on community development loans in the state of Arizona, as well as the bank's efforts to establish and grow working relationships with community, civic, and governmental partners in the state

Investment Test

The Investment Test rating is *Outstanding*. The bank has an excellent level of qualified community development investments and grants. The bank's activity exhibits good responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing.

The bank's investments and contributions in the assessment area during the review period totaled approximately $26.4 million, representing an increase of approximately 52 percent since the previous evaluation.

Community Development Investments and Donations Phoenix, AZ Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	$000s	#	$000s	#	$000s	#	$000s
Affordable Housing	23	13,252	11	12,376	4	55	38	25,683
Community Services	-	-	-	-	42	216	42	216
Economic Development	3	375	-	-	8	171	11	546
Total	26	13,627	11	12,376	54	442	91	26,445

In addition to the investment activity in the table above, the bank made two investments totaling approximately $8,000 benefitting a broader statewide area, and six donations totaling approximately $778,000 in organizations which serve multiple areas, including the state of Arizona.

The bank demonstrated responsiveness to needs in the assessment area through investments and grants to organizations like DreamSpring and Lendistry. Comerica provided approximately $125,000 to DreamSpring, an organization that provides access to credit and a community of support to help entrepreneurs realize their dreams. Additionally, the bank provided $500,000 in investments to Lendistry, a minority led CDFI that ranks second nationwide in SBA Community Advantage lending. The equity investments in Lendistry were used by the CDFI to make loans in the Phoenix, AZ Assessment Area, and the bank elected to have those funds considered under the Lending Test, however, the impact of the investments should be noted.

Service Test

The bank's Service Test performance in the Phoenix, AZ Assessment Area is *Low Satisfactory*. Its retail and community development services reflect adequate responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 17 branch offices and 23 ATMs as of December 31, 2020, was compared to the distribution of the population and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Phoenix Assessment Area.

Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	11.7	11.3	6.9	0	0.0	0	0.0
Moderate	22.6	23.0	16.9	0	0.0	0	0.0
Middle	31.2	31.2	28.5	9	52.9	10	43.5
Upper	33.5	34.3	47.0	8	47.1	13	56.5
Unknown	1.0	0.2	0.6	0	0.0	0	0.0
Total	100.0	100.0	100.0	17	100.0	23	100.0

Distribution of Branches and ATMs — Phoenix, AZ Assessment Area

While the bank has no branches in low- or moderate-income census tracts in the Phoenix, AZ Assessment Area, 12 of the bank's 17 branches (70.6 percent) are within one mile or less of LMI tracts.

The bank did not open or close any branches in the assessment area during the review period; however, two full services ATMs were opened in a middle- and an upper-income census tract. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are basically the same throughout the assessment area.

As part of the bank's COVID-19 pandemic relief efforts, the bank offered loan payment deferment programs to both business and consumer customers.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and as trustees, for five community development financial organizations offering community development services that focused on providing financial education to LMI individuals and students. Total hours served during the review period was approximately 471 hours. The table below shows the number of hours by type of involvement.

Community Development Services Phoenix, AZ Assessment Area	
Purpose	**Hours Served**
Community Services	390
Economic Development	81
Total	471

The bank is heavily involved with financial education organizations such as Junior Achievement of Arizona and the Arizona Council on Economic Education, both of which provide financial education to local students. Bank employees also served with the Arizona Hispanic Chamber of Commerce Foundation to provide the "Comerica Business $ense" program for LMI entrepreneurs and small business owners. The bank also offered the Comerica Money $ense and Comerica Sports $ense programs in the assessment area. In 2019, the bank completed its first ever Comerica Education $sense Program in the Phoenix, AZ Assessment Area, to support local Title 1 schoolteachers.

State of California

CRA Rating for California: Satisfactory
The Lending Test is Rated: Low Satisfactory
The Investment Test is Rated: High Satisfactory
The Service Test is Rated: High Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Comerica's lending activity reflects adequate responsiveness to assessment areas credit needs.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of Home Mortgage Disclosure Act (HMDA) lending reflects adequate penetration among customers of different income levels.
- The distribution of small business lending reflects poor penetration among business of different revenue sizes.
- The bank makes a relatively high level of community development loans.
- The bank makes use of innovative and/or flexible lending practices in serving assessment areas' needs.
- Comerica makes an excellent level of qualified community development investments and grants.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank's record of opening and closing of branches in the state has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services offered by the bank do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and LMI individuals.
- The bank provides a relatively high level of community development services.

Scope

Two assessment areas were selected for full-scope reviews based on the volume of lending, number of branches, and percent of total deposits, as well as the length of time since the last full-scope review. Overall, approximately 62.0 percent of lending activity (by number of loans), 53.8 percent of the total deposits, and 57.3 percent of total branches within California were evaluated through the full-scope reviews. The following assessment areas, were reviewed using full-scope procedures. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Greater Los Angeles, CA Assessment Area
- San Francisco Bay, CA Assessment Area

In addition, limited-scope reviews were conducted for the remaining six assessment areas, including:

- Inland Empire, CA Assessment Area
- Salinas, CA Assessment Area
- San Diego, CA Assessment Area
- San Jose, CA Assessment Area
- Santa Cruz, CA Assessment Area
- Ventura County, CA Assessment Area

The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report. The bank's performance in the Greater Los Angeles, CA Assessment Area was given greater consideration because this assessment area contains materially more branches, deposits, and loans than other assessment areas in the state of California.

Description of Institution's Operations in California

The bank operates 96 branch offices in its assessment areas in California, representing 22.2 percent of bank's total branches. As of June 30, 2020, the bank had $21.7 billion in deposits in the state, representing 31.8 percent of total deposits. According to the June 30, 2020 FDIC Summary of Deposits, the bank had a deposit market share of 1.2 percent and ranked 13th out of 191 FDIC-insured financial institutions across the state. Of the 13,131 HMDA loans originated and purchased by the bank, 3,482 (26.5 percent) were in the California assessment areas. Of the 13,919 small business loans originated and purchased by the bank, 2,412 (17.3 percent) were in the California assessment areas.

Conclusions with Respect to Performance Tests in California

Lending Test

In California, the bank's overall Lending Test rating is *Low Satisfactory*. Lending activity reflects adequate responsiveness to assessment areas' credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment areas. In addition, the distribution of loans to borrowers of different income levels reflects adequate penetration among borrowers of different income levels and poor penetration among businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

During the review period, the bank made use of innovative and flexible lending practices in serving the credit needs of the banks California assessment areas. This included the bank's small business micro loan program, as well as the bank's participation in SBA lending programs. The bank originated 646 Small Business Micro Loans in California during the review period, representing 20.1 percent of the total program originations. The bank also made use of its partnership with Elan Financial Services to offer business credit cards to address the credit needs of small business owners in California.

During the review period, the bank reported 3,482 (59.0 percent by number) HMDA loans compared to 2,412 (40.9 percent by number) small business loans in California. By dollar amount, HMDA loans accounted for 64.6 percent of the lending activity in the state, compared to small business loans at 35.2 percent. During the review period, the bank's long-term strategic plan in California included a focus on commercial lending, specifically small business, and middle-market lending. Based on the bank's portfolio and strategic focus, HMDA lending was given slightly more weight than small

business lending in determining the bank's Lending Test rating in the state of California. Farm loans were not considered a material product and accounted for less than one percent of lending in the state; therefore, farm loans were not included in the analysis.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices F and G, respectively.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. Lending distribution by borrower income in both of the full-scope assessment areas is adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

The geographic distribution of loans reflects adequate penetration throughout the assessment areas. The geographic distribution of lending in one full-scope assessment area is considered good, while geographic distribution of lending in the other full-scope assessment area is considered adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

Community Development Lending

In California, the bank makes a relatively high level of community development loans. During the review period, the bank originated 264 community development loans for $561.1 million in California representing 27.1 percent of the bank's total community development loans by number, and 29.6 percent by total dollar amount.

The community development loans originated during the evaluation period were for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending California Assessment Areas		
Purpose	Number	$('000s)
Affordable Housing	62	134,052
Community Services	53	157,026
Economic Development	27	66,618
Revitalize and Stabilize	122	203,389
Institution Total	264	561,085

Additionally, investments made by the institution to third-party community development organizations helped enabled those organizations to make 482 qualified community development loans benefitting either the state of California in general or one of the bank's assessment areas in California. The bank's the pro-rata share of those third-party loans credited to the institution total approximately $4.8 million.

In 2020, the bank was an active participant in the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. The bank's high level of participation in this program reflects responsiveness to the needs of the community and represents the bank's use of flexible lending practices to meet the needs of its assessment areas in the state of California.

Investment Test

In California, the bank's overall Investment Test rating is *High Satisfactory*. The bank has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors and is often in a leadership position. The table below summarizes the bank's community development investments and grants by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Investments and Donations California Assessment Areas								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	$000s	#	$000s	#	$000s	#	$000s
Full Review:								
Greater Los Angeles	17	29,199	41	28,700	283	2,975	341	60,874
San Francisco Bay	16	21,023	43	22,223	169	2,088	228	45,334
Limited Review:								
Inland Empire	11	3,701	2	497	27	243	40	4,441
Salinas	2	772	2	824	9	28	13	1,624
San Diego	6	10,977	12	10,087	62	286	80	21,350
San Jose	10	20,733	24	25,512	65	471	99	46,716
Santa Cruz	3	8,500	1	2,576	18	154	22	11,230
Ventura County	1	1,000	3	1,577	17	79	21	2,656
Statewide California	-	-	26	9,654	10	136	36	9,790
Total	**66**	**95,905**	**154**	**101,650**	**660**	**6,460**	**880**	**204,015**

In addition to the community development investments listed above, the bank also made two investments (totaling approximately $5,000) and five donations (totaling approximately $708,000) which benefitted multiple assessment areas, including some areas within the state of California.

The bank's investment activity in California focused primarily on affordable housing efforts, as this is a need that is consistently identified by the bank's Community Development Advisory Council in this market. Due to the impact of the COVID-19 pandemic, the bank prioritized pandemic relief investments during the final year of the review period. Throughout the review period, the bank made rare use of complex investments to support CD initiatives and exhibited adequate responsiveness to the needs of the California assessment areas. The bank maintained key partnerships with CDFIs, providing flexible investments to CDFIs in order to help facilitate programs designed to meet the needs of LMI individuals and geographies throughout the bank's assessment areas.

Service Test

In California, the bank's overall Service Test rating is *High Satisfactory*.

Retail Services

The bank's retail and community development services reflect good responsiveness to the needs of the assessment areas. The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals.

Distribution of Branches and ATMs California Assessment Areas							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	9.3	8.8	6.3	7	7.3	8	7.5
Moderate	25.8	26.2	18.9	13	13.6	14	13.1
Middle	29.0	29.9	29.0	22	22.9	27	25.2
Upper	34.6	34.7	44.7	51	53.1	54	50.5
Unknown	1.3	0.4	1.1	3	3.1	4	3.7
Total	100.0	100.0	100.0	96	100.0	107	100.0

Community Development Services

The bank provides a relatively high level of community development services in the state of California. In the Greater Los Angeles, CA Assessment Area, the bank was a leader in providing community development services. In the San Francisco Bay, CA Assessment Area, the bank provided an adequate level of community development services. Details regarding community development services in can be found in the respective Conclusions with Respect to Performance Tests section for each assessment area.

METROPOLITAN AREAS (Full-Scope Review)

Description of Operations in Greater Los Angeles

The Greater Los Angeles, CA Assessment Area includes Orange and Los Angeles counties in the state of California. These counties make up the Los Angeles-Long Beach-Anaheim MSA. As of 2020, the bank operated 38 branches in the assessment area, representing 39.6 percent of its branches in California. Since the previous evaluation, the bank closed one branch, and opened another in the assessment area. Both of these branches were located in upper-income census tracts.

According to the FDIC, as of June 30, 2020, Comerica had approximately $8.7 billion in deposits in the Greater Los Angeles, CA Assessment Area, which represented 1.29 percent of the market share. This amount also represented 40.0 percent of the bank's deposits within the state of California. The bank ranked 16th in deposit market share. Market leaders included Bank of America, Wells Fargo, and JP Morgan Chase Bank, which collectively held 44.4 percent of deposits in the market. Many of the bank's competitors are multi-regional or national banks. This competition may limit the bank's opportunity to lend and compete optimally in the assessment area.

Comerica plays an important role in the HMDA market, but is not considered a leading lender in the HMDA lending market in the Greater Los Angeles, CA Assessment Area. In 2018, 869 lenders originated HMDA loans in the Greater Los Angeles, CA Assessment Area. Comerica ranked 81st, with 0.22 percent of the HMDA market share. In 2019, the number of lenders increased to 882. Comerica's rank slipped to 91st, with 0.18 percent of the HMDA market share. Market leaders for both years included Wells Fargo, JP Morgan Chase Bank, Bank of America, United Shore Financial Service, and Quicken Loans Inc. Although their specific market ranked varied in each year, the top five HMDA lenders collectively held 28.0 percent and 32.8 percent of the HMDA market share in 2018 and 2019, respectively.

In 2018, there were 257 CRA reporters that originated 456,053 small business loans in the assessment area. Comerica ranked 38th, with 0.13 percent of the market share. In 2019, there were 251 CRA reporters that originated 486,465 small business loans in the assessment area. Comerica ranked 45th, with 0.09 percent of the market share. Market leaders in small business loans included American Express, JP Morgan Chase Bank, and Bank of America, which collectively held 52.0 percent and 59.3 percent of the CRA lending market share in 2018 and 2019, respectively. The market is dominated by these lenders. Comerica plays an important role in the market but is not considered a lender or influencer in the small business lending market in the Greater Los Angeles, CA assessment area.

Population Changes Greater Los Angeles, CA Assessment Area			
County	2019 Population Estimate	% Increase Since 2010	Major Municipalities
Los Angeles County	10,081,570	2.7	Los Angeles*, Long Beach, Glendale
Orange County	3,168,044	5.4	Anaheim, Santa Ana*, Irvine

*Denotes County Seat

Demographic Characteristics

As of 2015, the Greater Los Angeles, CA Assessment Area was made up of 2,775 census tracts. Of those, 257 (9.3 percent) were low-income, 792 (28.5 percent) were moderate-income, 720 (25.9 percent) were middle-income, 960 (34.6 percent) were upper-income, and 46 (1.7 percent) were unknown-income census tracts.

According to 2015 census estimates, the population in the assessment area was 12,481,167. Of those, 8.8 percent lived in low-income census tracts, 29.2 percent lived in moderate-income, 27.0 percent lived in middle-income, 34.5 percent lived in upper income, and 0.5 percent lived in unknown-income census tracts.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; HUD; and D&B.

Income Characteristics

The chart below reflects the median family income years 2018 and 2019 for the Greater Los Angeles, CA Assessment Area. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

Median Family Income Greater Los Angeles, CA Assessment Area		
Income Level	2018	2019
Median Family Income	$69,300	$73,100
Low-income	< $34,650	< $36,550
Moderate-income	$34,650 < $55,440	$36,550 < $58,480
Middle-income	$55,440 < $83,160	$58,480 < $87,720
Upper-income	≥ $83,160	≥ $87,720

According to the 2015 census estimate, 13.0 percent of the families in the assessment area live below poverty, with the majority (56.4 percent) of those living in LMI areas.

Housing Characteristics

According to available estimates, there were 4,322,426 housing units in the Greater Los Angeles, CA Assessment Area. Of these, 7.6 percent were located in low-income census tracts, 26.0 percent in moderate-income, 26.2 percent in middle-income, 39.8 percent in upper-income, and 0.4 percent in unknown-income census tracts. Of the available housing in the assessment area, 45.1 percent is owner-occupied, 49.0 percent is rental, and 5.9 percent is vacant. The significant majority (77.7 percent) of property in low-income census tracts is rental property, while only 16.3 percent is owner-occupied. This indicates a potential shortage of homes available for low-income families seeking to purchase a home. In moderate-income census tracts, 17.6 percent of housing units are owner-occupied, 63.9 percent are rental, and 5.5 percent are vacant.

The median age of housing stock in in the assessment area is 56 years old, and the median value of homes in the assessment area is $482,705. The median value of homes in LMI census tracts is $300,953 and $337,198, respectively. The average monthly rental payment in the assessment

area is $1,297. While this amount is slightly less in LMI census tracts at $993 and $1,147, respectively, 51.1 percent of those renting in LMI census tracts pay over rents in excess of 30 percent of their income.

Despite the high cost of renting, it is more affordable[1] to rent rather than purchase a home in the assessment area. This may make it difficult for lenders to finance homes for LMI individuals and families. In addition, and as previously discussed, there is likely to be a lack of housing units available for purchase due to the high percentage of rental units in low-income census tracts. Furthermore, Ability-to-repay (ATR) rules require lenders to verify the ability of mortgage applicants to be able to meet credit obligations based on documented income. Low-income individuals and families may not be able to afford a mortgage payment under the standard ATR guidelines for debt-to-income ratios (DTI)[2] in the assessment area.

Employment and Economic Conditions

The national unemployment rates for 2018 through 2020 were 3.9 percent and 3.7 percent, respectively. In 2020, the COVID-19 pandemic and subsequent measures taken to curb its spread caused the national unemployment rate to more than double to 8.1 percent. As shown in the table, unemployment in the state of California and the assessment area were each higher than the national average in each of the years reviewed.

Annual Average Unemployment Rate Greater Los Angeles, CA Assessment Area			
AREA	**2018**	**2019**	**2020**
Los Angeles County	4.6	4.4	12.9
Orange County	3.0	2.8	8.9
Greater Los Angeles, CA Assessment Area	**4.2**	**4.0**	**11.9**
Los Angeles-Long Beach-Anaheim, CA MSA	4.2	4.1	12.0
State of California	**4.3**	**4.0**	**10.2**
United States	**4.3**	**3.7**	**8.1**

The Greater Los Angeles, CA Assessment Area is home to a diverse range of industries and employers. Major industries include government, healthcare, education, retail, and entertainment/tourism. Various government agencies, including the County of Los Angeles, City of Los Angeles, Federal Government, and State of California collectively employ over 226 thousand employees. Institutions of higher learning, such as the University of California, Los Angeles; University of Southern California; Los Angeles Community College account for over 86 thousand jobs. Healthcare organizations, such as Kaiser Permanente, Cedars-Sinai Medical Center, and Providence Health employ over 70 thousand individuals. In addition, the Los Angeles, CA area hosts organizations such as Walt Disney Co., Six Flags, Sony Picture Entertainment, and Warner Bros. Entertainment, which contribute to a large tourist industry.

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[1] Based on median housing values for homes in low- and moderate-income census tracts, 30 year mortgage with a 20 percent down payment and an interest rate of 3.94 percent would equal monthly payments of $1,141 for low-income census tracts and $1,278 for moderate-income census tracts.

[2] The maximum DTI for conventional mortgages, according to Fannie Mae's website is 36 percent. While exceptions can be made for a DIT up to 50 percent, certain credit score and reserve requirements must be met. For low-income families, the maximum DTI ratio for an average priced home, when compared to their monthly income would be insufficient to cover a mortgage payment with taxes, insurance, and related costs (i.e. homeowners association fees), and still be within standard DTI guidelines.

Community Contacts and Community Development Opportunities

As part of the evaluation of the Greater Los Angeles, CA Assessment Area, contact was made with an organization involved in community development and affordable housing. The representatives of the organization highlighted the need for increased funding to support affordable housing initiatives. CDFIs operating in the area have more need than they are able to handle. In order to afford the high cost of housing, it is common for multigenerational families to live in a home. The majority of low-income families in the assessment area rent, and the fear of eviction is ever present. According to the contact, recent surveys found that low-income families have recently gone without necessities of life, such as food, in order to ensure rent is paid.

On the small business front, the Los Angeles area continues to struggle with the challenges created by the COVID-19 pandemic. Industries such as restaurants and dining, entertainment, and personal care (i.e., gyms, hair and nail salons, massage parlors, etc.) have been hit the hardest and continue to struggle. Small businesses, in general, struggle more than large businesses. On the other hand, manufacturing has flourished in the COVID environment and local manufacturers continue to provide jobs for LMI individuals.

According to the contact, financial institutions support the area, but not where it is needed the most. Manufacturing companies get offers and great rates, while struggling businesses and industries cannot find the financial support needed to overcome the economic impacts of the pandemic. Financial institutions can reinvest in the community by supporting affordable housing and lending to small businesses.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Combined Demographics Report

Assessment Area: CA - Greater Los Angeles

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	257	9.3	215,097	7.8	75,605	35.1	678,977	24.6
Moderate-income	792	28.5	753,178	27.3	160,387	21.3	451,769	16.4
Middle-income	720	25.9	734,875	26.6	75,971	10.3	469,773	17
Upper-income	960	34.6	1,051,937	38.1	47,378	4.5	1,157,762	42
Unknown-income	46	1.7	3,194	0.1	605	18.9	0	0
Total Assessment Area	**2,775**	**100.0**	**2,758,281**	**100.0**	**359,946**	**13.0**	**2,758,28**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	327,904	53,390	2.7	16.3	254,632	77.7	19,882	6.1
Moderate-income	1,122,042	342,640	17.6	30.5	717,233	63.9	62,169	5.5
Middle-income	1,131,161	538,963	27.6	47.6	532,134	47	60,064	5.3
Upper-income	1,722,181	1,013,949	52	58.9	599,432	34.8	108,800	6.3
Unknown-income	19,138	1,398	0.1	7.3	15,572	81.4	2,168	11.3
Total Assessment Area	**4,322,426**	**1,950,340**	**100.0**	**45.1**	**2,119,003**	**49.0**	**253,083**	**5.9**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	33,448	5	29,918	4.9	3,407	6.2	123	3.6
Moderate-income	133,023	20	120,235	19.8	12,257	22.3	531	15.5
Middle-income	170,596	25.6	153,750	25.3	16,098	29.3	748	21.8
Upper-income	316,046	47.5	293,494	48.3	20,626	37.6	1,926	56.1
Unknown-income	12,284	1.8	9,681	1.6	2,498	4.6	105	3.1
Total Assessment Area	**665,397**	**100.0**	**607,078**	**100.0**	**54,886**	**100.0**	**3,433**	**100.0**
	Percentage of Total Businesses:		**91.2**		**8.2**			**.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	55	2.5	55	2.6	0	0	0	0
Moderate-income	373	16.8	356	16.5	17	23.9	0	0
Middle-income	514	23.1	489	22.7	24	33.8	1	33.3
Upper-income	1,261	56.6	1,229	57.1	30	42.3	2	66.7
Unknown-income	23	1	23	1.1	0	0	0	0
Total Assessment Area	**2,226**	**100.0**	**2,152**	**100.0**	**71**	**100.0**	**3**	**100.0**
	Percentage of Total Farms:		**96.7**		**3.2**			**.1**

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

Lending activity in the Greater Los Angeles, CA Assessment Area reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

During the review period, the bank made use of innovative and flexible lending practices in serving the credit needs of the Greater Los Angeles, CA Assessment Area. This included the bank's small business micro loan program, as well as the bank's participation in the Small Business Administration's Paycheck Protection Program.

During the review period, the bank reported 1,563 (60.6 percent) HMDA-reportable loans compared to 1,022 (39.4 percent) small business loans in the Greater Los Angeles, CA Assessment Area. Based upon this, HMDA-reportable lending was given more weight than small business lending in analyzing the bank's Lending Test performance in the assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

<u>Lending to Borrowers of Different Income Levels and Businesses of Different Sizes</u>

The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, HMDA lending received the greatest weight when determining the overall rating. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

Comerica's HMDA lending to low-income borrowers in the Greater Los Angeles, CA Assessment Area is adequate. In 2018, the bank originated 1.4 percent by number (0.4 percent by dollar volume) of HMDA loans to low-income borrowers. By comparison, aggregate lenders originated 3.3 percent by number (1.8 percent by dollar volume) of HMDA loans to low-income borrowers. In 2019, Comerica originated 1.8 percent by number (1.2 percent by dollar volume) of HMDA loans to low-income borrowers. Aggregate lenders originated 2.2 percent by number (1.1 percent by dollar volume) of HMDA loans to low-income borrowers. The percentage of HMDA loans originated to low-income borrowers by both the bank and aggregate lenders fell well below the demographics of 24.6 percent of low-income families in the assessment area during the review period. While the bank performed below aggregate HMDA lenders, lending is considered reasonable in the context of the bank's position in the market and competition from other lenders.

In addition, lending to low-income individuals in the assessment area may be difficult due to the high cost of homes.

HMDA lending to moderate-income borrowers is adequate. In 2018, the bank originated 4.1 percent by number (1.4 percent by dollar volume) of HMDA loans to moderate-income borrowers. By comparison, aggregate lenders originated 6.2 percent by number (2.7 percent by dollar volume) of HMDA loans to moderate-income borrowers. In 2019, Comerica originated 4.4 percent by number (2.3 percent by dollar volume) of HMDA loans to moderate-income borrowers. Aggregate lenders originated 5.8 percent by number (2.7 percent by dollar volume) of HMDA loans to moderate-income borrowers. The percentage of HMDA loans originated to moderate-income borrowers by both the bank and aggregate lenders fell well below the demographics, with 16.4 percent of assessment area families classified as moderate-income. While the bank performed below aggregate HMDA lenders, lending is considered adequate in the context of the bank's position in the market and competition from other lenders.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is poor. The assessment area is saturated with large national banks; therefore, competition for business loans is high in this market.

In 2018, Comerica originated 15.7 percent by number (13.6 percent by dollar volume) of small business loans in the Greater Los Angeles, CA Assessment Area to businesses with reported revenues under $1 million. By comparison, aggregate lenders originated 46.9 percent by number (31.8 percent by dollar volume) of small business loans to businesses with revenues less than $1 million. In 2019, Comerica originated 22.6 percent by number (16.1 percent by dollar volume) of small business loans to businesses with revenues less than $1 million. Aggregate lenders originated 50.9 percent by number (32.9 percent by dollar volume) of small business loans to businesses with revenues less than $1 million. During the review period, 91.2 percent of businesses reported revenues of less than $1 million.

It is worth noting that a significant percentage (33.0 percent in 2018 and 21.4 percent in 2019) of loans were originated to businesses with unknown revenues. This significant portion of small business loans without revenue information may impact overall distribution of loans. The bank's small business credit card partnership with Elan Financial (discussed previously) represented a material volume of small business lending, though was not included in the CRA data reported by the bank.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a significant portion of the bank's small business loans were made in loan amounts of $100,000 or less. In 2018, 45.4 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (compared to 95.9 percent of aggregate small business loans), with another 22.4 percent in loan amounts between $100,000 and $250,000 (2.1 percent of aggregate). In 2019, 36.2 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (96.0 percent of aggregate), and 27.1 percent in loan amounts between $100,000 and $250,000 (2.2 percent of aggregate).

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate penetration throughout the assessment area. For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. There were no conspicuous gaps or anomalies in the bank's lending patterns.

The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies).

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank made very few multi-family loans in the Greater Los Angeles, CA Assessment Area during the review period, this product was not analyzed separately. During the review period, the largest portion of the bank's HMDA-related originations and purchases were home improvement loans (36.1 percent of total HMDA loans), followed by refinance loans (28.2 percent) and other purpose lines of credit (27.4 percent). Home purchase loans made up only 7.4 percent of the bank's total HMDA lending in the assessment area during the review period. As a result, home improvement lending was given the greatest weight among HMDA-related products, and home purchase lending was given the least weight.

Home Purchase Lending

The bank's geographic distribution of home purchase lending in the Greater Los Angeles, CA Assessment Area during the review period is excellent.

In 2018, the bank originated 9.4 percent by number (7.8 percent by dollar volume) of home purchase loans in low-income census tracts. This is significantly higher than aggregate lenders, which originated 3.5 percent by number (2.4 percent by dollar volume) of home purchase loans in low-income census tracts. In 2019, Comerica originated 5.9 percent by number (3.3 percent by dollar volume) of home purchase loans in low-income census tracts. Aggregate lenders originated 3.0 percent by number (2.2 percent by dollar volume) of home purchase loans in low-income census tracts. In both years during the review period, Comerica outperformed both the aggregate lenders' performance and the 2.7 percent of owner-occupied units in low-income census tracts.

In 2018, the bank originated 46.9 percent by number (43.0 percent by dollar volume) of home purchase loans in moderate-income census tracts. Aggregate lenders originated 18.4 percent by number (12.9 percent by dollar volume) of home purchase loans in moderate-income census tracts. In 2019, Comerica originated 35.3 percent by number (14.5 percent by dollar volume) of loans in moderate-income census tracts. Aggregate lenders originated 18.1 percent by number (12.8 percent by dollar volume) of home purchase loans in moderate-income census tracts. During the review period, Comerica outperformed both the 17.6 percent of owner-occupied units which were located in moderate-income census tracts and the performance of aggregate lenders.

Home Refinance Lending

The bank's geographic distribution of home refinance lending in the Greater Los Angeles, CA Assessment Area during the review period is good.

In 2018, the bank originated 1.4 percent by number (1.2 percent by dollar volume) of refinance loans in low-income census tracts. Aggregate lenders originated 3.2 percent by number (2.3 percent by dollar volume) of refinance loans in low-income census tracts. In 2019, Comerica originated 3.1 percent by number (2.1 percent by dollar volume) of refinance loans in low-income census tracts. Aggregate lenders originated 2.9 percent by number (1.9 percent by dollar volume) of refinance loans in low-income census tracts. During the review period, the bank performed similarly to the 2.7 percent of assessment area owner-occupied units located in low-income tracts, as well as the performance of aggregate lenders.

In 2018, the bank originated 11.2 percent by number (6.4 percent by dollar volume) of loans in moderate-income census tracts. Aggregate lenders originated 19.0 percent by number (13.7 percent by dollar volume) of refinance loans in moderate-income census tracts. In 2019, Comerica outperformed aggregate lenders, originating 20.0 percent by number (11.1 percent of by dollar volume) of refinance loans in moderate-income census tracts. Aggregate lenders originated 16.7 percent by number (12.0 percent by dollar volume) of refinance loans in moderate-income census tracts during 2019. During the review period, 17.6 percent of assessment area owner-occupied units were located in moderate-income tracts; therefore, the bank outperformed demographics in 2019, while aggregate lenders remained below the level of demographics.

Home Improvement Lending

The bank's geographic distribution of home improvement lending in the Greater Los Angeles, CA Assessment Area during the review period is good.

In 2018, the bank originated 1.2 percent by number (1.7 percent by dollar volume) of loans in low-income census tracts. Aggregate lenders originated 2.0 percent by number (1.9 percent by dollar volume) of home improvement loans in low-income census tracts. In 2019, Comerica originated 0.9 percent by number (0.5 percent by dollar volume) of home improvement loans in low-income census tracts. Aggregate lenders originated 1.8 percent by number (1.8 percent by dollar volume) of home improvement loans in low-income census tracts. Both the bank and aggregate lenders fell below the demographic data (2.7 percent) during the review period. While the bank's lending was slightly below aggregate lenders and demographic, it is considered adequate when compared to the bank's market share and position as a HMDA lender in the market.

In 2018, the bank originated 9.3 percent by number (6.6 percent by dollar volume) of home improvement loans in moderate-income census tracts). Aggregate lenders originated 13.6 percent by number (11.5 percent by dollar volume) of home improvement loans in moderate-income census tracts. In 2019, Comerica originated 12.6 percent by number (8.7 percent by dollar volume) of home improvement loans in moderate-income census tracts. Aggregate lenders originated 13.0 percent by number (10.5 percent by dollar volume) of home improvement loans in moderate-income census tracts. During the review period, 17.6 percent of owner-occupied units were located in moderate-income census tracts.

Other Purpose Line of Credit

The bank's geographic distribution of other purpose lines of credit in the Greater Los Angeles, CA Assessment Area during the review period is adequate.

In 2018, the bank originated 0.5 percent by number (0.1 percent by dollar volume) of other purpose lines of credit in in low-income census tracts. Aggregate lenders originated 1.1 percent by number (0.7 percent by dollar volume) of other purpose lines of credit in low-income census tracts. In 2019, Comerica originated 0.9 percent by number (0.4 percent by dollar volume) of other purpose lines of credit in low-income census tracts. Aggregate lenders originated 1.2 percent by number (0.7 percent by dollar volume) of other purpose lines of credit in low-income census tracts. During the review period, both the bank and aggregate HMDA lenders fell below the demographic of 2.7 percent. While the bank's lending was slightly below aggregate lenders and demographic, it is considered adequate when compared to the bank's market share and position as a HMDA lender in the market.

In 2018, the bank originated 5.0 percent by number (1.5 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. Aggregate lenders originated 10.3 percent by number (6.0 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. In 2019, Comerica's lending improved significantly, and the bank originated 11.1 percent by number (4.9 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. Aggregate lenders originated 10.5 percent by number (6.3 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. During the review period, both the bank and aggregate lenders fell below the demographic of 17.6 percent. The bank's lending is considered adequate when compared to the bank's market share and position as a HMDA lender in the market.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects good penetration throughout the Greater Los Angeles, CA Assessment Area. This was based on the bank's performance compared to demographics, taking into consideration the performance of the aggregate lenders.

The bank exceeded the market demographics and aggregate lenders' performance in low-income census tracts during the review period. In 2018, the bank originated 5.5 percent by number (4.2 percent by dollar volume) of small business loans in low-income census tracts. Aggregate lenders originated 4.6 percent by number (5.5 percent by dollar volume) of small business loans in low-income census tracts. In 2019, Comerica originated 7.3 percent by number (7.7 percent by dollar volume) of small business loans in low-income census tracts. Aggregate lenders originated 4.9 percent by number (5.7 percent by dollar volume) of small business loans in low-income census tracts. During the review period, 5.0 percent of small businesses were located in low-income census tracts.

The bank's lending was generally comparable to aggregate lenders and market demographic. In 2018, the bank originated 16.9 percent by number (19.8 percent by dollar volume) of small business loans in moderate-income census tracts. Aggregate lenders originated 19.5 percent by number (21.0 percent by dollar volume) of small business loans in moderate-income census tracts. In 2019, Comerica originated 17.9 percent by number (18.0 percent by dollar volume) of small business loans in moderate-income census tracts. Aggregate lenders originated 19.7

percent by number (20.6 percent by dollar volume) of small business loans in moderate-income census tracts. During the review period, 20.0 percent of small businesses were located in moderate-income census tracts.

Community Development Lending

The bank is a leader in making community development loans in the assessment area. The bank originated 114 community development qualified loans, totaling approximately $247 million. This represents a significant increase (79.0 percent) since the previous evaluation. The CD Loans (as shown in the table below) were primarily focused on providing or supporting affordable housing in the assessment area or loans with the purpose of revitalizing or stabilizing low- or moderate-income geographies, which were needs identified by community contacts. These loans demonstrate good responsiveness to assessment area needs.

Community Development Lending Greater Los Angeles, CA Assessment Area		
Purpose	**#**	**$000s**
Affordable Housing	48	109,260
Community Services	7	38,422
Economic Development	11	25,152
Revitalization and Stabilization	48	74,150
Institution Total	**114**	**246,984**

The bank participated heavily in the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. In the Greater Los Angeles, CA Assessment Area, the bank made 49 loans under the PPP, totaling $80.8 million. The bank's high level of participation in this program reflects responsiveness to the needs of the community and represents the bank's use of flexible lending practices to meet the needs of its assessment area. Additionally, investments made by the institution to third-party community development organizations helped enabled those organizations to make 30 qualified community development loans benefitting multiple areas including the bank's Greater Los Angeles, CA Assessment Area. The bank's the pro-rata share of those third-party loans credited to the institution totals $1.5 million in the areas including the Greater Los Angeles, CA Assessment Area.

Investment Test

The bank has an excellent level of qualified community development investments and grants in the Greater Los Angeles, CA Assessment Area, particularly those not routinely provided by private investors and is occassionally in a leadership position. The bank's investments were primarily focused on initiatives that provide affordable housing in the assessment area.

Community Development Investments and Donations Greater Los Angeles, CA Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	**#**	**$000s**	**#**	**$000s**	**#**	**$000s**	**#**	**$000s**
Affordable Housing	12	25,993	40	28,681	22	175	74	54,849
Community Services	-	-	-	-	233	2,182	233	2,182
Economic Development	5	3,206	1	19	28	618	34	3,843
Total	17	29,199	41	28,700	283	2,975	341	60,874

The bank demonstrated good responsiveness to needs in the assessment area through a $500,000 investment to Lendistry, a minority led CDFI that ranks second nationwide in SBA Community Advantage lending. The funds provided to Lendistry were used by the CDFI to make loans in the Greater Los Angeles, CA Assessment Area. Although, the bank elected to have those funds considered under the Lending Test, the impact of the investments should be noted. The bank also made notable investments to Broadway Federal Bank, a minority depository institution (MDI) serving the Greater Los Angeles, CA Assessment Area.

In addition, one investment of approximately $3,200 was made which benefitted affordable housing efforts in multiple assessment areas including the bank's Greater Los Angeles, CA Assessment Area.

Service Test

Its retail and community development services in the bank's Greater Los Angeles, CA Assessment Area reflect good responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 38 branch offices and 39 ATMs as of December 31, 2020, was compared to the distribution of the population and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Greater Los Angeles, CA Assessment Area.

Distribution of Branches and ATMs Greater Los Angeles, CA Assessment Area							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	9.3	8.8	5.0	1	2.6	1	2.6
Moderate	28.5	29.2	20.0	6	15.8	7	17.9
Middle	25.9	27.0	25.6	4	10.5	4	10.3
Upper	34.6	34.5	47.5	24	63.2	23	59.0
Unknown	1.7	0.5	1.9	3	7.9	4	10.2
Total	100.0	100.0	100.0	38	100.0	39	100.0

As shown in the table above, three of the bank's branches in the assessment area were located in unknown-income census tracts. Of these, two were located in census tracts that primarily boarded upper-income census tracts, and one was located in a census tract that primarily bordered LMI census tracts.

The bank opened one branch (in an upper-income census tract) and closed one branch (in an upper-income census tract) in the assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations are tailored to the convenience and needs of the assessment area, particularly in LMI geographies or to LMI individuals.

Products and services are uniformly offered in all branches in the assessment area. Hours of operation in the branches varies slightly, based on transaction volume. The bank has ensured that some branch locations in LMI census tracts in the assessment area offer extended and weekend hours. While there is only one branch in a low-income census tract, it offers extended and weekend hours. Of the six branches in moderate-income census tracts, half offer weekend hours and all of them offer extended hours. Branches in middle- and upper-income census tracts follow a similar pattern, with the majority offering extended hours and approximately half offering weekend hours.

Community Development Services

The bank is a leader in providing community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and as trustees, for 27 organizations offering community development services that focused on community services that aided LMI individuals. Total hours served during the review period was approximately 2,205 hours, which represents a significant increase in services provided in the assessment area since the previous evaluation.

The bank is active in supporting LMI students in the Greater Los Angeles, CA Assessment Area through programs such as Junior Achievement, with bank employees providing more than 900 hours of services during the review period. Additionally, the bank representative served on the board of The People Concern, providing financial expertise to one of the area's largest social service agencies which advocates for and serves homeless individuals, survivors of domestic violence, and challenged youth.

Description of Operations in San Francisco Bay

The San Francisco Bay, CA Assessment Area includes San Francisco, San Mateo, Contra Costa, and Alameda counties. These counties, along with Marin County, which is excluded from the assessment area, make up the San Francisco-Oakland-Berkeley, CA MSA.

Population Changes San Francisco Bay, CA Assessment Area			
County	2019 Population Estimate	% Increase Since 2010	Major Municipalities
Alameda County	1,671,329	10.7	Oakland*, Fremont, Hayward
Contra Costa	1,153,526	10.0	Concord, Richmond, Martinez*
San Francisco County	881,549	9.5	San Francisco†
San Mateo County	766,573	6.7	Daly City, San Mateo, Redwood City, South San Francisco

* Denotes county seat.
† San Francisco City makes up the entirety of San Francisco County.

The San Francisco Bay, CA Assessment Area is the bank's third largest market in the state and is saturated with some of the largest financial institutions in the nation. Therefore, Comerica is not a major lender or influencer in the assessment area. As of 2020, the bank operated 17 branches in the assessment area, representing 17.7 percent of branches in California. The bank has not opened or closed any branches in the assessment area since the previous evaluation.

According to the FDIC, as of June 30, 2020, Comerica had almost $3 billion in deposits in the San Francisco Bay, CA Assessment Area, which represented 0.6 percent of the market share. This amount also represented 13.7 percent of the bank's deposits in California. The bank ranked 16th in deposit market share. Market leaders included Bank of America, Wells Fargo, First Republic Bank, and JP Morgan Chase Bank. These top four deposit market leaders collectively held 73.5 percent of the deposit market. Many of the bank's competitors are multi-regional or national banks. This competition may limit the bank's opportunity to lend and compete optimally in the assessment area.

Comerica is not considered a major lender or influencer in the HMDA lending market in the San Francisco Bay, CA Assessment Area. In 2018, 657 HMDA lenders originated or purchased approximately 99,100 loans in the San Francisco Bay, CA Assessment Area. Comerica ranked 57th, with 0.3 percent of the HMDA market share. In 2019, the number of HMDA lenders increased to 679, and the number of loans originated or purchased in the assessment area significantly increased to over 134,000 loans. Comerica ranked 74th, with 0.2 percent of the HMDA market share. HMDA Market leaders included Wells Fargo, Bank of America, JP Morgan Chase Bank, and Quicken Loans. Although their specific market ranked varied in each year, these top four lenders collectively held 31.7 percent and 32.4 percent of the HMDA market share in 2018 and 2019, respectively.

In 2018, 172 CRA reporters originated or purchased over 139,000 small business loans in the assessment area. Comerica ranked 28th with 0.2 percent of the market share. In 2019, 177 CRA reporters originated or purchased 145,000 small business loans in the assessment area.

Comerica's ranking slipped to 38th, with 0.1 percent of the market share. Leaders in small business lending include JP Morgan Chase Bank, American Express, and Bank of America. These top three lenders collectively held 56.6 percent and 63.0 percent of the CRA small business market share in 2018 and 2019, respectively. The competition in the HMDA and CRA small business lending markets within the San Francisco Bay, CA Assessment Area is significant.

Demographic Characteristics

According to 2019 FFIEC data, the San Francisco Bay, CA Assessment Area was made up of 872 census tracts. Of those, 109 (12.5 percent) were low-income, 184 (21.1 percent) were moderate-income, 258 (29.6 percent) were middle-income, and 309 (35.4 percent) were upper-income, and 12 (1.4 percent) were unknown-income census tracts.

The population of the assessment area was 3,967,588. Of those, 12.0 percent lived in low-income, 22.0 percent were moderate-income, 31.5 percent were middle income, 34.0 percent were upper-income, and 0.5 percent were unknown-income census tracts.

Income Characteristics

The chart below reflects the changes in median family income during the review period for the San Francisco Bay, CA Assessment Area. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

Median Family Income San Francisco Bay, CA Assessment Area		
Income Level	2018	2019
Median Family Income	$116,400	$133,800
Low-income	< $58,200	< $66,900
Moderate-income	$58,200 < $93,120	$66,900 < $107,040
Middle-income	$93,120 < $139,680	$107,040 < $160,560
Upper-income	≥ $139,680	≥ $160,560

Housing Characteristics

According to the 2015 census estimates, there were 1,547,186 housing units in the assessment area. Of those, 11.9 percent were located in low-income census tracts, 20.8 percent were in moderate-income census tracts, 31.0 percent were in middle-income census tracts, 35.6 percent were in upper-income census tracts, and 0.7 percent were in unknown-income census tracts. Of the total housing units, 756,136 (48.9 percent) were owner-occupied, 702,398 (45.4 percent) were rental, and 88,652 (5.7 percent) were vacant. Owner-occupied housing units in low-income census tracts account for 5.0 percent of owner-occupied units and 16.8 percent of moderate-income census tracts. The majority (70.9 percent) of housing in low-income census tracts is rental property. In moderate-income census tracts, 54.9 percent of housing units are rental properties, and 39.4 percent are owner-occupied.

The median age of housing stock in the assessment area is 58 years old. The median housing value is $619,750. The median age of homes in low-income census tracts is similar at 61 years old, although the value is significantly lower at $289,168. In moderate-income census tracts, the median age of homes is 59 years old and the median value is $388,943. The median cost of rent in the assessment area is $1,469. The cost of rent in LMI census tracts is slightly lower at $1,059

and $1,354, respectively; however, 22.1 percent of renters in low-income census tracts, and 28.0 percent of renters in moderate-income census tracts pay over 30 percent of their income for rent. It is additionally worth noting that an extremely high percentage (28.6 percent) of renters in middle-income census tracts pay over 30 percent of their income for rent. This may be possible due to the fact that incomes in the assessment area are much higher than the national median; however, 24.5 percent of families in low-income census tracts live below poverty and 11.3 percent of families in moderate-income census tracts live below poverty.

Despite the high cost of renting, it is more affordable to rent rather than purchase a home in the assessment area[3]. This may make it difficult for lenders to finance homes for LMI individuals and families. In addition, there is likely to be a lack of housing units available for purchase in LMI census tracts due to the high percentage of rental units in these census tracts.

Employment and Economic Conditions

The national unemployment rates for 2018 and 2019 were 3.9 percent and 3.7 percent, respectively. In 2020, the COVID-19 pandemic and subsequent measures taken to curb its spread caused the national unemployment rate to more than double to 8.1 percent. As shown in the table, unemployment in the assessment area was materially lower than the national rate in 2018 and 2019 but rose slightly above the national rate during the 2020 COVID-19 pandemic.

Annual Average Unemployment Rate San Francisco Bay, CA Assessment Area			
AREA	**2018**	**2019**	**2020**
Alameda County	3.1	2.9	8.8
Contra Costa County	3.2	3.1	8.9
San Francisco County	2.4	2.2	7.9
San Mateo County	2.3	2.0	7.0
Assessment Area	**2.9**	**2.7**	**8.3**
San Francisco-Oakland-Berkeley, CA MSA	2.8	2.7	8.2
State of California	**4.3**	**4.0**	**10.2**
United States	**3.9**	**3.7**	**8.1**

The San Francisco Bay, CA Assessment Area is home to a diverse range of industries and employers. The local population speaks over 100 languages and the area serves as an epicenter for cultural diversity and thought exchange. According to the San Francisco Chamber of Commerce, key sectors include: Technology and Software, Social and Digital Media, Life Sciences and Biotech, Environmental and Cleantech, and International Business. San Francisco Bay area is home to more than 300 IT firms and employs over 71 thousand IT professionals. More than 300 digital media companies operate in the area, including YouTube, Twitter, Pixar, and Sony, among others. The Life Sciences industry contributes significantly to the area's economy. According to the Chamber, this industry has provided over 302 thousand jobs in the region and continues to grow. The Environmental and Cleantech industry adds nearly 60 thousand jobs to the region and is expected to soon exceed 104 thousand. More than 71

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[3] A 30 year mortgage with an interest rate equal to the average yearly rate of Freddie Mac mortgages in 2019 (3.94 percent) and a 20 percent down payment, would equal monthly mortgage payments of $1,096 for homes in low-income census tracts and $1,474 for homes in moderate-income census tracts (based on the median value of these homes). Additional costs such as property taxes, property insurance and homeowner's association fees would increase this amount.

consulates and foreign trade offices are located in San Francisco. It is the tenth largest exporting region in the U.S. and features over 30 of the largest non-American banking institutions in the country.

Community Contacts and Community Development Opportunities

As part of the evaluation of the San Francisco Bay, CA Assessment Area, two contacts involved in local affordable housing were made. The contacts highlighted the need for efforts in preventing displacement of LMI families in the region. The contacts indicated that financial institutions have been active in the area, though additional financial education for individuals and nonprofit organizations would be beneficial.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Combined Demographics Report

Assessment Area: CA - San Francisco Bay

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	109	12.5	94,763	10.5	23,236	24.5	223,868	24.7
Moderate-income	184	21.1	185,995	20.5	21,109	11.3	144,328	15.9
Middle-income	258	29.6	285,195	31.5	15,275	5.4	163,154	18
Upper-income	309	35.4	337,793	37.3	8,501	2.5	374,700	41.4
Unknown-income	12	1.4	2,304	0.3	283	12.3	0	0
Total Assessment Area	**872**	**100.0**	**906,050**	**100.0**	**68,404**	**7.5**	**906,050**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	184,029	37,813	5	20.5	130,406	70.9	15,810	8.6
Moderate-income	322,242	126,869	16.8	39.4	176,755	54.9	18,618	5.8
Middle-income	479,256	247,734	32.8	51.7	206,554	43.1	24,968	5.2
Upper-income	551,148	342,402	45.3	62.1	180,684	32.8	28,062	5.1
Unknown-income	10,511	1,318	0.2	12.5	7,999	76.1	1,194	11.4
Total Assessment Area	**1,547,186**	**756,136**	**100.0**	**48.9**	**702,398**	**45.4**	**88,652**	**5.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	26,422	12.2	23,075	11.7	3,221	17.3	126	12.7
Moderate-income	37,252	17.2	34,067	17.3	3,043	16.3	142	14.3
Middle-income	60,261	27.9	55,324	28.2	4,678	25.1	259	26.1
Upper-income	90,310	41.8	82,401	41.9	7,468	40.1	441	44.5
Unknown-income	1,878	0.9	1,639	0.8	215	1.2	24	2.4
Total Assessment Area	**216,123**	**100.0**	**196,506**	**100.0**	**18,625**	**100.0**	**992**	**100.0**
	Percentage of Total Businesses:		**90.9**		**8.6**			**.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	83	8.2	76	7.8	6	17.6	1	50
Moderate-income	130	12.9	127	13.1	2	5.9	1	50
Middle-income	267	26.5	255	26.2	12	35.3	0	0
Upper-income	526	52.1	512	52.6	14	41.2	0	0
Unknown-income	3	0.3	3	0.3	0	0	0	0
Total Assessment Area	**1,009**	**100.0**	**973**	**100.0**	**34**	**100.0**	**2**	**100.0**
	Percentage of Total Farms:		**96.4**		**3.4**			**.2**

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

The bank's lending activity in the San Francisco Bay, CA Assessment Area reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution lending by borrower income reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

During the review period, the bank made use of innovative and flexible lending practices in serving the credit needs of the San Francisco Bay, CA Assessment Area. This included the bank's small business micro loan program, as well as the bank's participation in the Small Business Administration's Paycheck Protection Program.

The bank is both a small business and HMDA lender. During the review period, the bank reported 656 (61.0 percent) HMDA-reportable loans, compared to 420 (39.0 percent) small business loans in the San Francisco Bay, CA Assessment Area. Based upon this, HMDA lending was given more weight than small business lending in assessing the bank's lending performance in the assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. During this review, more weight was placed on the bank's HMDA lending to LMI borrowers when assessing the overall performance of lending by borrower distribution of income.

The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

HMDA lending to low-income borrowers is good. In 2018, the bank originated 3.3 percent by number (1.1 percent dollar amount) of HMDA loans to low-income borrowers. Aggregate lenders originated 3.9 percent by number (1.8 percent by dollar amount) to low-income borrowers during the same period. In 2019, Comerica originated 3.4 percent by number (1.6 percent by dollar volume) of HMDA loans to low-income borrowers. Aggregate lenders originated 3.4 percent by number (1.7 percent by dollar volume) of HMDA loans to low-income borrowers. During the review period, 24.7 percent of the families in the assessment area were considered low-income

families. While both the bank and aggregate HMDA lenders fell significantly below demographics, the context of lending in the assessment area should be considered. Low-income borrowers typically struggle to meet debt-to-income guidelines by lenders to ensure safe and sound lending practices based on the median family income and median home values in the assessment area. Comerica's lending, which was very similar to aggregate lenders, indicates reasonable efforts being made to reach low-income borrowers. In this context, the bank's lending to low-income borrowers is considered good.

HMDA lending to moderate-income borrowers is adequate. In 2018, the bank originated 6.3 percent by number (3.8 percent by dollar volume) of HMDA loans to moderate-income borrowers. Aggregate lenders originated 9.5 percent by number (4.5 percent by dollar volume) of HMDA loans to moderate-income borrowers. In 2019, Comerica originated 7.5 percent by number (4.8 percent by dollar volume) of HMDA loans to moderate-income borrowers. Aggregate lenders originated 9.7 percent by number (4.9 percent by dollar volume) of HMDA loans to moderate-income borrowers. During the review period, both the bank and aggregate lenders performed below the 15.9 percent of assessment area families classified as moderate-income. Comerica's lending is below aggregate; however, considering the market share and competition in the market, the bank's performance is adequate.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is poor. In 2018, the bank originated 12.4 percent by number (8.8 percent by dollar volume) of small business loans to businesses with gross annual revenues below $1 million. By comparison, aggregate CRA lenders originated 46.9 percent by number (32.6 percent by dollar volume) of small business loans to businesses with gross annual revenues under $1 million, which is significantly better than the bank. Both the bank and aggregate lenders fell below the demographics, as 90.9 percent of assessment area businesses reported annual revenues of $1 million or less.

Of the total 420 small business loans originated by the bank in the assessment area during the review period, 111 (26.4 percent) were reported as being to businesses with unknown revenues. The regulations do not require institutions to request or consider revenue information when making a loan; however, the material portion of small business loans without revenue information may impact overall distribution of loans

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a significant portion of the bank's small business loans were made in loan amounts of $100,000 or less. In 2018, 46.2 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (compared to 95.8 percent of aggregate small business loans), with another 23.7 percent in loan amounts between $100,000 and $250,000 (2.2 percent of aggregate). In 2019, 38.6 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (95.9 percent of aggregate), and 25.7 percent in loan amounts between $100,000 and $250,000 (2.1 percent of aggregate).

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. There were no conspicuous gaps or anomalies in the bank's lending patterns in the San Francisco Bay, CA Assessment Area during the review period.

The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

During the review period, the bank made 656 total HMDA-reportable loans in the San Francisco Bay, CA Assessment Area. Of these, home improvement lending made up the largest percentage (44.7 percent), followed closely by home refinance lending (36.9 percent), other HMDA-reportable products in the assessment area represented much smaller portions of the bank's portfolio (other purpose lines of credit at 13.9 percent and home purchase lending at 4.1 percent). As a result, home improvement and home refinance lending were given the greatest weight in assessing the bank's performance.

Home Purchase Lending

The bank's geographic distribution of home purchase lending in the San Francisco Bay, CA Assessment Area during the review period is adequate.

In 2018, the bank originated 18.8 percent by number (11.7 percent by dollar volume) of home purchase loans in low-income census tracts. Aggregate lenders originated 7.0 percent by number (4.5 percent by dollar volume) of home purchase loans in low-income census tracts. In 2019, Comerica did not originate any loans in low-income census tracts. Aggregate lenders originated 7.1 percent by number (4.7 percent by dollar volume) of home purchase loans in low-income census tracts. Owner-occupied units in low-income census tracts accounted for 5.0 percent of the owner-occupied units in the assessment area. While the bank did not originate any home purchase loans in low-income census tracts, the combined performance during the review period still exceeded the demographics.

Comerica's lending fell below the 16.8 percent of owner-occupied units located in moderate-income tracts, while aggregate HMDA lenders generally performed slightly above the demographic during the review period. In 2018, the bank originated 6.3 percent by number (3.8 percent by dollar volume) of home purchase loans in moderate-income census tracts. Aggregate lenders originated 19.3 percent by number (14.1 percent by dollar volume) of home purchase loans in moderate-income census tracts. In 2019, Comerica originated 9.1 percent by number (6.1 percent by dollar volume) of home purchase loans in moderate-income census tracts.

Aggregate lenders originated 18.6 percent by number (13.6 percent by dollar volume) of home purchase loans in moderate-income census tracts.

Home Refinance Lending

The bank's geographic distribution of home refinance lending in the San Francisco Bay, CA Assessment Area during the review period is poor.

In 2018, the bank originated 3.3 percent by number (3.0 percent by dollar volume) of home refinance loans in low-income census tracts. Aggregate lenders originated 6.6 percent by number (4.8 percent by dollar volume) of home refinance loans in low-income census tracts. In 2019, Comerica originated 2.5 percent by number (1.3 percent by dollar volume) of home refinance loans in low-income census tracts. Aggregate lenders originated 5.4 percent by number (3.7 percent by dollar volume) of home refinance loans in low-income census tracts. Comerica's home refinance lending was below demographics, with 5.0 percent or assessment area owner-occupied units located in these tracts, while aggregate HMDA lenders performed similarly to, or slightly above the demographic, in home refinance lending during the review period.

In 2018, the bank originated 12.2 percent by number (6.8 percent by dollar volume) of home refinance loans in moderate-income census tracts. Aggregate lenders originated 18.4 percent by number (14.3 percent by dollar volume) of home refinance loans in moderate-income census tracts. In 2019, Comerica originated 10.1 percent by number (11.3 percent by dollar volume) of home refinance loans in moderate-income census tracts. Aggregate lenders originated 17.0 percent by number (12.7 percent by dollar volume) of home refinance loans in moderate-income census tracts. Comerica's home refinance lending in moderate-income census tracts fell below the demographic (16.8 percent of owner-occupied unit in these tracts) during the review period, while aggregate lenders performed similarly to the demographic.

Home Improvement Lending

The bank's geographic distribution of home improvement lending in the San Francisco Bay, CA Assessment Area during the review period is good.

In 2018, the bank originated 4.2 percent by number (3.3 percent by dollar volume) of home improvement loans in low-income census tracts. This was slightly above aggregate lenders, which originated 4.0 percent by number (3.3 percent by dollar volume) of home improvement loans in low-income census tracts. In 2019, Comerica originated 3.9 percent by number (2.3 percent by dollar volume) of home improvement loans in low-income census tracts. Aggregate lenders originated 4.2 percent by number (3.4 percent by dollar volume) of home improvement loans in low-income census tracts. Both the bank and aggregate lenders performed similarly to the demographics, as these tracts contained 5.0 percent of owner-occupied units during the review period.

During the review period, Comerica outperformed aggregate lenders, and performed similarly to the 16.8 percent of owner-occupied units in the assessment area. In 2018, the bank originated 17.0 percent by number (12.8 percent by dollar volume) of home improvement lending in moderate-income census tracts. Aggregate lenders originated 14.2 percent by number (11.7 percent by dollar volume) of home improvement loans in moderate-income census tracts. In 2019, Comerica originated 16.4 percent by number (11.3 percent by dollar volume) of home

improvement loans in moderate-income census tracts. Aggregate lenders originated 13.7 percent by number (11.2 percent by dollar volume) of home improvement loans in moderate-income census tracts.

Other Purpose Lines of Credit

The bank's geographic distribution of other purpose lines of credit in the San Francisco Bay, CA Assessment Area during the review period is adequate.

In 2018, the bank originated 1.7 percent by number (0.5 percent by dollar volume) of other purpose lines of credit in low-income census tracts. During the same year, aggregate lenders originated 3.0 percent by number (2.0 percent by dollar volume) of other purpose lines of credit in low-income census tracts. In 2019, Comerica's performance improved, originating 6.3 percent by number (3.1 percent by dollar volume) of other purpose lines of credit in low-income census tracts, compared to 2.5 percent by number (1.6 percent by dollar volume) of other purpose lines of credit originated by aggregate lenders. Both the bank and aggregate lenders performed below the demographics in 2018 (5.0 percent of owner-occupied units), though Comerica's performance exceeded this level in 2019.

While both the bank and aggregate lenders performed below the demographic (16.8 percent) during the review period, Comerica's performance was similar to aggregate HMDA reporters. In 2018, the bank originated 10.2 percent by number (5.0 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. Aggregate lenders originated 11.7 percent by number (8.4 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. In 2019, Comerica originated 12.5 percent by number (4.4 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts. Aggregate lenders originated 12.2 percent by number (7.9 percent by dollar volume) of other purpose lines of credit in moderate-income census tracts.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

In 2018, the bank originated 15.7 percent by number (16.6 percent by dollar volume) of small businesses loans in low-income census tracts. Aggregate lenders originated 10.6 percent by number (13.3 percent by dollar volume) of small business loans in low-income census tracts. In 2019, the bank originated 15.8 percent by number (16.2 percent by dollar volume) of small business loans in low-income census tracts. Aggregate CRA reporters originated 10.8 percent by number (13.3 percent by dollar volume) of small business loans in low-income census tracts. Of small businesses in the assessment area, 12.2 percent of them are located in low-income census tracts.

Comerica performed similarly to aggregate lenders in 2018, and outperformed aggregate lenders in 2019. Both the bank and aggregate CRA reporters performed similarly to the demographic. In 2018, the bank originated 13.3 percent by number (18.4 percent by dollar volume) of small business loans in moderate-income census tracts. Aggregate CRA reporters originated 18.0 percent by number (16.7 percent by dollar volume) of small business loans in moderate-income

census tracts. In 2019, Comerica originated 19.9 percent by number (21.3 percent by dollar volume) of small business loans in moderate-income census tracts. Aggregate CRA reporters originated 18.1 percent by number (16.5 percent by dollar volume) of small business loans in moderate-income census tracts. Of small businesses in the assessment area, 17.2 percent are located in moderate-income census tracts.

Community Development Lending

The bank makes a relatively high level of community development loans in the assessment area. As shown in the table below, the bank originated 51 community development loans in the San Francisco Bay, CA Assessment Area. The majority of those funds were used to support efforts to revitalize and stabilize low- or moderate-income geographies.

Community Development Lending San Francisco Bay, CA Assessment Area		
Purpose	**#**	**$000s**
Affordable Housing	4	8,294
Community Services	16	86,393
Economic Development	2	3,313
Revitalization and Stabilization	29	53,255
Totals	51	151,255

The bank participated heavily in the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. In the San Francisco Bay, CA Assessment Area, the bank made 30 loans under the PPP, totaling $55.9 million. The bank's high level of participation in this program reflects responsiveness to the needs of the community and is representative of the bank's use of flexible lending practices to meet the needs of its assessment area.

Investment Test

The bank has a significant level of qualified community development investments and grants in the San Francisco Bay, CA Assessment Area during the review period, but is rarely in a leadership position. As shown in the table below, the bank invested over $45 million during the review period, which included 169 donations or grants, totaling approximately $2.1 million. The bank's investments were focused on affordable housing initiatives, while the bank's donations primarily focused on community services targeted to LMI individuals, families, and geographies.

Community Development Investments and Donations San Francisco Bay, CA Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	**#**	**$000s**	**#**	**$000s**	**#**	**$000s**	**#**	**$000s**
Affordable Housing	16	21,023	43	22,223	8	195	67	43,441
Community Services	-	-	-	-	120	939	120	939
Economic Development	-	-	-	-	41	953	41	953
Total	16	21,023	43	22,223	169	2,087	228	45,333

The bank demonstrated good responsiveness to needs in the assessment area by focusing investments on funds for the creation and preservation of affordable housing, as lack of affordable

housing and the impact of increased gentrification were issues raised by a community contact in this assessment area.

Service Test

The bank's retail and community development services reflect good responsiveness to the needs of the San Francisco Bay, CA Assessment Area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 17 branch offices and 17 full service ATMs as of December 31, 2020, was compared to the distribution of the population and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the San Francisco Bay, CA Assessment Area.

Distribution of Branches and ATMs San Francisco Bay, CA Assessment Area							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	12.5	11.9	11.8	2	11.8	2	11.8
Moderate	21.1	22.0	17.3	3	17.6	3	17.6
Middle	29.6	31.5	28.7	5	29.4	4	23.5
Upper	35.4	34.1	41.5	7	41.2	8	47.1
Unknown	1.4	0.5	0.8	0	0.0	0	0.0
Total	100.0	100.0	100.0	17	100.0	17	100.0

Though a portion of the bank's assessment area, including the eastern most sections of Contra Costa and Alameda counties, does not contain bank branches, this is considered to be appropriate as this section is separated from the remainder of the assessment area by a mountain range.

The bank did not open or close any branches in the assessment area during the review period. Therefore, the bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are substantially similar throughout the assessment area.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. The bank's employees served in many various capacities, including (but not limited to) boards of directors and as trustees, for nine community development financial organizations offering community development services that focused on providing community services that primarily aided, or were targeted toward LMI individuals. Total hours served during the review period was approximately 574 hours.

The bank was involved in providing financial education to LMI students in the assessment area during the review period, with bank employees volunteering approximately 170 hours with organizations such as Junior Achievement and Operation HOPE, Inc. Employees also served with organizations such as Pacific Community Ventures, a local Community Development Financial Institution, providing assistance to small businesses and start-ups.

METROPOLITAN AREAS (Limited-Scope Review)

Description of Operations

- **Riverside-San Bernardino-Ontario, CA MSA Assessment Area (Inland Empire)**
    - As of June 30, 2020, the bank operated three branches in the assessment area, representing 3.1 percent of its branches in California and 0.7 percent of its total branches.
    - As of June 30, 2020, the bank had $78.7 million in deposits in this assessment area, representing a market share of 0.1 percent. The $78.7 million also represents 0.1 percent of the bank's total deposits.
- **Salinas, CA MSA Assessment Area (Salinas)**
    - As of June 30, 2020, the bank operated four branches in the assessment area, representing 4.2 percent of its branches in California and 0.9 percent of its total branches.
    - As of June 30, 2020, the bank had $347.4 million in deposits in this assessment area, representing a market share of 3.1 percent. The $347.4 million also represents 0.5 percent of the bank's total deposits.
- **San Diego-Chula Vista-Carlsbad, CA MSA Assessment Area (San Diego)**
    - As of June 30, 2020, the bank operated 14 branches in the assessment area, representing 14.6 percent of its branches in California and 3.2 percent of its total branches.
    - As of June 30, 2020, the bank had $846.5 million in deposits in this assessment area, representing a market share of 0.8 percent. The $846.5 million also represents 1.2 percent of the bank's total deposits.
- **San Jose-Sunnyvale-Santa Clara, CA MSA Assessment Area (San Jose)**
    - As of June 30, 2020, the bank operated 13 branches in the assessment area, representing 13.5 percent of its branches in California and 3.0 percent of its total branches.
    - As of June 30, 2020, the bank had $8.0 billion in deposits in this assessment area, representing a market share of 4.5 percent. The $8.0 billion also represents 11.7 percent of the bank's total deposits.
- **Santa Cruz-Watsonville, CA MSA Assessment Area (Santa Cruz)**
    - As of June 30, 2020, the bank operated six branches in the assessment area, representing 6.3 percent of its branches in California and 1.4 percent of its total branches.
    - As of June 30, 2020, the bank had $721.3 million in deposits in this assessment area, representing a market share of 9.7 percent. The $721.3 million also represents 1.1 percent of the bank's total deposits.
- **Oxnard-Thousand Oaks-Ventura, CA MSA Assessment Area (Ventura County)**
    - As of June 30, 2020, the bank operated one branch in the assessment area, representing 1.0 percent of its branches in California, and 0.2 percent if it's total branches.
    - As of June 30, 2020, the bank had $46.6 million in deposits in this assessment area, representing a market share of 0.2 percent. The $46.6 million also represents 0.1 percent of the bank's total deposits.

Conclusions with Respect to Performance Tests

Facts and data reviewed, including performance and demographic information can be found in Appendix D for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited-scope assessment areas can be found in Appendix G.

Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Inland Empire	Consistent	Consistent	Consistent
Salinas	Consistent	Consistent	Below
San Diego	Below	Consistent	Consistent
San Jose	Below	Consistent	Consistent
Santa Cruz	Consistent	Consistent	Below
Ventura County	Below	Exceeds	Consistent

The bank's performance in the limited-scope assessment areas was generally consistent with its performance in full-scope areas and did not change the bank's overall ratings.

State of Florida

CRA Rating for Florida: Satisfactory
The Lending Test is Rated: High Satisfactory
The Investment Test is Rated: High Satisfactory
The Service Test is Rated: High Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- The bank's lending activity reflects adequate responsiveness to assessment areas credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of Home Mortgage Disclosure Act (HMDA) lending reflects good penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among businesses of different revenue sizes.
- Comerica makes a relatively high level of community development loans in the state.
- The bank has an excellent level of qualified community development investments and grants.
- The bank's performance exhibits good responsiveness to credit and community development needs.
- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank's record of opening and closing of branches in the state has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The services offered by the bank do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of community development services.

Scope

One assessment area in Florida was selected for full-scope review based on the volume of lending, number of branches, and percent of total deposits, as well as the length of time since the last full-scope review. Overall, approximately 88.6 percent of lending activity (by number of loans), 91.6 percent of the total deposits, and 85.7 percent of total branches within Florida were evaluated through the full-scope review. The following assessment area, was reviewed using full-scope procedures. A description of the assessment area, listed below, can be found in the applicable assessment area section of this report.

- Fort Lauderdale – West Palm Beach Assessment Area

In addition, a limited-scope review was conducted for the remaining assessment area:

- Naples, FL Assessment Area

The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report.

Description of Institution's Operations in Florida

The bank operates seven branch offices in its assessment areas in Florida, representing 1.6 percent of total branches. As of June 30, 2020, the bank had $307.3 million in deposits in the state, representing 0.4 percent of total deposits. According to the June 30, 2020 FDIC Summary of Deposits, the bank had a deposit market share of less than 0.1 percent and ranked 109th out of 196 FDIC-insured financial institutions across the state. Of the 13,131 HMDA loans originated and purchased by the bank, 297 (2.3 percent) were in the Florida assessment areas. Of the 13,919 small business loans originated and purchased by the bank during the review period, 141 (1.0 percent) were in the Florida assessment areas.

Conclusions with Respect to Performance Tests in Florida

Lending Test

In Florida, the bank's overall Lending Test rating is *High Satisfactory*. Lending activity reflects adequate responsiveness to assessment areas' credit needs. The overall lending activity in Florida was brought down by the low level of lending activity in the limited-scope assessment area. The geographic distribution of loans reflects good penetration throughout the assessment areas. In addition, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

The bank is both a small business and HMDA lender. During the review period, the bank reported 141 (32.2 percent) small business loans compared to 297 (67.8 percent) HMDA loans in Florida. Therefore, small business lending was given less weight than HMDA lending in determining the bank's Lending Test rating in the state of Florida. While the bank also makes small farm loans, none were made in the state during the review period and therefore are not considered in the overall evaluation of the bank's CRA performance.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices F and G, respectively.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas considers; the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans to low-, moderate-, middle-, and upper-income individuals; small-business loans to businesses with gross annual revenues of $1 million or less and small-business loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels (including LMI) and businesses of different

revenue sizes. Fort Lauderdale – West Palm Beach, the only full-scope assessment area in the state, was considered good. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for the assessment area.

The geographic distribution of loans reflects good penetration throughout the assessment area. Fort Lauderdale – West Palm Beach, the only full-scope assessment area in the state, was considered good. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for the assessment area.

Community Development Lending

In Florida, the bank makes a relatively high level of community development loans. During the review period, the bank originated 19 community development loans for $10.4 million in Florida representing 1.9 percent of the bank's total community development loans and 0.5 percent by total dollar amount, respectively.

The community development loans originated in Florida during the evaluation period were split between affordable housing and revitalization and stabilization efforts. The table below summarizes the bank's community development lending. The majority of revitalization and stabilization lending (seven loans totaling $7.7 million) was associated with the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. The bank's participation in this program reflects responsiveness to the needs of the community as an estimated 3.2 million jobs were retained due to funds lent through the program.[4]

Community Development Lending Florida Assessment Areas		
Purpose	Number	$(000s)
Affordable Housing	10	2,456
Revitalize and Stabilize	9	7,958
Institution Total	19	10,414

Additionally, investments made by the institution to third-party community development organizations helped enabled those organizations to make 187 qualified community development loans benefitting several regions, including the state of Florida. The bank's pro-rata share of those third-party loans credited to the institution total $1.1 million; this is in addition to the total referenced above.

Investment Test

In Florida, the bank's overall Investment Test rating is *High Satisfactory*. The bank has an excellent level of qualified community development investments and grants, though the bank is rarely in a leadership position in the state. The bank's investments were primarily focused on affordable housing, with the investments consisting of qualifying mortgage-backed securities and projects qualifying for low-income housing tax credits. Qualified donations during the review period served an array of purposes, with the majority benefitting organizations that perform qualified community services targeted to low- or moderate-income individuals.

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[4] Forbes. "How Many Jobs Were Saved Because of PPP Loans?" forbes.com. https://www.forbes.com/advisor/loans/how-many-jobs-were-saved-because-of-ppp-loans/ (accessed March 31, 2021)

Community Development Investments and Donations Florida Assessment Areas								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	$000s	#	$000s	#	$000s	#	$000s
Full Review:								
Fort Lauderdale – West Palm Beach	18	16,555	9	10,961	114	536	141	28,052
Limited Review:								
Naples	3	526	1	12	15	64	19	602
Statewide	-	-	2	114	1	5	3	119
Total	21	17,081	12	11,087	130	605	163	28,773

Additionally, the bank provided $500,000 in investments to Lendistry, a minority led community development financial institution (CDFI) that ranks second nationwide in SBA Community Advantage lending. The funds provided to Lendistry were used by the CDFI to make loans in the Naples, FL Assessment Area, and the bank elected to have those funds considered under the Lending Test, however the impact of the investments should be noted.

Service Test

In Florida, the bank's overall Service Test rating is *High Satisfactory*.

Retail Services

The bank's retail and community development services reflect good responsiveness to the needs of the assessment area. The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals.

Distribution of Branches and ATMs Florida Assessment Areas							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	6.3	5.8	5.1	0	0.0	0	0.0
Moderate	28.4	28.1	22.4	1	14.3	1	16.7
Middle	31.1	33.0	31.6	2	28.6	2	33.3
Upper	33.1	32.9	40.6	4	57.1	3	50.0
Unknown	1.1	0.2	0.3	0	0.0	0	0.0
Total	100.0	100.0	100.0	7	100.0	6	100.0

Community Development Services

The bank provides a relatively high level of community development services. Staff provided community development services to approximately 55 organizations within the state of Florida totaling 969 hours. Particularly noteworthy is the bank's participation as board and committee members for community service organizations. During the review period, bank staff served in those capacities for 32 organizations throughout the state of Florida.

METROPOLITAN AREAS (Full-Scope Review)

Description of Operations in Fort Lauderdale – West Palm Beach, FL Assessment Area

The Fort Lauderdale – West Palm Beach, FL Assessment Area includes Broward and Palm Beach counties. Broward and Palm Beach counties make up the entirety of the Fort Lauderdale – Pompano Beach – Sunrise, FL Metropolitan Division (MD) and the West Palm Beach – Boca Raton – Boynton Beach, FL MD, respectively. These MDs, along with the Miami – Miami Beach – Kendall, FL MD (Miami-Dade County), which is excluded from the assessment area, make up the Miami–Fort Lauderdale–Pompano Beach, FL Metropolitan Statistical Area (MSA).

According to the 2010 census, the Fort Lauderdale – West Palm Beach, FL Assessment Area population was 3,068,200, which was 16.3 percent of the total population in the state of Florida. ACS 2019 population estimates reflect an assessment area population of 3,449,548, an increase of 12.4 percent since 2010. The assessment area population is distributed among several cities, with no city representing more than 6 percent of the assessment area population, and seven cities containing between 3.0 percent and 5.3 percent of the total assessment area population.

Population Changes Fort Lauderdale – West Palm Beach, FL Assessment Area			
County	2019 Population Estimate	% Increase Since 2010	Major Municipalities
Broward County	1,952,778	13.4	Fort Lauderdale*, Pembroke Pines, Hollywood, Miramar, Coral Springs
Palm Beach County	1,496,770	11.7	West Palm Beach*, Boca Raton, Daytona Beach

*Denotes County Seat

As of December 31, 2020, the bank operated six branches in the assessment area representing 1.4 percent of its total branches. None of the branches are located in low-income census tracts. One branch is in a moderate-income census tract, two are in middle-income census tracts, and three are located in upper-income tracts.

According to the FDIC, as of June 30, 2020, the bank had $281 million in deposits in the Fort Lauderdale – West Palm Beach, FL Assessment Area, representing 0.41 percent of the bank's total deposits. This also represents a market share of 0.2 percent, which includes all other FDIC-insured deposits that are located within the assessment area. The bank ranks 33rd out of 61 total FDIC-insured institutions in the assessment area. Bank of America holds the largest deposit market share at 20.3 percent, followed by Wells Fargo Bank at 18.6 percent, and JPMorgan Chase Bank at 11.3 percent.

In 2018, there were 902 financial institutions that reported HMDA data in the Fort Lauderdale – West Palm Beach, FL Assessment Area. The bank ranked 100th in HMDA market share with 0.1 percent of total HMDA-reportable originations and purchases. Wells Fargo Bank and Quicken Loans led the market with 8.5 percent and 4.8 percent of market share, respectively. In 2019, 945 institutions reported HMDA data in the assessment area. Comerica Bank ranked 124th in market share with less than 0.1 percent of the market. United Shore Financial Service and Wells Fargo led the market with 6.6 percent and 6.5 percent of the market, respectively. Many of the

bank's competitors are statewide and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area.

For 2018, there were 214 financial institutions that reported CRA small business lending data in the Fort Lauderdale – West Palm Beach, FL Assessment Area. The bank ranked 53rd with less than 0.1 percent of total CRA-reportable originations and purchases during the year. American Express National Bank and Bank of America dominated the market with 26.7 percent and 15.3 percent of the market share, respectively. During 2019, 204 institutions reported CRA data in the assessment area. Comerica again ranked 53rd, with less than 0.1 percent of the market share. In 2019, American Express National Bank and Bank of America led the market with 27.1 percent and 15.9 percent of the market, respectively. Many of the bank's competitors are statewide and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

During the review period, the Fort Lauderdale – West Palm Beach, FL Assessment Area was made up of 669 census tracts. Of the total tracts, 41 (6.1 percent) were classified as low-income, 196 (29.3 percent) were moderate-income, 205 (30.6 percent) were middle-income, 220 (32.9 percent) were upper-income, and the remaining seven tracts (1.0 percent) were designated as having an unknown income level.

Demographics and economic information impacting the bank's performance context are discussed below.

Income Characteristics

For purposes of classifying borrower income, this evaluation utilizes 2015 U.S. Census estimated data. The following chart reflects the estimated median family income for the review period for the Fort Lauderdale – West Palm Beach, FL Assessment Area. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to available data, approximately 10.9 percent of families in the assessment area lived below the poverty level.

Median Family Income Fort Lauderdale – West Palm Beach, FL Assessment Area		
Income Level	2018	2019
Median Family Income	$65,700	$68,600
Low-income	< $32,850	< $34,300
Moderate-income	$32,850 < $52,560	$34,300 < $54,880
Middle-income	$52,560 < $78,840	$54,880 < $82,320
Upper-income	≥ $78,840	≥ $82,320

Housing Characteristics

According to 2015 census estimates, there were a total of 1,443,810 housing units in the Fort Lauderdale – West Palm Beach, FL Assessment Area. Of the total housing in the assessment area, 53.2 percent of the units were classified as owner-occupied units, 27.7 percent were rental units, and the remaining 19.1 percent were vacant.

Low-income census tracts contained 5.4 percent of the total housing stock in the assessment area. The majority of housing units in the low-income census tracts (51.1 percent) were rental units, with the remainder split between owner-occupied units (27.7 percent) and vacant units (21.2 percent). The median age of all units in these tracts was 44 years with a median housing value of $84,990. Monthly mortgage payments for a 30-year loan at 3.85 percent interest[5] on a $84,990 home were approximately $319. While this could be considered affordable compared to the median gross rent in low-income census tracts of $968, barriers to home purchase such as down-payment requirements may impede home ownership. Additionally, 35.4 percent of families in low-income census tracts within the assessment area had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income census tracts accounted for 28.5 percent of the total housing stock in the assessment area according to 2015 data. The largest portion of these units, 45.9 percent, were classified as owner-occupied, while 34.2 percent were rental units, and 19.9 percent were vacant. The housing stock in moderate-income census tracts in the assessment area had a median age of 45 years and median value of $98,123. A 30-year fixed-rate loan with an interest rate of 3.85 percent would have a monthly mortgage payment of approximately $460. This is more affordable than the reported median gross rent in these tracts of $1,060. However, for the 17.7 percent of families in these census tracts which reported incomes below poverty level, qualifying for a mortgage may be difficult.

A large portion of the housing stock in the assessment area, 32.4 percent, was located in middle-income census tracts. In these tracts, the majority of units, 55.6 percent were owner-occupied, 27.7 percent were rental units, and 16.7 percent were vacant. The units in middle-income tracts were younger than those in low- or moderate-income tracts, with a median age of 38 years. According to 2015 data, the median housing value in middle-income tracts was $168,852.

The largest portion of the assessment area's housing stock, at 33.6 percent, was in upper-income tracts. Most units in these tracts were owner-occupied, representing 61.2 percent of total units, with 18.5 percent categorized as rental units, and 20.3 percent were vacant. The median age of the housing stock in upper-income census tracts was 34 years, with a median value of $326,113.

Employment and Economic Conditions

Unemployment rates for Broward and Palm Beach counties are lower than the national unemployment average, and similar to the annual unemployment rates for the state of Florida. The national average unemployment rates in 2018 and 2019 were 3.9 percent and 3.7 percent, respectively. Unemployment rates for every level decreased from 2018 to 2019 before increasing drastically in 2020. This rise in unemployment is attributable to the impact of the COVID-19 pandemic on the U.S. economy.

The following chart shows unemployment rates relevant to the assessment area for the lending and community development review periods, 2018 through 2020.

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[5] Available historical data from FreddieMac on 30-Year Fixed-Rate Mortgages indicate an Annual Average rate of 3.85 percent in 2015. http://www.freddiemac.com/pmms/pmms30.html

Annual Average Unemployment Rate Fort Lauderdale – West Palm Beach, FL Assessment Area			
AREA	2018	2019	2020
Broward County	3.4	3.0	8.6
Palm Beach County	3.6	3.3	7.7
Assessment Area	3.5	3.1	8.2
State of Florida	3.6	3.1	7.7
United States	3.9	3.7	8.1

The Fort Lauderdale – West Palm Beach, FL Assessment Area is one of the larger population centers of Florida; 16.3 percent of the state's population resides within the assessment area, and Broward and Palm Beach counties are the second and third most populous counties in the state, respectively. The Fort Lauderdale – Pompano Beach – Sunrise, FL MD (Broward County) and the West Palm Beach – Boca Raton – Boynton Beach, FL MD (Palm Beach County) had 2019 gross domestic products (GDPs) of $115 billion (ranked 20th among U.S. MDs) and $87 billion (ranked 23rd), respectively[6].

The assessment area economy is diverse, with major employers representing a wide range of industries from education to health care, manufacturing, and agriculture. Tourism remains one of the largest industries in the area, with more than 20 million visitors traveling to the assessment area annually and generating approximately $16 billion in revenue.

Community Contacts and Community Development Opportunities

As part of the evaluation of the Fort Lauderdale – West Palm Beach, FL Assessment Area, one community contact involved in affordable housing was made. The contact highlighted the need for additional affordable housing, financial literacy, small business education, and economic development in the assessment area.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

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[6] U.S. Bureau of Economic Analysis. "Gross Domestic Product by County and Metropolitan Area" BEA.gov. https://apps.bea.gov/iTable/drilldown.cfm?reqid=70&stepnum=40&Major_Area=8& State=8&Area=XX&TableId=501&Statistic=1&Year=2019&YearBegin=-1&Year_End=- 1&Unit_Of_Measure=Levels&Rank=1&Drill=1&nRange=5 (accessed February 23, 2021)

Comerica Bank   CRA Performance Evaluation
Dallas, Texas   February 8, 2021
Fort Lauderdale – West Palm Beach, FL Assessment Area

Combined Demographics Report

Assessment Area: FL - Fort Lauderdale-West Palm Beach

Income Categories	Tract Distribution #	%	Families by Tract Income #	%	Families < Poverty Level as % of Families by Tract #	%	Families by Family Income #	%
Low-income	41	6.1	35,229	4.8	12,467	35.4	164,967	22.6
Moderate-income	196	29.3	193,594	26.5	34,224	17.7	127,349	17.4
Middle-income	205	30.6	237,964	32.6	21,248	8.9	134,575	18.4
Upper-income	220	32.9	263,243	36	11,614	4.4	303,897	41.6
Unknown-income	7	1	758	0.1	99	13.1	0	0
Total Assessment Area	**669**	**100.0**	**730,788**	**100.0**	**79,652**	**10.9**	**730,788**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	78,121	21,666	2.8	27.7	39,924	51.1	16,531	21.2
Moderate-income	411,326	188,905	24.6	45.9	140,621	34.2	81,800	19.9
Middle-income	467,122	259,765	33.8	55.6	129,493	27.7	77,864	16.7
Upper-income	485,253	296,803	38.6	61.2	89,867	18.5	98,583	20.3
Unknown-income	1,988	851	0.1	42.8	599	30.1	538	27.1
Total Assessment Area	**1,443,810**	**767,990**	**100.0**	**53.2**	**400,504**	**27.7**	**275,316**	**19.1**

	Total Businesses by Tract #	%	Businesses by Tract & Revenue Size					
			Less Than or = $1 Million #	%	Over $1 Million #	%	Revenue Not Reported #	%
Low-income	14,887	5.3	13,220	5.1	1,543	9.9	124	4.3
Moderate-income	65,501	23.4	60,815	23.2	4,224	27.1	462	16
Middle-income	86,075	30.7	81,266	31.1	4,093	26.2	716	24.7
Upper-income	112,791	40.3	105,550	40.4	5,661	36.3	1,580	54.6
Unknown-income	833	0.3	732	0.3	88	0.6	13	0.4
Total Assessment Area	**280,087**	**100.0**	**261,583**	**100.0**	**15,609**	**100.0**	**2,895**	**100.0**
	Percentage of Total Businesses:		**93.4**		**5.6**		**1.0**	

	Total Farms by Tract #	%	Farms by Tract & Revenue Size					
			Less Than or = $1 Million #	%	Over $1 Million #	%	Revenue Not Reported #	%
Low-income	49	3.9	47	3.8	2	5.1	0	0
Moderate-income	192	15.1	185	15	7	17.9	0	0
Middle-income	373	29.4	363	29.5	10	25.6	0	0
Upper-income	651	51.3	631	51.3	20	51.3	0	0
Unknown-income	5	0.4	5	0.4	0	0	0	0
Total Assessment Area	**1,270**	**100.0**	**1,231**	**100.0**	**39**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**96.9**		**3.1**		**.0**	

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

Lending activity in the Fort Lauderdale – West Palm Beach, FL Assessment Area reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

The bank is both a small business and HMDA lender. During the review period, the bank reported 250 (64.4 percent) compared to 138 (35.6 percent) small business loans in the Fort Lauderdale – West Palm Beach, FL Assessment Area. Therefore, HMDA lending was given greater weight in determining the bank's Lending Test rating in the assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

<u>Lending to Borrowers of Different Income Levels and Businesses of Different Sizes</u>

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. As previously mentioned, HMDA lending received the greatest weight when determining overall ratings. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered excellent when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

The bank's HMDA lending to low-income borrowers in the Fort Lauderdale – West Palm Beach, FL Assessment Area is excellent. In 2018, the bank originated 26 loans to low-income borrowers, representing 17.2 percent of HMDA-reportable loans (7.1 percent by dollar volume) in the assessment area. While this performance did not meet the 22.6 percent of assessment area families that were classified as low-income, the bank outperformed aggregate lenders, which originated only 4.0 percent of HMDA-reportable loans (1.7 percent by dollar) to low-income borrowers in 2018. The bank's performance declined in 2019, originating nine HMDA loans (9.1 percent) to low-income borrowers, accounting for only 3.7 percent by dollar volume. However, the bank continues to out-perform aggregate lenders which originated 3.7 percent of HMDA loans (1.6 percent by dollar) to low-income borrowers.

Comerica's HMDA lending to moderate-income borrowers in the Fort Lauderdale – West Palm Beach, FL Assessment Area is excellent. In 2018, 54 loans, representing 35.5 percent of HMDA-reportable loans in the assessment area (19.2 percent by dollar volume) to moderate-income borrowers. This performance well outpaced aggregate lenders, which originated 13.4 percent of

HMDA loans by number, and 7.3 percent by dollar volume, to moderate-income borrowers. Additionally, the bank's performance was above the 17.4 percent of assessment area families classified as moderate-income. In 2019, the bank again outperformed aggregate lenders and demographic data, originating 32.3 percent of HMDA-reportable loans by number and 18.2 percent by dollar volume to moderate-income borrowers. During the same period, aggregate lenders originated 13.5 percent by number and 7.3 percent by dollar volume to moderate-income borrowers.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. This assessment area represents only 1.1 percent of the bank's total small business lending during the review period.

In 2018, the bank originated 32.0 percent of its loans, representing 29.6 percent by dollar volume, to businesses with gross annual revenue of $1 million or less. Aggregate CRA lenders originated 46.1 percent (29.6 percent by dollar) to small businesses during the same period. In 2018, the bank again lagged behind aggregate lenders, originating 36.5 percent of loans (22.4 percent by dollar) to small businesses while aggregate lenders originated 47.7 percent of loans (31.1 percent by dollar) to small businesses. In both 2018 and 2019, available data indicates that 93.4 percent of all businesses in the Fort Lauderdale – West Palm Beach, FL Assessment Area reported gross annual revenues of $1 million or less.

Of the total 138 small business loans originated by the bank in the assessment area during the review period, 25.4 percent were reported as being to businesses with unknown revenues. The regulations do not require institutions to request or consider revenue information when making a loan; however, the material portion of small business loans without revenue information may impact overall distribution of loans. The institution indicated that many of the unknown revenue loans reported were from the bank's commercial credit card product which are likely to be originated to borrowers with gross annual revenues over $1 million. The bank's credit card program which is more likely to be utilized by small businesses is offered through the bank's partnership with Elan Financial Services and is therefore not reported by the institution as CRA lending.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a significant portion of the bank's small business loans were made in loan amounts of $100,000 or less. In 2018, 42.7 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (compared to 96.3 percent of aggregate small business loans), with another 21.3 percent in loan amounts between $100,000 and $250,000 (2.1 percent of aggregate). In 2019, 30.2 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (96.4 percent of aggregate), and 20.6 percent in loan amounts between $100,000 and $250,000 (2.2 percent of aggregate).

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into

consideration. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects good penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank made very few multi-family loans or other purpose lines of credit in the Fort Lauderdale – West Palm Beach, FL Assessment Area during the review period, these product lines were not significant and not analyzed separately

Home Purchase Lending

The bank's geographic distribution of home purchase lending in the Fort Lauderdale – West Palm Beach, FL Assessment Area during the review period is excellent.

Only 2.8 percent of owner-occupied units were located within these tracts during the review period, indicating a lower demand for home purchase loans than in other tracts. In 2018, the bank originated only one home purchase loan in a low-income census tract, representing 1.6 percent of the total home purchase loans (1.3 percent by dollar) in the assessment area. This is comparable to the performance of aggregate lenders, which originated only 2.7 percent by number and 1.8 percent by dollar in these tracts. In 2019, the bank's performance improved, originating 8.6 percent by number (6.6 percent by dollar) in low-income census tracts. This was greater than the performance of aggregate lenders, which originated 2.8 percent by number and 1.9 percent by dollar in low-income census tracts in 2019.

In 2018, the bank originated 57.4 percent of its Fort Lauderdale – West Palm Beach, FL Assessment Area home purchase loans in middle-income census tracts (45.8 percent by dollar), which is significantly more than the 24.6 percent of owner-occupied units in these tracts. Additionally, the bank's 2018 performance more than doubled that of aggregate lenders, which originated 24.5 percent by number and 17.3 percent by dollar in moderate-income census tracts. The bank excelled again in 2019, originating 68.6 percent by number and 57.3 percent by dollar in moderate-income census tracts, compared to aggregate lending levels of 25.0 percent (17.8 percent by dollar).

The distribution of the remainder of home purchase lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

The bank's geographic distribution of home refinance lending in the Fort Lauderdale – West Palm Beach, FL Assessment Area during the review period is good.

During the review period, 2.8 percent of owner-occupied units were located in low-income tracts. The bank originated 5.9 percent of home refinance loans (1.7 percent by dollar) in low-income tracts, outpacing both demographics and aggregate lending performance at 2.2 percent of refinance loans (1.5 percent by dollar). The bank's performance in 2019 was similarly above

aggregate data; originating 7.7 percent of refinance loans (3.4 percent by dollar) in low-income tracts, compared to aggregate lenders 1.9 percent of loans and 1.4 percent by dollar.

In 2018, the bank outperformed aggregate lending data, originating 37.3 percent of refinance loans (17.0 percent by dollar) in moderate-income tracts compared to aggregate lenders' 20.2 percent of loans (13.6 percent by dollar) in these tracts. The bank's performance compared favorably to demographics, as 24.6 percent of owner-occupied units were in moderate-income tracts during the review period. In 2019, the bank's performance fell below aggregate lender performance. The bank originated 14.3 percent of home refinance loans (14.1 percent by dollar) in moderate-income tracts while aggregate lenders originated 15.5 percent of home refinance loans (10.4 percent by dollar) in these tracts.

The distribution of the remainder of home refinance lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Improvement Lending

The bank's geographic distribution of home improvement lending in the Fort Lauderdale – West Palm Beach, FL Assessment Area during the review period is good.

The bank originated a total of 27 home improvement loans during the review period in the Fort Lauderdale – West Palm Beach assessment area, significantly fewer than home purchase or refinance originations during this period. Low-income census tracts contained 2.8 percent of the owner-occupied units in the assessment area. Despite this low percentage of owner-occupied units, aggregate lenders struggled to meet this level or performance. In 2018, aggregate lenders originated 1.6 percent of home improvement loans in low-income tracts (1.2 percent by dollar). Aggregate performance dropped in 2019, when aggregate lenders originated only 1.3 percent of home improvement loans (0.9 percent by dollar) in low-income tracts. Aggregate performance is indicative of the low demand for this loan product in low-income census tracts.

In 2018, the bank originated 30.8 percent of its home improvement loans in moderate-income tracts (35.5 percent by dollar), while aggregate lenders originated 15.5 percent or home improvement loans (10.4 percent by dollar) in these tracts. The bank outperformed both aggregate lenders and demographic information, as 24.6 percent of owner-occupied units were in moderate-income tracts during the review period. In 2019, the bank's performance fell below demographics, originating 14.3 percent of home improvement loans (14.1 percent by dollar) in moderate-income tracts. This performance remained comparable to aggregate lenders, which originated 15.5 percent of home improvement loans (10.4 percent by dollar) in moderate-income tracts.

The distribution of the remainder of home improvement lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

In 2018, the bank originated 6.7 percent of small business loans (7.2 percent by dollar volume) in low-income census tracts; performing comparably to aggregate lenders, which originated 5.7 percent of small business loans (7.9 percent by dollar) in low-income tracts. In 2019, the bank outperformed both aggregate lenders and demographic data, originating 11.1 percent of small business loans (16.8 percent by dollar) in low-income tracts, while these tracts contained 5.3 percent of assessment area businesses. Further, in 2019, aggregate lenders originated 5.9 percent of small business loans (7.6 percent by dollar) in low-income tracts.

In 2018, the bank originated 24.0 percent of small business loans (20.9 percent by dollar) in moderate-income census tracts, which contained 23.4 percent of assessment area businesses during the review period. This performance is comparable to aggregate lenders, which originated 22.3 percent of small business loans (23.8 percent by dollar) in these tracts. In 2019, the bank's performance fell slightly, originating 19.0 percent of small business loans (12.9 percent by dollar) in moderate-income tracts, while aggregate lenders originated 23.5 percent of loans (24.0 percent by dollar) in these tracts.

The distribution of the remainder of small business lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies. The bank's small business lending in middle- and upper-income tracts was comparable to the percentages of businesses in these areas. When compared to aggregate lending data, the bank originated comparable levels of loans in these tracts during the review period.

Community Development Lending

In the Fort Lauderdale – West Palm Beach Assessment Area, the bank makes a relatively high level of community development loans. During the review period, the bank originated a total of 18 community development loans for $9.4 million in the assessment area. Additionally, one loan benefitting the statewide area provided $1 million to affordable housing efforts.

The community development loans originated in the Fort Lauderdale – West Palm Beach, FL Assessment Area during the evaluation period were split between affordable housing and revitalization and stabilization efforts. The table below summarizes the bank's community development lending. Several of the community development loans (seven loans totaling $7.9 million) were associated with the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. The bank's participation in this program reflects responsiveness to the needs of the community. Additionally, the bank's performance represents a substantial increase since the institution's previous CRA evaluation.

Community Development Lending Fort Lauderdale – West Palm Beach, FL Assessment Area		
Purpose	Number	$(000s)
Affordable Housing	11	1,528
Revitalize and Stabilize	7	7,886
Total	18	9,414

Investment Test

The bank has an excellent level of qualified community development investments and grants, though the bank is rarely in a leadership position in the assessment area. The bank's investments were focused on affordable housing, with the investments consisting of qualifying mortgage-backed securities and projects qualifying for low-income housing tax credits. Qualified donations during the review period served an array of purposes, with the majority benefitting organizations that perform qualified community services targeted to low- or moderate-income individuals.

Community Development Investments and Donations Fort Lauderdale – West Palm Beach, FL Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	$000s	#	$000s	#	$000s	#	$000s
Affordable Housing	18	16,555	9	10,961	16	56	43	27,572
Community Service	-	-	-	-	75	331	75	331
Economic Development	-	-	-	-	23	149	23	149
Total	18	16,555	9	10,961	114	536	141	28,052

The bank's investment activity in the Fort Lauderdale – West Palm Beach, FL Assessment Area increased significantly since the previous examination. The bank's focus on affordable housing has remained steady across multiple review periods and is steered by the bank's Community Development Advisory Councils' identification of affordable housing as a significant need in the assessment area.

Service Test

In Fort Lauderdale – West Palm Beach, FL Assessment Area, the bank's retail, and community development services reflect good responsiveness to the needs of the assessment area. The bank's branch hours are reasonable, and services do not vary in a way that inconveniences low- or moderate-income geographies or individuals. The bank provides a relatively high level of community development services, and delivery systems are accessible to the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's six branch offices and six ATMs as of December 31, 2020, was compared to the distribution of the population and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Fort Lauderdale – West Palm Beach, FL Assessment Area.

Distribution of Branches and ATMs Fort Lauderdale – West Palm Beach, FL Assessment Area							
Tract Income	**% of Geographies**	**% of Population**	**% of Businesses**	**Branches**		**Full Service ATMs**	
				#	**%**	**#**	**%**
Low	6.1	5.6	5.3	0	0.0	0	0.0
Moderate	29.3	28.7	23.4	1	16.7	1	16.7
Middle	30.6	32.4	30.7	2	33.3	2	33.3
Upper	32.9	33.1	40.3	3	50.0	3	50.0
Unknown	1.0	0.2	0.3	0	0.0	0	0.0
Total	100.0	100.0	100.0	6	100.0	6	100.0

While the bank only operates a single branch within a LMI census tract in the Fort Lauderdale – West Palm Beach, FL Assessment Area, two of the branches located in upper-income census tracts are within one mile of LMI tracts.

The bank did not open or close any branches in the assessment area during the review period. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are basically the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and as trustees, for 19 community development financial organizations offering community development services that aided LMI individuals. Total hours served during the review period was approximately 853 hours.

METROPOLITAN AREA (Limited-Scope Review)

Description of Operations

- **Naples – Marco Island MSA Assessment Area**
  - As of December 31, 2020, the bank operated one branch in the assessment area, representing 0.2 percent of its total branches.
  - As of June 30, 2020, the bank had $26.0 million in deposits in this assessment area, representing a market share of 0.14 percent. The $26.0 million also represents 0.04 percent of the bank's total deposits.

Conclusions with Respect to Performance Tests

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. Conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix G for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited-scope assessment areas can be found in Appendix D.

Assessment Area	Lending Test	Investment Test	Service Test
Naples – Marco Island	Below	Consistent	Below

The institution's Lending Test performance in the limited-scope assessment area is below the institution's performance in the state. However, the bank's state level rating is not altered by this performance. The bank's investment performance in the area is consistent with the institution's performance in the state. Service test performance is below the institution's performance in the state; however, it does not change the rating for the state.

State of Michigan

CRA Rating for Michigan: Satisfactory
The Lending Test is Rated: High Satisfactory
The Investment Test is Rated: High Satisfactory
The Service Test is Rated: High Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- The bank's lending activity reflects good responsiveness to assessment areas' credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas.
- The distribution of HMDA lending reflects good penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- Comerica is a leader in making community development loans in the state.
- The bank makes use of innovative and/or flexible lending practices in serving assessment areas' needs.
- The bank has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors and is often in a leadership position.
- Comerica exhibits good responsiveness to credit and community development needs.
- The bank's delivery systems are accessible to the geographies and individuals of different income levels in the assessment areas.
- The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services offered by the bank do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of community development services.

Scope

Two assessment areas were selected for full-scope reviews based on the volume of lending, number of branches, and percent of total deposits, as well as the length of time since the last full-scope review. Overall, approximately 75.3 percent of lending activity (by number of loans), 91.7 percent of the total deposits, and 75.7 percent of total branches within Michigan were evaluated through the full-scope reviews. The following assessment areas, were reviewed using full-scope procedures. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Lansing – East Lansing, MI Assessment Area
- Southeast Michigan Assessment Area

In addition, limited-scope reviews were conducted for the remaining nine assessment areas, including:

- Ann Arbor, MI Assessment Area
- Battle Creek, MI Assessment Area
- Fenton, MI Assessment Area
- Grand Rapids – Wyoming, MI Assessment Area
- Jackson, MI Assessment Area
- Kalamazoo, MI Assessment Area
- Lenawee County, MI Assessment Area
- Midland, MI Assessment Area
- Muskegon, MI Assessment Area

The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report. The bank's performance in the Southeast Michigan Assessment Area was given greater consideration because this assessment area is a strategic focus of the institution and is home to the majority of bank activity in the state of Michigan.

Description of Institution's Operations in Michigan

The bank operates 189 branch offices in its assessment areas in Michigan, representing 43.8 percent of total branches. As of June 30, 2020, the bank had $35.5 billion in deposits in the state, representing 51.8 percent of total deposits. According to the June 30, 2020 FDIC Summary of Deposits, the bank had a deposit market share of 12.5 percent and ranked second out of 114 FDIC-insured financial institutions across the state. Of the 13,131 HMDA loans originated and purchased by the bank, 4,879 (37.2 percent) were in the Michigan assessment areas. Of the 13,919 small business loans originated and purchased by the bank, 6,086 (43.7 percent) were in the bank's Michigan assessment areas.

Conclusions with Respect to Performance Tests in Michigan

Lending Test

In Michigan, the bank's overall Lending Test rating is *High Satisfactory*. Lending activity reflects good responsiveness to the credit needs of the assessment areas. The geographic distribution of loans reflects excellent penetration throughout the assessment areas. The distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

During the review period, the bank reported 6,086 (55.4 percent) small business loans in Michigan assessment areas, compared to 4,879 (44.4 percent) HMDA loans. Therefore, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the state. While the bank also makes small farm loans, the volume is minimal and not considered in the overall evaluation of the bank's CRA performance.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices F, G, and H.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size:

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas considers; the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home mortgage loans to low-, moderate-, middle-, and upper-income individuals; small-business loans to businesses with gross annual revenues of $1 million or less; and small-business loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. Of the two full-scope assessment areas, borrower distribution within one is good and the other is adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

The geographic distribution of loans reflects excellent penetration throughout the assessment areas. Of the two full-scope assessment areas, geographic distribution of the bank's HMDA and small business lending in one is considered excellent and activity in the other is considered good. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

Community Development Lending

In Michigan, the bank is a leader in making community development loans. During the review period, the bank originated 427 community development loans for $764.3 million in Michigan representing 43.8 percent of the bank's total community development loans and 40.3 percent by total dollar amount, respectively.

The community development loans originated during the evaluation period were for a variety of purposes, though lending to revitalize and stabilize low- or moderate-income geographies made up the largest percentage of the bank's qualified community development lending. The table below summarizes the bank's community development lending.

Community Development Lending Michigan Assessment Areas		
Purpose	Number	$(000s)
Affordable Housing	12	46,156
Community Services	111	188,345
Economic Development	35	114,418
Revitalize and Stabilize	269	415,409
CD Lending Total	427	764,328

In addition, during the review period, the bank made investments which enabled CDFIs to originate community development loans which benefitted assessment areas within the state of Michigan. The bank's pro rata share of the CDFIs' lending totaled approximately $1.6 million. The bank's engagement with CDFIs in Michigan enables investment dollars to be used multiple times to support community development activity and is representative of the bank's responsiveness to the credit needs of its assessment areas.

The bank made use of innovative and flexible lending practices in serving the needs of the bank's Michigan assessment areas. During the review period, the bank's lending in the state of Michigan included several programs specifically targeted toward LMI borrowers and small businesses. This includes a significant level of SBA guaranteed loan originations, as well as Small Business Micro Loan originations, and HomeReady™ Mortgages by Fannie Mae. These products are described in the Institution section above. During the review period, 46.5 percent of the bank's Small Business Micro Loans, 75 percent of the HomeReady™ Mortgages, and 90 percent of the FHA and VA loans originated by the bank were in the state of Michigan.

Investment Test

In Michigan, the bank's overall Investment Test rating is *High Satisfactory*. The bank has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors and is often in a leadership position. The table below summarizes the bank's community development investments and grants by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Investments and Donations Michigan Assessment Areas								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	$000s	#	$000s	#	$000s	#	$000s
Full Review:								
Lansing - East Lansing	4	3,209	10	7,974	41	112	55	11,295
Southeast Michigan	49	56,589	36	54,623	637	4,799	722	116,011
Limited Review:								
Ann Arbor	3	2,342	6	6,177	39	138	48	8,657
Battle Creek	-	-	4	1,490	21	48	25	1,538
Fenton	1	2,000	1	548	14	54	16	2,602
Grand Rapids - Wyoming	7	9,463	12	9,978	110	333	129	19,774
Jackson	2	5,126	3	3,463	25	91	30	8,680
Kalamazoo	3	6,332	2	5	38	81	43	6,418
Lenawee County	-	-	1	142	3	8	4	150
Midland	-	-	1	315	23	36	24	351
Muskegon	1	2,000	1	2,088	22	53	24	4,141
Multiple Michigan AAs	-	-	3	8	-	-	3	8
Statewide	1	350	3	22	8	16	12	388
Total	**71**	**87,411**	**83**	**86,833**	**981**	**5,769**	**1,135**	**180,013**

In addition to these state-specific investments and donations, the bank made two investments (totaling approximately $6,000) and five donations (approximately $708,000) which benefitted affordable housing efforts and community services in multiple regions, including within the state of Michigan.

During the review period, the bank made occasional use of innovative investments to support CD initiatives and exhibited good responsiveness to the needs of the bank's Michigan assessment areas. The bank made sizable deposits in the only Minority Depository Institution in Detroit, Michigan, and

enhanced relationships with other CDFIs in the state in an effort to enable the CDFIs to further address identified needs in the bank's assessment areas.

Service Test

In Michigan, the bank's overall Service Test rating is *High Satisfactory*.

Retail Services

The bank's Service Test performance is good. Its retail and community development services reflect good responsiveness to the needs of the assessment area. The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The table below shows the distribution of the bank's Michigan branches and full service ATMs, compared to demographic information from the bank's Michigan assessment areas.

Distribution of Branches and ATMs Michigan Assessment Areas							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	12.6	9.5	7.2	11	5.8	30	11.0
Moderate	23.0	20.6	18.5	47	24.9	75	27.5
Middle	34.5	37.5	35.9	60	31.7	70	25.6
Upper	27.7	31.6	37.5	69	36.5	90	33.0
Unknown	2.2	0.8	0.9	2	1.1	8	2.9
Total	100.0	100.0	100.0	189	100.0	273	100.0

Community Development Services

The bank provides a relatively high level of community development services. Staff provided community development services to approximately 215 organizations within the state of Michigan, totaling 6,181 hours. Particularly noteworthy is the bank's participation as board and committee members for community service organizations. During the review period, bank staff served in those capacities for 82 organizations throughout the state of Michigan. The bank also participated in numerous financial literacy initiatives with LMI schools throughout the state. During the review period, when the bank's Michigan assessment areas were impacted by the COVID-19 pandemic, the bank was able to pivot and offer many of their community development services via web-based media. This allowed the bank to continue to serve its Michigan assessment areas, even when face-to-face services were not possible.

An analysis of the community development services delivered in each full-scope assessment area can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

METROPOLITAN AREAS (Full-Scope Review)

Description of Operations in Lansing – East Lansing, MI Assessment Area

The Lansing – East Lansing, MI Assessment Area includes Clinton, Eaton, and Ingham counties in the southern portion of the state. These counties, along with Shiawassee County, which is excluded from the assessment area, make up the Lansing – East Lansing, MI MSA.

According to the 2010 census, the Lansing – East Lansing, MI Assessment Area had a population of 464,036, which was 4.7 percent of the total population of the state of Michigan. ACS 2019 population estimates reflect an assessment area population of 482,269 (4.8 percent of the total population of Michigan), an increase of 3.9 percent since 2010, a growth rate comparable to the statewide population growth of 1.0 percent during the same period. According to 2019 estimates, 24.5 percent of the assessment area population is contained with the city of Lansing, Michigan.

Population Changes Lansing – East Lansing, MI Assessment Area			
County	2019 Population Estimate	% Increase Since 2010	Major Municipalities
Clinton County	79,595	5.6	St. Johns*
Eaton County	110,268	2.3	Charlotte*
Ingham County	292,406	4.1	Lansing, East Lansing, Mason*

* Denotes County Seat

As of December 31, 2020, the bank operated seven branches in the assessment area, representing 1.6 percent of its total branches. Of the total, none are located in low-income census tracts, four branches (57.1 percent) are in moderate-income census tracts, two (28.6 percent) are in middle-income census tracts, and one branch (14.3 percent) is located in an upper-income tract.

According to the FDIC, as of June 30, 2020, the bank had $606.3 million in deposits in the Lansing – East Lansing, MI Assessment Area, representing 0.9 percent of the bank's total deposits. The bank ranks seventh out of 20 total FDIC-insured institutions in the assessment area, with a market share of 7.4 percent. First National Bank of America holds the largest deposit market share at 16.4 percent, followed by PNC Bank, with a market share of 13.0 percent.

In 2018, there were 325 financial institutions that reported a total of 11,719 HMDA loans in the Lansing – East Lansing, MI Assessment Area. The bank ranked 46th in HMDA market share with 0.3 percent of total HMDA-reportable originations and purchases. Michigan State University Federal Credit Union and The Dart Bank led the market with 11.0 percent and 7.7 percent of market share, respectively. In 2019, 345 institutions reported a total of 13,233 HMDA loans in the assessment area. Comerica Bank ranked 41st in market share with 0.4 percent of the market. Michigan State University Federal Credit Union and The Dart Bank again led the market with 11.5 percent and 8.5 percent of the market, respectively. Though the market is saturated, it does not appear that competition has adversely affected the bank's ability to serve its assessment area.

For 2018, there were 78 financial institutions that reported CRA small business lending data in the Lansing – East Lansing, MI Assessment Area. The bank ranked 14th with 1.6 percent of total CRA-reportable originations and purchases during the year. American Express and JPMorgan Chase Bank led the market with 16.0 percent and 12.3 percent of the market share, respectively. In 2019, 83 institutions reported CRA data in the assessment area. Comerica ranked 15th, with 1.2 percent of the market share. In 2019, American Express and JPMorgan Chase again led the market with 16.9 percent and 16.2 percent of the market, respectively. It does not appear as though competition adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Lansing – East Lansing, MI MSA as a whole, but not for the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area, as the population of the assessment area includes 87.6 percent of the total MSA population.

During the review period, the Lansing – East Lansing, MI Assessment Area was made up of 131 census tracts. Of those, nine tracts (6.9 percent) were classified as low-income, 27 (20.6 percent) were moderate-income, 52 (39.7 percent) were middle-income, 34 (26.0 percent) were upper-income, and the remaining nine tracts (6.9 percent) were designated as having an unknown income level.

Income Characteristics

For the purposes of classifying borrower income, the FFIEC estimated median family income for the MSA is utilized. The following chart reflects the estimated median family income for the MSA during the review period, as well as a range of the estimated annual family income for each income category (low, moderate, middle, and upper). Additionally, it should be noted that according to available data, approximately 10.9 percent of assessment area families lived below the poverty level.

Median Family Income Lansing – East Lansing, MI Assessment Area		
Income Level	**2018**	**2019**
Median Family Income	$73,900	$72,800
Low-income	< $36,950	< $36,400
Moderate-income	$36,950 < $59,120	$36,400 < $58,240
Middle-income	$59,120 < $88,680	$58,240 < $87,360
Upper-income	≥ $88,680	≥ $87,360

Housing Characteristics

According to 2015 census estimates, there were a total of 199,711 housing units in the Lansing – East Lansing, MI Assessment Area. Of the total housing units in the assessment area, 59.1 percent of the units were classified as owner-occupied units, 32.5 percent were rental units, and 8.4 percent were vacant units.

Low-income census tracts contained 6.7 percent of the total housing stock in the assessment area. The majority of housing units in the low-income census tracts (62.1 percent) were rental

units, with the remainder split between owner-occupied units (20.3 percent) and vacant units (17.5 percent). The housing units in low-income tracts have a median age of 61 years, significantly older than the overall assessment area median housing age of 48 years. The median value of these units is $57,079, which equate to a monthly mortgage payment of approximately $214 for a 30-year loan at 3.85 percent interest[7] with a 20 percent down payment. While this could be considered affordable compared to the median gross rent in low-income census tracts of $726, barriers to home purchase such as down-payment requirements may impede home ownership. With rental units representing the significant majority of the housing stock in these tracts, limited availability of owner-occupied units may also hinder those individuals and families desiring to purchase a home in these tracts. Additionally, 41.1 percent of families in low-income census tracts within the assessment area had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income census tracts accounted for 21.4 percent of the total housing stock in the assessment area according to available data. Owner-occupied units made up the largest portion of the units in these tracts (46.6 percent), closely followed by rental units (42.0 percent), with 11.4 percent classified as vacant. The housing stock in moderate-income census tracts in the assessment area had a median age of 60 years and median value of $78,052. A 30-year fixed-rate loan with an interest rate of 3.85 percent and 20 percent down would have a monthly mortgage payment of approximately $293. This is more affordable than the reported median gross rent in these tracts of $726. However, for the 22.4 percent of families in these census tracts which reported incomes below poverty level, qualifying for a mortgage may be difficult.

A large portion of the housing stock in the assessment area, 40.7 percent, was located in middle-income census tracts. In these tracts, the majority of units, 65.8 percent were owner-occupied, 26.5 percent were rental units, and 7.7 percent were vacant. The units in middle-income tracts were younger than those in low- or moderate-income tracts, with a median age of 48 years. According to 2015 data, the median housing value in middle-income tracts was $124,993.

Upper-income tracts also account for a large portion of the assessment area's housing stock, representing 30.5 percent of total units. Most units in these tracts were owner-occupied, 68.6 percent of total units, with 26.1 percent categorized as rental units, and 5.3 percent were vacant. The median age of the housing stock in upper-income census tracts was 42 years, which is younger than the housing in other tracts, with a median value of $171,863.

<u>Employment and Economic Conditions</u>

Unemployment rates in the Lansing – East Lansing, MI Assessment Area, however, were below those of the state and the national average in each year of the review period. Unemployment rates at every level rose significantly in 2020 due to the COVID-19 pandemic, more than doubling in each of the listed geographies. In the state of Michigan, the rates were consistently higher than the national average. The national average unemployment rates for 2018, 2019, and 2020 were 3.9 percent, 3.7 percent, and 8.1 percent, respectively.

The following chart shows unemployment rates relevant to the assessment area for 2018 through 2020.

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[7] Available historical data from FreddieMac on 30-Year Fixed-Rate Mortgages indicate an Annual Average rate of 3.85 percent in 2015. http://www.freddiemac.com/pmms/pmms30.html

Annual Average Unemployment Rate Lansing – East Lansing, MI Assessment Area			
AREA	**2018**	**2019**	**2020**
Eaton County	3.5	3.3	7.7
Clinton County	3.2	2.9	6.6
Ingham County	3.7	3.5	7.5
Assessment Area	**3.6**	**3.3**	**7.3**
Lansing-East Lansing, MI MSA	3.5	3.3	7.4
State of Michigan	**4.2**	**4.1**	**10.0**
United States	**3.9**	**3.7**	**8.1**

Lansing, Michigan is the state's capitol, resulting in a large number of assessment area residents being employed in the government sector. Aside from state government, the largest employment sector in the Lansing – East Lansing, MI Assessment Area is education, with Michigan State University, Lansing Community College, and several school districts employing large groups of assessment area residents.

Community Contacts and Community Development Opportunities

In conjunction with this evaluation, contact was made with an individual involved in local government and familiar with the credit needs of the Lansing – East Lansing, MI Assessment Area. This individual highlighted a need for personal financial education and indicated that courses or seminars could be offered by local financial institutions.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Combined Demographics Report

Assessment Area: MI - Lansing-East Lansing

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	6.9	4,657	4.3	1,915	41.1	22,380	20.5
Moderate-income	27	20.6	20,408	18.7	4,562	22.4	18,724	17.1
Middle-income	52	39.7	47,500	43.4	3,542	7.5	22,161	20.3
Upper-income	34	26	36,654	33.5	1,799	4.9	46,107	42.2
Unknown-income	9	6.9	153	0.1	62	40.5	0	0
Total Assessment Area	**131**	**100.0**	**109,372**	**100.0**	**11,880**	**10.9**	**109,372**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	13,332	2,713	2.3	20.3	8,280	62.1	2,339	17.5
Moderate-income	42,742	19,909	16.9	46.6	17,972	42	4,861	11.4
Middle-income	81,195	53,434	45.3	65.8	21,535	26.5	6,226	7.7
Upper-income	60,959	41,804	35.4	68.6	15,927	26.1	3,228	5.3
Unknown-income	1,483	156	0.1	10.5	1,177	79.4	150	10.1
Total Assessment Area	**199,711**	**118,016**	**100.0**	**59.1**	**64,891**	**32.5**	**16,804**	**8.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,315	7.2	1,103	6.7	205	12.8	7	4
Moderate-income	3,556	19.6	3,143	19.2	373	23.4	40	23
Middle-income	6,679	36.7	6,130	37.4	475	29.8	74	42.5
Upper-income	6,229	34.3	5,679	34.6	502	31.5	48	27.6
Unknown-income	399	2.2	353	2.2	41	2.6	5	2.9
Total Assessment Area	**18,178**	**100.0**	**16,408**	**100.0**	**1,596**	**100.0**	**174**	**100.0**
	Percentage of Total Businesses:		**90.3**		**8.8**			**1.0**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	5	0.7	5	0.7	0	0	0	0
Moderate-income	24	3.5	24	3.6	0	0	0	0
Middle-income	449	65	440	65.2	8	57.1	1	50
Upper-income	207	30	202	29.9	4	28.6	1	50
Unknown-income	6	0.9	4	0.6	2	14.3	0	0
Total Assessment Area	**691**	**100.0**	**675**	**100.0**	**14**	**100.0**	**2**	**100.0**
	Percentage of Total Farms:		**97.7**		**2.0**			**.3**

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

Lending activity reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

The bank is both a small business and HMDA lender. During the review period, the bank reported 116 (40.3 percent) HMDA-reportable loans compared to 172 (59.7 percent) small business loans in the Lansing – East Lansing, MI Assessment Area. Therefore, small business lending was given greater weight in determining the bank's Lending Test rating in the assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

The bank's HMDA lending to low-income borrowers in the Lansing – East Lansing, MI Assessment Area is good. In 2018, the bank originated 17.0 percent of HMDA-reportable loans in the assessment area to low-income borrowers (12.8 percent by dollar volume). This outpaced aggregate lenders, which originated 10.6 percent of HMDA-reportable loans (4.9 percent by dollar) to low-income borrowers. In 2019, the bank's performance fell slightly below aggregate lenders, originating 8.7 percent of HMDA loans (3.4 percent by dollar) compared to the aggregate's 9.0 percent (4.4 percent by dollar). During the review period, neither the bank, nor aggregate lenders met the level of demographics, as 20.5 percent of assessment area families were low-income.

Comerica's HMDA lending to moderate-income borrowers in the Lansing – East Lansing Assessment Area is excellent. During the review period, 17.1 percent of assessment area families were classified as moderate-income. The bank's performance was above the level of demographics in both 2018 and 2019. In 2018, the bank originated 27.7 percent of HMDA-reportable loans to moderate-income borrowers (26.9 percent), outperforming aggregate lenders' 24.1 percent of loans (16.0 percent by dollar). In 2019, the bank originated 20.3 percent of HMDA loans (8.0 percent by dollar) to moderate-income borrowers in the assessment area. This fell slightly below aggregate lenders which originated 21.5 percent of loans (14.6 percent by dollar)

to these borrowers. Despite performing slightly below aggregate in 2019, the bank's performance was consistently above demographic data and the bank's average performance across the review period is considered excellent.

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is poor. This assessment area represents only 1.4 percent of the bank's total small business lending during the review period.

In 2018, the bank originated only 18.6 percent of its small business loans, representing 11.9 percent by dollar volume, to businesses with gross annual revenue of $1 million or less. Aggregate CRA lenders originated 46.1 percent (29.4 percent by dollar) to small businesses during the same period. In 2019, the bank again lagged behind aggregate lenders, originating 14.7 percent of loans (11.9 percent by dollar) to small businesses while aggregate lenders originated 47.97 percent of loans (31.5 percent by dollar) to small businesses. In both 2018 and 2019, available data indicates that 90.3 percent of all businesses in the Lansing – East Lansing, MI Assessment Area reported gross annual revenues of $1 million or less.

Of note, a significant percentage (34.0 percent in 2018 and 32.0 percent in 2019) of loans were originated to businesses with unknown revenues. This significant portion of small business loans without revenue information may impact overall distribution of loans. The bank's small business credit card partnership with Elan Financial (discussed previously) represented a material volume of small business lending, though was not reported by the bank.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. It is noted that a large percentage of the bank's small business loans were made in loan amounts of $100,000 or less. In 2018, 61.9 percent of the bank's small business loans were originated in loan amounts of $100,000 or less, compared to 91.3 percent for the aggregate. In 2019, 48.0 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (91.8 percent for aggregate lenders).

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information and aggregate lending data. Considering all of these factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. Loans were generally made in close proximity to the bank's branches and there were no conspicuous gaps or anomalies in the lending patterns.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects adequate penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. The bank made only one multi-family loan in the Lansing – East Lansing, MI Assessment Area during the review period; therefore, this product line is not significant and not analyzed separately. Of the material HMDA products, refinance lending made up the largest portion of the bank's portfolio, representing 40.5 percent of

HMDA-reportable loans in the assessment area during the review period. Each of the remaining products represented less than 20 percent of the bank's HMDA lending in the assessment area. As a result, refinance lending was given the greatest weight when analyzing the bank's performance.

Home Purchase Lending

The bank's geographic distribution of home purchase lending in the Lansing – East Lansing, MI Assessment Area during the review period is good.

Only 2.3 percent of owner-occupied units were located within these tracts during the review period, likely indicating a lower demand for home purchase loans than in other tracts. In 2018, the bank originated no home purchase loans in low-income census tracts. During this time, aggregate lenders originated only 3.8 percent by number and 1.7 percent by dollar in these tracts. In 2019, the bank originated one home purchase loan (7.7 percent by number, 3.0 percent by dollar) in low-income census tracts. This was greater than the performance of aggregate lenders, which originated 3.0 percent by number and 1.3 percent by dollar in low-income census tracts in 2019.

In 2018, the bank originated 10.0 percent of its Lansing – East Lansing, MI Assessment Area home purchase loans in middle-income census tracts (10.3 percent by dollar). This is below the 16.9 percent of home purchase loans originated by aggregate lenders in moderate-income tracts (10.3 percent by dollar). The bank's 2019 performance improved substantially, originating 30.8 percent of Lansing – East Lansing, MI Assessment Area home purchase loans in moderate-income tracts, accounting for 18.1 percent by dollar volume. This was significantly greater than aggregate lenders, which originated 18.8 percent of loans in these tracts (11.3 percent by dollar).

The distribution of the remainder of home purchase lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

The bank's geographic distribution of home refinance lending in the Lansing – East Lansing, MI Assessment Area during the review period is good.

During the review period, 2.3 percent of owner-occupied units were located in low-income tracts. In 2018, the bank originated 4.0 percent of home refinance loans (2.7 percent by dollar) in low-income tracts, outpacing both the demographics and aggregate lending performance at 2.7 percent of refinance loans (1.2 percent by dollar). The bank's performance fell in 2019, when the bank originated no refinance loans in low-income tracts. Despite the lack of originations, the bank's performance is not far below aggregate lenders, which originated only 1.2 percent of refinance loans (0.5 percent by dollar) in these tracts. This is an indication of a lack of demand for this loan product in low-income tracts, and as a result the bank's performance is considered good.

In 2018, the bank originated 8.0 percent of refinance loans (4.4 percent by dollar) in moderate-income tracts, which contained 16.9 percent of assessment area owner-occupied units. Aggregate lenders originated 11.5 percent of refinance loans (7.0 percent by dollar) in these

tracts. In 2019, the bank's performance increased, originating 13.6 percent of refinance loans (7.3 percent by dollar) in moderate-income tracts. This is greater than the performance of aggregate lenders, which originated 10.2 percent of refinance loans (5.8 percent by dollar) in moderate-income tracts.

The distribution of the remainder of home refinance lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Improvement Lending

The bank's geographic distribution of home improvement lending in the Lansing – East Lansing, MI Assessment Area during the review period is adequate.

The bank originated a total of 22 home improvement loans during the review period in the Lansing – East Lansing, MI Assessment Area. While the bank originated no home improvement loans in low-income census tracts in 2018, the bank's overall performance is considered adequate. Low-income census tracts contained 2.3 percent of the owner-occupied units in the assessment area. Despite this low percentage of owner-occupied units, aggregate lenders struggled to meet this level or performance. In 2018, aggregate lenders originated 2.0 percent of home improvement loans in low-income tracts (1.4 percent by dollar). Aggregate performance dropped in 2019, when aggregate lenders originated only 1.3 percent of home improvement loans (0.8 percent by dollar) in low-income tracts. During this year, the bank originated 5.6 percent of home improvement loans (3.5 percent by dollar) in these same tracts. Aggregate performance is indicative of the low demand for this loan product in low-income census tracts during the review period.

In 2018, the bank originated no home improvement loans in moderate-income tracts, while aggregate lenders originated 11.6 percent of home improvement loans (8.6 percent by dollar) in these tracts. In 2019, the bank's performance increased, originating 11.1 percent of home improvement loans (5.2 percent by dollar) in moderate-income tracts. This performance is slightly above aggregate lenders, which originated 9.4 percent of home improvement loans (6.9 percent by dollar) in moderate-income tracts.

The distribution of the remainder of home improvement lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Other Purpose Lines of Credit

The bank's geographic distribution of other purpose lines of credit in the Lansing – East Lansing, MI Assessment Area during the review period is adequate.

The bank originated no other purpose lines of credit in low-income census tracts in the Lansing – East Lansing, MI Assessment Area. However, due to the lack of demand for this product indicated by the performance of aggregate lenders, the bank's performance is considered adequate. In 2018, aggregate lenders originated only 1.8 percent of other purpose lines of credit (0.9 percent by dollar) in low-income tracts. In 2019, this rate dropped to 0.6 percent of lines of credit (0.2 percent by dollar) originated in low-income census tracts. The low level of originations in these tracts indicates very low demand.

In 2018, the bank originated 12.5 percent of other purpose lines of credit (4.9 percent by dollar volume) in moderate-income census tracts. This is below the 16.9 percent of assessment area owner-occupied units located in these tracts, but is greater than aggregate lenders, which originated 9.5 percent of these lines of credit in moderate-income tracts (5.4 percent by dollar). In 2018, the bank's performance fell, originating 7.1 percent of these lines of credit (2.8 percent by dollar) in moderate-income tracts.   During 2019, aggregate lenders outperformed the institution, originating 9.7 percent (5.8 percent by dollar) in moderate-income tracts.

The distribution of the remainder of home improvement lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

Comerica's small business lending in low-income census tracts within the Lansing – East Lansing, MI Assessment Area is excellent. In 2018, the bank originated 15.5 percent of small business loans (13.8 percent by dollar volume) in low-income census tracts; outperforming aggregate lenders, which originated 10.9 percent of small business loans (16.1 percent by dollar) in low-income tracts. The bank's performance was greater than the demographic data, as 7.2 percent of assessment area businesses were located in low-income tracts. In 2019, the bank again outperformed both aggregate lenders and demographic data, originating 14.7 percent of small business loans (11.7 percent by dollar) in low-income tracts, while aggregate lenders originated 8.3 percent of small business loans in these tracts (11.3 percent by dollar volume).

The bank's small business lending in moderate-income census tracts is also excellent. In 2018, the bank originated 25.8 percent of small business loans (28.5 percent by dollar volume) in moderate-income census tracts, which contained 19.6 percent of assessment area businesses during the review period. This performance is greater than that of aggregate lenders, which originated 15.7 percent of small business loans (17.2 percent by dollar) in these tracts. In 2019, the bank's performance increased, originating 30.7 percent of small business loans (30.8 percent by dollar) in moderate-income tracts, while aggregate lenders originated 17.7 percent of loans (19.2 percent by dollar) in these tracts.

The distribution of the remainder of small business lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Community Development Lending

In the Lansing – East Lansing, MI Assessment Area, the bank makes an adequate level of community development loans. During the review period, the bank originated a total of 15 community development loans totaling $8.7 million in the assessment area.

The community development loans originated in the Lansing – East Lansing, MI Assessment Area during the evaluation period were primarily associated with efforts to revitalize and stabilize low- or moderate-income geographies. The remainder of the loans were split between affordable housing and community service efforts. The table below summarizes the bank's community development lending.

Community Development Lending Lansing – East Lansing, MI Assessment Area		
Purpose	Number	$(000s)
Affordable Housing	3	150
Community Service	3	1,050
Revitalize and Stabilize	9	7,545
Total	**15**	**8,745**

Several of the community development loans (seven loans totaling $2.6 million) were associated with the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. The bank's participation in this program reflects responsiveness to the needs of the community.

Investment Test

The bank has an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors. The bank's investments were primarily focused affordable housing efforts in the assessment area.

Community Development Investments and Donations Lansing – East Lansing, MI Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	$000s	#	$000s	#	$000s	#	$000s
Affordable Housing	4	3,209	9	7,895	8	19	21	11,124
Community Services	-	-	1	79	29	79	30	158
Economic Development	-	-	-	-	4	14	4	13
Total	4	3,209	10	7,974	41	112	55	11,295

In addition, the bank had two investments, totaling approximately $7,000 which benefitted affordable housing efforts in multiple assessment areas, including the bank's Lansing-East Lansing, MI Assessment Area.

Service Test

The bank's retail and community development services reflect adequate responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's seven branch offices and ten ATMs as of December 31, 2020, was compared to the distribution of the population and

businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Lansing – East Lansing, MI Assessment Area.

Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	6.9	14.9	7.2	0	0.0	0	0.0
Moderate	20.6	12.9	19.6	4	57.1	4	40.0
Middle	39.7	40.2	36.7	2	28.6	2	20.0
Upper	25.9	27.6	34.3	1	14.3	3	30.0
Unknown	6.9	4.4	2.2	0	0.0	1	10.0
Total	100.0	100.0	100.0	7	100.0	10	100.0

Distribution of Branches ATMS
Lansing – East Lansing, MI Assessment Area

The bank did not open or close any branches during the review period in the Lansing-East Lansing, MI Assessment Area. Therefore, the bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are basically the same throughout the assessment area.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and as trustees, for two community development financial organizations focused on providing community services to LMI students in the bank's Lansing – East Lansing, MI Assessment Area. Total hours served during the review period was approximately 462 hours.

Description of Operations in Southeast Michigan Assessment Area

The Southeast Michigan Assessment Area includes Livingston, Macomb, Oakland, and Wayne counties in the southeast portion of the state. These counties, along with Lapeer and St. Clair counties, which are excluded from the assessment area, make up the Detroit-Warren-Dearborn, MI MSA. The MSA is made up of two MDs, the Detroit-Dearborn-Livonia, MI MD (made up of Wayne County) and the Warren-Troy-Farmington Hills, MI MD.

According to the 2010 census, the Southeast Michigan Assessment Area had a population of 4,044,891, which was 40.9 percent of the total population of the state of Michigan. ACS 2019 population estimates reflect an assessment area population of 4,072,894 (40.8 percent of the total population of Michigan), an increase of 0.7 percent since 2010, indicating a growth rate comparable to the statewide population growth of 1.0 percent during the same period. According to 2019 estimates, 16.5 percent of the assessment area population is contained with the city of Detroit.

Population Changes Southeast Michigan Assessment Area			
County	2015 Population Estimate	% Increase Since 2010	Major Municipalities
Livingston County	191,995	6.1	Brighton, Howell*
Macomb County	873,972	3.9	Warren, Mount Clemens*,
Oakland County	1,257,584	4.6	Troy, Pontiac*, Novi, Southfield
Wayne County	1,749,343	-3.9	Dearborn, Detroit*, Livonia, Taylor

* Denotes County Seat

As of December 31, 2020, the bank operated 136 branches in the assessment area, representing 31.5 percent of its total branches. Ten branches (7.4 percent) are located in a low-income census tract, 29 branches (21.3 percent) are in moderate-income census tracts, 40 (29.4 percent) are in middle-income census tracts, 56 (41.2 percent) are located in upper-income tracts, and one branch (0.7 percent) is located in a census tract with an unknown income level.

According to the FDIC, as of June 30, 2020, the bank had $31.9 billion in deposits in the Southeast Michigan Assessment Area, representing 46.6 percent of the bank's total deposits. The bank ranks second out of 42 total FDIC-insured institutions in the assessment area, with a market share of 17.8 percent. JPMorgan Chase holds the largest deposit market share at 29.5 percent, followed by Comerica, and then Bank of America, with a market share of 14.9 percent.

In 2018, there were 597 financial institutions that reported a total of 115,638 HMDA loans in the Southeast Michigan Assessment Area. The bank ranked 18th in HMDA market share with 1.2 percent of total HMDA-reportable originations and purchases. Quicken Loans and JPMorgan Chase led the market with 10.2 percent and 6.4 percent of market share, respectively. In 2019, 612 institutions reported a total of 142,053 HMDA loans in the assessment area. Comerica Bank ranked 24th in market share with 0.9 percent of the market. Quicken Loans and United Shore Financial Service led the market with 12.4 percent and 7.4 percent of the market, respectively. Though the market is saturated, it does not appear that competition has adversely affected the bank's ability to serve its assessment area.

For 2018, there were 157 financial institutions that reported CRA small business lending data in the Southeast Michigan Assessment Area. The bank ranked 10th with 2.7 percent of total CRA-reportable originations and purchases during the year. American Express National Bank and JPMorgan Chase dominated the market with 21.0 percent and 18.2 percent of the market share, respectively. During 2019, 159 institutions reported CRA data in the assessment area. Comerica ranked ninth, with 0.2 percent of the market share. In 2019, JPMorgan Chase and American Express National Bank led the market with 22.1 percent and 20.9 percent of the market, respectively. It does not appear as though competition adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Detroit-Warren-Dearborn, MI MSA as a whole, but not for the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area, as the population of the assessment area includes 94.3 percent of the total MSA population.

During the review period, the Southeast Michigan Assessment Area was made up of 1,227 census tracts. Of those, 169 tracts (13.8 percent) were classified as low-income, 303 (24.7 percent) were moderate-income, 375 (30.6 percent) were middle-income, 357 (29.1 percent) were upper-income, and the remaining 23 tracts (1.9 percent) were designated as having an unknown income level.

Demographics and economic information impacting the bank's performance context are discussed below. Information was obtained from publicly available sources including the U.S. Department of Commerce's Bureau of Census; the U.S. Department of Labor; HUD; and D&B.

Income Characteristics

For the purposes of classifying borrower income, the FFIEC estimated median family income for the MSA is utilized. The following chart reflects the estimated median family income for the MSA during the review period, as well as a range of the estimated annual family income for each income category (low, moderate, middle, and upper). Additionally, it should be noted that according to available data, approximately 13.0 percent of assessment area families lived below the poverty level.

Median Family Income Southeast Michigan Assessment Area		
Income Level	2018	2019
Median Family Income	$55,500	$60,100
Low-income	< $27,750	< $30,050
Moderate-income	$27,750 < $44,400	$30,050 < $48,080
Middle-income	$44,400 < $66,600	$48,080 < $72,120
Upper-income	≥ $66,600	≥ $72,120

Housing Characteristics

According to census estimates, there were a total of 1,783,273 housing units in the Southeast Michigan Assessment Area. Of the total housing in the assessment area, 60.2 percent of the

units were classified as owner-occupied units, 27.7 percent were rental units, and 12.2 percent were vacant units.

Low-income census tracts contained 12.2 percent of the total housing stock in the assessment area. The majority of housing units in the low-income census tracts (42.6 percent) were rental units, with the remainder split between owner-occupied units (30.2 percent) and vacant units (27.2 percent). The housing units in low-income tracts have a median age of 61 years, with a median value of $40,673. This results in an estimated monthly mortgage payment of approximately $153 for a 30-year loan at 3.85 percent interest[8] and 20 percent down. While this is significantly more affordable than the median gross rent in low-income census tracts of $713, barriers to home purchase such as down-payment requirements may impede home ownership. Additionally, 42.9 percent of families in low-income census tracts within the assessment area had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income census tracts accounted for 24.5 percent of the total housing stock in the assessment area according to available data. Owner-occupied units made up the largest portion of the units in these tracts (45.9 percent), followed by rental units (36.2 percent), with 17.8 percent classified as vacant. The housing stock in moderate-income census tracts in the assessment area had median value of $64,623. A 30-year fixed-rate loan with an interest rate of 3.85 percent and 20 percent down would have a monthly mortgage payment of approximately $242. This is more affordable than the reported median gross rent in these tracts of $827. However, for the 23.0 percent of families in these census tracts reported incomes below poverty level, which may make qualifying for a mortgage difficult.

A large portion of the housing stock in the assessment area, 32.4 percent, was located in middle-income census tracts. In these tracts, the majority of units, 66.8 percent were owner-occupied, 25.4 percent were rental units, and 7.9 percent were vacant. The units in middle-income tracts were younger than those in low- or moderate-income tracts, with a median age of 53 years and median housing value of $123,014.

Upper-income tracts also account for a large portion of the assessment areas housing stock, representing 30.5 percent of total units. Most units in these tracts were owner-occupied, 77.0 percent of total units, with 17.1 percent categorized as rental units, and 5.9 percent were vacant. The median age of the housing stock in upper-income census tracts was 46 years, which is younger than the housing in other tracts, with a median value of $200,849.

Employment and Economic Conditions

Unemployment rates in the Southeast Michigan Assessment Area were slightly above the statewide and national rates throughout the review period. Unemployment rates at every level rose significantly in 2020 due to the COVID-19 pandemic, more than doubling in each of the listed geographies.

The following chart shows unemployment rates relevant to the assessment area for 2018 through 2020.

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[8] Available historical data from FreddieMac on 30-Year Fixed-Rate Mortgages indicate an Annual Average rate of 3.85 percent in 2015. http://www.freddiemac.com/pmms/pmms30.html

Annual Average Unemployment Rate Southeast Michigan Assessment Area			
AREA	**2018**	**2019**	**2020**
Livingston County	3.3	3.4	9.1
Oakland County	3.4	3.5	9.5
Macomb County	4.1	4.3	12.1
Wayne County	5.2	5.2	14.0
Assessment Area	**4.3**	**4.4**	**12.0**
Detroit-Warren-Dearborn, MI MSA	4.3	4.4	11.9
State of Michigan	**4.2**	**4.1**	**10.0**
United States	**3.9**	**3.7**	**8.1**

The Detroit-Warren-Dearborn, MI MSA has a real gross domestic product of approximately $237.1 billion in 2019. While this number has declined over the past decade, the MSA is still the 16th largest metropolitan economy in the United States. The region is home to a diverse range of industries and employers. The bank's Southeast Michigan Assessment Area is the primary headquarters of the domestic auto industry, serving as the home of Ford Motor Company, General Motors Company, and Fiat Chrysler Automobiles (collectively the "Big Three.") The MSA is also home to several Fortune 500 companies, including Ally Financial and DTE Energy.

Community Contacts and Community Development Opportunities

During this evaluation, contact was made with individuals active in affordable housing and familiar with the credit needs of the bank's Southeastern Michigan Assessment Area. These contacts highlighted opportunities for financial institutions to provide assistance to LMI individuals and families related to housing. Additionally, the contacts indicated that financial institutions must be careful in vetting recipients of CRA money to ensure that LMI individuals and families actually benefit from community development activities.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Combined Demographics Report

Assessment Area: MI - Southeast

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	169	13.8	88,318	8.7	37,881	42.9	229,922	22.7
Moderate-income	303	24.7	212,484	21	48,793	23	165,361	16.3
Middle-income	375	30.6	343,695	33.9	29,114	8.5	189,082	18.7
Upper-income	357	29.1	367,439	36.3	14,878	4	429,163	42.3
Unknown-income	23	1.9	1,592	0.2	599	37.6	0	0
Total Assessment Area	**1,227**	**100.0**	**1,013,528**	**100.0**	**131,265**	**13.0**	**1,013,52**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	217,771	65,819	6.1	30.2	92,699	42.6	59,253	27.2
Moderate-income	436,794	200,584	18.7	45.9	158,252	36.2	77,958	17.8
Middle-income	578,411	386,222	36	66.8	146,680	25.4	45,509	7.9
Upper-income	543,945	418,763	39	77	93,215	17.1	31,967	5.9
Unknown-income	6,352	1,466	0.1	23.1	2,423	38.1	2,463	38.8
Total Assessment Area	**1,783,273**	**1,072,854**	**100.0**	**60.2**	**493,269**	**27.7**	**217,150**	**12.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	13,660	7.4	11,818	7.1	1,777	10.5	65	5.5
Moderate-income	36,756	20	32,466	19.6	4,060	24.1	230	19.5
Middle-income	57,159	31.1	52,533	31.7	4,294	25.5	332	28.1
Upper-income	74,935	40.8	67,921	41	6,468	38.3	546	46.3
Unknown-income	1,054	0.6	778	0.5	269	1.6	7	0.6
Total Assessment Area	**183,564**	**100.0**	**165,516**	**100.0**	**16,868**	**100.0**	**1,180**	**100.0**
	Percentage of Total Businesses:		**90.2**		**9.2**		**.6**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	22	2.2	20	2.1	2	7.1	0	0
Moderate-income	116	11.6	114	11.8	2	7.1	0	0
Middle-income	478	47.9	467	48.2	11	39.3	0	0
Upper-income	382	38.3	368	38	13	46.4	1	100
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**998**	**100.0**	**969**	**100.0**	**28**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**97.1**		**2.8**		**.1**	

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

Lending activity reflects excellent responsiveness to assessment area credit needs including LMI borrowers and very small businesses. The geographic distribution of loans reflects excellent penetration throughout the assessment area. In addition, the distribution lending by borrower income reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

During the review period, the bank made use of innovative and flexible lending practices in serving the credit needs of the Southeast Michigan Assessment Area. This included the bank's small business micro loan program, the bank's participation in the HomeReady™ Mortgage by Fannie Mae program, as well as the bank's participation in the Small Business Administration's Paycheck Protection Program.

During the review period, the bank reported 3,583 (45.0 percent) HMDA-reportable loans, compared to 4,384 (55.0 percent) small business loans in the Southeast Michigan Assessment Area. As a result, small business lending and HMDA lending were given similar weight when determining the bank's Lending Test rating in the assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects good penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. The distribution of the bank's lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered excellent when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

In 2018, the bank originated 13.3 percent of assessment area HMDA-reportable loans to low-income borrowers, accounting for 6.1 percent by dollar volume. Aggregate lenders originated 8.9 percent of loans (4.6 percent by dollar) to low-income borrowers during the same period. In 2019, Comerica's performance remained steady, originating 13.0 percent of HMDA loans (6.6 percent by dollar) to low-income borrowers in the Southeast Michigan Assessment Area. Aggregate lenders originated 9.3 percent by number (4.8 percent by dollar volume) of HMDA loans to low-income borrowers. During the review period, 22.7 percent of the families in the assessment area were considered low-income families. While Comerica did not reach the level of the demographic data, the bank consistently outpaced aggregate HMDA lenders throughout the review period.

During the review period, 16.3 percent of assessment area families were classified as moderate-income. Both Comerica and aggregate HMDA lenders outperformed the demographic level of during both years of the review period. In 2018, the bank originated 19.0 percent of HMDA-reportable loans to moderate-income borrowers (12.1 percent by dollar volume); consistent with the 19.1 percent of loans (13.0 percent by dollar) originated by aggregate lenders to these borrowers. In 2019, the bank again performed similarly to aggregate lenders, originating 20.4 percent of HMDA loans (12.6 percent by dollar) to these borrowers, compared to the aggregate lenders' 19.2 percent of loans (13.1 percent by dollar.)

Small Business Lending

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. The assessment area is saturated with large national banks and the area has experienced steady growth since the previous examination, with noted exception of the period impacted by the COVID-19 pandemic. Therefore, competition in the market for business loans is very high.

In 2018, the bank originated 22.3 percent of small business loans, representing 8.8 percent by dollar volume to businesses with gross annual revenues of $1 million or less. By comparison, aggregate CRA lenders originated 46.8 percent of loans (29.0 percent by dollar volume) to small businesses. In 2019, the bank's performance improved, originating 27.6 percent of loans (16.9 percent by dollar) to businesses with revenues of $1 million or less; though the bank continued to lag behind aggregate lenders, which originated 48.8 percent of loans (29.4 percent by dollar) to these borrowers. During the entirety of the review period, both the bank's and aggregate lenders' performance fell below D&B demographic data, which reported 90.2 percent of all businesses in the assessment area with gross revenues of $1 million or less.

Another way to gauge the bank's small business lending performance is to review the data by loan amount, as smaller businesses typically require smaller dollar credits. It is noted that a large percentage of the bank's small business loans were made in loan amounts of $100,000 or less. In 2018, 51.7 percent of the bank's small business originations were in loan amounts of $100,000 or less, this is compared to 94.5 percent for aggregate lenders. In 2019, the bank's performance fell slightly, originating 44.3 percent of small business loans in amounts of $100,000 or less, compared to 94.5 percent of aggregate lending.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including, both originations and purchases, was compared with available demographic information. Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects excellent penetration throughout the assessment area. There were no conspicuous gaps or anomalies in the bank's lending patterns in the Southeast Michigan Assessment Area during the review period.

The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

HMDA Loan Geographic Distribution

The geographic distribution of HMDA loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

During the review period, the bank made 3,583 total HMDA-reportable loans in the Southeast Michigan Assessment Area. Of these, refinance lending made up the largest percentage (37.6 percent), followed by home improvement lending (27.0 percent), and other purpose lines of credit (23.7 percent) with home purchase lending making up only 10.4 percent of HMDA lending. As a result, home refinance lending was given the greatest weight in assessing the bank's performance, and home purchase lending was given the least weight. Additionally, the bank made very few multi-family loans in the assessment area during the review period; therefore, this product was not reviewed separately.

Home Purchase Lending

The bank's geographic distribution of home purchase lending in the Southeast Michigan Assessment Area during the review period is good.

During the review period, low-income census tracts contained 6.1 percent of assessment area owner-occupied housing units. In 2018, the bank originated 4.1 percent of home purchase loans (2.6 percent by dollar volume) in low-income census tracts. This performance is greater than aggregate HMDA lenders, which originated 2.7 percent of home purchase loans (1.3 percent by dollar) in these tracts. In 2019, the bank performed comparably with aggregate lenders, originating 3.4 percent of home purchase loans (1.7 percent by dollar volume) in low-income tracts, compared to 3.1 percent of aggregate home purchase originations (1.6 percent by dollar).

In 2018, the bank originated 13.9 percent of home purchase loans (8.5 percent by dollar volume) to borrowers in moderate-income tracts. During the same period, aggregate lenders originated 15.5 percent of home purchase loans (9.8 percent by dollar) in moderate-income tracts. In 2019, the bank's performance improved, originating 18.0 percent of home purchase loans (9.7 percent by dollar) in moderate-income tracts, while aggregate lenders originated 16.1 percent of home purchase loans (10.4 percent by dollar) in these tracts. During the review period, approximately 18.7 percent of owner-occupied units in the assessment area were located in moderate-income tracts. While the bank failed to surpass the level of the demographics in these tracts, the performance across the review period is comparable to the performance of peer HMDA lenders and the bank's performance is considered good.

Home Refinance Lending

The bank's geographic distribution of home refinance lending in the Southeast Michigan Assessment Area during the review period is excellent.

In 2018, the bank originated 2.3 percent by number (0.5 percent by dollar volume) of home refinance loans in low-income census tracts. Aggregate lenders originated 1.7 percent by number (0.9 percent by dollar volume) of home refinance loans in low-income census tracts. In 2019, Comerica originated 2.2 percent by number (0.9 percent by dollar volume) of home refinance loans in low-income census tracts. Aggregate lenders originated 1.3 percent by number (0.7

percent by dollar volume) of home refinance loans in low-income census tracts. Both the bank and aggregate lenders performed below demographic data, as 6.1 percent of owner-occupied units in the assessment area were located in moderate income tracts. The low level of originations from aggregate lenders indicates a lack of demand for this loan product in low-income census tracts.

In 2018, the bank originated 14.1 percent of home refinance loans (8.9 percent by dollar volume) in moderate-income census tracts. Aggregate lenders originated 11.9 percent by number (7.8 percent by dollar volume) of home refinance loans in moderate-income census tracts during this year. In 2019, Comerica originated 12.9 percent by number (6.7 percent by dollar volume) of home refinance loans in moderate-income census tracts. Aggregate lenders originated 10.1 percent by number (6.4 percent by dollar volume) of home refinance loans in moderate-income census tracts. Comerica's home refinance lending in moderate-income census tracts fell slightly below the demographic (18.7 percent of owner-occupied units were located in these tracts) during the review period, but the bank consistently outperformed aggregate lenders.

Home Improvement Lending

The bank's geographic distribution of home improvement lending in the Southeast Michigan Assessment Area during the review period is excellent.

In 2018, the bank originated 2.9 percent of home improvement loans (1.4 percent by dollar volume) in low-income census tracts. This is slightly above the 1.9 percent of home improvement loans originated by aggregate lenders (1.3 percent by dollar) in these tracts. In 2019, the bank originated 2.6 percent of home improvement loans in low-income census tracts (1.1 percent by dollar) compared to the 2.3 percent of home improvement loans originated by aggregate lenders (1.5 percent by dollar) in these tracts. Low-income census tracts contained 6.1 percent of owner-occupied units in the assessment area during the review period; however, the level of originations by the bank and aggregate lenders indicate a low demand for these products in low-income tracts.

During the review period, Comerica outperformed aggregate lenders, though both fell below the 18.7 percent of owner-occupied units located in moderate-income tracts. In 2018, the bank originated 13.4 percent of home improvement loans (7.4 percent by dollar) in moderate-income census tracts. Aggregate lenders originated 9.7 percent by number (7.1 percent by dollar volume) of home improvement loans in moderate-income census tracts during this year. In 2019, Comerica originated 12.2 percent by number (7.3 percent by dollar volume) of home improvement loans in moderate-income census tracts. Aggregate lenders originated 10.5 percent by number (7.4 percent by dollar volume) of home improvement loans in moderate-income census tracts.

Other Purpose Lines of Credit

The bank's geographic distribution of other purpose lines of credit in the Southeast Michigan Assessment Area during the review period is excellent.

In 2018, the bank originated 5.0 percent of these lines of credit (1.7 percent by dollar) in low-income census tracts. This outperforms aggregate HMDA lenders in the assessment area, which originated only 1.8 percent of other lines of credit (0.8 percent by dollar volume) in low-income census tracts. In 2019, the bank originated 1.9 percent of these lines of credit (0.8 percent by dollar volume) in low-income census tracts, compared to aggregate lenders, which originated 1.6

percent of other purpose lines of credit (0.7 percent by dollar) in these tracts. Neither the bank nor aggregate lenders performed to the level of demographics, as these tracts contained 6.1 percent of owner-occupied units; however, the bank's performance continually exceeded aggregate performance.

The bank did not lend to the level of demographics, as 18.7 percent of assessment area owner-occupied units were in moderate-income tracts; however, the bank consistently outperformed aggregate lenders. In 2018, the bank originated 13.9 percent of other purpose lines of credit (6.7 percent by dollar volume) in moderate-income census tracts, compared to 9.9 percent of aggregate lenders' originations (5.9 percent by dollar). In 2019, the bank again outperformed aggregate lenders, originating 12.7 percent of other purpose lines of credit (5.6 percent by dollar) in moderate-income tracts. During this time, aggregate lenders originated 10.0 percent of this product (6.3 percent by dollar) in moderate-income census tracts.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

In 2018, the bank originated 10.9 percent of small business loans (12.4 percent by dollar volume) in low-income census tracts. According to D&B demographic data, these tracts contained approximately 7.4 percent of assessment area businesses. Additionally, aggregate lenders originated 6.6 percent by number (7.1 percent by dollar volume) of small business loans in low-income census tracts. In 2019, the bank originated 11.5 percent by number (12.6 percent by dollar volume) of small business loans in low-income census tracts, while aggregate CRA reporters originated 6.7 percent by number (8.3 percent by dollar volume) of small business loans in these tracts. During each of the years reviewed, the bank outperformed aggregate lenders, as well as available demographic information in low-income tracts.

In both of the reviewed years, the bank originated a higher percentage of small business loans in moderate-income census tracts than the approximately 20.0 percent of assessment area businesses were located in moderate-income census tracts. In 2018, the bank originated 23.5 percent of small business loans (23.4 percent by dollar volume) in moderate-income census tracts. During this period, aggregate CRA lenders originated 18.8 percent of small business loans (21.2 percent by dollar) in these tracts. In 2019, the bank originated 22.5 percent of small business loans in moderate-income tracts (22.5 percent by dollar volume) compared to aggregate lenders' 19.3 percent of loans (20.3 percent by dollar volume). The bank's performance was constantly greater than that of aggregate lenders as well as the available demographic data and is considered excellent.

Community Development Lending

The bank is a leader in making community development loans in the Southeast Michigan Assessment Area. During the review period, the bank made a total of 311 qualifying community development loans totaling approximately $607.5 million in the assessment area.

The community development loans originated in the Southeast Michigan Assessment Area during the evaluation period were for a variety of qualified community development purposes, with the

largest portion associated with revitalization and stabilization of LMI geographies. The table below summarizes the bank's community development lending.

Several of the community development loans (seven loans totaling $2.6 million) were associated with the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. The bank's participation in this program reflects responsiveness to the needs of the community.

Community Development Lending Southeast Michigan Assessment Area		
Purpose	#	$000s
Affordable Housing	6	38,740
Community Services	66	122,347
Economic Development	31	104,249
Revitalization and Stabilization	208	342,171
Totals	**311**	**607,507**

In response to the COVID-19 pandemic, the bank actively participated in the Paycheck Protection Program, which was enacted and signed into law in order to support smaller businesses and retain jobs. Many of the loans originated by the bank under this program helped to revitalize or stabilize LMI geographies by allowing businesses to retain existing jobs in the area.

Affordable housing was identified as a need in the assessment area, and during the review period the bank made six community development loans totaling $38.7 million for the purchase or rehabilitation of Section 8 housing units. Further, the bank originated $122.3 million in loans to fund organizations providing community services targeted to LMI individuals in the Southeast Michigan Assessment Area. Examples of the organizations benefitting from this responsiveness are SER Metro Detroit, Vista Maria, as well as a number of schools where a majority of students are eligible for free or reduced-price lunches.

Investment Test

The bank has an excellent level of qualified community development investments and grants, particularly those not routinely provided by private investors and is occassionally in a leadership position. The bank's investments were primarily focused affordable housing efforts.

The bank's total amount of investment and contributions, approximately $116.0 million, has increased significantly since the previous examination.

Community Development Investments and Donations Southeast Michigan Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	$000s	#	$000s	#	$000s	#	$000s
Affordable Housing	46	53,007	36	54,623	31	167	113	107,797
Community Services	3	3,582	-	-	552	3,788	557	7,370
Economic Development	-	-	-	-	52	841	52	841
Revitalization and Stabilization	-	-	-	-	2	3	2	3
Total	49	56,589	36	54,623	637	4,799	722	116,011

During the review period, the bank made $2.5 million worth of deposits in a local minority-owned financial institution, intended to increase capacity and to help that institution meet the credit needs of the community in which it is chartered. In addition to the above investments, the bank made two investments, totaling approximately $2,600, which benefitted affordable housing efforts in multiple assessment areas, including the bank's Southeast Michigan Assessment Area.

The bank is also an investor in the Detroit Home Mortgage Fund, a program designed to help qualified borrowers purchase a home in the Detroit area, where appraised values are still often deflated compared to market value, as a result of the 2006-2010 credit crisis, making it difficult for borrowers to get a traditional mortgage.

Service Test

The bank's retail and community development services reflect good responsiveness to the needs of the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 136 branch offices and 210 ATMs as of December 31, 2020, was compared to the distribution of the population and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Southeast Michigan Assessment Area.

Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	13.8	7.4	7.5	10	7.4	29	13.8
Moderate	24.7	26.5	20.0	29	21.3	51	24.3
Middle	30.5	39.2	31.1	40	29.4	51	24.3
Upper	29.1	26.9	40.8	56	41.2	75	35.7
Unknown	1.9	0.0	0.6	1	0.7	4	1.9
Total	100.0	100.0	100.0	136	100.0	210	100.0

Distribution of Branches and ATMs
Southeast Michigan Assessment Area

The bank opened two branches (one in a low-income census tract and one in an upper-income tract), closed four branches (two in middle-income tracts and two in upper-income tracts), and relocated two branches (one in a low-income tract and one in an upper-income tract) in the Southeast Michigan Assessment Area. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are basically the same throughout the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. The bank's employees served in various capacities, including boards of directors and as trustees, for 51 community development financial organizations offering community development

services that focused on services targeting LMI individuals. Total hours served during the review period was approximately 3,943 hours.

The bank was active in supporting community services for LMI individuals and families in the Southeast Michigan Assessment Area by serving with organizations like Mary's Mantle, which provides shelter for homeless expecting mothers, and the Oakland Literacy Council, which serves adults in the area who struggle to read, write, and understand English. The bank also continued its work with the Financial Institutions Community Development Conference, seeking to bring together financial, governmental, nonprofit, and private sector entities involved in neighborhood revitalization efforts to problem solve, build relationships, educate, and advance the cause of neighborhood community development in the Detroit region.

METROPOLITAN AREAS (Limited-Scope Review)

Description of Operations

- **Ann Arbor, MI Assessment Area**
  - As of December 31, 2020, the bank operated nine branches in the assessment area, representing 2.1 percent of its branches.
  - As of June 30, 2020, the bank had $967.4 million in deposits in this assessment area, representing a market share of 8.5 percent. The $967.4 million also represents 1.4 percent of the bank's total deposits.
- **Battle Creek, MI Assessment Area**
  - As of December 31, 2020, the bank operated four branches in the assessment area, representing 0.9 percent of its branches.
  - As of June 30, 2020, the bank had $198.1 million in deposits in this assessment area, representing a market share of 15.5 percent. The $198.1 million also represents 0.3 percent of the bank's total deposits.
- **Fenton, MI Assessment Area**
  - As of December 31, 2020, the bank operated one branch in the assessment area, representing 0.2 percent of its branches.
  - As of June 30, 2020, the bank had $62.0 million in deposits in this assessment area, representing a market share of 1.2 percent. The $62.0 million also represents 0.1 percent of the bank's total deposits.
- **Grand Rapids-Wyoming, MI Assessment Area**
  - As of December 31, 2020, the bank operated 11 branches in the assessment area, representing 2.6 percent of its branches.
  - As of June 30, 2020, the bank had $615.9 million in deposits in this assessment area, representing a market share of 2.4 percent. The $615.9 million also represents 0.9 percent of the bank's total deposits.
- **Jackson, MI Assessment Area**
  - As of December 31, 2020, the bank operated eight branches in the assessment area, representing 1.9 percent of its branches.
  - As of June 30, 2020, the bank had $461.0 million in deposits in this assessment area, representing a market share of 16.6 percent. The $461.0 million also represents 0.7 percent of the bank's total deposits.
- **Kalamazoo, MI Assessment Area**
  - As of December 31, 2020, the bank operated six branches in the assessment area, representing 1.4 percent of its branches.
  - As of June 30, 2020, the bank had $264.2 million in deposits in this assessment area, representing a market share of 6.4 percent. The $264.2 million also represents 0.4 percent of the bank's total deposits.
- **Midland, MI Assessment Area**
  - As of December 31, 2020, the bank operated two branches in the assessment area, representing 0.5 percent of its branches.
  - As of June 30, 2020, the bank had $114.6 million in deposits in this assessment area, representing a market share of 5.7 percent. The $114.6 million also represents 0.2 percent of the bank's total deposits.

- **Muskegon, MI Assessment Area**
  - As of December 31, 2020, the bank operated four branches in the assessment area, representing 0.9 percent of its branches.
  - As of June 30, 2020, the bank had $220.5 million in deposits in this assessment area, representing a market share of 11.7 percent. The $220.5 million also represents 0.3 percent of the bank's total deposits.

Conclusions with Respect to Performance Tests

Facts and data reviewed, including performance and demographic information can be found in Appendix D for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited-scope assessment areas can be found in Appendix G.

Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Ann Arbor	Consistent	Consistent	Consistent
Battle Creek	Consistent	Below	Below
Fenton	Consistent	Consistent	Consistent
Grand Rapids-Wyoming	Consistent	Exceeds	Consistent
Jackson	Exceeds	Consistent	Consistent
Kalamazoo	Consistent	Consistent	Consistent
Midland	Below	Below	Below
Muskegon	Consistent	Consistent	Consistent

The bank's performance in the limited-scope assessment areas was generally consistent with its performance in full-scope areas and did not change the bank's overall ratings.

NONMETROPOLITAN STATEWIDE AREA (Limited-Scope Review)

Description of Operations

- **Lenawee County Assessment Area**
    - As of December 31, 2020, the bank operated one branches in the assessment area, representing 0.2 percent of its branches.
    - As of June 30, 2020, the bank had $39.3 million in deposits in this assessment area, representing a market share of 3.3 percent. The $39.3 million also represents less than 0.1 percent of the bank's total deposits.

Conclusions with Respect to Performance Tests

Facts and data reviewed, including performance and demographic information can be found in Appendix E for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited-scope assessment areas can be found in Appendix H.

Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Lenawee County	Below	Below	Below

The bank's performance in the limited-scope nonmetropolitan assessment area did not change the bank's overall rating.

State of Texas

CRA Rating for Texas: Satisfactory
The Lending Test is Rated: High Satisfactory
The Investment Test is Rated: Outstanding
The Service Test is Rated: High Satisfactory

Summary of Major Factors Supporting Rating

Major factors supporting the institution's rating include:

- Comerica's lending activity reflects good responsiveness to assessment areas credit needs.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The distribution of HMDA lending reflects good penetration among customers of different income levels.
- The distribution of small business lending reflects adequate penetration among business of different revenue sizes.
- The bank has a good record of servicing the credit needs of low-income individuals and areas and very small businesses.
- The bank makes a relatively high level of community development loans.
- Comerica makes use of innovative and/or flexible lending practices in serving assessment areas' needs.
- The bank has an excellent level of qualified community development investments and grants.
- The bank exhibits good responsiveness to credit and community development needs.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment areas.
- The bank's record of opening and closing of branches in the state has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Services offered by the bank do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- Comerica provides a relatively high level of community development services.

Scope

Two assessment areas were selected for full-scope reviews based on the volume of lending, number of branches, and percent of total deposits within those assessment areas, as well as the length of time since the last full-scope review of the areas. Overall, approximately 89.3 percent of lending activity (by number of loans), 63.3 percent of the total deposits, and 52.8 percent of total branches within the state of Texas were evaluated through full-scope reviews. The following assessment areas, were reviewed using full-scope procedures. Descriptions of the assessment areas, listed below, can be found in the applicable assessment area sections of this report.

- Austin, TX Assessment Area
- Dallas – Fort Worth Metroplex Assessment Area

In addition, limited-scope reviews were conducted for the remaining three assessment areas, including:

- Houston, TX Assessment Area
- Kerr County, TX Assessment Area
- San Antonio, TX Assessment Area

The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report. The bank's performance in the Dallas – Fort Worth Metroplex Assessment Area was given greater consideration in determining the bank's overall performance in the state of Texas because this assessment area contains substantially more branches, deposits, and lending activity than the other full-scope assessment area in Texas.

Description of Institution's Operations in Texas

The bank operates 123 branch offices in its assessment areas in Texas, representing 28.5 percent of total branches. As of June 30, 2020, the bank had $10.5 billion in deposits in the state, representing 15.3 percent of total deposits. According to the June 30, 2020 FDIC Summary of Deposits, the bank had a deposit market share of 0.8 percent and ranked 14th out of 498 FDIC-insured financial institutions across the state. Of the 13,131 HMDA loans originated and purchased by the bank during the review period, 3,068 (23.4 percent) were in the Texas assessment areas. Of the 13,919 small business loans originated and purchased by the bank, 3,356 (24.1 percent) were in the Texas assessment areas.

Conclusions with Respect to Performance Tests in Texas

Lending Test

In Texas, the bank's overall Lending Test rating is *High Satisfactory*. Lending activity reflects good responsiveness to assessment areas' credit needs. The geographic distribution of loans reflects good penetration throughout the assessment areas. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

Small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the state of Texas as, during the review period, small business lending accounted for the majority of reviewed loans (approximately 52.2 percent). While the bank also makes small farm loans, their volume is minimal (0.2 percent, 0.1 percent by dollar) and not considered in the overall evaluation of the bank's CRA performance.

References are made to the bank's lending distribution by geography and borrower income throughout this report. Detailed information about the bank's HMDA- and CRA-reportable loans can be found in tables in Appendices F, G, and H.

Geographic Distribution and Distribution by Borrower Income and Business Revenue Size:

Consistent with the performance standards for a large bank, conclusions about the bank's distribution of lending within its assessment areas considers the number and amount of loans in low-, moderate-, middle-, and upper-income geographies in the bank's assessment areas; home

mortgage loans to low-, moderate-, middle-, and upper-income individuals; small-business loans to businesses with gross annual revenues of $1 million or less; and, small-business and small-farm loans by loan amount at origination.

The CRA emphasizes the importance of banks serving the credit needs of their assessment areas, including LMI borrowers and areas. The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels (including LMI) and businesses of revenue different sizes. Of the two full-scope assessment areas, one is excellent and one is adequate. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

The geographic distribution of loans reflects good penetration throughout the assessment areas. Of the two full-scope assessment areas, one is considered excellent and one is considered good. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each assessment area.

Community Development Lending

In Texas, the bank makes a relatively high level of community development loans. During the review period, the bank originated 244 community development loans for $534.9 million in Texas representing 25.0 percent of the bank's total community development loans and 28.1 percent by total dollar amount, respectively. The bank's community development lending in the state of Texas increased since the bank's previous CRA evaluation. Additionally, investments made by the institution to third-party community development organizations helped enabled those organizations to make 187 qualified community development loans benefitting the state of Texas. The bank's the pro-rata share of those third-party loans credited to the institution total $1.1 million.

The community development loans originated during the evaluation period were for a variety of purposes. The table below summarizes the bank's community development lending.

Community Development Lending Texas Assessment Areas		
Purpose	Number	$(000s)
Affordable Housing	4	35,529
Community Services	30	31,333
Economic Development	15	30,857
Revitalize and Stabilize	195	437,203
Institution Total	244	534,922

The bank participated heavily in the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. The bank's high level of participation in this program reflects responsiveness to the needs of the community and represents the bank's use of flexible lending practices to meet the needs of its assessment areas in the state of Texas.

The bank made use of innovative and flexible lending practices in serving the needs of the bank's Texas assessment areas. During the review period, the bank's lending in the state of Texas included several programs specifically targeted toward LMI borrowers and small businesses. This includes a significant level of SBA guaranteed loan originations, as well as Small Business Micro Loan originations, and HomeReady™ Mortgages by Fannie Mae. These products are described in the

Institution section above. During the review period, 29.1 percent of the bank's Small Business Micro Loans, and 25 percent of the HomeReady™ Mortgages were originated in the state of Texas.

Investment Test

In Texas, the bank's overall Investment Test rating is *Outstanding*. The bank has an excellent level of qualified community development investments and grants and exhibits good responsiveness to credit and community development needs. The table below summarizes the bank's community development investments and donations by assessment area within the state. Specific details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for each assessment area.

Community Development Investments and Donations Texas Assessment Areas								
	Current Period Investments		Prior Period Investments		Donations		Total	
Assessment Area	#	$000s	#	$000s	#	$000s	#	$000s
Full Review:								
Austin	12	7,091	4	2,570	21	95	37	9,756
Dallas – Fort Worth	20	19,405	10	12,132	223	2,264	253	33,801
Limited Review:								
Houston	20	20,805	19	18,611	189	1,259	228	40,675
Kerr County	-	-	-	-	13	52	13	52
San Antonio	7	9,371	5	8,044	17	273	29	17,688
Statewide	-	-	4	64	8	250	12	314
Total	**59**	**56,672**	**42**	**41,421**	**471**	**4,193**	**572**	**102,286**

In addition to the assessment area-specific investments and donations, the bank had two prior period investments and six donations which benefitted multiple areas, which included assessment areas within the state of Texas. These investments and donations totaled approximately $784 thousand.

During the review period, the bank made occasional use of innovative investments to support CD initiatives and exhibited good responsiveness to the needs of the bank's Texas assessment areas. The bank made sizable deposits in Minority Depository Institutions in the state, as well as enhancing relationships with CDFIs by providing large investments to support increased lending capital requests for small businesses impacted by the COVID-19 pandemic.

Service Test

In Texas, the bank's overall Service Test rating is *High Satisfactory*.

Retail Services

The bank's Service Test performance is good. Its retail and community development services reflect good responsiveness to the needs of the assessment areas. The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment areas. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services

and hours of operations do not vary in a way that inconveniences the assessment areas, particularly in LMI geographies or to LMI individuals.

Distribution of Branches and ATMs Texas Assessment Areas							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	13.7	11.4	8.4	14	11.4	12	7.1
Moderate	27.8	26.3	19.1	24	19.5	35	20.7
Middle	25.8	27.4	25.3	30	24.4	37	21.9
Upper	31.9	34.6	46.7	55	44.7	85	50.3
Unknown	0.8	0.3	0.5	0	0.0	0	0.0
Total	100.0	100.0	100.0	123	100.0	169	100.0

Community Development Services

The bank provides a relatively high level of community development services. Staff provided community development services to approximately 106 organizations within the state of Texas, totaling 3,774 hours. Particularly noteworthy is the bank's participation as board and committee members for community service organizations. During the review period, bank staff served in those capacities for 54 organizations throughout the state of Texas. The bank's efforts in providing financial education, in particular, were recognized by the Texas Bankers Association, which awarded the bank with the Leaders in Financial Education Award for the bank's 2020 EMPOWER series, a free monthly financial education and self-development coaching and counseling program offered by the bank.

METROPOLITAN AREAS (Full-Scope Review)

Description of Operations in Austin, TX Assessment Area

The Austin, TX Assessment Area includes Travis and Williamson counties in central Texas. These counties, along with Bastrop, Caldwell, and Hays counties, which are excluded from the assessment area, make up the Austin – Round Rock - Georgetown, TX MSA.

According to the 2010 census, the Austin, TX Assessment Area population was 1,446,945, which was 5.8 percent of the total population of the state of Texas. ACS 2019 population estimates reflect an assessment area population of 1,864,505 (6.4 percent of the total population of Texas), an increase of 28.9 percent since 2010, materially more than the overall growth rate in the state of Texas, which increased in population by 15.3 percent during the same period. According to 2019 estimates, 52.5 percent of the assessment area population is contained with the city of Austin, with no other city representing a materially significant portion of the assessment area population.

Population Changes Austin, TX Assessment Area			
County	2019 Population Estimate	% Increase Since 2010	Major Municipalities
Travis County	1,273,954	24.4	Austin*, Cedar Park, Pflugerville
Williamson County	590,551	39.7	Georgetown*, Round Rock

*Denotes County Seat

As of December 31, 2020, the bank operates ten branches in the assessment area, representing 2.3 percent of its total branches. One of the branches (10.0 percent) is located in a low-income census tract, no branches are in moderate-income census tracts, two (20.0 percent) are in middle-income census tracts, and seven (70.0 percent) are located in upper-income tracts.

According to the FDIC, as of June 30, 2020, the bank had $1.1 billion in deposits in the Austin TX Assessment Area, representing 1.6 percent of the bank's total deposits. The bank ranks ninth out of 61 total FDIC-insured institutions in the assessment area, with a market share of 2.3 percent. Wells Fargo Bank holds the largest deposit market share at 19.6 percent, followed by JPMorgan Chase at 19.1 percent, and Bank of America at 14.5 percent. With 61 FDIC-insured institutions within the assessment area, the competition for deposits is significant.

In 2018, there were 697 financial institutions that reported HMDA data in the Austin, TX Assessment Area. The bank ranked 111th in HMDA market share with 0.1 percent of total HMDA-reportable originations and purchases. Wells Fargo Bank and JPMorgan Chase Bank led the market with 11.8 percent and 5.9 percent of market share, respectively. In 2019, 728 institutions reported HMDA data in the assessment area. Comerica Bank ranked 135th in market share with less than 0.1 percent of the market. Wells Fargo Bank and JPMorgan Chase Bank led the market again with 9.0 percent and 5.7 percent of the market, respectively. Many of the bank's competitors are statewide, multi-national, and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area.

In 2018, there were 214 financial institutions that reported CRA small business lending data in the Austin, TX Assessment Area. The bank ranked 23rd with 0.3 percent of total CRA-reportable originations and purchases during the year. Chase Bank and American Express National Bank dominated the market with 25.3 percent and 19.9 percent of the market share, respectively. During 2019, 180 institutions reported CRA data in the assessment area. Comerica ranked 28th, with 0.2 percent of the market share. In 2019, JPMorgan Chase and American Express led the market with 30.3 percent and 21.1 percent of the market, respectively. Many of the bank's competitors are statewide, multi-national, and national banks, and it appears competition could have adversely affected the bank's ability to serve the credit needs of its assessment area, specifically regarding small business lending.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Austin – Round Rock – Georgetown, TX MSA as a whole, but not for the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area, as the population of the assessment area includes 83.7 percent of the total MSA population.

During the review period, the Austin, TX Assessment Area was made up of 285 census tracts. Of the total, 35 census tracts (12.3 percent) were classified as low-income, 57 (20.0 percent) were moderate-income, 96 (33.7 percent) were middle-income, 91 (31.9 percent) were upper-income, and the remaining six tracts (2.1 percent) were designated as having an unknown income level.

Income Characteristics

The following chart reflects the estimated median family income for 2018 and 2019 in the Austin, TX Assessment Area. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to available data, 9.7 percent of families in the assessment area lived below the poverty level.

Median Family Income Austin, TX Assessment Area		
Income Level	**2018**	**2019**
Median Family Income	$86,000	$95,900
Low-income	< $43,000	< $47,950
Moderate-income	$43,000 < $68,800	$47,950 < $76,720
Middle-income	$68,800 < $103,200	$76,720 < $115,080
Upper-income	≥ $103,200	≥ $115,080

Housing Characteristics

According to 2015 census estimates, there were a total of 599,068 housing units in the Austin, TX Assessment Area. Of the total housing in the assessment area, 50.7 percent of the units were classified as owner-occupied units, 42.0 percent were rental units, and the remaining 7.3 percent were vacant.

Low-income census tracts contained 11.8 percent of the total housing stock in the assessment area. The majority of housing units in the low-income census tracts (70.4 percent) were rental units, with the remainder split between owner-occupied units (20.5 percent) and vacant units (9.1

percent). The median age of all units in these tracts was 40 years with a median housing value of $145,088. Monthly mortgage payments for a 30-year loan at 3.85 percent interest[9] and 20 percent down on a $145,088 home were approximately $544. While this could be considered affordable compared to the median gross rent in low-income census tracts of $887, barriers to home purchase such as down-payment, taxes, and insurance requirements may impede home ownership. With rental units representing the significant majority of the housing stock in these tracts, limited availability of owner-occupied units may also hinder those individuals and families desiring to purchase a home in these tracts. Additionally, 32.0 percent of families in low-income census tracts within the assessment area had incomes below the poverty level, which may make it difficult to qualify for a loan.

Moderate-income census tracts accounted for 17.7 percent of the total housing stock in the assessment area according to 2015 data. The largest portion of these units, 48.7 percent were classified as rental units, while 44.4 percent were owner-occupied, and 7.0 percent were vacant. The housing stock in moderate-income census tracts in the assessment area had a median age of 36 years and median value of $138,713. A 30-year fixed-rate loan with 20 percent down and an interest rate of 3.85 percent would have a monthly mortgage payment of approximately $460. This is significantly more affordable than the reported median gross rent in these tracts of $993. However, for the 30.8 percent of families in these census tracts which reported incomes below poverty level, qualifying for a mortgage may be difficult.

A large portion of the housing stock in the assessment area, 34.8 percent, was located in middle-income census tracts. In these tracts, the majority of units, 50.7 percent were owner-occupied, 42.4 percent were rental units, and 6.9 percent were vacant. The units in middle-income tracts were younger than those in low- or moderate-income tracts, with a median age of 28 years. According to 2015 data, the median housing value in middle-income tracts was $182,786.

Upper-income tracts also account for a large portion of the assessment areas housing stock, representing 34.7 percent of total units. Most units in these tracts were owner-occupied, 65.4 percent of total units, with 27.5 percent categorized as rental units, and 7.1 percent were vacant. The median age of the housing stock in upper-income census tracts was 26 years, with a median value of $333,617.

Employment and Economic Conditions

The national average unemployment rates for 2018, 2019, and 2020 were 3.9 percent, 3.7 percent, and 8.1 percent, respectively. In the state of Texas, the rates were consistently slightly below those of the United States. Unemployment rates in the Austin, TX Assessment Area were below those of the state in each year of the review period. According to the 2015 Labor Summary, unemployment rates in LMI census tracts within the assessment area (8.2 percent and 7.5 percent, respectively) were higher than the rates in the remainder of the assessment area. High unemployment rates in LMI census tracts could affect the number of eligible borrowers in these tracts.

Unemployment rates at every income level rose significantly in 2020 due to the COVID-19 pandemic, more than doubling in each of the listed geographies. This increase in unemployment

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[9] Available historical data from FreddieMac on 30-Year Fixed-Rate Mortgages indicate an annual average rate of 3.85 percent in 2015. http://www.freddiemac.com/pmms/pmms30.html

nationwide was outside of the scope of the retail Lending Test for this evaluation, and the impact of these increases on HDMA and CRA-reportable lending was not evaluated. However, the pandemic highlighted needs in the bank's assessment areas that could be addressed through community development activity.

The following chart shows unemployment rates relevant to the assessment area for 2018 through 2020.

Annual Average Unemployment Rate Austin, TX Assessment Area			
AREA	2018	2019	2020
Travis County	2.8	2.6	6.3
Williamson County	3.0	2.8	5.9
Assessment Area	**2.9**	**2.7**	**6.2**
MSA	2.9	2.7	6.2
State of Texas	**3.8**	**3.5**	**7.7**
United States	**3.9**	**3.7**	**8.1**

The Austin – Round Rock – Georgetown, TX MSA is one of the population centers of Texas; 7.7 percent of the state's population resides within the MSA making it the fourth largest MSA in the state. Additionally, Travis County is the fifth most populous county in the state. Austin has emerged as a growing technology hub for the state and the nation, attracting many technology firms in recent years, and becoming one of the most popular relocation hotspots for tech talent during the 2020 pandemic.

Austin is the capital of Texas, resulting in a large number of governmental jobs. The city, state, and federal governments are each among the largest employers in the assessment area. Other significant employment sectors include technology (large companies in the assessment area include Apple, Dell, and Samsung), education (local school districts as well as the University of Texas) and healthcare.

Community Contacts and Community Development Opportunities

As part of the evaluation of the Austin, TX Assessment Area, one community contact involved in affordable housing was made. The contact highlighted the needs for additional affordable housing and financial literacy education in the assessment area. The contact indicated that in recent years as the area has grown, especially through technology businesses relocating to Austin, the lack of affordable housing has been exacerbated by rising home prices and increased gentrification.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

Combined Demographics Report

Assessment Area: TX - Austin

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	35	12.3	31,879	9.5	10,391	32.6	75,889	22.6
Moderate-income	57	20	58,069	17.3	9,996	17.2	53,888	16
Middle-income	96	33.7	116,243	34.6	7,951	6.8	64,735	19.3
Upper-income	91	31.9	128,294	38.2	3,415	2.7	141,329	42.1
Unknown-income	6	2.1	1,356	0.4	723	53.3	0	0
Total Assessment Area	**285**	**100.0**	**335,841**	**100.0**	**32,476**	**9.7**	**335,841**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	70,447	14,466	4.8	20.5	49,572	70.4	6,409	9.1
Moderate-income	105,869	46,974	15.5	44.4	51,507	48.7	7,388	7
Middle-income	208,426	105,603	34.8	50.7	88,415	42.4	14,408	6.9
Upper-income	207,703	135,742	44.7	65.4	57,209	27.5	14,752	7.1
Unknown-income	6,623	712	0.2	10.8	5,039	76.1	872	13.2
Total Assessment Area	**599,068**	**303,497**	**100.0**	**50.7**	**251,742**	**42.0**	**43,829**	**7.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7,267	7.3	6,566	7.2	645	10.1	56	4.2
Moderate-income	12,525	12.6	11,555	12.7	874	13.6	96	7.2
Middle-income	29,917	30.2	27,649	30.3	1,935	30.2	333	24.8
Upper-income	47,967	48.4	44,345	48.6	2,832	44.2	790	58.9
Unknown-income	1,336	1.3	1,146	1.3	124	1.9	66	4.9
Total Assessment Area	**99,012**	**100.0**	**91,261**	**100.0**	**6,410**	**100.0**	**1,341**	**100.0**
	Percentage of Total Businesses:		**92.2**		**6.5**		**1.4**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	44	4.5	42	4.3	1	16.7	1	100
Moderate-income	107	11	104	10.7	3	50	0	0
Middle-income	309	31.7	309	31.9	0	0	0	0
Upper-income	510	52.3	509	52.6	1	16.7	0	0
Unknown-income	5	0.5	4	0.4	1	16.7	0	0
Total Assessment Area	**975**	**100.0**	**968**	**100.0**	**6**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**99.3**		**.6**		**.1**	

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

Lending activity reflects good responsiveness to Austin, TX Assessment Area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. In addition, the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank makes a relatively high level of community development loans.

During the review period, the bank made limited use of innovative and flexible lending practices in serving assessment area credit needs. This included the bank's small business micro loan program, as well as the bank's participation in the Small Business Administration's Paycheck Protection Program.

During the review period, the bank reported 273 (64.8 percent) small business loans, more than the 148 (35.2 percent) HMDA loans in the Austin, TX Assessment Area. Additionally, the bank's articulated long-term strategy in Texas assessment areas includes a focus on community banking, specifically small business lending. Based upon this, small business lending was given more weight than HMDA lending in determining the bank's Lending Test rating in the assessment area

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered good when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

In 2018, the bank originated 3.5 percent of HMDA-reportable loans (0.9 percent by dollar volume) in the assessment area to low-income borrowers. While this performance did not meet the 22.6 percent of assessment area families that were classified as low-income, the bank performed comparably to aggregate lenders, which originated 3.4 percent of HMDA-reportable loans (1.5 percent by dollar) to low-income borrowers in 2018. The bank's performance improved in 2019, originating 9.7 percent of HMDA-reportable loans to low-income borrowers, accounting for 6.0 percent by dollar volume. However, the bank out-performed aggregate lenders which originated 3.7 percent of HMDA loans (1.7 percent by dollar) to low-income borrowers.

In 2018, 20.9 percent of the bank's HMDA-reportable loans in the assessment area were to moderate-income borrowers (10.5 percent by dollar volume). This performance outpaced aggregate lenders, which originated 14.0 percent of HMDA loans by number, and 8.2 percent by dollar volume, to moderate-income borrowers. Additionally, the bank's performance was slightly above the 16.0 percent of assessment area families classified as moderate-income. In 2019, the bank performed similarly to aggregate lenders, originating 14.5 percent of HMDA-reportable loans by number and 8.2 percent by dollar volume to moderate-income borrowers. During the same period, aggregate lenders originated 15.4 percent by number and 9.3 percent by dollar volume to moderate-income borrowers.

Small Business Lending

Considering the bank's performance when compared to aggregate CRA lenders, the distribution of small business loans by revenue size of businesses is poor. The assessment area is saturated with large national banks; therefore, competition for business loans is high in the market, which experienced economic growth and increased loan demand during the review period.

In 2018, the bank originated 8.0 percent of its loans, representing 7.5 percent by dollar volume, to businesses with gross annual revenues of $1 million or less. This is lower than aggregate CRA lenders, which originated 42.9 percent (33.4 percent by dollar) to small businesses during the same period. In 2019, the bank's performance improved significantly, originating 23.6 percent of small business loans (18.2 percent by dollar) to businesses with gross revenue under $1 million. This performance still lagged behind aggregate lenders, which originated 47.8 percent (35.7 percent by dollar) to small businesses in 2019. Comerica and aggregate lenders both fell below D&B demographic data, which reported 92.2 percent of assessment area business having revenues of $1 million or less during the review period.

Of the total 273 small business loans originated by the bank in the assessment area during the review period, 94 (34.4 percent) were reported as being to businesses with unknown revenues. The regulations do not require institutions to request or consider revenue information when making a loan; however, the material portion of small business loans without revenue information may impact overall distribution of loans.

Another way to gauge the bank's small business lending performance is to review the data by loan amount, as smaller businesses typically require smaller dollar credits. It is noted that a large percentage of the bank's small business loans in the Austin, TX Assessment Area were made in loan amounts of $100,000 or less. In 2018, 60.7 percent of the bank's small business originations were in loan amounts of $100,000 or less, this is compared to 94.6 percent for aggregate lenders. In 2019, the bank's performance fell, originating 34.5 percent of small business loans in amounts of $100,000 or less, compared to 95.0 percent of aggregate lending.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA-reportable lending, including both originations and purchases, was compared with available demographic information as well as the performance of aggregate lenders. Considering performance context factors, the bank's geographic distribution of loans reflects good penetration throughout the assessment area. There were no conspicuous gaps or anomalies in the bank's lending patterns.

The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies).

HMDA Loan Geographic Distribution

The geographic distribution of HMDA-reportable loans reflects adequate penetration throughout the Austin, TX Assessment Area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. As the bank made no multi-family loans in the assessment area during the review period, this product was not analyzed separately. During the review period, the largest portion of the bank's HMDA-related originations and purchases were classified as refinance loans (40.5 percent of total HMDA loans) and the smallest portion was home purchase loans (15.5 percent). As a result, refinance lending was given the greatest weight among HMDA-related products, and home purchase lending was given the least weight.

Home Purchase Lending

The bank's geographic distribution of home purchase lending in the Austin, TX Assessment Area during the review period is adequate.

In 2018, the bank originated or purchased only one home purchase loan in a low-income census tract, representing 8.3 percent of the total home purchase loans (3.0 percent by dollar) in the assessment area. This is greater than the performance of aggregate lenders, which originated or purchased only 4.8 percent by number and 4.4 percent by dollar in these tracts. In 2019, the bank's performance fell, originating or purchasing no home purchase loans in low-income census tracts. This was below the performance of aggregate lenders, which reported 4.3 percent by number and 4.0 percent by dollar in low-income census tracts in 2019. The limited level of lending in low-income census tracks is expected as only 4.8 percent of owner-occupied units were located within low-income census tracts during the review period, indicating a lower demand for home purchase loans than in other tracts

The bank made no home purchase loans in moderate-income census tracts in either 2018 or 2019Aggregate lenders performance far outpaced the bank. In 2018, aggregate lenders reported 14.2 percent of home purchase loans by number (10.7 percent by dollar) in moderate-income census tracts. Aggregate performance improved in 2019, reporting 14.7 percent of home purchase loans (11.4 percent by dollar) in moderate-income tracts. During the review period, 15.5 percent of owner-occupied units in the assessment area were located in moderate-income census tracts.

The distribution of the remainder of home purchase lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

The bank's geographic distribution of home refinance lending in the Austin, TX Assessment Area during the review period is adequate.

In 2018, the bank originated or purchased only one home refinance loan in a low-income census tract, representing 3.0 percent of the total home refinance loans (2.4 percent by dollar) in the assessment area. This is comparable to the performance of aggregate lenders, which originated or purchased only 4.3 percent by number and 3.5 percent by dollar in these tracts. In 2019, the bank's performance fell, originating or purchasing no home refinance loans in low-income census tracts. This was below the performance of aggregate lenders, which reported 4.2 percent by number and 3.7 percent by dollar in low-income census tracts in 2019.

In 2018, the bank performed comparably with aggregate lenders in moderate-income tracts, originating 15.2 percent of refinance loans (10.0 percent by dollar) in these geographies compared to aggregate lenders' 14.5 percent of loans (9.6 percent by dollar) in these tracts. The bank's performance was also comparable to demographics, as 15.5 percent of owner-occupied units were in moderate-income tracts during the review period. In 2019, the bank's performance fell below aggregate lender performance. The bank originated only one home refinance loan (3.7 percent by number, 0.6 percent by dollar) in moderate-income tracts while aggregate lenders originated 12.0 percent of home refinance loans (8.3 percent by dollar) in these tracts.

The distribution of the remainder of home purchase lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Improvement Lending

The bank's geographic distribution of home improvement lending in the Austin, TX Assessment Area during the review period is adequate.

The bank originated 31 home improvement loans during the review period in the Austin, TX Assessment Area. The bank originated only one home improvement loan in low-income census tracts. This loan was originated in 2018, representing 4.8 percent of the total home improvement loans reported for the year (1.2 percent by dollar volume). Low-income census tracts contained 4.8 percent of the owner-occupied units in the assessment area. Despite this low percentage of owner-occupied units, aggregate lenders struggled to meet this level or performance, originating 3.4 percent of home improvement loans in low-income tracts (2.7 percent by dollar) in 2018. In 2019, the bank originated or purchased no home improvement loans in low-income tracts, while aggregate performance improved slightly, originating 3.5 percent of home improvement loans (3.4 percent by dollar) in these tracts.

In 2018, the bank originated 14.3 percent of its home improvement loans in moderate-income tracts (8.6 percent by dollar), while aggregate lenders originated 10.3 percent of home improvement loans (8.0 percent by dollar) in these tracts. The bank and aggregate lenders failed to surpass demographic information, as 15.5 percent of owner-occupied units were in moderate-income tracts during the review period. In 2019, the bank's performance rose above demographics, originating 20.0 percent of home improvement loans (7.3 percent by dollar) in moderate-income tracts. This performance remained greater than aggregate lenders, which originated 10.2 percent of home improvement loans (8.1 percent by dollar) in moderate-income tracts.

The distribution of the remainder of home improvement lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Other Purpose Lines of Credit

The bank's geographic distribution of other purpose lines of credit in the Austin, TX Assessment Area during the review period is adequate.

HMDA reportable lines of credit represented 21.6 percent of the bank's HMDA loans in the Austin, TX Assessment Area during the review period, the second largest HMDA product by number of loans. In 2018, the bank originated or purchased no lines of credit in low-income census tracts, despite these tracts containing 4.8 percent of the owner-occupied units in the assessment area. While aggregate lending data surpassed the bank's performance, aggregate lenders originated only 1.5 percent of HMDA lines of credit in low-income tracts (1.1 percent by dollar). Aggregate lenders' low performance may be an indication of low demand for these loans in low-income tracts in 2018. In 2019, the bank originated only one line of credit in low-income tracts in the Austin, TX Assessment Area; however, this loan represented 8.3 percent of the lines of credit reported (2.7 percent by dollar). This performance outpaced aggregate lenders, which originated 2.1 percent of the lines of credit (1.2 percent by dollar) in low-income tracts in the assessment area.

In 2018, the bank originated no lines of credit in moderate-income tracts, while aggregate lenders originated 7.6 percent of these lines of credit (3.9 percent by dollar) in these tracts. Aggregate lenders failed to meet demographic information, as 15.5 percent of owner-occupied units were in moderate-income tracts during the review period. In 2019, the bank's performance improved, but remained below demographics, originating 8.3 percent of HMDA reportable lines of credit (9.5 percent by dollar) in moderate-income tracts. This performance was greater than aggregate lenders, which originated 6.3 percent of these lines of credit (4.2 percent by dollar) in moderate-income tracts.

The distribution of the remainder of home improvement lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders.

The bank's small business lending by number in low-income census tracts during the review period exceeded the percentage of small business located in these tracts as well as the performance of aggregate lenders. In 2018, 13.5 percent of small business loans (13.8 percent by dollar) were originated in low-income tracts, compared to 7.3 percent of businesses located in those tracts and 7.8 percent of aggregate loans (8.4 percent by dollar). In 2019, the bank originated 19.1 percent of small business loans (22.8 percent by dollar) in low-income tracts, compared to 7.3 percent of businesses being located in these tracts and 7.6 percent of aggregate loans (8.3 percent by dollar).

Comerica Bank   CRA Performance Evaluation
Dallas, Texas   February 8, 2021
Austin, TX Assessment Area

In 2018, 8.6 percent of small business loans (15.1 percent by dollar) were originated in moderate-income tracts, compared to the 12.6 percent of businesses located in those tracts and 13.1 percent of aggregate loans (12.9 percent by dollar). In 2019, 13.6 percent of small business loans (10.2 percent by dollar) were originated in moderate-income tracts, compared to 12.6 percent of assessment area businesses in these tracts and 12.6 percent of aggregate small business loans (13.6 percent by dollar).

The bank's small business lending in middle- and upper-income tracts during the review period was generally lower than the percentage of small businesses in these tracts. When compared to the aggregate, the bank generally originated fewer loans in middle- and upper-income census tract.

Community Development Lending

The bank makes a relatively high level of community development loans in the Austin, TX Assessment Area. During the review period, the bank originated a total of 20 community development loans for $38.0 million in the assessment area. Additionally, one loan benefitting a broader statewide area provided $1 million towards supporting affordable housing efforts.

The community development loans originated in the Austin, TX Assessment Area during the evaluation period served a variety of community development purposes, with revitalization and stabilization representing the largest portion. The table below summarizes the bank's community development lending.

Community Development Lending Austin, TX Assessment Area		
Purpose	**#**	**$000s**
Affordable Housing	3	5,821
Community Services	5	8,883
Economic Development	4	5,504
Revitalization and Stabilization	8	17,833
Totals	**20**	**38,041**

Several of the community development loans (five loans totaling $11.8 million) were associated with the Paycheck Protection Program, implemented in response to the COVID-19 pandemic. The bank's high level of participation in this program reflects responsiveness to the needs of the community and the bank's use of flexible lending practices to meet the needs of the assessment area.

Investment Test

The bank made a significant level of qualified community development investments and grants in area during the review period. The bank's investments were primarily focused on affordable housing, with the investments consisting of qualifying mortgage-backed securities and projects qualifying for low-income housing tax credits. Notable investments made by the institution include five investments in programs for the construction or preservation of rent restricted units for LMI individuals and families. Qualified donations during the review period served an array of community development purposes, with the majority benefitting organizations that perform qualified community services targeted to low- or moderate-income individuals.

Community Development Investments Austin, TX Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	$000s	#	$000s	#	$000s	#	$000s
Affordable Housing	11	3,111	4	2,570	1	2	16	5,683
Community Services	-	-	-	-	15	72	15	72
Economic Development	1	3,980	-	-	5	21	6	4,001
Total	12	7,091	4	2,570	21	95	37	9,756

The bank's investment and grant activity in the Austin, TX Assessment Area lines up with needs highlighted by the community contact in the area, with the largest volume of investments targeted toward affordable housing availability.

Service Test

Retail and community development services reflect adequate responsiveness to the needs of the assessment area. The bank's branch hours are reasonable, and services do not vary in a way that inconveniences low- or moderate-income geographies or individuals. The bank provides an adequate level of community development services, and delivery systems are reasonably accessible to the assessment area.

Retail Services

The bank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's ten branch offices and 13 ATMs as of December 31, 2020, was compared to the distribution of the population and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the Austin Assessment Area.

Distribution of Branches and ATMs Austin, TX Assessment Area							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	12.3	11.9	7.3	1	10.0	1	7.7
Moderate	20.0	19.7	12.7	0	0.0	0	0.0
Middle	33.7	33.3	30.2	2	20.0	4	30.8
Upper	31.9	33.7	48.4	7	70.0	8	61.5
Unknown	2.1	1.4	1.4	0	0.0	0	0.0
Total	100.0	100.0	100.0	10	100.0	13	100.0

While the significant majority of the bank's branches were located within upper-income census tracts, six of the seven branches in upper-income tracts are within two miles of a low- or moderate-income census tract. The bank did not open or close any branches in the assessment area during the review period, though the bank did relocate one branch within an upper-income census tract. During the review period, the bank closed one cash-only ATM in a middle-income tract. The bank's record of opening or closing branches has not adversely affected the accessibility of its

delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the assessment area.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. The bank's employees served in many various capacities, including boards of directors and as trustees, for six community development organizations offering community development services that focused on providing services to LMI individuals. Total hours served during the review period was approximately 131 hours. A significant portion of the bank's community development services in the Austin, TX Assessment Area were provided through an organization that provides support services to seniors in particularly low-income geographies in the assessment area.

Description of Operations in Dallas – Fort Worth Metroplex Assessment Area

The Dallas – Fort Worth Metroplex (DFW) Assessment Area includes Collin, Dallas, Denton, Ellis, Rockwall, and Tarrant counties in the north central region of Texas. These counties, along with Hunt, Kaufman, Johnson, Parker, and Wise counties, which are excluded from the assessment area, make up the Dallas – Plano – Irving, TX MD and the Fort Worth – Arlington – Grapevine, TX MD (together, comprising the Dallas – Fort Worth – Arlington, TX MSA.)

Population Changes Dallas – Fort Worth Metroplex Assessment Area			
County	2019 Population Estimate	% Increase Since 2010	Major Municipalities
Collin County	1,034,730	32.3	McKinney*, Plano, Frisco, Allen
Dallas County	2,635,516	11.3	Dallas*, Carrollton, Irving
Denton County	887,207	33.9	Denton*, Highland Village, Sanger
Ellis County	184,826	23.5	Waxahachie*, Ennis, Midlothian
Rockwall County	104,915	33.9	Rockwall*, Mobile City
Tarrant County	2,102,515	16.2	Fort Worth*, Arlington, Bedford, Hurst

*Denotes County Seat

As of December 31, 2020, the bank operated 55 branches in the DFW Assessment Area representing 12.7 percent of its total branches, and 44.7 percent of the branches in Texas. Six of the branches are located in low-income census tracts, 12 branches are in moderate-income census tracts, 16 are in middle-income census tracts, and 21 are located in upper-income tracts.

According to the FDIC, as of June 30, 2020, the bank had $5.5 billion in deposits in the DFW Assessment Area, representing 8.1 percent of the bank's total deposits. This also represents a market share of 0.84 percent, which ranks 13th out of 157 total FDIC-insured deposits that are located within the assessment area. Charles Schwab Bank holds the largest deposit market share at 40.5 percent, followed by Bank of America at 18.3 percent, and JPMorgan Chase Bank at 12.1 percent. With the top three institutions holding 70.9 percent of the total deposits in the assessment area, competition among the remaining 154 institutions is fierce.

In 2018, there were 946 financial institutions that reported HMDA data in the DFW Assessment Area. The bank ranked 67th in HMDA market share with 0.3 percent of total HMDA-reportable originations and purchases. Wells Fargo Bank and JPMorgan Chase Bank led the market with 10.5 percent and 6.6 percent of market share, respectively. In 2019, 970 institutions reported HMDA data in the assessment area. Comerica Bank ranked 77th in market share with 0.3 percent of the market. Wells Fargo Bank and JPMorgan Chase Bank led the market again with 7.2 percent and 6.2 percent of the market, respectively.

For 2018, there were 256 financial institutions that reported CRA small business lending data in the DFW Assessment Area. The bank ranked 20th with 0.6 percent of total CRA-reportable originations and purchases during the year. JP Morgan Chase Bank and American Express National Bank dominated the market with 19.9 percent and 19.5 percent of the market share,

respectively. During 2019, 256 institutions reported CRA data in the assessment area. Comerica ranked 22nd, with 0.4 percent of the market share. In 2019, JPMorgan Chase and American Express National Bank led the market with 23.9 percent and 19.2 percent of the market, respectively.

Demographic Characteristics

Certain economic and demographic data is available for analysis for the Dallas – Fort Worth - Arlington, TX MSA as a whole, but not for the specific assessment area. However, it is reasonable to believe that the data for the MSA provides a good representation of the characteristics of the assessment area, as the 2019 population of the assessment area includes 91.8 percent of the total MSA population.

During the review period, the DFW Assessment Area was made up of 1,176 total census tracts. Of the total assessment area tracts, 164 (13.9 percent) were classified as low-income, 309 (26.3 percent) were moderate-income, 305 (25.9 percent) were middle-income, 391 (33.2 percent) were upper-income, and the remaining seven census tracts (0.6 percent) were designated as having an unknown income level.

Income Characteristics

Income characteristics are provided for each of the two MDs that make up the Dallas – Fort Worth – Arlington, TX MSA. The following chart reflects the estimated median family income for 2018 and 2019 in the DFW Assessment Area. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper). According to available data, 11.7 percent of families in the assessment area lived below the poverty level.

Median Family Income Dallas – Fort Worth Metroplex Assessment Area				
	2018		**2019**	
Income Level	Dallas-Plano-Irving, TX MD	Fort Worth-Arlington, TX MD	Dallas-Plano-Irving, TX MD	Fort Worth-Arlington, TX MD
Median Family Income	$77,200	$75,000	$83,100	$75,300
Low-income	< $38,600	< $37,500	< $41,550	< $37,650
Moderate-income	$38,600 < $61,760	$37,500 < $60,000	$41,550 < $66,480	$37,650 < $60,240
Middle-income	$61,760 < $92,640	$60,000 < $90,000	$66,480 < $99,720	$60,240 < $90,360
Upper-income	≥ $92,640	≥ $90,000	≥ $99,720	≥ $90,360

Housing Characteristics

According to 2015 census estimates, there were a total of 2,285,520 housing units in the DFW Assessment Area. Of the total housing units, 53.8 percent were classified as owner-occupied units, 38.6 percent were rental units, and the remaining 7.5 percent were vacant.

Low-income census tracts contained 12.4 percent of the total housing stock in the assessment area. The majority of housing units in the low-income census tracts were rental units (62.0 percent), with the remainder split between owner-occupied units (24.8 percent) and vacant units (13.3 percent). The median age of all units in these tracts was 46 years with a median housing value of $72,458. Monthly mortgage payments for a 30-year loan with 20 percent down at 3.85

percent interest[10] on a $72,458 home is approximately $272. This is considered more affordable than the median gross rent in low-income census tracts of $747. However, 34.2 percent of families in low-income census tracts within the assessment area had incomes below the poverty level, which may make it difficult to qualify for a loan or afford a down payment. Additionally, as rental units represent the significant majority of the housing stock in these tracts, limited availability of owner-occupied units may also hinder those individuals and families desiring to purchase a home in these tracts.

Moderate-income census tracts accounted for 24.7 percent of the total housing stock in the assessment area according to 2015 data. The largest portion of these units, 47.3 percent were classified as rental units, closely followed by owner-occupied units (43.9 percent), with the remaining 8.8 percent classified as vacant. The housing stock in moderate-income census tracts in the assessment area had a median age of 45 years and median value of $94,173. A 30-year fixed-rate loan with an interest rate of 3.85 percent and 20 percent down payment would have a monthly mortgage payment of approximately $460. This is more affordable than the reported median gross rent in these tracts of $875. However, for the 19.0 percent of families which reported incomes below poverty level in these census tracts, qualifying for a mortgage may be difficult.

A large portion of the housing stock in the assessment area, 27.8 percent, was located in middle-income census tracts. In these tracts, the majority of units, 55.4 percent were owner-occupied, 38.0 percent were rental units, and 6.6 percent were vacant. The units in middle-income tracts were younger than those in low- or moderate-income tracts, with a median age of 34 years. According to 2015 data, the median housing value in middle-income tracts was $138,525.

Upper-income tracts account for the largest portion of the assessment areas housing stock, representing 34.9 percent of total units. Most units in these tracts were owner-occupied, 70.0 percent of total units, with 24.6 percent categorized as rental units, and 5.4 percent were vacant. The median age of the housing stock in upper-income census tracts was 26 years, with a median value of $238,521.

Employment and Economic Conditions

The national average unemployment rates for 2018, 2019, and 2020 were 3.9 percent, 3.7 percent, and 8.1 percent, respectively. Unemployment rates in the DFW Assessment Area were consistently below those of Texas and the nation as a whole. According to the 2015 Labor Summary, unemployment rates in LMI census tracts within the assessment area (10.6 percent and 8.6 percent, respectively) were materially higher than the rates in the remainder of the assessment area. High unemployment rates in LMI census tracts could affect loan demand for these tracts. Additionally, unemployment rates rose significantly in 2020 due to the COVID-19 pandemic, more than doubling in each of the listed geographies.

The following chart shows unemployment rates relevant to the assessment area for 2018 through 2020.

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[10] Available historical data from FreddieMac on 30-Year Fixed-Rate Mortgages indicate an Annual Average rate of 3.85 percent in 2015. http://www.freddiemac.com/pmms/pmms30.html

Annual Average Unemployment Rate Dallas – Fort Worth Metroplex Assessment Area			
AREA	**2018**	**2019**	**2020**
Collin County	3.3	3.1	6.4
Dallas County	3.8	3.5	7.6
Denton County	3.2	3.0	6.6
Ellis County	3.3	3.1	6.1
Rockwall County	3.2	3.1	6.2
Tarrant County	3.5	3.3	7.4
Assessment Area	**3.5**	**3.3**	**7.2**
MSA	3.5	3.3	7.1
State of Texas	**3.8**	**3.5**	**7.7**
United States	**3.9**	**3.7**	**8.1**

The Dallas – Fort Worth - Arlington, TX MSA is one of the significant population centers of Texas; 26.1 percent of the state's population resides within the MSA, and Dallas, Tarrant, Collin, and Denton counties are the 2nd, 3rd,6th, and 7th most populous counties in the state, respectively. The MSA had a total gross domestic product of $523.9 billion in 2019, similar to the economic output of countries such as Sweden[11].

The MSA is home to several Fortune 500 companies, including Exxon Mobil, AT&T, American Airlines Group, and real estate services firm CBRE Group[12]. Other major employers in the area include the financial institutions Bank of America and JPMorgan Chase, and several local healthcare facilities. In addition, the Texas farming and ranching industry is based in Fort Worth. Several major defense manufacturers, including Lockheed Martin, Bell Textron, and Raytheon, maintain significant operations in the Metroplex.

Community Contacts and Community Development Opportunities

As part of the evaluation of the DFW Assessment Area, a community contact involved in affordable housing and community services was made. The contact highlighted the gap between the LMI population in the area and the availability of affordable housing to accommodate that population. The gap has continued to grow as LMI families relocate to the area. In addition to the ongoing need for funding for organizations that provide affordable housing, the contact indicated an opportunity for financial institutions to support LMI individuals in the area by providing financial education services targeted toward helping LMI individuals increase their creditworthiness.

Key Assessment Area Demographics

The following table details selected characteristics of the assessment area.

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[11] Country Economy. "Sweden GDP- Gross Domestic Product." CountryEconomy.com
https://countryeconomy.com/gdp (accessed March 18, 2021)
[12] Fortune. "Fortune 500" Fortune.com,
https://fortune.com/fortune500/2020/search/?hqstate=TX (accessed March 18, 2021)

Combined Demographics Report

Assessment Area: TX - Dallas-Fort Worth Metroplex

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	164	13.9	149,845	10.3	51,243	34.2	345,301	23.8
Moderate-income	309	26.3	345,828	23.8	65,575	19	237,937	16.4
Middle-income	305	25.9	402,775	27.7	33,336	8.3	259,813	17.9
Upper-income	391	33.2	552,589	38	19,167	3.5	609,474	42
Unknown-income	7	0.6	1,488	0.1	273	18.3	0	0
Total Assessment Area	**1,176**	**100.0**	**1,452,525**	**100.0**	**169,594**	**11.7**	**1,452,52**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	282,267	69,865	5.7	24.8	174,883	62	37,519	13.3
Moderate-income	565,407	248,322	20.2	43.9	267,495	47.3	49,590	8.8
Middle-income	634,680	351,925	28.6	55.4	241,066	38	41,689	6.6
Upper-income	798,244	558,585	45.4	70	196,539	24.6	43,120	5.4
Unknown-income	4,922	1,248	0.1	25.4	3,133	63.7	541	11
Total Assessment Area	**2,285,520**	**1,229,945**	**100.0**	**53.8**	**883,116**	**38.6**	**172,459**	**7.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	27,803	7.9	24,730	7.6	2,883	11.6	190	4.8
Moderate-income	70,963	20.1	64,001	19.7	6,463	26.1	499	12.6
Middle-income	91,096	25.8	84,115	26	6,127	24.7	854	21.6
Upper-income	160,846	45.6	149,742	46.2	8,731	35.2	2,373	60.1
Unknown-income	2,131	0.6	1,525	0.5	573	2.3	33	0.8
Total Assessment Area	**352,839**	**100.0**	**324,113**	**100.0**	**24,777**	**100.0**	**3,949**	**100.0**
	Percentage of Total Businesses:		**91.9**		**7.0**		**1.1**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	112	4.4	107	4.2	5	16.1	0	0
Moderate-income	340	13.2	333	13.1	7	22.6	0	0
Middle-income	675	26.3	672	26.5	3	9.7	0	0
Upper-income	1,428	55.6	1,410	55.6	15	48.4	3	100
Unknown-income	13	0.5	12	0.5	1	3.2	0	0
Total Assessment Area	**2,568**	**100.0**	**2,534**	**100.0**	**31**	**100.0**	**3**	**100.0**
	Percentage of Total Farms:		**98.7**		**1.2**		**.1**	

2019 FFIEC Census Data and 2019 D&B Information

Conclusions with Respect to Performance Tests

Lending Test

Lending activity reflects good responsiveness to credit needs in the DFW Assessment Area. The geographic distribution of loans reflects excellent penetration throughout the assessment area. In addition, the distribution of borrowers reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank is a leader in making community development loans.

During the review period, the bank reported 1,552 (49.9 percent) HMDA-reportable loans compared to 1,556 (50.1 percent) small business loans in the DFW Assessment Area. Therefore, HMDA and small business lending were given similar weight in determining the bank's Lending Test rating in the assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix F.

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The bank's distribution of lending to borrowers reflects a good penetration among individuals of different income levels (including LMI) and businesses of different revenue sizes. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to LMI borrowers.

HMDA Lending

HMDA lending by borrower income in the assessment area is considered excellent when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the assessment area.

In 2018, the bank originated 104 loans to low-income borrowers, representing 13.1 percent of HMDA-reportable loans (5.0 percent by dollar volume) in the assessment area. While this performance did not meet the 23.8 percent of assessment area families that were classified as low-income, the bank significantly outperformed aggregate lenders, which originated only 4.2 percent of HMDA-reportable loans (1.8 percent by dollar) to low-income borrowers in 2018. The bank's performance remained steady in 2019, originating 11.4 percent of HMDA loans to low-income borrowers, accounting for 5.8 percent by dollar volume. The bank continued to out-perform aggregate lenders which originated 3.8 percent of HMDA loans (1.6 percent by dollar) to low-income borrowers.

In 2018, 139 loans, representing 17.6 percent of HMDA-reportable loans were made in the assessment area (9.4 percent by dollar volume) to moderate-income borrowers. This performance outpaced aggregate lenders, which originated 13.5 percent of HMDA loans by number, and 7.8 percent by dollar volume, to moderate-income borrowers. Additionally, the bank's performance was above the 16.4 percent of assessment area families classified as moderate-income. In 2019, the bank again outperformed aggregate lenders and demographic data, originating 18.3 percent of HMDA-reportable loans by number and 11.2 percent by dollar volume to moderate-income borrowers. During the same period, aggregate lenders originated 14.2 percent by number and 8.1 percent by dollar volume to moderate-income borrowers.

Small Business Lending

Considering the bank's performance when compared to aggregate CRA lenders in the DFW Assessment Area, the borrower distribution of small business loans by revenue size of businesses is adequate. The assessment area is saturated with large national banks and competition for business loans is high.

In 2018, the bank originated 19.6 percent of its small business loans, representing 13.9 percent by dollar volume, to businesses with gross annual revenues of $1 million or less. This is lower than aggregate CRA lenders, which originated 42.2 percent (33.8 percent by dollar) to small businesses during the same period. In 2019, the bank's performance improved, originating 24.9 percent of small business loans (15.2 percent by dollar) to businesses with gross revenue under $1 million. This performance again lagged behind aggregate lenders, which originated 47.0 percent (34.0 percent by dollar) to small businesses in 2019. Comerica and aggregate lenders both fell below D&B demographic data, which reported 91.9 percent of assessment area business having revenues of $1 million or less during the review period.

Of the 1,556 small business loans originated by the bank in the assessment area during the review period, 31.0 percent were reported as being to businesses with unknown revenues (33.3 percent in 2018 and 28.1 percent in 2019). Applicable regulations do not require institutions to request or consider revenue information when making a loan; however, the material portion of small business loans without revenue information may impact overall distribution of loans. The institution indicated that many of the unknown revenue loans reported were from the bank's commercial credit card product which are likely to be originated to borrowers with gross annual revenues over $1 million. Another of the bank's credit card programs, which is more likely to be utilized by small businesses, is offered through the bank's partnership with Elan Financial Services and is therefore not reported by the institution as CRA lending.

Another way to gauge the bank's small business lending performance is to review the data by loan amount. Small businesses typically require smaller dollar credits. In this regard, it is noted that a large portion of the bank's small business loans in the DFW Assessment Area were made in loan amounts of $100,000 or less. In 2018, 47.0 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (compared to 93.4 percent of aggregate small business loans), with another 20.0 percent in loan amounts between $100,000 and $250,000 (3.3 percent of aggregate). In 2019, 39.0 percent of the bank's small business loans were originated in loan amounts of $100,000 or less (93.9 percent of aggregate), and 25.2 percent in loan amounts between $100,000 and $250,000 (3.1 percent of aggregate).

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business lending and HMDA lending, including both originations and purchases, was compared with available demographic information.   Performance context issues and aggregate lending data were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects excellent penetration throughout the assessment area. There were no conspicuous gaps or anomalies in the bank's lending patterns.

The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies).

HMDA Loan Geographic Distribution

The geographic distribution of the bank's HMDA loans reflects good penetration throughout the DFW Assessment Area. This is based on the bank's performance compared to demographics, taking into consideration the performance of the aggregate lenders. During the review period, the largest portion of the bank's HMDA-related originations and purchases were home refinance loans (51.7 percent of total HMDA loans) and the smallest portion were classified as home purchase loans (6.2 percent). As a result, refinance lending was given the greatest weight among HMDA-related products, and home purchase lending was given the least weight. Additionally, as the bank made only two multi-family loans during the review period, this product was not analyzed separately.

Home Purchase Lending

The bank's geographic distribution of home purchase lending in the DFW Assessment Area during the review period is adequate.

In 2018, the bank originated or purchased no home purchase loans in low-income census tracts. This is below the performance of aggregate lenders, which originated or purchased 4.0 percent by number and 2.6 percent by dollar in these tracts; however, aggregate lenders also failed to perform at the level of demographic data. In 2019, the bank's performance improved, originating or purchasing 8.9 percent of home purchase loans in low-income census tracts (4.0 percent by dollar). This was more than double the performance of aggregate lenders, which reported 4.2 percent by number and 2.8 percent by dollar in low-income census tracts in 2019. Only 5.7 percent of owner-occupied units were located within low-income census tracts during the review period, possibly indicating a lower demand for home purchase loans than in other tracts.

The bank originated 13.5 percent of home purchase loans in moderate-income census tracts in 2018 (6.5 percent by dollar). While the bank was unable to perform to the level of the demographic data, Comerica performed comparably to aggregate lenders, which originated 14.0 percent of home purchase loans (9.5 percent by dollar) in moderate-income census tracts in 2018. In 2019, the bank originated 11.1 percent of home purchase loans in moderate-income tracts (10.2 percent by dollar), which was again comparable to aggregate lenders, which originated 14.6 percent of home purchase loans in these tracts (10.2 percent by dollar). Moderate-income census tracts contained 20.2 percent of the assessment area owner-occupied units during the review period.

The distribution of the remainder of home purchase lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Refinance Lending

The bank's geographic distribution of home refinance lending in the DFW Assessment Area during the review period is good.

In 2018, the bank originated or purchased 4.7 percent of home refinance loans in low-income census tracts in the assessment area (1.9 percent by dollar). This is above the performance of aggregate lenders, which originated or purchased only 2.6 percent by number and 1.5 percent by dollar in these tracts. In 2019, the bank's performance fell, originating or purchasing 3.2 percent of home refinance loans in low-income census tracts (1.6 percent by dollar). However, this was still greater than the performance of aggregate lenders, which reported 2.4 percent by number and 1.7 percent by dollar in low-income census tracts in 2019.

In 2018, the bank slightly outperformed aggregate lending in moderate-income census tracts, originating 16.7 percent of refinance loans (8.8 percent by dollar) in these geographies, compared to aggregate lenders' 14.7 percent of loans (9.3 percent by dollar) in these tracts. Both the bank and aggregate lenders failed to meet the level of demographics, as 20.2 percent of owner-occupied units were in moderate-income tracts during the review period. In 2019, the bank's performance increased. The bank originated 18.0 percent of home refinance loans (10.4 percent by dollar) in moderate-income tracts while aggregate lenders originated 12.0 percent of home refinance loans (7.4 percent by dollar) in these tracts.

The distribution of the remainder of home purchase lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Home Improvement Lending

The bank's geographic distribution of home purchase lending in the DFW Assessment Area during the review period is excellent.

Home improvement lending represented 18.8 percent of the bank's HMDA lending in the DFW Assessment Area during the review period. In 2018, the bank originated 6.0 percent of home improvement loans (3.2 percent by dollar) in low-income tracts. This slightly outpaces demographic data, as low-income census tracts contained 5.7 percent of owner-occupied units in the assessment area. Further, the bank's 2018 performance is more than double that of aggregate lenders, which originated 2.5 percent of home improvement loans (1.9 percent by dollar) in these tracts. In 2019, the bank continued to perform well, originating 9.2 percent of home improvement loans in low-income census tracts (8.4 percent by dollar). Again, the bank materially outperformed aggregate lenders, which originated just 3.1 percent of home improvement loans (2.2 percent by dollar) in low-income census tracts.

In 2018, the bank originated 28.2 percent of home improvement loans (18.9 percent by dollar) in moderate income census tracts; outpacing demographics, as these tracts contained 20.2 percent of assessment area owner-occupied units. During the same year, aggregate lenders originated 12.5 percent of home improvement loans (10.0 percent by dollar) in moderate-income tracts. In 2019, the bank originated 19.0 percent of home improvement loans in moderate-income census tracts (12.8 percent by dollar), which compared favorably to aggregate lenders, which originated 12.4 percent of home improvement loans (9.5 percent by dollar) in these tracts.

The distribution of the remainder of home improvement lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Other Purpose Lines of Credit

The bank's geographic distribution of other purpose lines of credit in the DFW Assessment Area during the review period is excellent.

Other lines of credit represented 22.4 percent of the banks HMDA loans in the DFW Assessment Area during the review period. The bank's performance in originating these lines of credit in low-income census tracts is good. In 2018, the bank originated 2.2 percent of other lines of credit in low-income tracts (1.3 percent by dollar). While this did not meet the level of demographics (5.7 percent of owner-occupied units were in these tracts), the bank performed comparably with aggregate lenders, which originated 2.1 percent of other lines of credit (1.4 percent by dollar) in low-income tracts. In 2019, the bank's performance improved, surpassing demographic data by originating 6.1 percent of other lines of credit in low-income tracts (2.9 percent by dollar). Aggregate lenders performance did not keep pace with the bank, originating 2.0 percent of other lines of credit (1.0 percent by dollar) in low-income tracts.

The bank's performance in moderate-income census tracts in the DFW Assessment Area is excellent. In 2018, the bank originated 15.3 percent of other lines of credit in moderate-income census tracts (9.2 percent by dollar). Though these tracts contained 20.2 percent of owner-occupied units, a level the bank did not match, the bank did outperform aggregate lenders which originated 10.2 percent of other lines of credit (6.6 percent by dollar) in these tracts in 2018. The bank's performance remained steady in 2019, originating 15.2 percent of other lines of credit (10.3 percent by dollar) in moderate-income tracts. During this year, aggregate lenders' performance was again below the bank's, originating 11.0 percent of other lines of credit (6.6 percent by dollar) in moderate-income census tracts.

The distribution of the remainder of home improvement lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Small Business Loan Geographic Distribution

The geographic distribution of small business loans reflects excellent penetration throughout the assessment area. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders

The bank's small business lending by number in low-income census tracts during the review period exceeded the percentage of small business located in these tracts as well as aggregate lending. In 2018, 13.2 percent of small business loans (12.2 percent by dollar) were originated in low-income tracts, compared to 7.9 percent of businesses located in those tracts and 7.5 percent of aggregate loans (8.9 percent by dollar). In 2019, the bank originated 15.7 percent of small business loans (15.9 percent by dollar) in low-income tracts, compared to 7.9 percent of businesses being located in these tracts and 7.3 percent of aggregate loans (8.5 percent by dollar).

In 2018, 27.8 percent of small business loans (31.1 percent by dollar) were originated in moderate-income tracts, compared to the 20.1 percent of businesses located in those tracts and 19.4 percent of aggregate loans (22.2 percent by dollar). In 2019, the bank continued to perform well, as 25.1 percent of small business loans (26.4 percent by dollar) were originated in moderate-

income tracts, compared to static demographic data and 19.5 percent of aggregate small business loans (22.0 percent by dollar).

The bank's small business lending in middle- and upper-income tracts during the review period was generally lower than the percentage of small businesses in these tracts. When compared to the aggregate, the bank generally originated fewer loans in middle- and upper-income census tract.

Community Development Lending

The bank is a leader in making community development loans in the DFW Assessment Area. During the review period, the bank originated a total of 121 qualifying community development loans, totaling $301.3 million in the assessment area.

The community development loans originated in the DFW Assessment Area during the review period were for a variety of purposes, though activities that revitalize or stabilize low- or moderate-income geographies representing the significant majority of activity. The table below summarizes the bank's community development lending.

The majority of the community development loans (95 loans) were made under the Paycheck Protection Program, implemented in response to the ongoing COVID-19 pandemic's impact on small businesses. This program was specifically enacted to support smaller businesses and retain jobs. The bank's high level of participation in this program reflects responsiveness to the needs of the community and represents the bank's use of flexible lending practices to meet the needs of the assessment area. Additionally, the bank's performance represents a substantial increase since the institution's previous CRA evaluation.

Community Development Lending Dallas – Fort Worth Metroplex Assessment Area		
Purpose	**#**	**$000s**
Community Services	10	10,295
Economic Development	2	4,860
Revitalization and Stabilization	109	286,163
Totals	121	301,318

Investment Test

The bank has an excellent level of qualified community development investments and grants and exhibits good responsiveness to credit and community development needs. The bank's investments were primarily focused on affordable housing, while donations focused on community services. The bank's volume of investments and contributions increased significantly since the previous evaluation.

Community Development Investments and Donations Dallas – Fort Worth Metroplex Assessment Area								
	Current Period Investments		Prior Period Investments		Donations		Total	
Purpose	#	$000s	#	$000s	#	$000s	#	$000s
Affordable Housing	18	19,215	10	12,132	12	88	40	31,435
Community Services	-	-	-	-	195	1,720	195	1,720
Economic Development	2	190	-	-	16	455	18	645
Total	20	19,405	10	12,132	223	2,263	253	33,800

Notable investments made by the institution include 15 investments (totaling approximately $29.1 million) in programs for the construction of rent restricted units for LMI individuals and families. These efforts represent responsiveness to needs in the assessment area as affordable housing was the primary need identified by a contact in the DFW Assessment Area.

Service Test

Its retail and community development services reflect good responsiveness to the needs of the assessment area. The bank's branch hours are reasonable, and services do not vary in a way that inconveniences low- or moderate-income geographies or individuals. The bank is a leader in the provision of community development services, and delivery systems are reasonably accessible to the assessment area.

Retail Services

The bank's delivery systems are accessible to the bank's geographies and individuals of different income levels in its assessment area. The distribution of the bank's 55 branch offices and 96 ATMs as of December 31, 2020, was compared to the distribution of the population and businesses among the tract categories within the assessment area. The table below summarizes the bank's retail locations in the DFW Assessment Area.

Distribution of Branches and ATMs Dallas – Fort Worth Metroplex Assessment Area							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full Service ATMs	
				#	%	#	%
Low	13.9	11.9	7.9	6	10.9	6	6.3
Moderate	26.3	26.0	20.1	12	21.8	20	20.8
Middle	25.9	27.2	25.8	16	29.1	21	21.9
Upper	33.3	34.8	45.6	21	38.2	49	51.0
Unknown	0.6	0.1	0.6	0	0.0	0	0.0
Total	100.0	100.0	100.0	55	100.0	96	100.0

During the review period, the bank opened one branch, located in an upper-income census tract, and did not close any branches. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are basically the same throughout the assessment area.

Community Development Services

The bank is a leader in providing community development services in the assessment area. The bank's employees served in many capacities, including boards of directors and as trustees, for 24 community development financial organizations offering community development services targeted to LMI individuals. During the review period, the bank provided a significant level of financial education to LMI students in the DFW Assessment Area through involvement in Junior Achievement and similar programs. Total hours served during the review period was approximately 1,651 hours.

METROPOLITAN AREAS (Limited-Scope Review)

Description of Operations

- **Houston Assessment Area**
  - As of December 31, 2020, the bank operated 48 branches in the assessment area, representing 11.1 percent of its branches.
  - As of June 30, 2020, the bank had approximately $3.5 billion in deposits in this assessment area, representing a market share of 1.2 percent. The $3.5 billion also represents 5.0 percent of the bank's total deposits.
- **San Antonio Assessment Area**
  - As of December 31, 2020, the bank operated six branches in the assessment area, representing 1.4 percent of its branches.
  - As of June 30, 2020, the bank had approximately $204.7 million in deposits in this assessment area, representing a market share of 0.15 percent. The $204.7 million also represents 0.3 percent of the bank's total deposits.

Conclusions with Respect to Performance Tests

Facts and data reviewed, including performance and demographic information can be found in Appendix D for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited-scope assessment areas can be found in Appendix G.

Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Houston	Exceeds	Consistent	Consistent
San Antonio	Consistent	Consistent	Below

The institution's performance in the limited-scope metropolitan assessment areas were generally consistent with the institution's overall performance in the state of Texas and did not change the bank's overall rating.

NONMETROPOLITAN STATEWIDE AREA (Limited-Scope Review)

Description of Operations

- **Kerr County Assessment Area**
    - As of December 31, 2020, the bank operated four branches in the assessment area, representing 0.9 percent of its total branches.
    - As of June 30, 2020, the bank had approximately $174.6 million in deposits in this assessment area, representing a market share of 11.1 percent. The $174.6 million also represents 0.3 percent of the bank's total deposits.

Conclusions with Respect to Performance Tests

Facts and data reviewed, including performance and demographic information can be found in Appendix E for information regarding these areas. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited-scope assessment areas can be found in Appendix H.

Conclusions regarding performance are as follows:

Assessment Area	Lending Test	Investment Test	Service Test
Kerr County	Below	Below	Consistent

The institution's performance in the limited-scope nonmetropolitan assessment area was generally below the institution's overall performance in the state of Texas but did not change the bank's overall rating.

APPENDICES

Appendix A – Scope of Examination

SCOPE OF EXAMINAITON	
Time Period Reviewed	
Lending Test: January 1, 2018 to December 31, 2019 Community Development Loans, Investment Test, and Service Tests: April 1, 2018 to December 31, 2020	
Financial Institution	**Products Reviewed**
Comerica Bank Dallas, Texas	CRA and HMDA Reportable Loans Community Development Loans
List of Assessment Areas	
Assessment Area	**Type of Examination**
Phoenix, AZ	Full Scope
Greater Los Angeles, CA	Full Scope
Inland Empire, CA	Limited Scope
Salinas, CA	Limited Scope
San Diego, CA	Limited Scope
San Francisco Bay, CA	Full Scope
San Jose, CA	Limited Scope
Santa Cruz, CA	Limited Scope
Ventura County, CA	Limited Scope
Fort Lauderdale – West Palm Beach, FL	Full Scope
Naples, FL	Limited Scope
Ann Arbor, MI	Limited Scope
Battle Creek, MI	Limited Scope
Fenton, MI	Limited Scope
Grand Rapids – Wyoming, MI	Limited Scope
Jackson, MI	Limited Scope
Kalamazoo, MI	Limited Scope
Lansing – East Lansing, MI	Full Scope
Lenawee County, MI	Limited Scope
Midland, MI	Limited Scope
Muskegon, MI	Limited Scope
Southeast Michigan	Full Scope
Austin, TX	Full Scope
Dallas Fort Worth (DFW), TX	Full Scope
Houston, TX	Limited Scope
Kerr County, TX (Bank of the Hills)	Limited Scope
San Antonio, TX	Limited Scope

Appendix B – General Information

Acronyms

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credit
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit Ratio
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OCC	Office of the Comptroller of the Currency
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 in the tables were rounded to the nearest tenth in most cases, some columns may not total exactly to 100 percent.

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, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language:
1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. 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.
4. Activities that revitalize or stabilize –
   a. Low- or moderate-income geographies.
   b. Designated disaster areas.
   c. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
      i. Rates of poverty, unemployment, and population loss.
      ii. 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 non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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 metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of the applicants; the amount of loan requested; and the disposition of the application (for example, approved, denied, or withdrawn).

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

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 metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A 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. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a 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.

Multifamily: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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 that is 120 percent or more, in the case of a geography.

Appendix D – Metropolitan Limited-Scope Assessment Area/Areas Demographics

Combined Demographics Report

Assessment Area: CA - Inland Empire

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	28	5.4	27,592	4.4	11,383	41.3	131,983	20.8
Moderate-income	143	27.5	147,417	23.3	34,396	23.3	101,876	16.1
Middle-income	175	33.7	199,907	31.6	24,800	12.4	119,325	18.8
Upper-income	172	33.1	258,333	40.8	12,951	5	280,065	44.2
Unknown-income	2	0.4	0	0	0	0	0	0
Total Assessment Area	**520**	**100.0**	**633,249**	**100.0**	**83,530**	**13.2**	**633,249**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	44,253	11,540	2.3	26.1	27,993	63.3	4,720	10.7
Moderate-income	218,052	89,516	17.6	41.1	111,353	51.1	17,183	7.9
Middle-income	277,036	164,163	32.3	59.3	95,318	34.4	17,555	6.3
Upper-income	333,178	243,779	47.9	73.2	72,654	21.8	16,745	5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**872,519**	**508,998**	**100.0**	**58.3**	**307,318**	**35.2**	**56,203**	**6.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	5,211	4.7	4,714	4.6	471	5.8	26	5.1
Moderate-income	25,252	22.9	22,671	22.3	2,457	30.3	124	24.4
Middle-income	36,823	33.4	33,616	33.1	3,051	37.7	156	30.7
Upper-income	42,969	39	40,669	40	2,099	25.9	201	39.6
Unknown-income	57	0.1	36	0	20	0.2	1	0.2
Total Assessment Area	**110,312**	**100.0**	**101,706**	**100.0**	**8,098**	**100.0**	**508**	**100.0**
	Percentage of Total Businesses:		**92.2**		**7.3**			**.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	14	1.5	14	1.6	0	0	0	0
Moderate-income	129	14	120	13.8	9	19.6	0	0
Middle-income	314	34.2	293	33.6	21	45.7	0	0
Upper-income	462	50.3	444	51	16	34.8	2	100
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**919**	**100.0**	**871**	**100.0**	**46**	**100.0**	**2**	**100.0**
	Percentage of Total Farms:		**94.8**		**5.0**			**.2**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: CA - Salinas

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	3.8	2,494	3.3	984	39.5	15,489	20.5
Moderate-income	15	19	14,775	19.5	3,533	23.9	13,080	17.3
Middle-income	25	31.6	26,352	34.9	2,969	11.3	13,906	18.4
Upper-income	34	43	31,957	42.3	1,609	5	33,107	43.8
Unknown-income	2	2.5	4	0	4	100	0	0
Total Assessment Area	**79**	**100.0**	**75,582**	**100.0**	**9,099**	**12.0**	**75,582**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,377	355	0.7	10.5	2,813	83.3	209	6.2
Moderate-income	19,764	6,007	11.6	30.4	12,713	64.3	1,044	5.3
Middle-income	38,414	16,041	31	41.8	20,130	52.4	2,243	5.8
Upper-income	57,453	29,346	56.7	51.1	19,146	33.3	8,961	15.6
Unknown-income	4	4	0	100	0	0	0	0
Total Assessment Area	**119,012**	**51,753**	**100.0**	**43.5**	**54,802**	**46.0**	**12,457**	**10.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	638	4.3	593	4.3	41	3.8	4	7
Moderate-income	1,499	10	1,409	10.2	87	8.1	3	5.3
Middle-income	4,460	29.8	4,043	29.2	395	36.7	22	38.6
Upper-income	8,311	55.5	7,744	55.9	540	50.1	27	47.4
Unknown-income	73	0.5	58	0.4	14	1.3	1	1.8
Total Assessment Area	**14,981**	**100.0**	**13,847**	**100.0**	**1,077**	**100.0**	**57**	**100.0**
	Percentage of Total Businesses:		**92.4**		**7.2**			**.4**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	9	2.3	7	2.2	2	2.4	0	0
Moderate-income	37	9.3	27	8.6	10	11.9	0	0
Middle-income	169	42.5	122	38.9	47	56	0	0
Upper-income	179	45	157	50	22	26.2	0	0
Unknown-income	4	1	1	0.3	3	3.6	0	0
Total Assessment Area	**398**	**100.0**	**314**	**100.0**	**84**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**78.9**		**21.1**			**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: CA - San Diego

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	52	10.3	48,329	8.5	16,121	33.4	134,567	23.6
Moderate-income	109	21.6	121,038	21.3	18,636	15.4	95,092	16.7
Middle-income	161	31.9	176,363	31	15,476	8.8	98,851	17.4
Upper-income	177	35	223,334	39.2	10,462	4.7	240,599	42.3
Unknown-income	6	1.2	45	0	0	0	0	0
Total Assessment Area	**505**	**100.0**	**569,109**	**100.0**	**60,695**	**10.7**	**569,109**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	77,311	12,880	2.9	16.7	58,990	76.3	5,441	7
Moderate-income	197,362	66,179	14.7	33.5	118,868	60.2	12,315	6.2
Middle-income	318,646	154,124	34.3	48.4	141,708	44.5	22,814	7.2
Upper-income	358,176	215,909	48.1	60.3	116,693	32.6	25,574	7.1
Unknown-income	56	26	0	46.4	19	33.9	11	19.6
Total Assessment Area	**951,551**	**449,118**	**100.0**	**47.2**	**436,278**	**45.8**	**66,155**	**7.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	8,311	5.6	7,659	5.6	609	5.6	43	6.2
Moderate-income	21,968	14.8	20,409	14.9	1,480	13.7	79	11.4
Middle-income	51,497	34.8	47,344	34.7	3,989	37	164	23.6
Upper-income	66,163	44.7	61,056	44.7	4,698	43.5	409	58.8
Unknown-income	138	0.1	122	0.1	16	0.1	0	0
Total Assessment Area	**148,077**	**100.0**	**136,590**	**100.0**	**10,792**	**100.0**	**695**	**100.0**
	Percentage of Total Businesses:		**92.2**		**7.3**			**.5**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	17	1.7	17	1.8	0	0	0	0
Moderate-income	122	12.3	116	12.3	6	14	0	0
Middle-income	377	38.2	358	37.9	19	44.2	0	0
Upper-income	472	47.8	454	48	18	41.9	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**988**	**100.0**	**945**	**100.0**	**43**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**95.6**		**4.4**			**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: CA - San Jose

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	34	9.1	34,983	7.8	7,016	20.1	106,442	23.8
Moderate-income	77	20.7	83,269	18.6	8,913	10.7	69,255	15.5
Middle-income	136	36.6	164,673	36.9	8,107	4.9	82,649	18.5
Upper-income	124	33.3	163,795	36.7	4,746	2.9	188,388	42.2
Unknown-income	1	0.3	14	0	4	28.6	0	0
Total Assessment Area	**372**	**100.0**	**446,734**	**100.0**	**28,786**	**6.4**	**446,734**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	50,462	15,496	4.4	30.7	33,260	65.9	1,706	3.4
Moderate-income	124,428	54,515	15.5	43.8	65,318	52.5	4,595	3.7
Middle-income	243,890	129,315	36.7	53	105,120	43.1	9,455	3.9
Upper-income	227,325	153,510	43.5	67.5	64,849	28.5	8,966	3.9
Unknown-income	85	0	0	0	80	94.1	5	5.9
Total Assessment Area	**646,190**	**352,836**	**100.0**	**54.6**	**268,627**	**41.6**	**24,727**	**3.8**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	5,562	5.8	5,101	5.9	452	5.6	9	2.4
Moderate-income	17,577	18.4	15,523	17.9	1,990	24.9	64	17.1
Middle-income	34,290	36	31,125	35.8	3,049	38.1	116	30.9
Upper-income	37,692	39.6	35,000	40.3	2,506	31.3	186	49.6
Unknown-income	168	0.2	160	0.2	8	0.1	0	0
Total Assessment Area	**95,289**	**100.0**	**86,909**	**100.0**	**8,005**	**100.0**	**375**	**100.0**
	Percentage of Total Businesses:		**91.2**		**8.4**			**.4**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	14	2.6	10	1.9	4	18.2	0	0
Moderate-income	98	17.9	93	17.7	5	22.7	0	0
Middle-income	191	34.9	183	34.9	7	31.8	1	100
Upper-income	244	44.6	238	45.4	6	27.3	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**547**	**100.0**	**524**	**100.0**	**22**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**95.8**		**4.0**			**.2**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: CA - Santa Cruz-Watsonville MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	3.8	2,495	4.2	640	25.7	13,798	23.1
Moderate-income	11	20.8	14,713	24.7	2,199	14.9	10,138	17
Middle-income	22	41.5	23,214	38.9	1,700	7.3	10,715	18
Upper-income	17	32.1	19,253	32.3	610	3.2	25,024	41.9
Unknown-income	1	1.9	0	0	0	0	0	0
Total Assessment Area	**53**	**100.0**	**59,675**	**100.0**	**5,149**	**8.6**	**59,675**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,113	1,393	2.5	22.8	4,288	70.1	432	7.1
Moderate-income	21,021	9,412	17.2	44.8	10,467	49.8	1,142	5.4
Middle-income	45,656	22,479	41.1	49.2	17,275	37.8	5,902	12.9
Upper-income	32,244	21,344	39.1	66.2	8,144	25.3	2,756	8.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**105,034**	**54,628**	**100.0**	**52.0**	**40,174**	**38.2**	**10,232**	**9.7**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	574	4	506	3.8	67	6.9	1	1.8
Moderate-income	2,264	15.6	2,057	15.3	200	20.7	7	12.3
Middle-income	6,979	48.2	6,518	48.4	433	44.9	28	49.1
Upper-income	4,667	32.2	4,381	32.5	265	27.5	21	36.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**14,484**	**100.0**	**13,462**	**100.0**	**965**	**100.0**	**57**	**100.0**
	Percentage of Total Businesses:		**92.9**		**6.7**		**.4**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	11	2.9	9	2.7	2	5.3	0	0
Moderate-income	84	22.3	68	20.1	16	42.1	0	0
Middle-income	184	48.9	168	49.7	16	42.1	0	0
Upper-income	97	25.8	93	27.5	4	10.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**376**	**100.0**	**338**	**100.0**	**38**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**89.9**		**10.1**		**.0**	

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: CA - Ventura

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	6	6,306	4	1,870	29.7	34,144	21.7
Moderate-income	40	29.9	40,370	25.6	6,004	14.9	26,034	16.5
Middle-income	41	30.6	51,962	33	2,771	5.3	30,707	19.5
Upper-income	45	33.6	59,032	37.4	1,465	2.5	66,785	42.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**134**	**100.0**	**157,670**	**100.0**	**12,110**	**7.7**	**157,670**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	8,043	2,287	1.7	28.4	5,365	66.7	391	4.9
Moderate-income	57,481	24,989	18.1	43.5	28,649	49.8	3,843	6.7
Middle-income	76,113	49,012	35.6	64.4	22,857	30	4,244	5.6
Upper-income	77,290	61,405	44.6	79.4	13,745	17.8	2,140	2.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**218,927**	**137,693**	**100.0**	**62.9**	**70,616**	**32.3**	**10,618**	**4.9**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,718	5.2	1,389	4.6	325	13.6	4	3
Moderate-income	6,837	20.9	6,379	21.1	429	17.9	29	21.8
Middle-income	11,080	33.8	10,127	33.5	911	38	42	31.6
Upper-income	13,103	40	12,312	40.8	733	30.6	58	43.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**32,738**	**100.0**	**30,207**	**100.0**	**2,398**	**100.0**	**133**	**100.0**
	Percentage of Total Businesses:		**92.3**		**7.3**			**.4**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	40	8.5	27	6.7	13	19.1	0	0
Moderate-income	113	24	86	21.4	27	39.7	0	0
Middle-income	173	36.8	157	39.1	16	23.5	0	0
Upper-income	144	30.6	132	32.8	12	17.6	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**470**	**100.0**	**402**	**100.0**	**68**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**85.5**		**14.5**			**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: FL - Naples-Immokalee-Marco Island MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	8.1	4,106	4.7	1,627	39.6	18,278	20.8
Moderate-income	15	20.3	17,381	19.8	3,098	17.8	15,489	17.7
Middle-income	26	35.1	35,130	40.1	2,147	6.1	16,908	19.3
Upper-income	26	35.1	31,048	35.4	1,147	3.7	36,990	42.2
Unknown-income	1	1.4	0	0	0	0	0	0
Total Assessment Area	**74**	**100.0**	**87,665**	**100.0**	**8,019**	**9.1**	**87,665**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,284	2,124	2.3	29.2	3,424	47	1,736	23.8
Moderate-income	36,919	15,285	16.3	41.4	10,215	27.7	11,419	30.9
Middle-income	76,674	38,746	41.3	50.5	13,667	17.8	24,261	31.6
Upper-income	80,705	37,578	40.1	46.6	8,849	11	34,278	42.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**201,582**	**93,733**	**100.0**	**46.5**	**36,155**	**17.9**	**71,694**	**35.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	895	2.8	841	2.8	49	3	5	1.7
Moderate-income	4,251	13.5	4,122	14	109	6.8	20	6.9
Middle-income	12,504	39.8	11,813	40	586	36.4	105	36.1
Upper-income	13,778	43.8	12,751	43.2	866	53.8	161	55.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**31,428**	**100.0**	**29,527**	**100.0**	**1,610**	**100.0**	**291**	**100.0**
	Percentage of Total Businesses:		**94.0**			**5.1**		**.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	28	11.5	25	11	3	18.8	0	0
Moderate-income	42	17.2	36	15.8	6	37.5	0	0
Middle-income	91	37.3	88	38.6	3	18.8	0	0
Upper-income	83	34	79	34.6	4	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**244**	**100.0**	**228**	**100.0**	**16**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**93.4**			**6.6**		**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Ann Arbor MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	16	8,921	11.2	2,461	27.6	18,032	22.7
Moderate-income	16	16	10,689	13.5	1,261	11.8	13,501	17
Middle-income	37	37	33,861	42.7	2,054	6.1	15,572	19.6
Upper-income	25	25	25,698	32.4	484	1.9	32,268	40.7
Unknown-income	6	6	204	0.3	67	32.8	0	0
Total Assessment Area	**100**	**100.0**	**79,373**	**100.0**	**6,327**	**8.0**	**79,373**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	23,605	5,440	6.6	23	15,959	67.6	2,206	9.3
Moderate-income	21,049	9,873	12	46.9	9,787	46.5	1,389	6.6
Middle-income	60,457	36,901	44.7	61	19,025	31.5	4,531	7.5
Upper-income	40,983	30,117	36.5	73.5	8,317	20.3	2,549	6.2
Unknown-income	3,004	194	0.2	6.5	2,454	81.7	356	11.9
Total Assessment Area	**149,098**	**82,525**	**100.0**	**55.3**	**55,542**	**37.3**	**11,031**	**7.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,466	8.6	1,321	8.5	140	9.6	5	4.8
Moderate-income	1,592	9.3	1,484	9.6	101	6.9	7	6.7
Middle-income	7,384	43.2	6,674	43	662	45.5	48	46.2
Upper-income	5,548	32.5	5,096	32.8	415	28.5	37	35.6
Unknown-income	1,104	6.5	960	6.2	137	9.4	7	6.7
Total Assessment Area	**17,094**	**100.0**	**15,535**	**100.0**	**1,455**	**100.0**	**104**	**100.0**
	Percentage of Total Businesses:		**90.9**		**8.5**			**.6**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.3	1	0.3	0	0	0	0
Moderate-income	15	4.1	14	3.9	1	33.3	0	0
Middle-income	233	64.4	231	64.5	2	66.7	0	0
Upper-income	113	31.2	112	31.3	0	0	1	100
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**362**	**100.0**	**358**	**100.0**	**3**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**98.9**		**.8**			**.3**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Battle Creek MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	10.3	2,135	6.3	908	42.5	7,285	21.7
Moderate-income	12	30.8	7,832	23.3	1,835	23.4	5,985	17.8
Middle-income	15	38.5	13,788	41	1,243	9	6,591	19.6
Upper-income	8	20.5	9,870	29.4	518	5.2	13,764	40.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**39**	**100.0**	**33,625**	**100.0**	**4,504**	**13.4**	**33,625**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,608	1,907	5.2	41.4	1,689	36.7	1,012	22
Moderate-income	16,795	7,716	21.1	45.9	6,041	36	3,038	18.1
Middle-income	23,487	15,641	42.7	66.6	5,338	22.7	2,508	10.7
Upper-income	15,826	11,376	31	71.9	3,142	19.9	1,308	8.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**60,716**	**36,640**	**100.0**	**60.3**	**16,210**	**26.7**	**7,866**	**13.0**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	378	8.3	322	8	52	11.5	4	9.1
Moderate-income	1,169	25.8	991	24.6	169	37.3	9	20.5
Middle-income	1,579	34.9	1,439	35.7	119	26.3	21	47.7
Upper-income	1,403	31	1,280	31.7	113	24.9	10	22.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**4,529**	**100.0**	**4,032**	**100.0**	**453**	**100.0**	**44**	**100.0**
	Percentage of Total Businesses:		**89.0**		**10.0**		**1.0**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	1.1	2	1.1	0	0	0	0
Moderate-income	6	3.2	6	3.4	0	0	0	0
Middle-income	137	73.7	129	72.9	7	87.5	1	100
Upper-income	41	22	40	22.6	1	12.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**186**	**100.0**	**177**	**100.0**	**8**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**95.2**		**4.3**		**.5**	

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Flint MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	20	15.3	10,926	10.2	5,076	46.5	25,191	23.6
Moderate-income	28	21.4	17,635	16.5	5,354	30.4	16,425	15.4
Middle-income	47	35.9	39,617	37.1	5,147	13	21,298	20
Upper-income	34	26	38,469	36.1	1,978	5.1	43,733	41
Unknown-income	2	1.5	0	0	0	0	0	0
Total Assessment Area	**131**	**100.0**	**106,647**	**100.0**	**17,555**	**16.5**	**106,647**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,965	9,778	8.5	37.7	9,208	35.5	6,979	26.9
Moderate-income	40,574	17,059	14.9	42	14,236	35.1	9,279	22.9
Middle-income	67,526	44,230	38.5	65.5	16,987	25.2	6,309	9.3
Upper-income	57,113	43,756	38.1	76.6	10,014	17.5	3,343	5.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**191,178**	**114,823**	**100.0**	**60.1**	**50,445**	**26.4**	**25,910**	**13.6**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,386	9.8	1,240	9.5	137	12.3	9	8.8
Moderate-income	1,875	13.2	1,705	13.1	159	14.3	11	10.8
Middle-income	6,113	43	5,525	42.5	542	48.8	46	45.1
Upper-income	4,787	33.7	4,497	34.6	255	23	35	34.3
Unknown-income	39	0.3	21	0.2	17	1.5	1	1
Total Assessment Area	**14,200**	**100.0**	**12,988**	**100.0**	**1,110**	**100.0**	**102**	**100.0**
	Percentage of Total Businesses:		**91.5**		**7.8**		**.7**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7	3.3	7	3.4	0	0	0	0
Moderate-income	6	2.9	6	2.9	0	0	0	0
Middle-income	83	39.7	83	40.3	0	0	0	0
Upper-income	113	54.1	110	53.4	3	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**209**	**100.0**	**206**	**100.0**	**3**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**98.6**		**1.4**		**.0**	

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Grand Rapids-Wyoming

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	6.6	7,778	3.5	3,245	41.7	42,098	18.7
Moderate-income	33	18.1	33,662	14.9	6,327	18.8	39,134	17.4
Middle-income	90	49.5	115,651	51.3	8,403	7.3	49,913	22.1
Upper-income	46	25.3	68,308	30.3	2,379	3.5	94,254	41.8
Unknown-income	1	0.5	0	0	0	0	0	0
Total Assessment Area	**182**	**100.0**	**225,399**	**100.0**	**20,354**	**9.0**	**225,399**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	15,395	4,718	2	30.6	8,400	54.6	2,277	14.8
Moderate-income	62,933	28,754	12.3	45.7	29,441	46.8	4,738	7.5
Middle-income	181,174	125,000	53.4	69	45,196	24.9	10,978	6.1
Upper-income	92,569	75,801	32.4	81.9	11,934	12.9	4,834	5.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**352,071**	**234,273**	**100.0**	**66.5**	**94,971**	**27.0**	**22,827**	**6.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,305	3.4	1,033	3.1	264	6.2	8	2.8
Moderate-income	5,399	14.1	4,676	13.9	697	16.3	26	9.2
Middle-income	18,794	49.2	16,554	49.2	2,110	49.3	130	45.8
Upper-income	12,734	33.3	11,407	33.9	1,207	28.2	120	42.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**38,232**	**100.0**	**33,670**	**100.0**	**4,278**	**100.0**	**284**	**100.0**
	Percentage of Total Businesses:			**88.1**		**11.2**		**.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2	0.2	2	0.3	0	0	0	0
Moderate-income	27	3.3	21	2.8	6	9.5	0	0
Middle-income	495	60.7	453	60.2	42	66.7	0	0
Upper-income	291	35.7	276	36.7	15	23.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**815**	**100.0**	**752**	**100.0**	**63**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**92.3**		**7.7**		**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Jackson MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	15.8	3,504	8.8	1,654	47.2	8,910	22.3
Moderate-income	9	23.7	7,028	17.6	1,361	19.4	6,996	17.5
Middle-income	14	36.8	20,124	50.4	1,772	8.8	8,057	20.2
Upper-income	8	21.1	9,274	23.2	371	4	15,967	40
Unknown-income	1	2.6	0	0	0	0	0	0
Total Assessment Area	**38**	**100.0**	**39,930**	**100.0**	**5,158**	**12.9**	**39,930**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,780	2,485	5.7	36.7	3,214	47.4	1,081	15.9
Moderate-income	14,319	6,790	15.6	47.4	5,487	38.3	2,042	14.3
Middle-income	32,454	23,375	53.7	72	5,948	18.3	3,131	9.6
Upper-income	15,568	10,905	25	70	2,387	15.3	2,276	14.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**69,121**	**43,555**	**100.0**	**63.0**	**17,036**	**24.6**	**8,530**	**12.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	568	10.2	464	9.3	101	18.1	3	5.8
Moderate-income	1,574	28.2	1,344	27	221	39.6	9	17.3
Middle-income	2,273	40.7	2,086	41.9	157	28.1	30	57.7
Upper-income	1,168	20.9	1,079	21.7	79	14.2	10	19.2
Unknown-income	5	0.1	5	0.1	0	0	0	0
Total Assessment Area	**5,588**	**100.0**	**4,978**	**100.0**	**558**	**100.0**	**52**	**100.0**
	Percentage of Total Businesses:		**89.1**		**10.0**			**.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	5	2.4	5	2.5	0	0	0	0
Middle-income	146	70.5	143	70.4	3	75	0	0
Upper-income	55	26.6	54	26.6	1	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**207**	**100.0**	**203**	**100.0**	**4**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**98.1**		**1.9**			**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Kalamazoo-Portage MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	7	12.3	4,549	7.5	1,812	39.8	13,136	21.7
Moderate-income	11	19.3	7,582	12.5	1,342	17.7	10,337	17.1
Middle-income	24	42.1	29,446	48.7	2,718	9.2	12,245	20.3
Upper-income	14	24.6	18,759	31	823	4.4	24,720	40.9
Unknown-income	1	1.8	102	0.2	51	50	0	0
Total Assessment Area	**57**	**100.0**	**60,438**	**100.0**	**6,746**	**11.2**	**60,438**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	12,207	3,153	4.9	25.8	6,969	57.1	2,085	17.1
Moderate-income	17,169	7,111	11.1	41.4	8,159	47.5	1,899	11.1
Middle-income	52,290	32,604	50.7	62.4	15,645	29.9	4,041	7.7
Upper-income	28,119	21,384	33.3	76	4,973	17.7	1,762	6.3
Unknown-income	411	50	0.1	12.2	293	71.3	68	16.5
Total Assessment Area	**110,196**	**64,302**	**100.0**	**58.4**	**36,039**	**32.7**	**9,855**	**8.9**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	800	8.1	683	7.7	115	11.5	2	2.7
Moderate-income	1,979	20	1,676	19	287	28.7	16	21.9
Middle-income	4,575	46.2	4,120	46.6	428	42.8	27	37
Upper-income	2,501	25.2	2,309	26.1	164	16.4	28	38.4
Unknown-income	57	0.6	51	0.6	6	0.6	0	0
Total Assessment Area	**9,912**	**100.0**	**8,839**	**100.0**	**1,000**	**100.0**	**73**	**100.0**
	Percentage of Total Businesses:		**89.2**		**10.1**			**.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.4	1	0.5	0	0	0	0
Moderate-income	26	11.6	18	9	8	34.8	0	0
Middle-income	130	58	117	58.5	12	52.2	1	100
Upper-income	67	29.9	64	32	3	13	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**224**	**100.0**	**200**	**100.0**	**23**	**100.0**	**1**	**100.0**
	Percentage of Total Farms:		**89.3**		**10.3**			**.4**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Midland MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	5.3	599	2.6	182	30.4	4,635	20.1
Moderate-income	4	21.1	4,364	18.9	620	14.2	4,073	17.7
Middle-income	9	47.4	9,968	43.2	831	8.3	4,782	20.7
Upper-income	5	26.3	8,135	35.3	469	5.8	9,576	41.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**19**	**100.0**	**23,066**	**100.0**	**2,102**	**9.1**	**23,066**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,089	436	1.7	40	597	54.8	56	5.1
Moderate-income	7,588	4,423	17.5	58.3	2,571	33.9	594	7.8
Middle-income	15,259	11,325	44.7	74.2	2,607	17.1	1,327	8.7
Upper-income	12,259	9,153	36.1	74.7	2,505	20.4	601	4.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**36,195**	**25,337**	**100.0**	**70.0**	**8,280**	**22.9**	**2,578**	**7.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	190	5.7	135	4.5	54	19	1	2.8
Moderate-income	708	21.1	635	20.9	63	22.2	10	27.8
Middle-income	1,076	32.1	986	32.5	72	25.4	18	50
Upper-income	1,378	41.1	1,276	42.1	95	33.5	7	19.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**3,352**	**100.0**	**3,032**	**100.0**	**284**	**100.0**	**36**	**100.0**
	Percentage of Total Businesses:			**90.5**		**8.5**		**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	21	20	21	20.4	0	0	0	0
Middle-income	65	61.9	63	61.2	2	100	0	0
Upper-income	19	18.1	19	18.4	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**105**	**100.0**	**103**	**100.0**	**2**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**98.1**		**1.9**		**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: MI - Muskegon MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	11.6	3,329	7.6	1,611	48.4	9,463	21.7
Moderate-income	11	25.6	9,228	21.1	2,102	22.8	7,404	17
Middle-income	14	32.6	17,533	40.1	1,992	11.4	9,013	20.6
Upper-income	12	27.9	13,586	31.1	630	4.6	17,796	40.7
Unknown-income	1	2.3	0	0	0	0	0	0
Total Assessment Area	**43**	**100.0**	**43,676**	**100.0**	**6,335**	**14.5**	**43,676**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,912	2,421	5	35	3,048	44.1	1,443	20.9
Moderate-income	17,758	9,070	18.8	51.1	6,583	37.1	2,105	11.9
Middle-income	26,965	20,263	41.9	75.1	3,873	14.4	2,829	10.5
Upper-income	21,719	16,567	34.3	76.3	2,665	12.3	2,487	11.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**73,354**	**48,321**	**100.0**	**65.9**	**16,169**	**22.0**	**8,864**	**12.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	482	8.3	397	7.7	84	14.3	1	2.4
Moderate-income	1,244	21.4	1,048	20.2	188	32.1	8	19.5
Middle-income	2,051	35.3	1,904	36.8	129	22	18	43.9
Upper-income	2,028	34.9	1,829	35.3	185	31.6	14	34.1
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**5,805**	**100.0**	**5,178**	**100.0**	**586**	**100.0**	**41**	**100.0**
	Percentage of Total Businesses:			**89.2**		**10.1**		**.7**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1	0.7	1	0.8	0	0	0	0
Middle-income	90	65.7	89	69.5	1	11.1	0	0
Upper-income	46	33.6	38	29.7	8	88.9	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**137**	**100.0**	**128**	**100.0**	**9**	**100.0**	**0**	**.0**
	Percentage of Total Farms:			**93.4**		**6.6**		**.0**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: TX - Houston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	154	15.7	157,131	11	56,331	35.8	349,343	24.4
Moderate-income	286	29.2	349,232	24.4	68,433	19.6	228,678	16
Middle-income	229	23.3	372,071	26	37,866	10.2	242,033	16.9
Upper-income	305	31.1	550,382	38.5	21,302	3.9	611,067	42.7
Unknown-income	7	0.7	2,305	0.2	999	43.3	0	0
Total Assessment Area	**981**	**100.0**	**1,431,121**	**100.0**	**184,931**	**12.9**	**1,431,12**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	286,650	66,621	5.5	23.2	175,649	61.3	44,380	15.5
Moderate-income	559,466	257,608	21.2	46	243,806	43.6	58,052	10.4
Middle-income	557,969	328,376	27	58.9	187,226	33.6	42,367	7.6
Upper-income	817,434	562,638	46.3	68.8	198,535	24.3	56,261	6.9
Unknown-income	6,183	789	0.1	12.8	4,770	77.1	624	10.1
Total Assessment Area	**2,227,702**	**1,216,032**	**100.0**	**54.6**	**809,986**	**36.4**	**201,684**	**9.1**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	32,751	10.1	28,772	9.8	3,793	15.2	186	5.4
Moderate-income	61,030	18.9	55,070	18.7	5,567	22.3	393	11.5
Middle-income	72,320	22.4	66,635	22.6	5,108	20.4	577	16.9
Upper-income	156,252	48.4	143,532	48.7	10,468	41.9	2,252	66
Unknown-income	607	0.2	547	0.2	54	0.2	6	0.2
Total Assessment Area	**322,960**	**100.0**	**294,556**	**100.0**	**24,990**	**100.0**	**3,414**	**100.0**
	Percentage of Total Businesses:		**91.2**		**7.7**			**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	84	3.9	79	3.7	5	14.3	0	0
Moderate-income	249	11.4	239	11.2	8	22.9	2	25
Middle-income	528	24.2	516	24.2	7	20	5	62.5
Upper-income	1,315	60.3	1,299	60.8	15	42.9	1	12.5
Unknown-income	3	0.1	3	0.1	0	0	0	0
Total Assessment Area	**2,179**	**100.0**	**2,136**	**100.0**	**35**	**100.0**	**8**	**100.0**
	Percentage of Total Farms:		**98.0**		**1.6**			**.4**

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: TX - San Antonio

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	33	8.9	28,586	6.7	10,764	37.7	102,399	23.8
Moderate-income	131	35.2	135,059	31.5	28,860	21.4	75,626	17.6
Middle-income	94	25.3	117,189	27.3	12,655	10.8	82,128	19.1
Upper-income	110	29.6	148,558	34.6	6,006	4	169,251	39.4
Unknown-income	4	1.1	12	0	0	0	0	0
Total Assessment Area	**372**	**100.0**	**429,404**	**100.0**	**58,285**	**13.6**	**429,404**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	47,834	19,121	5.1	40	22,334	46.7	6,379	13.3
Moderate-income	229,217	100,677	27.1	43.9	105,396	46	23,144	10.1
Middle-income	192,965	101,728	27.4	52.7	76,061	39.4	15,176	7.9
Upper-income	219,934	150,148	40.4	68.3	56,906	25.9	12,880	5.9
Unknown-income	12	12	0	100	0	0	0	0
Total Assessment Area	**689,962**	**371,686**	**100.0**	**53.9**	**260,697**	**37.8**	**57,579**	**8.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	4,159	5	3,663	4.8	476	8.5	20	2.7
Moderate-income	19,017	22.8	17,558	22.8	1,362	24.4	97	13
Middle-income	23,693	28.4	21,731	28.2	1,799	32.2	163	21.9
Upper-income	36,315	43.5	33,942	44.1	1,911	34.2	462	62
Unknown-income	205	0.2	159	0.2	43	0.8	3	0.4
Total Assessment Area	**83,389**	**100.0**	**77,053**	**100.0**	**5,591**	**100.0**	**745**	**100.0**
	Percentage of Total Businesses:		**92.4**		**6.7**			**.9**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	13	1.3	12	1.3	1	9.1	0	0
Moderate-income	106	10.9	105	11	1	9.1	0	0
Middle-income	235	24.3	231	24.1	4	36.4	0	0
Upper-income	615	63.5	610	63.7	5	45.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**969**	**100.0**	**958**	**100.0**	**11**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**98.9**		**1.1**			**.0**

2019 FFIEC Census Data and 2019 D&B Information

Appendix E – Nonmetropolitan Limited-Scope Assessment Area/Areas Demographics

Combined Demographics Report

Assessment Area: MI - Lenawee County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	857	13.9
Moderate-income	0	0	0	0	0	0	802	13
Middle-income	3	60	3,341	54.1	262	7.8	1,289	20.9
Upper-income	2	40	2,833	45.9	161	5.7	3,226	52.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**5**	**100.0**	**6,174**	**100.0**	**423**	**6.9**	**6,174**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	6,169	3,818	51.6	61.9	1,335	21.6	1,016	16.5
Upper-income	4,493	3,580	48.4	79.7	515	11.5	398	8.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**10,662**	**7,398**	**100.0**	**69.4**	**1,850**	**17.4**	**1,414**	**13.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	578	60.1	526	59.4	46	70.8	6	54.5
Upper-income	384	39.9	360	40.6	19	29.2	5	45.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**962**	**100.0**	**886**	**100.0**	**65**	**100.0**	**11**	**100.0**
	Percentage of Total Businesses:		**92.1**		**6.8**		**1.1**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	0	0	0	0	0	0	0	0
Middle-income	19	40.4	19	41.3	0	0	0	0
Upper-income	28	59.6	27	58.7	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**47**	**100.0**	**46**	**100.0**	**1**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**97.9**		**2.1**		**.0**	

2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report

Assessment Area: TX - Kerr County

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	2,592	19.7
Moderate-income	3	30	4,197	32	830	19.8	2,369	18
Middle-income	4	40	4,556	34.7	658	14.4	2,335	17.8
Upper-income	3	30	4,377	33.3	178	4.1	5,834	44.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**10**	**100.0**	**13,130**	**100.0**	**1,666**	**12.7**	**13,130**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental			Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	7,668	3,679	26	48	3,009	39.2	980	12.8
Middle-income	8,027	5,063	35.8	63.1	1,707	21.3	1,257	15.7
Upper-income	8,282	5,408	38.2	65.3	1,450	17.5	1,424	17.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**23,977**	**14,150**	**100.0**	**59.0**	**6,166**	**25.7**	**3,661**	**15.3**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	1,074	33.6	1,001	33.6	64	33.7	9	33.3
Middle-income	1,184	37	1,106	37.1	68	35.8	10	37
Upper-income	940	29.4	874	29.3	58	30.5	8	29.6
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**3,198**	**100.0**	**2,981**	**100.0**	**190**	**100.0**	**27**	**100.0**
	Percentage of Total Businesses:		**93.2**		**5.9**		**.8**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	25	19.2	25	19.4	0	0	0	0
Middle-income	47	36.2	47	36.4	0	0	0	0
Upper-income	58	44.6	57	44.2	1	100	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	**130**	**100.0**	**129**	**100.0**	**1**	**100.0**	**0**	**.0**
	Percentage of Total Farms:		**99.2**		**.8**		**.0**	

2019 FFIEC Census Data and 2019 D&B Information

Appendix F – Metropolitan Full-Scope Assessment Area Loan Tables

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: AZ - Phoenix

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
		#	%	$ (000s)	$ %		Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %
HOME PURCHASE	Low	1	5.0%	$10	0.1%	4.7%	0	0.0%	4.7%	$0	0.0%	3.0%	1	11.1%	5.0%	$10	0.5%	3.1%
	Moderate	2	10.0%	$1,463	21.2%	18.9%	0	0.0%	16.4%	$0	0.0%	11.5%	2	22.2%	17.0%	$1,463	66.9%	12.0%
	Middle	7	35.0%	$721	10.5%	34.5%	4	36.4%	36.4%	$472	10.0%	31.2%	3	33.3%	36.3%	$249	11.4%	31.4%
	Upper	9	45.0%	$4,545	66.0%	41.9%	7	63.6%	41.6%	$4,230	90.0%	53.4%	2	22.2%	40.9%	$315	14.4%	52.5%
	Unknown	1	5.0%	$150	2.2%	0.0%	0	0.0%	0.9%	$0	0.0%	1.0%	1	11.1%	0.8%	$150	6.9%	0.9%
	Total	*20*	*100.0%*	*$6,889*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$4,702*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$2,187*	*100.0%*	*100.0%*
REFINANCE	Low	5	5.3%	$1,280	6.1%	4.7%	2	4.9%	3.5%	$666	7.3%	2.0%	3	5.6%	2.6%	$614	5.2%	1.6%
	Moderate	7	7.4%	$995	4.7%	18.9%	3	7.3%	15.9%	$453	5.0%	11.0%	4	7.4%	12.9%	$542	4.6%	9.0%
	Middle	20	21.1%	$4,321	20.6%	34.5%	6	14.6%	35.7%	$1,756	19.3%	30.0%	14	25.9%	34.4%	$2,565	21.5%	29.1%
	Upper	63	66.3%	$14,399	68.6%	41.9%	30	73.2%	44.7%	$6,208	68.3%	56.8%	33	61.1%	49.6%	$8,191	68.8%	59.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.2%	0	0.0%	0.5%	$0	0.0%	0.6%
	Total	*95*	*100.0%*	*$20,995*	*100.0%*	*100.0%*	*41*	*100.0%*	*100.0%*	*$9,083*	*100.0%*	*100.0%*	*54*	*100.0%*	*100.0%*	*$11,912*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	5	2.3%	$415	2.1%	4.7%	1	1.2%	2.3%	$50	0.6%	1.7%	4	3.0%	2.6%	$365	3.2%	2.0%
	Moderate	21	9.8%	$1,292	6.4%	18.9%	5	6.0%	11.7%	$432	5.1%	9.1%	16	12.1%	12.5%	$860	7.4%	9.6%
	Middle	67	31.2%	$4,924	24.5%	34.5%	33	39.8%	31.9%	$2,444	28.7%	26.7%	34	25.8%	34.4%	$2,480	21.4%	25.8%
	Upper	121	56.3%	$13,393	66.7%	41.9%	44	53.0%	53.7%	$5,603	65.7%	62.3%	77	58.3%	53.5%	$7,790	67.4%	62.4%
	Unknown	1	0.5%	$68	0.3%	0.0%	0	0.0%	0.3%	$0	0.0%	0.2%	1	0.8%	0.2%	$68	0.6%	0.2%
	Total	*215*	*100.0%*	*$20,092*	*100.0%*	*100.0%*	*83*	*100.0%*	*100.0%*	*$8,529*	*100.0%*	*100.0%*	*132*	*100.0%*	*100.0%*	*$11,563*	*100.0%*	*100.0%*
MULTI FAMILY					**Multi-Family Units**													
	Low	0	0.0%	$0	0.0%	18.9%	0	0.0%	29.0%	$0	0.0%	16.9%	0	0.0%	24.5%	$0	0.0%	14.0%
	Moderate	0	0.0%	$0	0.0%	30.6%	0	0.0%	34.8%	$0	0.0%	25.3%	0	0.0%	37.8%	$0	0.0%	29.7%
	Middle	0	0.0%	$0	0.0%	30.9%	0	0.0%	20.7%	$0	0.0%	29.8%	0	0.0%	21.5%	$0	0.0%	26.6%
	Upper	0	0.0%	$0	0.0%	19.0%	0	0.0%	15.0%	$0	0.0%	27.9%	0	0.0%	15.2%	$0	0.0%	27.9%
	Unknown	0	0.0%	$0	0.0%	0.5%	0	0.0%	0.5%	$0	0.0%	0.1%	0	0.0%	1.1%	$0	0.0%	1.7%
	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%*
OTHER PURPOSE LOC	Low	4	2.6%	$178	1.1%	4.7%	1	1.4%	1.5%	$30	0.4%	0.7%	3	3.5%	1.2%	$148	1.7%	0.8%
	Moderate	21	13.5%	$1,755	10.8%	18.9%	13	18.6%	10.0%	$1,220	16.1%	5.5%	8	9.4%	9.6%	$535	6.1%	5.7%
	Middle	45	29.0%	$3,602	22.1%	34.5%	16	22.9%	31.4%	$1,485	19.6%	21.6%	29	34.1%	29.0%	$2,117	24.3%	20.5%
	Upper	85	54.8%	$10,771	66.1%	41.9%	40	57.1%	56.8%	$4,852	64.0%	72.0%	45	52.9%	59.8%	$5,919	67.9%	72.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.3%	$0	0.0%	0.2%	0	0.0%	0.4%	$0	0.0%	0.2%
	Total	*155*	*100.0%*	*$16,306*	*100.0%*	*100.0%*	*70*	*100.0%*	*100.0%*	*$7,587*	*100.0%*	*100.0%*	*85*	*100.0%*	*100.0%*	*$8,719*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2

Assessment Area: AZ - Phoenix

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	4.7%	0	0.0%	3.3%	$0	0.0%	1.6%	0	0.0%	3.3%	$0	0.0%	1.9%
	Moderate	0	0.0%	$0	0.0%	18.9%	0	0.0%	15.5%	$0	0.0%	9.5%	0	0.0%	14.0%	$0	0.0%	7.3%
	Middle	0	0.0%	$0	0.0%	34.5%	0	0.0%	35.3%	$0	0.0%	21.7%	0	0.0%	34.9%	$0	0.0%	22.1%
	Upper	0	0.0%	$0	0.0%	41.9%	0	0.0%	45.7%	$0	0.0%	67.1%	0	0.0%	47.4%	$0	0.0%	68.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.1%	0	0.0%	0.4%	$0	0.0%	0.2%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	4.7%	0	0.0%	5.9%	$0	0.0%	4.2%	0	0.0%	5.1%	$0	0.0%	3.1%
	Moderate	0	0.0%	$0	0.0%	18.9%	0	0.0%	20.2%	$0	0.0%	14.9%	0	0.0%	18.7%	$0	0.0%	12.3%
	Middle	0	0.0%	$0	0.0%	34.5%	0	0.0%	37.6%	$0	0.0%	31.4%	0	0.0%	39.5%	$0	0.0%	33.8%
	Upper	0	0.0%	$0	0.0%	41.9%	0	0.0%	36.0%	$0	0.0%	49.0%	0	0.0%	36.5%	$0	0.0%	50.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.3%	$0	0.0%	0.5%	0	0.0%	0.2%	$0	0.0%	0.4%
	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	15	3.1%	$1,883	2.9%	4.7%	4	2.0%	4.2%	$746	2.5%	3.9%	11	3.9%	3.8%	$1,137	3.3%	3.2%
	Moderate	51	10.5%	$5,505	8.6%	18.9%	21	10.2%	15.9%	$2,105	7.0%	12.4%	30	10.7%	14.9%	$3,400	9.9%	11.9%
	Middle	139	28.7%	$13,568	21.1%	34.5%	59	28.8%	35.8%	$6,157	20.6%	30.5%	80	28.6%	35.1%	$7,411	21.6%	29.9%
	Upper	278	57.3%	$43,108	67.1%	41.9%	121	59.0%	43.4%	$20,893	69.9%	52.5%	157	56.1%	45.6%	$22,215	64.6%	54.1%
	Unknown	2	0.4%	$218	0.3%	0.0%	0	0.0%	0.6%	$0	0.0%	0.7%	2	0.7%	0.6%	$218	0.6%	0.8%
	Total	*485*	*100.0%*	*$64,282*	*100.0%*	*100.0%*	*205*	*100.0%*	*100.0%*	*$29,901*	*100.0%*	*100.0%*	*280*	*100.0%*	*100.0%*	*$34,381*	*100.0%*	*100.0%*
SMALL BUSINESSES						**Total Businesses**												
	Low	29	12.1%	$7,379	13.3%	7.0%	15	10.9%	7.0%	$2,894	9.4%	11.7%	14	13.9%	6.9%	$4,485	18.3%	10.5%
	Moderate	52	21.8%	$12,828	23.1%	17.0%	29	21.0%	16.5%	$7,167	23.2%	18.6%	23	22.8%	16.5%	$5,661	23.0%	18.6%
	Middle	80	33.5%	$15,835	28.5%	28.5%	50	36.2%	26.8%	$10,317	33.4%	24.6%	30	29.7%	27.0%	$5,518	22.5%	25.4%
	Upper	77	32.2%	$19,338	34.9%	47.0%	43	31.2%	49.2%	$10,435	33.8%	43.7%	34	33.7%	49.0%	$8,903	36.2%	44.4%
	Unknown	1	0.4%	$100	0.2%	0.6%	1	0.7%	0.6%	$100	0.3%	1.4%	0	0.0%	0.6%	$0	0.0%	1.1%
	Tr 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%
	Total	*239*	*100.0%*	*$55,480*	*100.0%*	*100.0%*	*138*	*100.0%*	*100.0%*	*$30,913*	*100.0%*	*100.0%*	*101*	*100.0%*	*100.0%*	*$24,567*	*100.0%*	*100.0%*
SMALL FARM						**Total Farms**												
	Low	0	0.0%	$0	0.0%	3.3%	0	0.0%	1.0%	$0	0.0%	1.0%	0	0.0%	1.6%	$0	0.0%	0.4%
	Moderate	0	0.0%	$0	0.0%	13.5%	0	0.0%	12.5%	$0	0.0%	14.5%	0	0.0%	13.9%	$0	0.0%	17.8%
	Middle	0	0.0%	$0	0.0%	28.7%	0	0.0%	34.1%	$0	0.0%	47.0%	0	0.0%	25.0%	$0	0.0%	25.7%
	Upper	0	0.0%	$0	0.0%	54.2%	0	0.0%	52.1%	$0	0.0%	37.5%	0	0.0%	59.2%	$0	0.0%	55.3%
	Unknown	0	0.0%	$0	0.0%	0.3%	0	0.0%	0.3%	$0	0.0%	0.0%	0	0.0%	0.3%	$0	0.0%	0.7%
	Tr 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%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: AZ - Phoenix

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	21.9%	0	0.0%	4.0%	$0	0.0%	2.2%	0	0.0%	4.5%	$0	0.0%	2.4%
	Moderate	5	25.0%	$575	8.3%	16.8%	1	9.1%	16.0%	$140	3.0%	11.1%	4	44.4%	17.3%	$435	19.9%	12.2%
	Middle	2	10.0%	$431	6.3%	19.1%	2	18.2%	20.2%	$431	9.2%	17.3%	0	0.0%	21.1%	$0	0.0%	18.2%
	Upper	13	65.0%	$5,883	85.4%	42.1%	8	72.7%	40.2%	$4,131	87.9%	51.6%	5	55.6%	38.8%	$1,752	80.1%	50.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	19.5%	$0	0.0%	17.9%	0	0.0%	18.3%	$0	0.0%	17.1%
	Total	20	100.0%	$6,889	100.0%	100.0%	11	100.0%	100.0%	$4,702	100.0%	100.0%	9	100.0%	100.0%	$2,187	100.0%	100.0%
REFINANCE	Low	5	5.3%	$528	2.5%	21.9%	2	4.9%	7.8%	$201	2.2%	4.3%	3	5.6%	5.1%	$327	2.7%	2.8%
	Moderate	11	11.6%	$1,592	7.6%	16.8%	6	14.6%	17.6%	$954	10.5%	12.5%	5	9.3%	13.8%	$638	5.4%	9.3%
	Middle	20	21.1%	$2,795	13.3%	19.1%	6	14.6%	21.6%	$954	10.5%	18.9%	14	25.9%	19.6%	$1,841	15.5%	16.5%
	Upper	54	56.8%	$14,849	70.7%	42.1%	23	56.1%	39.4%	$5,873	64.7%	50.8%	31	57.4%	40.2%	$8,976	75.4%	49.4%
	Unknown	5	5.3%	$1,231	5.9%	0.0%	4	9.8%	13.7%	$1,101	12.1%	13.5%	1	1.9%	21.3%	$130	1.1%	22.0%
	Total	95	100.0%	$20,995	100.0%	100.0%	41	100.0%	100.0%	$9,083	100.0%	100.0%	54	100.0%	100.0%	$11,912	100.0%	100.0%
HOME IMPROVEMENT	Low	7	3.3%	$476	2.4%	21.9%	4	4.8%	5.0%	$327	3.8%	3.4%	3	2.3%	5.1%	$149	1.3%	3.4%
	Moderate	21	9.8%	$1,175	5.8%	16.8%	6	7.2%	12.7%	$320	3.8%	9.8%	15	11.4%	13.5%	$855	7.4%	10.7%
	Middle	43	20.0%	$2,957	14.7%	19.1%	15	18.1%	20.6%	$888	10.4%	16.6%	28	21.2%	22.0%	$2,069	17.9%	18.7%
	Upper	142	66.0%	$15,034	74.8%	42.1%	56	67.5%	57.4%	$6,544	76.7%	62.5%	86	65.2%	55.7%	$8,490	73.4%	63.0%
	Unknown	2	0.9%	$450	2.2%	0.0%	2	2.4%	4.4%	$450	5.3%	7.6%	0	0.0%	3.6%	$0	0.0%	4.2%
	Total	215	100.0%	$20,092	100.0%	100.0%	83	100.0%	100.0%	$8,529	100.0%	100.0%	132	100.0%	100.0%	$11,563	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	21.9%	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%	16.8%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	19.1%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	42.1%	0	0.0%	3.0%	$0	0.0%	0.1%	0	0.0%	3.0%	$0	0.0%	0.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	97.0%	$0	0.0%	99.9%	0	0.0%	96.6%	$0	0.0%	99.7%
	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%
OTHER PURPOSE LOC	Low	12	7.7%	$665	4.1%	21.9%	6	8.6%	6.3%	$337	4.4%	4.3%	6	7.1%	5.7%	$328	3.8%	3.1%
	Moderate	20	12.9%	$990	6.1%	16.8%	7	10.0%	14.7%	$257	3.4%	8.9%	13	15.3%	13.3%	$733	8.4%	7.6%
	Middle	34	21.9%	$2,605	16.0%	19.1%	17	24.3%	20.2%	$1,566	20.6%	13.4%	17	20.0%	19.5%	$1,039	11.9%	13.2%
	Upper	87	56.1%	$11,973	73.4%	42.1%	38	54.3%	55.8%	$5,354	70.6%	70.6%	49	57.6%	57.0%	$6,619	75.9%	71.6%
	Unknown	2	1.3%	$73	0.4%	0.0%	2	2.9%	3.0%	$73	1.0%	2.8%	0	0.0%	4.5%	$0	0.0%	4.6%
	Total	155	100.0%	$16,306	100.0%	100.0%	70	100.0%	100.0%	$7,587	100.0%	100.0%	85	100.0%	100.0%	$8,719	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: AZ - Phoenix

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	21.9%	0	0.0%	7.3%	$0	0.0%	4.4%	0	0.0%	6.8%	$0	0.0%	3.7%
	Moderate	0	0.0%	$0	0.0%	16.8%	0	0.0%	17.4%	$0	0.0%	11.2%	0	0.0%	16.6%	$0	0.0%	9.9%
	Middle	0	0.0%	$0	0.0%	19.1%	0	0.0%	21.6%	$0	0.0%	12.8%	0	0.0%	23.1%	$0	0.0%	14.2%
	Upper	0	0.0%	$0	0.0%	42.1%	0	0.0%	49.0%	$0	0.0%	62.4%	0	0.0%	47.1%	$0	0.0%	58.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	4.8%	$0	0.0%	9.2%	0	0.0%	6.5%	$0	0.0%	13.3%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	21.9%	0	0.0%	1.4%	$0	0.0%	0.7%	0	0.0%	0.2%	$0	0.0%	0.1%
	Moderate	0	0.0%	$0	0.0%	16.8%	0	0.0%	3.0%	$0	0.0%	1.8%	0	0.0%	0.4%	$0	0.0%	0.3%
	Middle	0	0.0%	$0	0.0%	19.1%	0	0.0%	2.6%	$0	0.0%	1.4%	0	0.0%	0.7%	$0	0.0%	0.9%
	Upper	0	0.0%	$0	0.0%	42.1%	0	0.0%	5.1%	$0	0.0%	4.2%	0	0.0%	2.8%	$0	0.0%	5.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	87.9%	$0	0.0%	91.9%	0	0.0%	95.9%	$0	0.0%	93.6%
	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	24	4.9%	$1,669	2.6%	21.9%	12	5.9%	5.2%	$865	2.9%	2.5%	12	4.3%	4.8%	$804	2.3%	2.4%
	Moderate	57	11.8%	$4,332	6.7%	16.8%	20	9.8%	16.0%	$1,671	5.6%	10.3%	37	13.2%	15.3%	$2,661	7.7%	9.9%
	Middle	99	20.4%	$8,788	13.7%	19.1%	40	19.5%	20.3%	$3,839	12.8%	16.0%	59	21.1%	20.2%	$4,949	14.4%	16.0%
	Upper	296	61.0%	$47,739	74.3%	42.1%	125	61.0%	40.7%	$21,902	73.2%	47.1%	171	61.1%	40.1%	$25,837	75.1%	46.2%
	Unknown	9	1.9%	$1,754	2.7%	0.0%	8	3.9%	17.8%	$1,624	5.4%	24.0%	1	0.4%	19.6%	$130	0.4%	25.5%
	Total	485	100.0%	$64,282	100.0%	100.0%	205	100.0%	100.0%	$29,901	100.0%	100.0%	280	100.0%	100.0%	$34,381	100.0%	100.0%
Small Business — Revenue						Total Businesses												
	$1 Million or Less	74	31.0%	$11,742	21.2%	92.5%	30	21.7%	46.0%	$4,851	15.7%	30.2%	44	43.6%	49.5%	$6,891	28.0%	31.5%
	Over $1 Million	110	46.0%	$33,704	60.7%	6.5%	66	47.8%					44	43.6%				
	Total Rev. available	184	77.0%	$45,446	81.9%	99.0%	96	69.5%					88	87.2%				
	Rev. Not Known	55	23.0%	$10,034	18.1%	1.0%	42	30.4%					13	12.9%				
	Total	239	100.0%	$55,480	100.0%	100.0%	138	100.0%					101	100.0%				
Small Business — Loan Size	$100,000 or Less	119	49.8%	$6,974	12.6%		69	50.0%	95.2%	$4,179	13.5%	43.5%	50	49.5%	95.5%	$2,795	11.4%	46.8%
	$100,001 - $250,000	53	22.2%	$10,619	19.1%		31	22.5%	2.3%	$6,243	20.2%	12.5%	22	21.8%	2.2%	$4,376	17.8%	12.2%
	$250,001 - $1 Million	67	28.0%	$37,887	68.3%		38	27.5%	2.5%	$20,491	66.3%	44.0%	29	28.7%	2.3%	$17,396	70.8%	40.9%
	Total	239	100.0%	$55,480	100.0%		138	100.0%	100.0%	$30,913	100.0%	100.0%	101	100.0%	100.0%	$24,567	100.0%	100.0%
Small Farm — Revenue						Total Farms												
	$1 Million or Less	0	0.0%	$0	0.0%	95.6%	0	0.0%	41.5%	$0	0.0%	45.8%	0	0.0%	42.7%	$0	0.0%	38.6%
	Over $1 Million	0	0.0%	$0	0.0%	4.4%	0	0.0%					0	0.0%				
	Not Known	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%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	93.2%	$0	0.0%	51.9%	0	0.0%	92.1%	$0	0.0%	45.7%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	4.5%	$0	0.0%	21.1%	0	0.0%	4.9%	$0	0.0%	22.1%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	2.3%	$0	0.0%	27.0%	0	0.0%	3.0%	$0	0.0%	32.2%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019				Bank & Aggregate Lending Comparison											
		Bank				2018						2019					
		Count		Dollar		Owner Occupied Units	Count			Dollar			Count			Dollar		
		#	%	$ (000s)	$ %	%	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %
HOME PURCHASE	Low	9	7.8%	$3,670	4.9%	2.7%	6	9.4%	3.5%	$2,134	7.8%	2.4%	3	5.9%	3.0%	$1,536	3.3%	2.2%
	Moderate	48	41.7%	$18,596	25.0%	17.6%	30	46.9%	18.4%	$11,729	43.0%	12.9%	18	35.3%	18.1%	$6,867	14.5%	12.8%
	Middle	10	8.7%	$2,228	3.0%	27.6%	3	4.7%	26.9%	$737	2.7%	21.3%	7	13.7%	27.3%	$1,491	3.2%	21.8%
	Upper	48	41.7%	$49,985	67.1%	52.0%	25	39.1%	50.1%	$12,668	46.5%	61.9%	23	45.1%	50.5%	$37,317	79.0%	61.8%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	1.2%	$0	0.0%	1.5%	0	0.0%	1.1%	$0	0.0%	1.4%
	Total	115	100.0%	$74,479	100.0%	100.0%	64	100.0%	100.0%	$27,268	100.0%	100.0%	51	100.0%	100.0%	$47,211	100.0%	100.0%
REFINANCE	Low	10	2.3%	$3,160	1.7%	2.7%	3	1.4%	3.2%	$1,001	1.2%	2.3%	7	3.1%	2.6%	$2,159	2.1%	1.9%
	Moderate	69	15.7%	$16,642	9.0%	17.6%	24	11.2%	19.0%	$5,218	6.4%	13.7%	45	20.0%	16.7%	$11,424	11.1%	12.0%
	Middle	73	16.6%	$18,920	10.3%	27.6%	36	16.7%	28.2%	$9,208	11.3%	22.7%	37	16.4%	28.0%	$9,712	9.5%	22.3%
	Upper	287	65.2%	$145,316	78.8%	52.0%	152	70.7%	49.4%	$66,273	81.1%	61.2%	135	60.0%	52.4%	$79,043	77.0%	63.5%
	Unknown	1	0.2%	$369	0.2%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%	1	0.4%	0.3%	$369	0.4%	0.3%
	Total	440	100.0%	$184,407	100.0%	100.0%	215	100.0%	100.0%	$81,700	100.0%	100.0%	225	100.0%	100.0%	$102,707	100.0%	100.0%
HOME IMPROVEMENT	Low	6	1.1%	$1,249	1.0%	2.7%	3	1.2%	2.0%	$959	1.7%	1.9%	3	0.9%	1.8%	$290	0.5%	1.8%
	Moderate	63	11.2%	$9,166	7.6%	17.6%	23	9.3%	13.6%	$3,811	6.6%	11.5%	40	12.6%	13.0%	$5,355	8.7%	10.5%
	Middle	130	23.0%	$18,587	15.5%	27.6%	54	22.0%	25.5%	$8,363	14.4%	20.3%	76	23.9%	25.6%	$10,224	16.5%	20.8%
	Upper	363	64.4%	$90,378	75.4%	52.0%	165	67.1%	58.7%	$44,673	77.0%	66.1%	198	62.3%	59.4%	$45,705	73.9%	66.7%
	Unknown	2	0.4%	$490	0.4%	0.1%	1	0.4%	0.1%	$190	0.3%	0.1%	1	0.3%	0.1%	$300	0.5%	0.1%
	Total	564	100.0%	$119,870	100.0%	100.0%	246	100.0%	100.0%	$57,996	100.0%	100.0%	318	100.0%	100.0%	$61,874	100.0%	100.0%
MULTI FAMILY					Multi-Family Units												
	Low	0	0.0%	$0	0.0%	12.3%	0	0.0%	15.3%	$0	0.0%	9.3%	0	0.0%	14.9%	$0	0.0%	10.5%
	Moderate	1	20.0%	$4,543	9.8%	31.3%	1	25.0%	38.4%	$4,543	20.2%	29.8%	0	0.0%	37.0%	$0	0.0%	30.2%
	Middle	1	20.0%	$23,905	51.6%	23.7%	0	0.0%	22.9%	$0	0.0%	28.1%	1	100.0%	22.1%	$23,905	100.0%	23.8%
	Upper	3	60.0%	$17,920	38.6%	31.5%	3	75.0%	22.7%	$17,920	79.8%	28.5%	0	0.0%	25.4%	$0	0.0%	33.8%
	Unknown	0	0.0%	$0	0.0%	1.2%	0	0.0%	0.7%	$0	0.0%	4.4%	0	0.0%	0.7%	$0	0.0%	1.7%
	Total	5	100.0%	$46,368	100.0%	100.0%	4	100.0%	100.0%	$22,463	100.0%	100.0%	1	100.0%	100.0%	$23,905	100.0%	100.0%
OTHER PURPOSE LOC	Low	3	0.7%	$281	0.2%	2.7%	1	0.5%	1.1%	$50	0.1%	0.7%	2	0.9%	1.2%	$231	0.4%	0.7%
	Moderate	35	8.2%	$4,048	2.9%	17.6%	10	5.0%	10.3%	$1,276	1.5%	6.0%	25	11.1%	10.5%	$2,772	4.9%	6.3%
	Middle	103	24.1%	$17,116	12.3%	27.6%	35	17.3%	22.4%	$4,882	5.9%	14.6%	68	30.1%	23.4%	$12,234	21.6%	15.7%
	Upper	285	66.6%	$117,243	84.2%	52.0%	154	76.2%	66.1%	$75,854	91.9%	78.6%	131	58.0%	64.6%	$41,389	73.1%	77.2%
	Unknown	2	0.5%	$510	0.4%	0.1%	2	1.0%	0.2%	$510	0.6%	0.2%	0	0.0%	0.3%	$0	0.0%	0.2%
	Total	428	100.0%	$139,198	100.0%	100.0%	202	100.0%	100.0%	$82,572	100.0%	100.0%	226	100.0%	100.0%	$56,626	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2

Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019				Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019				
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.7%	0	0.0%	2.2%	$0	0.0%	0.9%	0	0.0%	2.3%	$0	0.0%	1.0%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	14.9%	$0	0.0%	6.5%	0	0.0%	13.8%	$0	0.0%	5.8%
	Middle	2	18.2%	$1,116	3.2%	27.6%	1	16.7%	23.9%	$750	3.4%	11.4%	1	20.0%	25.3%	$366	2.9%	12.2%
	Upper	9	81.8%	$33,428	96.8%	52.0%	5	83.3%	58.8%	$21,295	96.6%	81.0%	4	80.0%	58.2%	$12,133	97.1%	80.7%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.3%	$0	0.0%	0.3%	0	0.0%	0.4%	$0	0.0%	0.4%
	Total	11	100.0%	$34,544	100.0%	100.0%	6	100.0%	100.0%	$22,045	100.0%	100.0%	5	100.0%	100.0%	$12,499	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.7%	0	0.0%	3.9%	$0	0.0%	2.9%	0	0.0%	3.2%	$0	0.0%	2.6%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	21.5%	$0	0.0%	15.0%	0	0.0%	16.9%	$0	0.0%	12.2%
	Middle	0	0.0%	$0	0.0%	27.6%	0	0.0%	29.7%	$0	0.0%	24.6%	0	0.0%	25.2%	$0	0.0%	21.1%
	Upper	0	0.0%	$0	0.0%	52.0%	0	0.0%	44.7%	$0	0.0%	57.2%	0	0.0%	54.4%	$0	0.0%	63.6%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.2%	$0	0.0%	0.3%	0	0.0%	0.2%	$0	0.0%	0.5%
	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	28	1.8%	$8,360	1.4%	2.7%	13	1.8%	3.4%	$4,144	1.4%	3.3%	15	1.8%	2.8%	$4,216	1.4%	2.9%
	Moderate	216	13.8%	$52,995	8.8%	17.6%	88	11.9%	18.3%	$26,577	9.0%	15.2%	128	15.5%	17.1%	$26,418	8.7%	13.9%
	Middle	319	20.4%	$81,872	13.7%	27.6%	129	17.5%	27.1%	$23,940	8.1%	22.4%	190	23.0%	27.4%	$57,932	19.0%	22.1%
	Upper	995	63.7%	$454,270	75.9%	52.0%	504	68.4%	50.6%	$238,683	81.2%	57.8%	491	59.4%	52.2%	$215,587	70.7%	60.4%
	Unknown	5	0.3%	$1,369	0.2%	0.1%	3	0.4%	0.6%	$700	0.2%	1.3%	2	0.2%	0.5%	$669	0.2%	0.8%
	Total	1,563	100.0%	$598,866	100.0%	100.0%	737	100.0%	100.0%	$294,044	100.0%	100.0%	826	100.0%	100.0%	$304,822	100.0%	100.0%
SMALL BUSINESSES						Total Businesses												
	Low	64	6.3%	$17,160	5.7%	5.0%	33	5.5%	4.6%	$6,901	4.2%	5.5%	31	7.3%	4.9%	$10,259	7.7%	5.7%
	Moderate	177	17.3%	$56,820	19.0%	20.0%	101	16.9%	19.5%	$32,776	19.8%	21.0%	76	17.9%	19.7%	$24,044	18.0%	20.6%
	Middle	249	24.4%	$72,778	24.3%	25.6%	141	23.6%	25.5%	$38,791	23.4%	26.9%	108	25.4%	25.3%	$33,987	25.5%	26.5%
	Upper	487	47.7%	$140,030	46.8%	47.5%	296	49.6%	48.6%	$79,737	48.2%	43.9%	191	44.9%	48.3%	$60,293	45.2%	44.2%
	Unknown	45	4.4%	$12,110	4.1%	1.8%	26	4.4%	1.6%	$7,394	4.5%	2.6%	19	4.5%	1.6%	$4,716	3.5%	2.8%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.2%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.2%
	Total	1,022	100.0%	$298,898	100.0%	100.0%	597	100.0%	100.0%	$165,599	100.0%	100.0%	425	100.0%	100.0%	$133,299	100.0%	100.0%
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	2.5%	0	0.0%	3.4%	$0	0.0%	5.2%	0	0.0%	3.3%	$0	0.0%	4.8%
	Moderate	0	0.0%	$0	0.0%	16.8%	0	0.0%	15.4%	$0	0.0%	17.1%	0	0.0%	14.0%	$0	0.0%	12.5%
	Middle	0	0.0%	$0	0.0%	23.1%	0	0.0%	24.9%	$0	0.0%	28.3%	0	0.0%	26.4%	$0	0.0%	23.8%
	Upper	0	0.0%	$0	0.0%	56.6%	0	0.0%	54.2%	$0	0.0%	47.4%	0	0.0%	54.5%	$0	0.0%	56.9%
	Unknown	0	0.0%	$0	0.0%	1.0%	0	0.0%	1.5%	$0	0.0%	1.1%	0	0.0%	1.0%	$0	0.0%	0.9%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.6%	$0	0.0%	0.9%	0	0.0%	0.8%	$0	0.0%	1.0%
	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%

Originations & Purchases

2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: CA - Greater Los Angeles

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	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%	24.6%	0	0.0%	1.9%	$0	0.0%	1.3%	0	0.0%	0.8%	$0	0.0%	0.4%
	Moderate	10	8.7%	$2,707	3.6%	16.4%	2	3.1%	3.4%	$418	1.5%	1.6%	8	15.7%	3.9%	$2,289	4.8%	1.8%
	Middle	31	27.0%	$11,228	15.1%	17.0%	22	34.4%	11.9%	$8,452	31.0%	7.3%	9	17.6%	13.2%	$2,776	5.9%	8.2%
	Upper	68	59.1%	$48,976	65.8%	42.0%	37	57.8%	65.7%	$15,582	57.1%	73.5%	31	60.8%	66.5%	$33,394	70.7%	74.1%
	Unknown	6	5.2%	$11,568	15.5%	0.0%	3	4.7%	17.1%	$2,816	10.3%	16.3%	3	5.9%	15.6%	$8,752	18.5%	15.5%
	Total	*115*	*100.0%*	*$74,479*	*100.0%*	*100.0%*	*64*	*100.0%*	*100.0%*	*$27,268*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*$47,211*	*100.0%*	*100.0%*
REFINANCE	Low	10	2.3%	$3,016	1.6%	24.6%	6	2.8%	5.0%	$777	1.0%	3.2%	4	1.8%	2.8%	$2,239	2.2%	1.6%
	Moderate	25	5.7%	$4,506	2.4%	16.4%	14	6.5%	9.1%	$2,111	2.6%	5.1%	11	4.9%	6.9%	$2,395	2.3%	3.7%
	Middle	40	9.1%	$10,684	5.8%	17.0%	21	9.8%	17.4%	$5,478	6.7%	12.2%	19	8.4%	16.3%	$5,206	5.1%	11.1%
	Upper	354	80.5%	$129,571	70.3%	42.0%	170	79.1%	55.4%	$65,160	79.8%	64.8%	184	81.8%	59.7%	$64,411	62.7%	68.2%
	Unknown	11	2.5%	$36,630	19.9%	0.0%	4	1.9%	13.1%	$8,174	10.0%	14.7%	7	3.1%	14.4%	$28,456	27.7%	15.4%
	Total	*440*	*100.0%*	*$184,407*	*100.0%*	*100.0%*	*215*	*100.0%*	*100.0%*	*$81,700*	*100.0%*	*100.0%*	*225*	*100.0%*	*100.0%*	*$102,707*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	8	1.4%	$1,087	0.9%	24.6%	2	0.8%	2.3%	$223	0.4%	1.7%	6	1.9%	2.9%	$864	1.4%	2.5%
	Moderate	19	3.4%	$2,086	1.7%	16.4%	8	3.3%	5.7%	$865	1.5%	3.7%	11	3.5%	6.0%	$1,221	2.0%	4.0%
	Middle	50	8.9%	$5,855	4.9%	17.0%	23	9.3%	13.9%	$2,802	4.8%	9.1%	27	8.5%	14.7%	$3,053	4.9%	10.6%
	Upper	480	85.1%	$99,169	82.7%	42.0%	208	84.6%	71.6%	$48,018	82.8%	72.9%	272	85.5%	72.6%	$51,151	82.7%	75.2%
	Unknown	7	1.2%	$11,673	9.7%	0.0%	5	2.0%	6.5%	$6,088	10.5%	12.5%	2	0.6%	3.8%	$5,585	9.0%	7.7%
	Total	*564*	*100.0%*	*$119,870*	*100.0%*	*100.0%*	*246*	*100.0%*	*100.0%*	*$57,996*	*100.0%*	*100.0%*	*318*	*100.0%*	*100.0%*	*$61,874*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	24.6%	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%	16.4%	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%	17.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.1%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	42.0%	0	0.0%	0.5%	$0	0.0%	0.1%	0	0.0%	0.5%	$0	0.0%	0.1%
	Unknown	5	100.0%	$46,368	100.0%	0.0%	4	100.0%	99.4%	$22,463	100.0%	99.9%	1	100.0%	99.5%	$23,905	100.0%	99.9%
	Total	*5*	*100.0%*	*$46,368*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$22,463*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$23,905*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	7	1.6%	$721	0.5%	24.6%	2	1.0%	2.7%	$229	0.3%	1.8%	5	2.2%	3.0%	$492	0.9%	2.6%
	Moderate	11	2.6%	$1,397	1.0%	16.4%	6	3.0%	5.6%	$781	0.9%	2.6%	5	2.2%	5.6%	$616	1.1%	2.9%
	Middle	43	10.0%	$4,383	3.1%	17.0%	20	9.9%	12.6%	$2,064	2.5%	6.7%	23	10.2%	12.9%	$2,319	4.1%	6.7%
	Upper	355	82.9%	$96,093	69.0%	42.0%	168	83.2%	76.6%	$53,572	64.9%	83.0%	187	82.7%	74.8%	$42,521	75.1%	80.9%
	Unknown	12	2.8%	$36,604	26.3%	0.0%	6	3.0%	2.6%	$25,926	31.4%	5.9%	6	2.7%	3.7%	$10,678	18.9%	6.9%
	Total	*428*	*100.0%*	*$139,198*	*100.0%*	*100.0%*	*202*	*100.0%*	*100.0%*	*$82,572*	*100.0%*	*100.0%*	*226*	*100.0%*	*100.0%*	*$56,626*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - Greater Los Angeles

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	24.6%	0	0.0%	3.9%	$0	0.0%	1.4%	0	0.0%	4.2%	$0	0.0%	2.4%
	Moderate	1	9.1%	$350	1.0%	16.4%	0	0.0%	7.6%	$0	0.0%	2.7%	1	20.0%	8.9%	$350	2.8%	3.3%
	Middle	0	0.0%	$0	0.0%	17.0%	0	0.0%	13.6%	$0	0.0%	5.0%	0	0.0%	14.7%	$0	0.0%	5.8%
	Upper	10	90.9%	$34,194	99.0%	42.0%	6	100.0%	64.7%	$22,045	100.0%	70.0%	4	80.0%	61.3%	$12,149	97.2%	68.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	10.2%	$0	0.0%	20.9%	0	0.0%	10.9%	$0	0.0%	19.8%
	Total	*11*	*100.0%*	*$34,544*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$22,045*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$12,499*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	24.6%	0	0.0%	1.8%	$0	0.0%	0.5%	0	0.0%	0.3%	$0	0.0%	0.1%
	Moderate	0	0.0%	$0	0.0%	16.4%	0	0.0%	5.6%	$0	0.0%	1.6%	0	0.0%	1.0%	$0	0.0%	0.6%
	Middle	0	0.0%	$0	0.0%	17.0%	0	0.0%	6.6%	$0	0.0%	2.2%	0	0.0%	1.3%	$0	0.0%	1.1%
	Upper	0	0.0%	$0	0.0%	42.0%	0	0.0%	8.5%	$0	0.0%	4.7%	0	0.0%	2.1%	$0	0.0%	3.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	77.6%	$0	0.0%	90.9%	0	0.0%	95.2%	$0	0.0%	94.9%
	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	25	1.6%	$4,824	0.8%	24.6%	10	1.4%	3.3%	$1,229	0.4%	1.8%	15	1.8%	2.2%	$3,595	1.2%	1.1%
	Moderate	66	4.2%	$11,046	1.8%	16.4%	30	4.1%	6.2%	$4,175	1.4%	2.7%	36	4.4%	5.8%	$6,871	2.3%	2.7%
	Middle	164	10.5%	$32,150	5.4%	17.0%	86	11.7%	14.0%	$18,796	6.4%	8.0%	78	9.4%	14.8%	$13,354	4.4%	8.9%
	Upper	1,267	81.1%	$408,003	68.1%	42.0%	589	79.9%	59.4%	$204,377	69.5%	59.5%	678	82.1%	61.0%	$203,626	66.8%	62.9%
	Unknown	41	2.6%	$142,843	23.9%	0.0%	22	3.0%	17.1%	$65,467	22.3%	28.0%	19	2.3%	16.3%	$77,376	25.4%	24.4%
	Total	*1,563*	*100.0%*	*$598,866*	*100.0%*	*100.0%*	*737*	*100.0%*	*100.0%*	*$294,044*	*100.0%*	*100.0%*	*826*	*100.0%*	*100.0%*	*$304,822*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	190	18.6%	$43,918	14.7%	91.2%	94	15.7%	46.9%	$22,477	13.6%	31.8%	96	22.6%	50.9%	$21,441	16.1%	32.9%
	Over $1 Million	544	53.2%	$191,394	64.0%	8.2%	306	51.3%					238	56.0%				
	Total Rev. available	*734*	*71.8%*	*$235,312*	*78.7%*	*99.4%*	*400*	*67.0%*					*334*	*78.6%*				
	Rev. Not Known	288	28.2%	$63,586	21.3%	0.5%	197	33.0%					91	21.4%				
	Total	1,022	100.0%	$298,898	100.0%	100.0%	597	100.0%					425	100.0%				
Small Business — Loan Size	$100,000 or Less	425	41.6%	$26,170	8.8%		271	45.4%	95.9%	$15,956	9.6%	49.5%	154	36.2%	96.0%	$10,214	7.7%	50.2%
	$100,001 - $250,000	249	24.4%	$50,262	16.8%		134	22.4%	2.1%	$26,944	16.3%	12.5%	115	27.1%	2.2%	$23,318	17.5%	12.9%
	$250,001 - $1 Million	348	34.1%	$222,466	74.4%		192	32.2%	1.9%	$122,699	74.1%	38.0%	156	36.7%	1.9%	$99,767	74.8%	36.9%
	Total	1,022	100.0%	$298,898	100.0%		597	100.0%	100.0%	$165,599	100.0%	100.0%	425	100.0%	100.0%	$133,299	100.0%	100.0%
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	96.7%	0	0.0%	45.4%	$0	0.0%	38.9%	0	0.0%	54.9%	$0	0.0%	36.3%
	Over $1 Million	0	0.0%	$0	0.0%	3.2%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.1%	0	0.0%					0	0.0%				
	Total	0	0.0%	$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	94.5%	$0	0.0%	58.6%	0	0.0%	95.1%	$0	0.0%	65.5%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	4.1%	$0	0.0%	18.5%	0	0.0%	4.1%	$0	0.0%	20.2%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	1.5%	$0	0.0%	22.9%	0	0.0%	0.8%	$0	0.0%	14.2%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
		#	%	$ (000s)	$ %	%	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %
HOME PURCHASE	Low	3	11.1%	$767	6.7%	5.0%	3	18.8%	7.0%	$767	11.7%	4.5%	0	0.0%	7.1%	$0	0.0%	4.7%
	Moderate	2	7.4%	$546	4.8%	16.8%	1	6.3%	19.3%	$250	3.8%	14.1%	1	9.1%	18.6%	$296	6.1%	13.6%
	Middle	10	37.0%	$3,349	29.4%	32.8%	6	37.5%	30.8%	$1,729	26.5%	27.7%	4	36.4%	30.5%	$1,620	33.4%	27.3%
	Upper	12	44.4%	$6,719	59.0%	45.3%	6	37.5%	42.3%	$3,787	58.0%	53.2%	6	54.5%	43.3%	$2,932	60.5%	54.0%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.5%	$0	0.0%	0.5%	0	0.0%	0.5%	$0	0.0%	0.4%
	Total	27	100.0%	$11,381	100.0%	100.0%	16	100.0%	100.0%	$6,533	100.0%	100.0%	11	100.0%	100.0%	$4,848	100.0%	100.0%
REFINANCE	Low	7	2.9%	$2,039	2.1%	5.0%	4	3.3%	6.6%	$1,432	3.0%	4.8%	3	2.5%	5.4%	$607	1.3%	3.7%
	Moderate	27	11.2%	$8,599	9.0%	16.8%	15	12.2%	18.4%	$3,181	6.8%	14.3%	12	10.1%	17.0%	$5,418	11.3%	12.7%
	Middle	71	29.3%	$21,694	22.8%	32.8%	36	29.3%	32.3%	$10,413	22.2%	29.2%	35	29.4%	32.2%	$11,281	23.5%	28.3%
	Upper	137	56.6%	$62,701	66.0%	45.3%	68	55.3%	42.4%	$31,982	68.0%	51.6%	69	58.0%	45.2%	$30,719	64.0%	55.0%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.2%
	Total	242	100.0%	$95,033	100.0%	100.0%	123	100.0%	100.0%	$47,008	100.0%	100.0%	119	100.0%	100.0%	$48,025	100.0%	100.0%
HOME IMPROVEMENT	Low	12	4.1%	$1,714	2.8%	5.0%	7	4.2%	4.0%	$1,049	3.3%	3.3%	5	3.9%	4.2%	$665	2.3%	3.4%
	Moderate	49	16.7%	$7,268	12.1%	16.8%	28	17.0%	14.2%	$4,051	12.8%	11.7%	21	16.4%	13.7%	$3,217	11.3%	11.2%
	Middle	110	37.5%	$21,854	36.3%	32.8%	68	41.2%	33.0%	$14,023	44.3%	29.6%	42	32.8%	32.0%	$7,831	27.5%	27.7%
	Upper	122	41.6%	$29,326	48.7%	45.3%	62	37.6%	48.7%	$12,520	39.6%	55.4%	60	46.9%	50.0%	$16,806	58.9%	57.6%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%
	Total	293	100.0%	$60,162	100.0%	100.0%	165	100.0%	100.0%	$31,643	100.0%	100.0%	128	100.0%	100.0%	$28,519	100.0%	100.0%
MULTI FAMILY				Multi-Family Units														
	Low	0	0.0%	$0	0.0%	19.8%	0	0.0%	19.6%	$0	0.0%	13.8%	0	0.0%	18.8%	$0	0.0%	15.5%
	Moderate	0	0.0%	$0	0.0%	23.9%	0	0.0%	24.3%	$0	0.0%	22.2%	0	0.0%	28.8%	$0	0.0%	32.3%
	Middle	0	0.0%	$0	0.0%	26.7%	0	0.0%	29.5%	$0	0.0%	21.2%	0	0.0%	25.9%	$0	0.0%	28.5%
	Upper	0	0.0%	$0	0.0%	27.7%	0	0.0%	25.1%	$0	0.0%	40.8%	0	0.0%	25.3%	$0	0.0%	23.1%
	Unknown	0	0.0%	$0	0.0%	1.9%	0	0.0%	1.5%	$0	0.0%	2.0%	0	0.0%	1.1%	$0	0.0%	0.7%
	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%
OTHER PURPOSE LOC	Low	3	3.3%	$522	1.6%	5.0%	1	1.7%	3.0%	$100	0.5%	2.0%	2	6.3%	2.5%	$422	3.1%	1.6%
	Moderate	10	11.0%	$1,554	4.8%	16.8%	6	10.2%	11.7%	$956	5.0%	8.4%	4	12.5%	12.2%	$598	4.4%	7.9%
	Middle	23	25.3%	$4,490	13.7%	32.8%	11	18.6%	30.9%	$2,105	11.0%	24.9%	12	37.5%	29.3%	$2,385	17.5%	22.8%
	Upper	54	59.3%	$25,660	78.5%	45.3%	40	67.8%	54.2%	$15,426	80.9%	64.6%	14	43.8%	55.7%	$10,234	75.0%	67.4%
	Unknown	1	1.1%	$473	1.4%	0.2%	1	1.7%	0.1%	$473	2.5%	0.1%	0	0.0%	0.2%	$0	0.0%	0.2%
	Total	91	100.0%	$32,699	100.0%	100.0%	59	100.0%	100.0%	$19,060	100.0%	100.0%	32	100.0%	100.0%	$13,639	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	6.0%	$0	0.0%	2.9%	0	0.0%	5.3%	$0	0.0%	3.0%
	Moderate	0	0.0%	$0	0.0%	16.8%	0	0.0%	17.4%	$0	0.0%	9.3%	0	0.0%	16.1%	$0	0.0%	8.8%
	Middle	1	33.3%	$350	8.9%	32.8%	1	100.0%	30.5%	$350	100.0%	20.3%	0	0.0%	30.4%	$0	0.0%	22.3%
	Upper	2	66.7%	$3,580	91.1%	45.3%	0	0.0%	46.0%	$0	0.0%	67.5%	2	100.0%	48.1%	$3,580	100.0%	65.7%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.1%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.2%
	Total	*3*	*100.0%*	*$3,930*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$350*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$3,580*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	6.2%	$0	0.0%	4.1%	0	0.0%	5.6%	$0	0.0%	3.8%
	Moderate	0	0.0%	$0	0.0%	16.8%	0	0.0%	19.0%	$0	0.0%	14.7%	0	0.0%	14.9%	$0	0.0%	10.4%
	Middle	0	0.0%	$0	0.0%	32.8%	0	0.0%	32.0%	$0	0.0%	26.2%	0	0.0%	29.3%	$0	0.0%	24.6%
	Upper	0	0.0%	$0	0.0%	45.3%	0	0.0%	42.5%	$0	0.0%	54.6%	0	0.0%	49.9%	$0	0.0%	60.9%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.3%	$0	0.0%	0.3%	0	0.0%	0.4%	$0	0.0%	0.3%
	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	25	3.8%	$5,042	2.5%	5.0%	15	4.1%	6.5%	$3,348	3.2%	5.5%	10	3.4%	5.9%	$1,694	1.7%	4.8%
	Moderate	88	13.4%	$17,967	8.8%	16.8%	50	13.7%	18.1%	$8,438	8.1%	14.8%	38	13.0%	17.2%	$9,529	9.7%	14.1%
	Middle	215	32.8%	$51,737	25.5%	32.8%	122	33.5%	31.6%	$28,620	27.4%	27.3%	93	31.8%	31.4%	$23,117	23.4%	27.8%
	Upper	327	49.8%	$127,986	63.0%	45.3%	176	48.4%	43.5%	$63,715	60.9%	51.9%	151	51.7%	45.2%	$64,271	65.2%	53.0%
	Unknown	1	0.2%	$473	0.2%	0.2%	1	0.3%	0.3%	$473	0.5%	0.5%	0	0.0%	0.3%	$0	0.0%	0.3%
	Total	*656*	*100.0%*	*$203,205*	*100.0%*	*100.0%*	*364*	*100.0%*	*100.0%*	*$104,594*	*100.0%*	*100.0%*	*292*	*100.0%*	*100.0%*	*$98,611*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	66	15.7%	$18,316	16.4%	12.2%	39	15.7%	10.6%	$10,158	16.6%	13.3%	27	15.8%	10.8%	$8,158	16.2%	13.3%
	Moderate	67	16.0%	$22,013	19.7%	17.2%	33	13.3%	18.0%	$11,295	18.4%	16.7%	34	19.9%	18.1%	$10,718	21.3%	16.5%
	Middle	93	22.1%	$22,315	20.0%	27.9%	56	22.5%	29.3%	$12,465	20.3%	26.8%	37	21.6%	29.6%	$9,850	19.6%	26.8%
	Upper	193	46.0%	$48,740	43.7%	41.8%	120	48.2%	41.2%	$27,147	44.3%	42.3%	73	42.7%	40.6%	$21,593	42.9%	42.4%
	Unknown	1	0.2%	$250	0.2%	0.9%	1	0.4%	0.7%	$250	0.4%	0.8%	0	0.0%	0.8%	$0	0.0%	0.8%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.2%	$0	0.0%	0.1%	0	0.0%	0.2%	$0	0.0%	0.2%
	Total	*420*	*100.0%*	*$111,634*	*100.0%*	*100.0%*	*249*	*100.0%*	*100.0%*	*$61,315*	*100.0%*	*100.0%*	*171*	*100.0%*	*100.0%*	*$50,319*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	8.2%	0	0.0%	5.0%	$0	0.0%	11.3%	0	0.0%	7.6%	$0	0.0%	8.7%
	Moderate	0	0.0%	$0	0.0%	12.9%	0	0.0%	12.1%	$0	0.0%	7.2%	0	0.0%	14.0%	$0	0.0%	6.3%
	Middle	0	0.0%	$0	0.0%	26.5%	0	0.0%	28.8%	$0	0.0%	23.8%	0	0.0%	29.2%	$0	0.0%	16.5%
	Upper	0	0.0%	$0	0.0%	52.1%	0	0.0%	53.8%	$0	0.0%	57.6%	0	0.0%	48.5%	$0	0.0%	68.0%
	Unknown	0	0.0%	$0	0.0%	0.3%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.4%	$0	0.0%	0.1%	0	0.0%	0.8%	$0	0.0%	0.5%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: CA - San Francisco Bay

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	24.7%	0	0.0%	1.1%	$0	0.0%	0.5%	0	0.0%	1.1%	$0	0.0%	0.4%
	Moderate	0	0.0%	$0	0.0%	15.9%	0	0.0%	5.8%	$0	0.0%	2.7%	0	0.0%	6.9%	$0	0.0%	3.3%
	Middle	6	22.2%	$1,821	16.0%	18.0%	4	25.0%	13.9%	$1,061	16.2%	8.9%	2	18.2%	16.1%	$760	15.7%	10.6%
	Upper	19	70.4%	$7,432	65.3%	41.4%	11	68.8%	68.2%	$3,797	58.1%	78.4%	8	72.7%	66.2%	$3,635	75.0%	76.8%
	Unknown	2	7.4%	$2,128	18.7%	0.0%	1	6.3%	11.0%	$1,675	25.6%	9.5%	1	9.1%	9.8%	$453	9.3%	8.9%
	Total	*27*	*100.0%*	*$11,381*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*$6,533*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$4,848*	*100.0%*	*100.0%*
REFINANCE	Low	6	2.5%	$977	1.0%	24.7%	2	1.6%	6.8%	$179	0.4%	4.2%	4	3.4%	4.5%	$798	1.7%	2.4%
	Moderate	15	6.2%	$5,295	5.6%	15.9%	7	5.7%	13.4%	$2,215	4.7%	8.6%	8	6.7%	11.4%	$3,080	6.4%	6.5%
	Middle	30	12.4%	$6,515	6.9%	18.0%	18	14.6%	19.5%	$3,907	8.3%	15.6%	12	10.1%	19.2%	$2,608	5.4%	14.3%
	Upper	186	76.9%	$77,044	81.1%	41.4%	93	75.6%	50.3%	$38,382	81.6%	61.0%	93	78.2%	55.4%	$38,662	80.5%	66.9%
	Unknown	5	2.1%	$5,202	5.5%	0.0%	3	2.4%	10.0%	$2,325	4.9%	10.7%	2	1.7%	9.6%	$2,877	6.0%	9.9%
	Total	*242*	*100.0%*	*$95,033*	*100.0%*	*100.0%*	*123*	*100.0%*	*100.0%*	*$47,008*	*100.0%*	*100.0%*	*119*	*100.0%*	*100.0%*	*$48,025*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	13	4.4%	$1,448	2.4%	24.7%	7	4.2%	3.8%	$698	2.2%	2.5%	6	4.7%	4.5%	$750	2.6%	3.4%
	Moderate	26	8.9%	$3,123	5.2%	15.9%	14	8.5%	9.5%	$1,543	4.9%	6.2%	12	9.4%	10.0%	$1,580	5.5%	6.9%
	Middle	60	20.5%	$9,324	15.5%	18.0%	32	19.4%	18.4%	$4,891	15.5%	13.1%	28	21.9%	18.9%	$4,433	15.5%	13.9%
	Upper	192	65.5%	$46,117	76.7%	41.4%	111	67.3%	63.8%	$24,411	77.1%	70.6%	81	63.3%	62.7%	$21,706	76.1%	69.8%
	Unknown	2	0.7%	$150	0.2%	0.0%	1	0.6%	4.6%	$100	0.3%	7.6%	1	0.8%	3.8%	$50	0.2%	5.9%
	Total	*293*	*100.0%*	*$60,162*	*100.0%*	*100.0%*	*165*	*100.0%*	*100.0%*	*$31,643*	*100.0%*	*100.0%*	*128*	*100.0%*	*100.0%*	*$28,519*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	24.7%	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%	15.9%	0	0.0%	0.2%	$0	0.0%	0.0%	0	0.0%	0.1%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	18.0%	0	0.0%	0.2%	$0	0.0%	0.0%	0	0.0%	0.1%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	41.4%	0	0.0%	1.1%	$0	0.0%	0.2%	0	0.0%	0.9%	$0	0.0%	0.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	98.6%	$0	0.0%	99.7%	0	0.0%	98.9%	$0	0.0%	99.6%
	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%*
OTHER PURPOSE LOC	Low	3	3.3%	$324	1.0%	24.7%	3	5.1%	4.1%	$324	1.7%	2.4%	0	0.0%	4.6%	$0	0.0%	3.8%
	Moderate	4	4.4%	$324	1.0%	15.9%	2	3.4%	9.3%	$226	1.2%	5.4%	2	6.3%	9.5%	$98	0.7%	5.0%
	Middle	15	16.5%	$2,549	7.8%	18.0%	5	8.5%	18.1%	$904	4.7%	12.2%	10	31.3%	17.1%	$1,645	12.1%	11.1%
	Upper	63	69.2%	$20,298	62.1%	41.4%	46	78.0%	65.8%	$12,106	63.5%	75.5%	17	53.1%	63.7%	$8,192	60.1%	72.6%
	Unknown	6	6.6%	$9,204	28.1%	0.0%	3	5.1%	2.7%	$5,500	28.9%	4.5%	3	9.4%	5.2%	$3,704	27.2%	7.5%
	Total	*91*	*100.0%*	*$32,699*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*$19,060*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*$13,639*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - San Francisco Bay

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	24.7%	0	0.0%	6.3%	$0	0.0%	3.0%	0	0.0%	6.7%	$0	0.0%	4.5%
	Moderate	0	0.0%	$0	0.0%	15.9%	0	0.0%	12.0%	$0	0.0%	4.9%	0	0.0%	12.4%	$0	0.0%	4.8%
	Middle	0	0.0%	$0	0.0%	18.0%	0	0.0%	16.9%	$0	0.0%	8.4%	0	0.0%	17.2%	$0	0.0%	8.3%
	Upper	3	100.0%	$3,930	100.0%	41.4%	1	100.0%	56.9%	$350	100.0%	68.9%	2	100.0%	55.3%	$3,580	100.0%	67.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	7.9%	$0	0.0%	14.9%	0	0.0%	8.3%	$0	0.0%	14.4%
	Total	*3*	*100.0%*	*$3,930*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$350*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$3,580*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	24.7%	0	0.0%	3.3%	$0	0.0%	0.8%	0	0.0%	0.2%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	15.9%	0	0.0%	5.9%	$0	0.0%	1.7%	0	0.0%	1.2%	$0	0.0%	0.7%
	Middle	0	0.0%	$0	0.0%	18.0%	0	0.0%	4.5%	$0	0.0%	1.4%	0	0.0%	0.7%	$0	0.0%	0.6%
	Upper	0	0.0%	$0	0.0%	41.4%	0	0.0%	5.4%	$0	0.0%	4.4%	0	0.0%	1.0%	$0	0.0%	1.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	80.9%	$0	0.0%	91.6%	0	0.0%	96.9%	$0	0.0%	97.4%
	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	22	3.4%	$2,749	1.4%	24.7%	12	3.3%	3.9%	$1,201	1.1%	1.8%	10	3.4%	3.4%	$1,548	1.6%	1.7%
	Moderate	45	6.9%	$8,742	4.3%	15.9%	23	6.3%	9.5%	$3,984	3.8%	4.5%	22	7.5%	9.7%	$4,758	4.8%	4.9%
	Middle	111	16.9%	$20,209	9.9%	18.0%	59	16.2%	16.5%	$10,763	10.3%	10.3%	52	17.8%	17.8%	$9,446	9.6%	11.9%
	Upper	463	70.6%	$154,821	76.2%	41.4%	262	72.0%	57.9%	$79,046	75.6%	62.6%	201	68.8%	58.0%	$75,775	76.8%	65.5%
	Unknown	15	2.3%	$16,684	8.2%	0.0%	8	2.2%	12.2%	$9,600	9.2%	20.8%	7	2.4%	11.1%	$7,084	7.2%	16.0%
	Total	*656*	*100.0%*	*$203,205*	*100.0%*	*100.0%*	*364*	*100.0%*	*100.0%*	*$104,594*	*100.0%*	*100.0%*	*292*	*100.0%*	*100.0%*	*$98,611*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	61	14.5%	$11,186	10.0%	90.9%	31	12.4%	46.9%	$5,382	8.8%	32.6%	30	17.5%	52.4%	$5,804	11.5%	33.7%
	Over $1 Million	248	59.0%	$82,349	73.8%	8.6%	145	58.2%					103	60.2%				
	Total Rev. available	309	73.5%	$93,535	83.8%	99.5%	176	70.6%					133	77.7%				
	Rev. Not Known	111	26.4%	$18,099	16.2%	0.5%	73	29.3%					38	22.2%				
	Total	*420*	*100.0%*	*$111,634*	*100.0%*	*100.0%*	*249*	*100.0%*					*171*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	181	43.1%	$10,407	9.3%		115	46.2%	95.8%	$6,359	10.4%	49.2%	66	38.6%	95.9%	$4,048	8.0%	49.9%
	$100,001 - $250,000	103	24.5%	$19,956	17.9%		59	23.7%	2.2%	$11,284	18.4%	12.7%	44	25.7%	2.1%	$8,672	17.2%	12.5%
	$250,001 - $1 Million	136	32.4%	$81,271	72.8%		75	30.1%	2.0%	$43,672	71.2%	38.1%	61	35.7%	2.0%	$37,599	74.7%	37.6%
	Total	420	100.0%	$111,634	100.0%		249	100.0%	100.0%	$61,315	100.0%	100.0%	171	100.0%	100.0%	$50,319	100.0%	100.0%
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	96.4%	0	0.0%	45.4%	$0	0.0%	43.5%	0	0.0%	58.3%	$0	0.0%	45.4%
	Over $1 Million	0	0.0%	$0	0.0%	3.4%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.2%	0	0.0%					0	0.0%				
	Total	*0*	*0.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*					*0*	*0.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	95.4%	$0	0.0%	57.8%	0	0.0%	95.1%	$0	0.0%	53.2%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	2.9%	$0	0.0%	16.8%	0	0.0%	3.0%	$0	0.0%	18.1%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	1.7%	$0	0.0%	25.4%	0	0.0%	1.9%	$0	0.0%	28.8%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count		Dollar			Count		Dollar				
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	4	4.2%	$583	3.2%	2.8%	1	1.6%	2.7%	$148	1.3%	1.8%	3	8.6%	2.8%	$435	6.6%	1.9%
	Moderate	59	61.5%	$9,105	50.0%	24.6%	35	57.4%	24.5%	$5,348	45.8%	17.3%	24	68.6%	25.0%	$3,757	57.3%	17.8%
	Middle	17	17.7%	$3,359	18.4%	33.8%	12	19.7%	34.9%	$1,861	16.0%	29.8%	5	14.3%	35.0%	$1,498	22.8%	30.1%
	Upper	15	15.6%	$4,893	26.8%	38.6%	13	21.3%	37.9%	$4,310	36.9%	50.9%	2	5.7%	37.0%	$583	8.9%	49.8%
	Unknown	1	1.0%	$288	1.6%	0.1%	0	0.0%	0.1%	$0	0.0%	0.2%	1	2.9%	0.1%	$288	4.4%	0.4%
	Total	*96*	*100.0%*	*$18,228*	*100.0%*	*100.0%*	*61*	*100.0%*	*100.0%*	*$11,667*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*$6,561*	*100.0%*	*100.0%*
REFINANCE	Low	6	6.7%	$647	2.3%	2.8%	3	5.9%	2.2%	$311	1.7%	1.5%	3	7.7%	1.9%	$336	3.4%	1.4%
	Moderate	25	27.8%	$3,720	13.4%	24.6%	19	37.3%	20.2%	$3,035	17.0%	13.6%	6	15.4%	19.1%	$685	6.9%	12.9%
	Middle	31	34.4%	$4,398	15.9%	33.8%	17	33.3%	34.9%	$2,363	13.3%	28.7%	14	35.9%	34.3%	$2,035	20.6%	27.4%
	Upper	28	31.1%	$18,951	68.4%	38.6%	12	23.5%	42.6%	$12,113	68.0%	55.1%	16	41.0%	44.6%	$6,838	69.1%	57.5%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	1.1%	0	0.0%	0.1%	$0	0.0%	0.8%
	Total	*90*	*100.0%*	*$27,716*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*$17,822*	*100.0%*	*100.0%*	*39*	*100.0%*	*100.0%*	*$9,894*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	2.8%	0	0.0%	1.6%	$0	0.0%	1.2%	0	0.0%	1.3%	$0	0.0%	0.9%
	Moderate	6	22.2%	$1,019	22.5%	24.6%	4	30.8%	15.5%	$628	35.5%	10.4%	2	14.3%	15.5%	$391	14.1%	10.4%
	Middle	8	29.6%	$1,260	27.8%	33.8%	4	30.8%	32.5%	$410	23.2%	26.7%	4	28.6%	32.5%	$850	30.7%	24.0%
	Upper	13	48.1%	$2,256	49.7%	38.6%	5	38.5%	50.4%	$732	41.4%	60.0%	8	57.1%	50.6%	$1,524	55.1%	60.7%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	1.6%	0	0.0%	0.1%	$0	0.0%	3.9%
	Total	*27*	*100.0%*	*$4,535*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*$1,770*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$2,765*	*100.0%*	*100.0%*
MULTI FAMILY						Multi-Family Units												
	Low	0	0.0%	$0	0.0%	6.4%	0	0.0%	12.7%	$0	0.0%	22.8%	0	0.0%	14.8%	$0	0.0%	7.3%
	Moderate	0	0.0%	$0	0.0%	33.8%	0	0.0%	41.2%	$0	0.0%	24.1%	0	0.0%	41.9%	$0	0.0%	32.4%
	Middle	0	0.0%	$0	0.0%	32.4%	0	0.0%	25.1%	$0	0.0%	37.5%	0	0.0%	23.0%	$0	0.0%	25.6%
	Upper	0	0.0%	$0	0.0%	27.3%	0	0.0%	19.5%	$0	0.0%	15.5%	0	0.0%	20.4%	$0	0.0%	34.7%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	1.5%	$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%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	2.8%	0	0.0%	0.7%	$0	0.0%	0.4%	0	0.0%	1.0%	$0	0.0%	0.6%
	Moderate	4	21.1%	$170	6.9%	24.6%	3	30.0%	13.8%	$95	9.7%	7.7%	1	11.1%	13.3%	$75	5.0%	7.5%
	Middle	3	15.8%	$478	19.3%	33.8%	1	10.0%	31.8%	$100	10.2%	23.8%	2	22.2%	30.3%	$378	25.1%	21.7%
	Upper	12	63.2%	$1,831	73.9%	38.6%	6	60.0%	53.7%	$781	80.0%	67.5%	6	66.7%	55.2%	$1,050	69.9%	69.7%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.5%	0	0.0%	0.1%	$0	0.0%	0.5%
	Total	*19*	*100.0%*	*$2,479*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$976*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$1,503*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.8%	0	0.0%	2.0%	$0	0.0%	0.5%	0	0.0%	2.5%	$0	0.0%	1.4%
	Moderate	2	100.0%	$157	100.0%	24.6%	0	0.0%	19.9%	$0	0.0%	4.8%	2	100.0%	18.7%	$157	100.0%	7.1%
	Middle	0	0.0%	$0	0.0%	33.8%	0	0.0%	30.3%	$0	0.0%	11.8%	0	0.0%	30.0%	$0	0.0%	13.4%
	Upper	0	0.0%	$0	0.0%	38.6%	0	0.0%	47.2%	$0	0.0%	66.7%	0	0.0%	48.7%	$0	0.0%	76.0%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.5%	$0	0.0%	16.2%	0	0.0%	0.1%	$0	0.0%	2.1%
	Total	2	100.0%	$157	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	2	100.0%	100.0%	$157	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.8%	0	0.0%	2.7%	$0	0.0%	1.8%	0	0.0%	1.8%	$0	0.0%	1.0%
	Moderate	7	43.8%	$1,210	47.9%	24.6%	7	43.8%	28.1%	$1,210	47.9%	20.9%	0	0.0%	26.6%	$0	0.0%	21.0%
	Middle	6	37.5%	$812	32.1%	33.8%	6	37.5%	36.8%	$812	32.1%	32.2%	0	0.0%	35.6%	$0	0.0%	30.4%
	Upper	3	18.8%	$506	20.0%	38.6%	3	18.8%	32.4%	$506	20.0%	45.0%	0	0.0%	36.0%	$0	0.0%	47.6%
	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%
	Total	16	100.0%	$2,528	100.0%	100.0%	16	100.0%	100.0%	$2,528	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%
HMDA TOTALS	Low	10	4.0%	$1,230	2.2%	2.8%	4	2.6%	2.5%	$459	1.3%	3.5%	6	6.1%	2.5%	$771	3.7%	2.1%
	Moderate	103	41.2%	$15,381	27.6%	24.6%	68	45.0%	22.7%	$10,316	29.7%	16.7%	35	35.4%	22.5%	$5,065	24.3%	17.2%
	Middle	65	26.0%	$10,307	18.5%	33.8%	40	26.5%	34.6%	$5,546	16.0%	29.8%	25	25.3%	34.5%	$4,761	22.8%	28.5%
	Upper	71	28.4%	$28,437	51.1%	38.6%	39	25.8%	40.1%	$18,442	53.1%	49.2%	32	32.3%	40.5%	$9,995	47.9%	51.6%
	Unknown	1	0.4%	$288	0.5%	0.1%	0	0.0%	0.1%	$0	0.0%	0.8%	1	1.0%	0.1%	$288	1.4%	0.5%
	Total	250	100.0%	$55,643	100.0%	100.0%	151	100.0%	100.0%	$34,763	100.0%	100.0%	99	100.0%	100.0%	$20,880	100.0%	100.0%
SMALL BUSINESSES						Total Businesses												
	Low	12	8.7%	$4,986	12.3%	5.3%	5	6.7%	5.7%	$1,357	7.2%	7.9%	7	11.1%	5.9%	$3,629	16.8%	7.6%
	Moderate	30	21.7%	$6,718	16.6%	23.4%	18	24.0%	22.3%	$3,934	20.9%	23.8%	12	19.0%	23.5%	$2,784	12.9%	24.0%
	Middle	41	29.7%	$12,837	31.8%	30.7%	21	28.0%	29.4%	$5,498	29.2%	27.8%	20	31.7%	29.0%	$7,339	34.0%	27.6%
	Upper	53	38.4%	$15,707	38.9%	40.3%	30	40.0%	42.4%	$7,952	42.3%	40.1%	23	36.5%	41.4%	$7,755	35.9%	40.4%
	Unknown	2	1.4%	$150	0.4%	0.3%	1	1.3%	0.3%	$75	0.4%	0.4%	1	1.6%	0.2%	$75	0.3%	0.4%
	Tr 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%
	Total	138	100.0%	$40,398	100.0%	100.0%	75	100.0%	100.0%	$18,816	100.0%	100.0%	63	100.0%	100.0%	$21,582	100.0%	100.0%
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	3.9%	0	0.0%	3.1%	$0	0.0%	3.4%	0	0.0%	3.1%	$0	0.0%	1.3%
	Moderate	0	0.0%	$0	0.0%	15.1%	0	0.0%	13.2%	$0	0.0%	11.9%	0	0.0%	14.1%	$0	0.0%	6.0%
	Middle	0	0.0%	$0	0.0%	29.4%	0	0.0%	30.4%	$0	0.0%	26.0%	0	0.0%	26.8%	$0	0.0%	30.5%
	Upper	0	0.0%	$0	0.0%	51.3%	0	0.0%	53.3%	$0	0.0%	58.7%	0	0.0%	56.0%	$0	0.0%	62.2%
	Unknown	0	0.0%	$0	0.0%	0.4%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Tr 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%
	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%

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	10	10.4%	$890	4.9%	22.6%	9	14.8%	3.2%	$743	6.4%	1.4%	1	2.9%	3.5%	$147	2.2%	1.5%
	Moderate	42	43.8%	$4,971	27.3%	17.4%	25	41.0%	13.7%	$2,756	23.6%	8.1%	17	48.6%	15.0%	$2,215	33.8%	9.0%
	Middle	17	17.7%	$3,307	18.1%	18.4%	9	14.8%	20.8%	$1,623	13.9%	16.6%	8	22.9%	22.2%	$1,684	25.7%	17.7%
	Upper	26	27.1%	$8,680	47.6%	41.6%	17	27.9%	45.5%	$6,165	52.8%	58.8%	9	25.7%	45.3%	$2,515	38.3%	57.8%
	Unknown	1	1.0%	$380	2.1%	0.0%	1	1.6%	16.8%	$380	3.3%	15.1%	0	0.0%	14.0%	$0	0.0%	14.0%
	Total	*96*	*100.0%*	*$18,228*	*100.0%*	*100.0%*	*61*	*100.0%*	*100.0%*	*$11,667*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*$6,561*	*100.0%*	*100.0%*
REFINANCE	Low	14	15.6%	$1,571	5.7%	22.6%	10	19.6%	6.1%	$1,238	6.9%	3.2%	4	10.3%	4.1%	$333	3.4%	2.0%
	Moderate	28	31.1%	$3,707	13.4%	17.4%	16	31.4%	14.6%	$2,376	13.3%	9.1%	12	30.8%	11.6%	$1,331	13.5%	6.5%
	Middle	11	12.2%	$1,673	6.0%	18.4%	7	13.7%	21.1%	$1,151	6.5%	16.4%	4	10.3%	19.2%	$522	5.3%	13.7%
	Upper	31	34.4%	$15,054	54.3%	41.6%	16	31.4%	45.3%	$8,004	44.9%	58.2%	15	38.5%	46.4%	$7,050	71.3%	57.6%
	Unknown	6	6.7%	$5,711	20.6%	0.0%	2	3.9%	13.0%	$5,053	28.4%	13.2%	4	10.3%	18.6%	$658	6.7%	20.1%
	Total	*90*	*100.0%*	*$27,716*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*$17,822*	*100.0%*	*100.0%*	*39*	*100.0%*	*100.0%*	*$9,894*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	4	14.8%	$209	4.6%	22.6%	2	15.4%	4.1%	$80	4.5%	2.1%	2	14.3%	4.3%	$129	4.7%	2.4%
	Moderate	4	14.8%	$254	5.6%	17.4%	2	15.4%	11.0%	$74	4.2%	6.6%	2	14.3%	11.2%	$180	6.5%	6.7%
	Middle	4	14.8%	$734	16.2%	18.4%	3	23.1%	19.2%	$434	24.5%	12.8%	1	7.1%	19.3%	$300	10.8%	13.0%
	Upper	15	55.6%	$3,338	73.6%	41.6%	6	46.2%	61.0%	$1,182	66.8%	70.5%	9	64.3%	61.7%	$2,156	78.0%	67.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	4.6%	$0	0.0%	8.1%	0	0.0%	3.6%	$0	0.0%	10.0%
	Total	*27*	*100.0%*	*$4,535*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*$1,770*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$2,765*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	22.6%	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%	17.4%	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%	18.4%	0	0.0%	0.4%	$0	0.0%	0.0%	0	0.0%	0.4%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	41.6%	0	0.0%	0.7%	$0	0.0%	0.0%	0	0.0%	2.6%	$0	0.0%	0.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	98.9%	$0	0.0%	100.0%	0	0.0%	97.0%	$0	0.0%	99.9%
	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%*
OTHER PURPOSE LOC	Low	2	10.5%	$116	4.7%	22.6%	2	20.0%	4.8%	$116	11.9%	2.1%	0	0.0%	3.9%	$0	0.0%	1.8%
	Moderate	3	15.8%	$175	7.1%	17.4%	2	20.0%	11.5%	$100	10.2%	5.6%	1	11.1%	11.2%	$75	5.0%	6.2%
	Middle	6	31.6%	$643	25.9%	18.4%	2	20.0%	17.7%	$100	10.2%	11.2%	4	44.4%	17.3%	$543	36.1%	9.7%
	Upper	7	36.8%	$1,489	60.1%	41.6%	4	40.0%	64.1%	$660	67.6%	78.2%	3	33.3%	64.8%	$829	55.2%	79.7%
	Unknown	1	5.3%	$56	2.3%	0.0%	0	0.0%	1.8%	$0	0.0%	2.8%	1	11.1%	2.8%	$56	3.7%	2.6%
	Total	*19*	*100.0%*	*$2,479*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$976*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$1,503*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: FL - Fort Lauderdale-West Palm Beach

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison												
		2018, 2019				2018						2019						
		Bank			Families by Family Income	Count			Dollar			Count			Dollar			
		Count		Dollar		Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	2	100.0%	$157	100.0%	22.6%	0	0.0%	7.2%	$0	0.0%	1.5%	2	100.0%	6.1%	$157	100.0%	1.6%
	Moderate	0	0.0%	$0	0.0%	17.4%	0	0.0%	11.8%	$0	0.0%	2.3%	0	0.0%	12.7%	$0	0.0%	3.7%
	Middle	0	0.0%	$0	0.0%	18.4%	0	0.0%	16.7%	$0	0.0%	4.1%	0	0.0%	17.4%	$0	0.0%	5.8%
	Upper	0	0.0%	$0	0.0%	41.6%	0	0.0%	54.5%	$0	0.0%	65.2%	0	0.0%	53.9%	$0	0.0%	73.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	9.8%	$0	0.0%	27.0%	0	0.0%	10.0%	$0	0.0%	14.9%
	Total	2	100.0%	$157	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	2	100.0%	100.0%	$157	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	3	18.8%	$305	12.1%	22.6%	3	18.8%	2.8%	$305	12.1%	1.6%	0	0.0%	1.3%	$0	0.0%	0.7%
	Moderate	9	56.3%	$1,353	53.5%	17.4%	9	56.3%	7.9%	$1,353	53.5%	6.3%	0	0.0%	5.3%	$0	0.0%	5.5%
	Middle	1	6.3%	$143	5.7%	18.4%	1	6.3%	6.8%	$143	5.7%	6.5%	0	0.0%	3.3%	$0	0.0%	4.3%
	Upper	3	18.8%	$727	28.8%	41.6%	3	18.8%	6.8%	$727	28.8%	7.5%	0	0.0%	4.2%	$0	0.0%	7.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	75.6%	$0	0.0%	78.1%	0	0.0%	85.9%	$0	0.0%	81.6%
	Total	16	100.0%	$2,528	100.0%	100.0%	16	100.0%	100.0%	$2,528	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%
HMDA TOTALS	Low	35	14.0%	$3,248	5.8%	22.6%	26	17.2%	4.0%	$2,482	7.1%	1.7%	9	9.1%	3.7%	$766	3.7%	1.6%
	Moderate	86	34.4%	$10,460	18.8%	17.4%	54	35.8%	13.4%	$6,659	19.2%	7.3%	32	32.3%	13.5%	$3,801	18.2%	7.3%
	Middle	39	15.6%	$6,500	11.7%	18.4%	22	14.6%	20.1%	$3,451	9.9%	14.4%	17	17.2%	20.6%	$3,049	14.6%	14.6%
	Upper	82	32.8%	$29,288	52.6%	41.6%	46	30.5%	45.6%	$16,738	48.1%	53.1%	36	36.4%	46.2%	$12,550	60.1%	53.2%
	Unknown	8	3.2%	$6,147	11.0%	0.0%	3	2.0%	16.7%	$5,433	15.6%	23.4%	5	5.1%	16.0%	$714	3.4%	23.3%
	Total	250	100.0%	$55,643	100.0%	100.0%	151	100.0%	100.0%	$34,763	100.0%	100.0%	99	100.0%	100.0%	$20,880	100.0%	100.0%
Small Business — Revenue						Total Businesses												
	$1 Million or Less	47	34.1%	$10,402	25.7%	93.4%	24	32.0%	46.1%	$5,565	29.6%	31.5%	23	36.5%	47.7%	$4,837	22.4%	31.1%
	Over $1 Million	56	40.6%	$19,033	47.1%	5.6%	31	41.3%					25	39.7%				
	Total Rev. available	103	74.7%	$29,435	72.8%	99.0%	55	73.3%					48	76.2%				
	Rev. Not Known	35	25.4%	$10,963	27.1%	1.0%	20	26.7%					15	23.8%				
	Total	138	100.0%	$40,398	100.0%	100.0%	75	100.0%					63	100.0%				
Small Business — Loan Size	$100,000 or Less	51	37.0%	$3,163	7.8%		32	42.7%	96.3%	$1,878	10.0%	52.4%	19	30.2%	96.4%	$1,285	6.0%	53.8%
	$100,001 - $250,000	29	21.0%	$5,351	13.2%		16	21.3%	2.1%	$3,092	16.4%	13.7%	13	20.6%	2.2%	$2,259	10.5%	14.5%
	$250,001 - $1 Million	58	42.0%	$31,884	78.9%		27	36.0%	1.6%	$13,846	73.6%	33.9%	31	49.2%	1.5%	$18,038	83.6%	31.6%
	Total	138	100.0%	$40,398	100.0%		75	100.0%	100.0%	$18,816	100.0%	100.0%	63	100.0%	100.0%	$21,582	100.0%	100.0%
Small Farm — Revenue						Total Farms												
	$1 Million or Less	0	0.0%	$0	0.0%	96.9%	0	0.0%	49.8%	$0	0.0%	58.3%	0	0.0%	62.9%	$0	0.0%	61.7%
	Over $1 Million	0	0.0%	$0	0.0%	3.1%	0	0.0%					0	0.0%				
	Not Known	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%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	96.1%	$0	0.0%	67.2%	0	0.0%	96.9%	$0	0.0%	72.2%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	3.1%	$0	0.0%	19.9%	0	0.0%	2.7%	$0	0.0%	22.9%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	0.8%	$0	0.0%	12.8%	0	0.0%	0.3%	$0	0.0%	4.9%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: MI - Lansing-East Lansing

Product Type	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	1	4.3%	$60	1.9%	2.3%	0	0.0%	3.8%	$0	0.0%	1.7%	1	7.7%	3.0%	$60	3.0%	1.3%
	Moderate	5	21.7%	$481	15.2%	16.9%	1	10.0%	16.9%	$118	10.3%	10.3%	4	30.8%	18.8%	$363	18.1%	11.3%
	Middle	7	30.4%	$724	22.9%	45.3%	5	50.0%	46.9%	$518	45.0%	44.7%	2	15.4%	44.4%	$206	10.2%	42.7%
	Upper	10	43.5%	$1,896	60.0%	35.4%	4	40.0%	32.3%	$515	44.7%	43.0%	6	46.2%	33.5%	$1,381	68.7%	44.4%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.2%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.3%
	Total	23	100.0%	$3,161	100.0%	100.0%	10	100.0%	100.0%	$1,151	100.0%	100.0%	13	100.0%	100.0%	$2,010	100.0%	100.0%
REFINANCE	Low	1	2.1%	$55	1.1%	2.3%	1	4.0%	2.7%	$55	2.4%	1.2%	0	0.0%	1.2%	$0	0.0%	0.5%
	Moderate	5	10.6%	$293	6.0%	16.9%	2	8.0%	11.5%	$100	4.4%	7.0%	3	13.6%	10.2%	$193	7.3%	5.8%
	Middle	14	29.8%	$1,405	28.8%	45.3%	10	40.0%	47.4%	$932	41.3%	46.0%	4	18.2%	44.5%	$473	18.0%	40.1%
	Upper	27	57.4%	$3,132	64.1%	35.4%	12	48.0%	38.2%	$1,169	51.8%	45.4%	15	68.2%	44.0%	$1,963	74.7%	53.5%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.3%	$0	0.0%	0.4%	0	0.0%	0.1%	$0	0.0%	0.2%
	Total	47	100.0%	$4,885	100.0%	100.0%	25	100.0%	100.0%	$2,256	100.0%	100.0%	22	100.0%	100.0%	$2,629	100.0%	100.0%
HOME IMPROVEMENT	Low	1	4.5%	$55	3.1%	2.3%	0	0.0%	2.0%	$0	0.0%	1.4%	1	5.6%	1.3%	$55	3.5%	0.8%
	Moderate	2	9.1%	$83	4.7%	16.9%	0	0.0%	11.6%	$0	0.0%	8.6%	2	11.1%	9.4%	$83	5.2%	6.9%
	Middle	8	36.4%	$519	29.1%	45.3%	2	50.0%	47.1%	$80	40.0%	45.9%	6	33.3%	44.3%	$439	27.7%	42.7%
	Upper	11	50.0%	$1,125	63.1%	35.4%	2	50.0%	39.2%	$120	60.0%	44.1%	9	50.0%	45.1%	$1,005	63.5%	49.5%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	22	100.0%	$1,782	100.0%	100.0%	4	100.0%	100.0%	$200	100.0%	100.0%	18	100.0%	100.0%	$1,582	100.0%	100.0%
MULTI FAMILY						**Multi-Family Units**												
	Low	0	0.0%	$0	0.0%	14.8%	0	0.0%	18.2%	$0	0.0%	5.9%	0	0.0%	10.1%	$0	0.0%	1.6%
	Moderate	0	0.0%	$0	0.0%	21.7%	0	0.0%	21.2%	$0	0.0%	9.6%	0	0.0%	23.2%	$0	0.0%	22.1%
	Middle	1	100.0%	$6,000	100.0%	33.2%	0	0.0%	24.2%	$0	0.0%	27.7%	1	100.0%	44.9%	$6,000	100.0%	55.5%
	Upper	0	0.0%	$0	0.0%	28.2%	0	0.0%	31.8%	$0	0.0%	56.1%	0	0.0%	17.4%	$0	0.0%	17.3%
	Unknown	0	0.0%	$0	0.0%	2.2%	0	0.0%	4.5%	$0	0.0%	0.7%	0	0.0%	4.3%	$0	0.0%	3.6%
	Total	1	100.0%	$6,000	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	1	100.0%	100.0%	$6,000	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	1.8%	$0	0.0%	0.9%	0	0.0%	0.6%	$0	0.0%	0.2%
	Moderate	2	9.1%	$44	3.5%	16.9%	1	12.5%	9.5%	$20	4.9%	5.4%	1	7.1%	9.7%	$24	2.8%	5.8%
	Middle	12	54.5%	$705	55.9%	45.3%	4	50.0%	40.7%	$243	59.4%	38.0%	8	57.1%	39.7%	$462	54.2%	37.6%
	Upper	8	36.4%	$512	40.6%	35.4%	3	37.5%	47.8%	$146	35.7%	55.5%	5	35.7%	49.9%	$366	43.0%	55.9%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.3%	$0	0.0%	0.2%	0	0.0%	0.1%	$0	0.0%	0.5%
	Total	22	100.0%	$1,261	100.0%	100.0%	8	100.0%	100.0%	$409	100.0%	100.0%	14	100.0%	100.0%	$852	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	1.4%	$0	0.0%	1.4%	0	0.0%	2.0%	$0	0.0%	1.2%
	Moderate	0	0.0%	$0	0.0%	16.9%	0	0.0%	12.2%	$0	0.0%	10.4%	0	0.0%	15.3%	$0	0.0%	11.0%
	Middle	1	100.0%	$53	100.0%	45.3%	0	0.0%	54.9%	$0	0.0%	51.7%	1	100.0%	44.9%	$53	100.0%	44.6%
	Upper	0	0.0%	$0	0.0%	35.4%	0	0.0%	31.5%	$0	0.0%	36.5%	0	0.0%	37.7%	$0	0.0%	43.2%
	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%
	Total	*1*	*100.0%*	*$53*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$53*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	5.1%	$0	0.0%	3.3%	0	0.0%	3.1%	$0	0.0%	1.8%
	Moderate	0	0.0%	$0	0.0%	16.9%	0	0.0%	22.9%	$0	0.0%	18.0%	0	0.0%	23.9%	$0	0.0%	14.9%
	Middle	0	0.0%	$0	0.0%	45.3%	0	0.0%	42.8%	$0	0.0%	43.4%	0	0.0%	52.1%	$0	0.0%	50.2%
	Upper	0	0.0%	$0	0.0%	35.4%	0	0.0%	28.8%	$0	0.0%	35.3%	0	0.0%	20.9%	$0	0.0%	33.1%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.4%	$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	3	2.6%	$170	1.0%	2.3%	1	2.1%	3.3%	$55	1.4%	2.4%	2	2.9%	2.2%	$115	0.9%	1.0%
	Moderate	14	12.1%	$901	5.3%	16.9%	4	8.5%	14.8%	$238	5.9%	9.5%	10	14.5%	14.9%	$663	5.1%	10.2%
	Middle	43	37.1%	$9,406	54.9%	45.3%	21	44.7%	46.8%	$1,773	44.1%	41.9%	22	31.9%	44.3%	$7,633	58.2%	42.9%
	Upper	56	48.3%	$6,665	38.9%	35.4%	21	44.7%	34.9%	$1,950	48.6%	46.0%	35	50.7%	38.5%	$4,715	35.9%	45.3%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.2%	$0	0.0%	0.3%	0	0.0%	0.2%	$0	0.0%	0.5%
	Total	*116*	*100.0%*	*$17,142*	*100.0%*	*100.0%*	*47*	*100.0%*	*100.0%*	*$4,016*	*100.0%*	*100.0%*	*69*	*100.0%*	*100.0%*	*$13,126*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	26	15.1%	$4,662	12.9%	7.2%	15	15.5%	10.9%	$2,795	13.8%	16.1%	11	14.7%	8.3%	$1,867	11.7%	11.3%
	Moderate	48	27.9%	$10,682	29.5%	19.6%	25	25.8%	15.7%	$5,775	28.5%	17.2%	23	30.7%	17.7%	$4,907	30.8%	19.2%
	Middle	38	22.1%	$8,020	22.2%	36.7%	22	22.7%	35.6%	$4,004	19.8%	30.8%	16	21.3%	32.1%	$4,016	25.2%	29.5%
	Upper	57	33.1%	$12,381	34.2%	34.3%	33	34.0%	35.3%	$7,545	37.3%	33.9%	24	32.0%	39.7%	$4,836	30.4%	38.5%
	Unknown	3	1.7%	$415	1.1%	2.2%	2	2.1%	1.7%	$115	0.6%	1.8%	1	1.3%	1.1%	$300	1.9%	1.0%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.8%	$0	0.0%	0.3%	0	0.0%	1.1%	$0	0.0%	0.5%
	Total	*172*	*100.0%*	*$36,160*	*100.0%*	*100.0%*	*97*	*100.0%*	*100.0%*	*$20,234*	*100.0%*	*100.0%*	*75*	*100.0%*	*100.0%*	*$15,926*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	0.7%	0	0.0%	1.0%	$0	0.0%	0.2%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	3.5%	0	0.0%	2.1%	$0	0.0%	0.3%	0	0.0%	1.9%	$0	0.0%	0.2%
	Middle	0	0.0%	$0	0.0%	65.0%	0	0.0%	75.6%	$0	0.0%	69.1%	0	0.0%	62.7%	$0	0.0%	68.4%
	Upper	0	0.0%	$0	0.0%	30.0%	0	0.0%	21.2%	$0	0.0%	30.5%	0	0.0%	35.4%	$0	0.0%	31.4%
	Unknown	0	0.0%	$0	0.0%	0.9%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Tr 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%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	4	17.4%	$314	9.9%	20.5%	2	20.0%	11.6%	$110	9.6%	6.0%	2	15.4%	10.7%	$204	10.1%	5.5%
	Moderate	6	26.1%	$566	17.9%	17.1%	3	30.0%	26.7%	$382	33.2%	20.7%	3	23.1%	25.4%	$184	9.2%	18.6%
	Middle	5	21.7%	$785	24.8%	20.3%	1	10.0%	23.4%	$80	7.0%	23.6%	4	30.8%	24.1%	$705	35.1%	23.4%
	Upper	8	34.8%	$1,496	47.3%	42.2%	4	40.0%	27.9%	$579	50.3%	39.9%	4	30.8%	31.2%	$917	45.6%	43.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	10.5%	$0	0.0%	9.8%	0	0.0%	8.6%	$0	0.0%	8.8%
	Total	23	100.0%	$3,161	100.0%	100.0%	10	100.0%	100.0%	$1,151	100.0%	100.0%	13	100.0%	100.0%	$2,010	100.0%	100.0%
REFINANCE	Low	4	8.5%	$283	5.8%	20.5%	3	12.0%	10.4%	$228	10.1%	6.2%	1	4.5%	6.9%	$55	2.1%	3.7%
	Moderate	12	25.5%	$874	17.9%	17.1%	7	28.0%	22.9%	$518	23.0%	18.0%	5	22.7%	18.0%	$356	13.5%	12.5%
	Middle	15	31.9%	$1,419	29.0%	20.3%	10	40.0%	25.1%	$871	38.6%	24.1%	5	22.7%	24.7%	$548	20.8%	22.1%
	Upper	15	31.9%	$2,223	45.5%	42.2%	5	20.0%	33.0%	$639	28.3%	42.2%	10	45.5%	39.2%	$1,584	60.3%	49.3%
	Unknown	1	2.1%	$86	1.8%	0.0%	0	0.0%	8.6%	$0	0.0%	9.6%	1	4.5%	11.2%	$86	3.3%	12.5%
	Total	47	100.0%	$4,885	100.0%	100.0%	25	100.0%	100.0%	$2,256	100.0%	100.0%	22	100.0%	100.0%	$2,629	100.0%	100.0%
HOME IMPROVEMENT	Low	3	13.6%	$193	10.8%	20.5%	1	25.0%	9.7%	$60	30.0%	8.0%	2	11.1%	8.6%	$133	8.4%	5.9%
	Moderate	5	22.7%	$410	23.0%	17.1%	1	25.0%	18.8%	$100	50.0%	15.2%	4	22.2%	18.0%	$310	19.6%	16.2%
	Middle	7	31.8%	$347	19.5%	20.3%	1	25.0%	25.9%	$20	10.0%	22.3%	6	33.3%	28.1%	$327	20.7%	25.3%
	Upper	5	22.7%	$743	41.7%	42.2%	0	0.0%	42.7%	$0	0.0%	49.1%	5	27.8%	42.4%	$743	47.0%	47.9%
	Unknown	2	9.1%	$89	5.0%	0.0%	1	25.0%	3.0%	$20	10.0%	5.4%	1	5.6%	3.0%	$69	4.4%	4.7%
	Total	22	100.0%	$1,782	100.0%	100.0%	4	100.0%	100.0%	$200	100.0%	100.0%	18	100.0%	100.0%	$1,582	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	20.5%	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%	17.1%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	1.4%	$0	0.0%	0.1%
	Middle	0	0.0%	$0	0.0%	20.3%	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%	42.2%	0	0.0%	1.5%	$0	0.0%	0.0%	0	0.0%	4.3%	$0	0.0%	5.1%
	Unknown	1	100.0%	$6,000	100.0%	0.0%	0	0.0%	98.5%	$0	0.0%	100.0%	1	100.0%	94.2%	$6,000	100.0%	94.8%
	Total	1	100.0%	$6,000	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	1	100.0%	100.0%	$6,000	100.0%	100.0%
OTHER PURPOSE LOC	Low	3	13.6%	$166	13.2%	20.5%	2	25.0%	6.4%	$116	28.4%	4.2%	1	7.1%	7.2%	$50	5.9%	4.7%
	Moderate	4	18.2%	$280	22.2%	17.1%	2	25.0%	20.1%	$80	19.6%	14.6%	2	14.3%	16.9%	$200	23.5%	13.2%
	Middle	6	27.3%	$291	23.1%	20.3%	0	0.0%	26.2%	$0	0.0%	23.9%	6	42.9%	25.8%	$291	34.2%	20.4%
	Upper	9	40.9%	$524	41.6%	42.2%	4	50.0%	47.2%	$213	52.1%	57.2%	5	35.7%	49.6%	$311	36.5%	60.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.1%	$0	0.0%	0.0%	0	0.0%	0.6%	$0	0.0%	1.4%
	Total	22	100.0%	$1,261	100.0%	100.0%	8	100.0%	100.0%	$409	100.0%	100.0%	14	100.0%	100.0%	$852	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Lansing-East Lansing

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison											
		2018, 2019				2018						2019					
		Bank			Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar		Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	20.5%	0	0.0%	11.2%	$0	0.0%	8.5%	0	0.0%	10.6%	$0	0.0%	8.2%
	Moderate	0	0.0%	$0	0.0%	17.1%	0	0.0%	19.6%	$0	0.0%	18.4%	0	0.0%	20.7%	$0	0.0%	18.8%
	Middle	0	0.0%	$0	0.0%	20.3%	0	0.0%	23.4%	$0	0.0%	19.4%	0	0.0%	23.6%	$0	0.0%	23.8%
	Upper	1	100.0%	$53	100.0%	42.2%	0	0.0%	42.1%	$0	0.0%	45.8%	1	100.0%	44.5%	$53	100.0%	48.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	3.8%	$0	0.0%	7.9%	0	0.0%	0.6%	$0	0.0%	0.5%
	Total	1	100.0%	$53	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	1	100.0%	100.0%	$53	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	20.5%	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%	17.1%	0	0.0%	2.5%	$0	0.0%	2.2%	0	0.0%	1.2%	$0	0.0%	0.9%
	Middle	0	0.0%	$0	0.0%	20.3%	0	0.0%	2.1%	$0	0.0%	3.1%	0	0.0%	1.2%	$0	0.0%	0.8%
	Upper	0	0.0%	$0	0.0%	42.2%	0	0.0%	3.0%	$0	0.0%	1.0%	0	0.0%	1.2%	$0	0.0%	2.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	92.4%	$0	0.0%	93.7%	0	0.0%	96.3%	$0	0.0%	95.6%
	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	14	12.1%	$956	5.6%	20.5%	8	17.0%	10.6%	$514	12.8%	4.9%	6	8.7%	9.0%	$442	3.4%	4.4%
	Moderate	27	23.3%	$2,130	12.4%	17.1%	13	27.7%	24.1%	$1,080	26.9%	16.0%	14	20.3%	21.5%	$1,050	8.0%	14.6%
	Middle	33	28.4%	$2,842	16.6%	20.3%	12	25.5%	23.6%	$971	24.2%	19.2%	21	30.4%	24.2%	$1,871	14.3%	20.7%
	Upper	38	32.8%	$5,039	29.4%	42.2%	13	27.7%	31.0%	$1,431	35.6%	33.4%	25	36.2%	35.5%	$3,608	27.5%	42.3%
	Unknown	4	3.4%	$6,175	36.0%	0.0%	1	2.1%	10.7%	$20	0.5%	26.5%	3	4.3%	9.8%	$6,155	46.9%	18.0%
	Total	116	100.0%	$17,142	100.0%	100.0%	47	100.0%	100.0%	$4,016	100.0%	100.0%	69	100.0%	100.0%	$13,126	100.0%	100.0%
Small Business — Revenue					Total Businesses												
	$1 Million or Less	29	16.9%	$4,305	11.9%	90.3%	18	18.6%	46.1%	$2,417	11.9%	29.4%	11	14.7%	47.9%	$1,888	11.9%	31.5%
	Over $1 Million	86	50.0%	$17,430	48.2%	8.8%	46	47.4%					40	53.3%				
	Total Rev. available	115	66.9%	$21,735	60.1%	99.1%	64	66.0%					51	68.0%				
	Rev. Not Known	57	33.1%	$14,425	39.9%	1.0%	33	34.0%					24	32.0%				
	Total	172	100.0%	$36,160	100.0%	100.0%	97	100.0%					75	100.0%				
Small Business — Loan Size	$100,000 or Less	96	55.8%	$5,214	14.4%		60	61.9%	91.3%	$3,206	15.8%	31.5%	36	48.0%	91.8%	$2,008	12.6%	29.6%
	$100,001 - $250,000	36	20.9%	$6,983	19.3%		16	16.5%	4.6%	$3,198	15.8%	19.1%	20	26.7%	4.0%	$3,785	23.8%	16.8%
	$250,001 - $1 Million	40	23.3%	$23,963	66.3%		21	21.6%	4.1%	$13,830	68.4%	49.4%	19	25.3%	4.2%	$10,133	63.6%	53.6%
	Total	172	100.0%	$36,160	100.0%		97	100.0%	100.0%	$20,234	100.0%	100.0%	75	100.0%	100.0%	$15,926	100.0%	100.0%
Small Farm — Revenue					Total Farms												
	$1 Million or Less	0	0.0%	$0	0.0%	97.7%	0	0.0%	26.4%	$0	0.0%	44.3%	0	0.0%	36.1%	$0	0.0%	43.4%
	Over $1 Million	0	0.0%	$0	0.0%	2.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.3%	0	0.0%					0	0.0%				
	Total	0	0.0%	$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	90.7%	$0	0.0%	35.5%	0	0.0%	95.6%	$0	0.0%	53.5%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	6.2%	$0	0.0%	30.2%	0	0.0%	2.5%	$0	0.0%	15.8%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	3.1%	$0	0.0%	34.3%	0	0.0%	1.9%	$0	0.0%	30.8%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: MI - Southeast

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	14	3.8%	$1,557	2.2%	6.1%	8	4.1%	2.7%	$963	2.6%	1.3%	6	3.4%	3.1%	$594	1.7%	1.6%
	Moderate	59	15.9%	$6,528	9.1%	18.7%	27	13.9%	15.5%	$3,079	8.5%	9.8%	32	18.0%	16.1%	$3,449	9.7%	10.4%
	Middle	110	29.6%	$17,710	24.6%	36.0%	66	34.0%	38.9%	$9,844	27.0%	34.0%	44	24.7%	38.6%	$7,866	22.1%	34.1%
	Upper	189	50.8%	$46,298	64.2%	39.0%	93	47.9%	42.8%	$22,534	61.9%	54.8%	96	53.9%	42.2%	$23,764	66.6%	53.9%
	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%
	Total	*372*	*100.0%*	*$72,093*	*100.0%*	*100.0%*	*194*	*100.0%*	*100.0%*	*$36,420*	*100.0%*	*100.0%*	*178*	*100.0%*	*100.0%*	*$35,673*	*100.0%*	*100.0%*
REFINANCE	Low	30	2.2%	$1,543	0.7%	6.1%	16	2.3%	1.7%	$550	0.5%	0.9%	14	2.2%	1.3%	$993	0.9%	0.7%
	Moderate	182	13.5%	$16,227	7.8%	18.7%	98	14.1%	11.9%	$9,052	8.9%	7.8%	84	12.9%	10.1%	$7,175	6.7%	6.4%
	Middle	424	31.5%	$51,670	24.7%	36.0%	227	32.6%	39.4%	$25,465	25.0%	34.0%	197	30.3%	37.1%	$26,205	24.5%	31.5%
	Upper	711	52.8%	$139,473	66.8%	39.0%	356	51.1%	47.0%	$66,696	65.5%	57.3%	355	54.6%	51.5%	$72,777	67.9%	61.4%
	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%
	Total	*1,347*	*100.0%*	*$208,913*	*100.0%*	*100.0%*	*697*	*100.0%*	*100.0%*	*$101,763*	*100.0%*	*100.0%*	*650*	*100.0%*	*100.0%*	*$107,150*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	27	2.8%	$1,055	1.3%	6.1%	14	2.9%	1.9%	$572	1.4%	1.3%	13	2.6%	2.3%	$483	1.1%	1.5%
	Moderate	124	12.8%	$6,037	7.4%	18.7%	64	13.4%	9.7%	$2,937	7.4%	7.1%	60	12.2%	10.5%	$3,100	7.3%	7.4%
	Middle	320	33.1%	$22,035	26.9%	36.0%	142	29.8%	35.3%	$9,848	25.0%	30.8%	178	36.2%	36.1%	$12,187	28.8%	31.7%
	Upper	496	51.2%	$52,605	64.3%	39.0%	256	53.8%	53.1%	$26,111	66.2%	60.9%	240	48.8%	51.1%	$26,494	62.6%	59.3%
	Unknown	1	0.1%	$48	0.1%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%	1	0.2%	0.1%	$48	0.1%	0.1%
	Total	*968*	*100.0%*	*$81,780*	*100.0%*	*100.0%*	*476*	*100.0%*	*100.0%*	*$39,468*	*100.0%*	*100.0%*	*492*	*100.0%*	*100.0%*	*$42,312*	*100.0%*	*100.0%*
MULTI FAMILY						Multi-Family Units												
	Low	1	14.3%	$100	0.8%	16.8%	0	0.0%	14.0%	$0	0.0%	9.3%	1	20.0%	21.7%	$100	3.7%	14.3%
	Moderate	3	42.9%	$11,400	85.8%	29.0%	2	100.0%	33.2%	$10,600	100.0%	22.4%	1	20.0%	28.3%	$800	29.8%	13.8%
	Middle	1	14.3%	$600	4.5%	31.4%	0	0.0%	31.8%	$0	0.0%	45.3%	1	20.0%	30.7%	$600	22.3%	27.3%
	Upper	2	28.6%	$1,185	8.9%	22.2%	0	0.0%	21.0%	$0	0.0%	23.1%	2	40.0%	17.7%	$1,185	44.1%	43.8%
	Unknown	0	0.0%	$0	0.0%	0.7%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	1.6%	$0	0.0%	0.7%
	Total	*7*	*100.0%*	*$13,285*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$10,600*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$2,685*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	30	3.5%	$1,134	1.2%	6.1%	22	5.0%	1.8%	$747	1.7%	0.8%	8	1.9%	1.6%	$387	0.8%	0.7%
	Moderate	113	13.3%	$5,626	6.1%	18.7%	61	13.9%	9.9%	$2,999	6.7%	5.9%	52	12.7%	10.0%	$2,627	5.6%	6.3%
	Middle	278	32.7%	$24,262	26.4%	36.0%	152	34.7%	34.5%	$11,784	26.4%	27.7%	126	30.7%	35.9%	$12,478	26.4%	30.0%
	Upper	427	50.3%	$60,806	66.2%	39.0%	203	46.3%	53.8%	$29,047	65.2%	65.5%	224	54.5%	52.4%	$31,759	67.2%	63.0%
	Unknown	1	0.1%	$18	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%	1	0.2%	0.1%	$18	0.0%	0.0%
	Total	*849*	*100.0%*	*$91,846*	*100.0%*	*100.0%*	*438*	*100.0%*	*100.0%*	*$44,577*	*100.0%*	*100.0%*	*411*	*100.0%*	*100.0%*	*$47,269*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2

Assessment Area: MI - Southeast

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison										
		Bank				Owner Occupied Units	2018						2019				
		Count		Dollar			Count			Dollar			Count			Dollar	
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	1	2.7%	$80	0.6%	6.1%	0	0.0%	3.2%	$0	0.0%	1.7%	1	4.3%	4.1%	$80	0.8%	2.5%
	Moderate	5	13.5%	$388	2.7%	18.7%	2	14.3%	13.7%	$150	3.2%	9.1%	3	13.0%	15.5%	$238	2.4%	9.3%
	Middle	10	27.0%	$2,079	14.4%	36.0%	6	42.9%	38.3%	$1,514	32.4%	30.5%	4	17.4%	37.3%	$565	5.8%	28.3%
	Upper	21	56.8%	$11,912	82.4%	39.0%	6	42.9%	44.7%	$3,014	64.4%	58.6%	15	65.2%	43.0%	$8,898	91.0%	59.9%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*37*	*100.0%*	*$14,459*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$4,678*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*$9,781*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	6.1%	0	0.0%	5.3%	$0	0.0%	2.9%	0	0.0%	5.5%	$0	0.0%	2.2%
	Moderate	1	33.3%	$127	35.9%	18.7%	1	33.3%	20.7%	$127	35.9%	15.0%	0	0.0%	21.5%	$0	0.0%	19.7%
	Middle	1	33.3%	$38	10.7%	36.0%	1	33.3%	40.8%	$38	10.7%	36.1%	0	0.0%	39.1%	$0	0.0%	38.2%
	Upper	1	33.3%	$189	53.4%	39.0%	1	33.3%	33.2%	$189	53.4%	46.1%	0	0.0%	33.8%	$0	0.0%	39.9%
	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%	0.0%
	Total	*3*	*100.0%*	*$354*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$354*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
HMDA TOTALS	Low	103	2.9%	$5,469	1.1%	6.1%	60	3.3%	2.4%	$2,832	1.2%	1.8%	43	2.4%	2.3%	$2,637	1.1%	1.8%
	Moderate	487	13.6%	$46,333	9.6%	18.7%	255	14.0%	13.8%	$28,944	12.2%	10.0%	232	13.2%	13.0%	$17,389	7.1%	8.7%
	Middle	1,144	31.9%	$118,394	24.5%	36.0%	594	32.6%	38.6%	$58,493	24.6%	34.6%	550	31.3%	37.6%	$59,901	24.5%	32.5%
	Upper	1,847	51.5%	$312,468	64.7%	39.0%	915	50.2%	45.2%	$147,591	62.0%	53.7%	932	53.0%	47.0%	$164,877	67.3%	57.0%
	Unknown	2	0.1%	$66	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%	2	0.1%	0.0%	$66	0.0%	0.1%
	Total	*3,583*	*100.0%*	*$482,730*	*100.0%*	*100.0%*	*1,824*	*100.0%*	*100.0%*	*$237,860*	*100.0%*	*100.0%*	*1,759*	*100.0%*	*100.0%*	*$244,870*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	490	11.2%	$135,194	12.5%	7.4%	249	10.9%	6.6%	$69,052	12.4%	7.1%	241	11.5%	6.7%	$66,142	12.6%	8.3%
	Moderate	1,011	23.1%	$248,411	23.0%	20.0%	540	23.5%	18.8%	$129,744	23.4%	21.1%	471	22.5%	19.3%	$118,667	22.5%	20.3%
	Middle	1,125	25.7%	$282,840	26.1%	31.1%	596	26.0%	30.1%	$145,993	26.3%	27.8%	529	25.3%	30.0%	$136,847	26.0%	27.5%
	Upper	1,682	38.4%	$393,455	36.4%	40.8%	869	37.9%	43.5%	$197,944	35.6%	42.4%	813	38.9%	42.9%	$195,511	37.1%	42.6%
	Unknown	76	1.7%	$22,359	2.1%	0.6%	40	1.7%	0.5%	$12,537	2.3%	1.3%	36	1.7%	0.5%	$9,822	1.9%	1.1%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.5%	$0	0.0%	0.2%	0	0.0%	0.5%	$0	0.0%	0.3%
	Total	*4,384*	*100.0%*	*$1,082,259*	*100.0%*	*100.0%*	*2,294*	*100.0%*	*100.0%*	*$555,270*	*100.0%*	*100.0%*	*2,090*	*100.0%*	*100.0%*	*$526,989*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	2.2%	0	0.0%	1.0%	$0	0.0%	0.2%	0	0.0%	2.6%	$0	0.0%	3.3%
	Moderate	0	0.0%	$0	0.0%	11.6%	0	0.0%	12.0%	$0	0.0%	16.4%	0	0.0%	7.9%	$0	0.0%	17.7%
	Middle	0	0.0%	$0	0.0%	47.9%	0	0.0%	44.7%	$0	0.0%	33.5%	0	0.0%	47.4%	$0	0.0%	36.4%
	Upper	0	0.0%	$0	0.0%	38.3%	0	0.0%	38.9%	$0	0.0%	48.7%	0	0.0%	38.2%	$0	0.0%	39.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.0%	$0	0.0%	0.2%	0	0.0%	1.3%	$0	0.0%	2.0%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	2.4%	$0	0.0%	0.9%	0	0.0%	2.6%	$0	0.0%	1.0%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Southeast

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	35	9.4%	$3,671	5.1%	22.7%	17	8.8%	8.9%	$1,708	4.7%	4.7%	18	10.1%	11.3%	$1,963	5.5%	6.1%
	Moderate	105	28.2%	$12,764	17.7%	16.3%	56	28.9%	20.9%	$6,661	18.3%	14.6%	49	27.5%	23.2%	$6,103	17.1%	16.8%
	Middle	73	19.6%	$10,780	15.0%	18.7%	44	22.7%	23.0%	$5,915	16.2%	20.8%	29	16.3%	23.8%	$4,865	13.6%	21.9%
	Upper	113	30.4%	$35,294	49.0%	42.3%	61	31.4%	35.4%	$19,141	52.6%	48.7%	52	29.2%	32.9%	$16,153	45.3%	46.2%
	Unknown	46	12.4%	$9,584	13.3%	0.0%	16	8.2%	11.8%	$2,995	8.2%	11.3%	30	16.9%	8.9%	$6,589	18.5%	9.0%
	Total	*372*	*100.0%*	*$72,093*	*100.0%*	*100.0%*	*194*	*100.0%*	*100.0%*	*$36,420*	*100.0%*	*100.0%*	*178*	*100.0%*	*100.0%*	*$35,673*	*100.0%*	*100.0%*
REFINANCE	Low	190	14.1%	$15,023	7.2%	22.7%	101	14.5%	9.7%	$7,240	7.1%	5.5%	89	13.7%	7.6%	$7,783	7.3%	4.0%
	Moderate	262	19.5%	$24,782	11.9%	16.3%	131	18.8%	18.5%	$12,167	12.0%	13.7%	131	20.2%	16.3%	$12,615	11.8%	11.2%
	Middle	287	21.3%	$37,813	18.1%	18.7%	153	22.0%	23.3%	$18,666	18.3%	21.0%	134	20.6%	22.6%	$19,147	17.9%	19.7%
	Upper	537	39.9%	$117,894	56.4%	42.3%	278	39.9%	39.1%	$57,025	56.0%	50.3%	259	39.8%	40.3%	$60,869	56.8%	51.3%
	Unknown	71	5.3%	$13,401	6.4%	0.0%	34	4.9%	9.4%	$6,665	6.5%	9.4%	37	5.7%	13.2%	$6,736	6.3%	13.9%
	Total	*1,347*	*100.0%*	*$208,913*	*100.0%*	*100.0%*	*697*	*100.0%*	*100.0%*	*$101,763*	*100.0%*	*100.0%*	*650*	*100.0%*	*100.0%*	*$107,150*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	118	12.2%	$5,348	6.5%	22.7%	54	11.3%	7.9%	$2,124	5.4%	5.0%	64	13.0%	8.3%	$3,224	7.6%	5.7%
	Moderate	170	17.6%	$10,787	13.2%	16.3%	79	16.6%	15.1%	$4,946	12.5%	11.3%	91	18.5%	16.5%	$5,841	13.8%	13.1%
	Middle	187	19.3%	$13,026	15.9%	18.7%	101	21.2%	22.0%	$7,492	19.0%	17.5%	86	17.5%	24.6%	$5,534	13.1%	21.0%
	Upper	433	44.7%	$48,969	59.9%	42.3%	216	45.4%	51.9%	$23,518	59.6%	60.8%	217	44.1%	48.1%	$25,451	60.2%	57.3%
	Unknown	60	6.2%	$3,650	4.5%	0.0%	26	5.5%	3.2%	$1,388	3.5%	5.4%	34	6.9%	2.5%	$2,262	5.3%	2.9%
	Total	*968*	*100.0%*	*$81,780*	*100.0%*	*100.0%*	*476*	*100.0%*	*100.0%*	*$39,468*	*100.0%*	*100.0%*	*492*	*100.0%*	*100.0%*	*$42,312*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	22.7%	0	0.0%	0.5%	$0	0.0%	0.0%	0	0.0%	0.4%	$0	0.0%	0.5%
	Moderate	0	0.0%	$0	0.0%	16.3%	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%	2.3%	$0	0.0%	0.1%	0	0.0%	1.2%	$0	0.0%	0.1%
	Upper	0	0.0%	$0	0.0%	42.3%	0	0.0%	3.7%	$0	0.0%	0.4%	0	0.0%	3.5%	$0	0.0%	0.2%
	Unknown	7	100.0%	$13,285	100.0%	0.0%	2	100.0%	93.5%	$10,600	100.0%	99.5%	5	100.0%	94.9%	$2,685	100.0%	99.3%
	Total	*7*	*100.0%*	*$13,285*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$10,600*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$2,685*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	122	14.4%	$6,199	6.7%	22.7%	67	15.3%	9.5%	$3,184	7.1%	5.6%	55	13.4%	10.1%	$3,015	6.4%	6.5%
	Moderate	158	18.6%	$10,088	11.0%	16.3%	77	17.6%	16.7%	$4,596	10.3%	11.7%	81	19.7%	18.1%	$5,492	11.6%	13.2%
	Middle	193	22.7%	$15,388	16.8%	18.7%	109	24.9%	22.4%	$7,807	17.5%	18.2%	84	20.4%	22.9%	$7,581	16.0%	18.4%
	Upper	357	42.0%	$55,813	60.8%	42.3%	174	39.7%	50.1%	$26,581	59.6%	62.8%	183	44.5%	47.5%	$29,232	61.8%	60.3%
	Unknown	19	2.2%	$4,358	4.7%	0.0%	11	2.5%	1.3%	$2,409	5.4%	1.6%	8	1.9%	1.4%	$1,949	4.1%	1.7%
	Total	*849*	*100.0%*	*$91,846*	*100.0%*	*100.0%*	*438*	*100.0%*	*100.0%*	*$44,577*	*100.0%*	*100.0%*	*411*	*100.0%*	*100.0%*	*$47,269*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Southeast

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	6	16.2%	$426	2.9%	22.7%	3	21.4%	9.0%	$214	4.6%	5.7%	3	13.0%	11.5%	$212	2.2%	6.4%
	Moderate	9	24.3%	$1,106	7.6%	16.3%	2	14.3%	18.0%	$215	4.6%	13.4%	7	30.4%	19.3%	$891	9.1%	12.8%
	Middle	4	10.8%	$530	3.7%	18.7%	2	14.3%	24.2%	$250	5.3%	17.7%	2	8.7%	23.9%	$280	2.9%	17.3%
	Upper	16	43.2%	$11,523	79.7%	42.3%	6	42.9%	43.6%	$3,899	83.3%	51.8%	10	43.5%	40.7%	$7,624	77.9%	57.2%
	Unknown	2	5.4%	$874	6.0%	0.0%	1	7.1%	5.2%	$100	2.1%	11.5%	1	4.3%	4.6%	$774	7.9%	6.3%
	Total	*37*	*100.0%*	*$14,459*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$4,678*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*$9,781*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	1	33.3%	$38	10.7%	22.7%	1	33.3%	1.0%	$38	10.7%	0.6%	0	0.0%	0.4%	$0	0.0%	0.2%
	Moderate	1	33.3%	$189	53.4%	16.3%	1	33.3%	2.6%	$189	53.4%	1.5%	0	0.0%	1.2%	$0	0.0%	0.8%
	Middle	1	33.3%	$127	35.9%	18.7%	1	33.3%	3.4%	$127	35.9%	2.1%	0	0.0%	2.0%	$0	0.0%	2.6%
	Upper	0	0.0%	$0	0.0%	42.3%	0	0.0%	3.8%	$0	0.0%	4.2%	0	0.0%	4.5%	$0	0.0%	9.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	89.2%	$0	0.0%	91.6%	0	0.0%	92.0%	$0	0.0%	87.4%
	Total	*3*	*100.0%*	*$354*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$354*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
HMDA TOTALS	Low	472	13.2%	$30,705	6.4%	22.7%	243	13.3%	8.9%	$14,508	6.1%	4.6%	229	13.0%	9.3%	$16,197	6.6%	4.8%
	Moderate	705	19.7%	$59,716	12.4%	16.3%	346	19.0%	19.1%	$28,774	12.1%	13.0%	359	20.4%	19.2%	$30,942	12.6%	13.1%
	Middle	745	20.8%	$77,664	16.1%	18.7%	410	22.5%	22.6%	$40,257	16.9%	19.0%	335	19.0%	23.0%	$37,407	15.3%	19.5%
	Upper	1,456	40.6%	$269,493	55.8%	42.3%	735	40.3%	38.0%	$130,164	54.7%	46.0%	721	41.0%	37.3%	$139,329	56.9%	46.4%
	Unknown	205	5.7%	$45,152	9.4%	0.0%	90	4.9%	11.4%	$24,157	10.2%	17.3%	115	6.5%	11.2%	$20,995	8.6%	16.1%
	Total	*3,583*	*100.0%*	*$482,730*	*100.0%*	*100.0%*	*1,824*	*100.0%*	*100.0%*	*$237,860*	*100.0%*	*100.0%*	*1,759*	*100.0%*	*100.0%*	*$244,870*	*100.0%*	*100.0%*
Small Business — Revenue						**Total Businesses**												
	$1 Million or Less	1,088	24.8%	$165,135	15.3%	90.2%	512	22.3%	46.8%	$76,023	13.7%	29.0%	576	27.6%	48.8%	$89,112	16.9%	29.4%
	Over $1 Million	2,127	48.5%	$681,498	63.0%	9.2%	1,108	48.3%					1,019	48.8%				
	Total Rev. available	*3,215*	*73.3%*	*$846,633*	*78.3%*	*99.4%*	*1,620*	*70.6%*					*1,595*	*76.4%*				
	Rev. Not Known	1,169	26.7%	$235,626	21.8%	0.6%	674	29.4%					495	23.7%				
	Total	4,384	100.0%	$1,082,259	100.0%	100.0%	2,294	100.0%					2,090	100.0%				
Small Business — Loan Size	$100,000 or Less	2,111	48.2%	$121,674	11.2%		1,185	51.7%	94.5%	$66,608	12.0%	36.8%	926	44.3%	94.5%	$55,066	10.4%	37.0%
	$100,001 - $250,000	904	20.6%	$177,692	16.4%		392	17.1%	2.7%	$77,900	14.0%	14.0%	512	24.5%	2.7%	$99,792	18.9%	14.6%
	$250,001 - $1 Million	1,369	31.2%	$782,893	72.3%		717	31.3%	2.9%	$410,762	74.0%	49.3%	652	31.2%	2.8%	$372,131	70.6%	48.4%
	Total	4,384	100.0%	$1,082,259	100.0%		2,294	100.0%	100.0%	$555,270	100.0%	100.0%	2,090	100.0%	100.0%	$526,989	100.0%	100.0%
Small Farm — Revenue						**Total Farms**												
	$1 Million or Less	0	0.0%	$0	0.0%	97.1%	0	0.0%	47.6%	$0	0.0%	39.2%	0	0.0%	52.6%	$0	0.0%	40.7%
	Over $1 Million	0	0.0%	$0	0.0%	2.8%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.1%	0	0.0%					0	0.0%				
	Total	0	0.0%	$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	96.2%	$0	0.0%	60.2%	0	0.0%	96.9%	$0	0.0%	61.6%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	2.9%	$0	0.0%	23.2%	0	0.0%	1.8%	$0	0.0%	17.0%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	1.0%	$0	0.0%	16.6%	0	0.0%	1.3%	$0	0.0%	21.3%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: TX - Austin

PRODUCT TYPE	Tract Income Levels	Bank Count #	Bank Count %	Dollar $ (000s)	Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	1	4.3%	$192	1.8%	4.8%	1	8.3%	4.8%	$192	3.0%	4.4%	0	0.0%	4.3%	$0	0.0%	4.0%
	Moderate	0	0.0%	$0	0.0%	15.5%	0	0.0%	14.2%	$0	0.0%	10.7%	0	0.0%	14.7%	$0	0.0%	11.4%
	Middle	10	43.5%	$2,722	25.2%	34.8%	4	33.3%	39.3%	$1,440	22.5%	33.4%	6	54.5%	38.1%	$1,282	29.1%	32.3%
	Upper	12	52.2%	$7,905	73.1%	44.7%	7	58.3%	41.5%	$4,782	74.6%	51.2%	5	45.5%	42.5%	$3,123	70.9%	52.1%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.3%	$0	0.0%	0.3%	0	0.0%	0.3%	$0	0.0%	0.3%
	Total	23	100.0%	$10,819	100.0%	100.0%	12	100.0%	100.0%	$6,414	100.0%	100.0%	11	100.0%	100.0%	$4,405	100.0%	100.0%
REFINANCE	Low	1	1.7%	$166	0.9%	4.8%	1	3.0%	4.3%	$166	2.4%	3.5%	0	0.0%	4.2%	$0	0.0%	3.7%
	Moderate	6	10.0%	$780	4.1%	15.5%	5	15.2%	14.5%	$705	10.0%	9.6%	1	3.7%	12.0%	$75	0.6%	8.3%
	Middle	23	38.3%	$3,727	19.6%	34.8%	10	30.3%	37.1%	$874	12.4%	29.1%	13	48.1%	34.7%	$2,853	23.8%	27.8%
	Upper	30	50.0%	$14,374	75.5%	44.7%	17	51.5%	43.8%	$5,299	75.2%	57.5%	13	48.1%	48.9%	$9,075	75.6%	59.9%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.3%	$0	0.0%	0.3%	0	0.0%	0.2%	$0	0.0%	0.3%
	Total	60	100.0%	$19,047	100.0%	100.0%	33	100.0%	100.0%	$7,044	100.0%	100.0%	27	100.0%	100.0%	$12,003	100.0%	100.0%
HOME IMPROVEMENT	Low	1	3.2%	$37	0.8%	4.8%	1	4.8%	3.4%	$37	1.2%	2.7%	0	0.0%	3.5%	$0	0.0%	3.4%
	Moderate	5	16.1%	$362	8.2%	15.5%	3	14.3%	10.3%	$262	8.6%	8.0%	2	20.0%	10.2%	$100	7.3%	8.1%
	Middle	6	19.4%	$613	13.8%	34.8%	6	28.6%	34.4%	$613	20.0%	28.4%	0	0.0%	31.2%	$0	0.0%	23.9%
	Upper	19	61.3%	$3,415	77.1%	44.7%	11	52.4%	51.7%	$2,146	70.2%	60.8%	8	80.0%	55.0%	$1,269	92.7%	64.2%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.1%	0	0.0%	0.2%	$0	0.0%	0.3%
	Total	31	100.0%	$4,427	100.0%	100.0%	21	100.0%	100.0%	$3,058	100.0%	100.0%	10	100.0%	100.0%	$1,369	100.0%	100.0%
MULTI FAMILY						Multi-Family Units												
	Low	0	0.0%	$0	0.0%	22.4%	0	0.0%	20.0%	$0	0.0%	17.4%	0	0.0%	26.5%	$0	0.0%	17.9%
	Moderate	0	0.0%	$0	0.0%	15.7%	0	0.0%	18.7%	$0	0.0%	12.8%	0	0.0%	23.2%	$0	0.0%	21.6%
	Middle	0	0.0%	$0	0.0%	34.3%	0	0.0%	34.0%	$0	0.0%	41.8%	0	0.0%	22.6%	$0	0.0%	25.6%
	Upper	0	0.0%	$0	0.0%	24.9%	0	0.0%	24.0%	$0	0.0%	26.0%	0	0.0%	25.2%	$0	0.0%	27.3%
	Unknown	0	0.0%	$0	0.0%	2.8%	0	0.0%	3.3%	$0	0.0%	2.1%	0	0.0%	2.6%	$0	0.0%	7.7%
	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%
OTHER PURPOSE LOC	Low	1	3.1%	$48	1.0%	4.8%	0	0.0%	1.5%	$0	0.0%	1.1%	1	8.3%	2.1%	$48	2.7%	1.2%
	Moderate	1	3.1%	$168	3.5%	15.5%	0	0.0%	7.6%	$0	0.0%	3.9%	1	8.3%	6.3%	$168	9.5%	4.2%
	Middle	12	37.5%	$1,805	37.2%	34.8%	7	35.0%	28.9%	$714	23.3%	20.6%	5	41.7%	27.2%	$1,091	61.4%	19.3%
	Upper	17	53.1%	$2,792	57.6%	44.7%	13	65.0%	62.0%	$2,356	76.7%	74.4%	4	33.3%	64.0%	$436	24.5%	75.2%
	Unknown	1	3.1%	$33	0.7%	0.2%	0	0.0%	0.0%	$0	0.0%	0.0%	1	8.3%	0.4%	$33	1.9%	0.1%
	Total	32	100.0%	$4,846	100.0%	100.0%	20	100.0%	100.0%	$3,070	100.0%	100.0%	12	100.0%	100.0%	$1,776	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: TX - Austin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	4.8%	0	0.0%	4.8%	$0	0.0%	4.1%	0	0.0%	4.1%	$0	0.0%	3.1%
	Moderate	0	0.0%	$0	0.0%	15.5%	0	0.0%	12.2%	$0	0.0%	6.7%	0	0.0%	9.9%	$0	0.0%	3.8%
	Middle	0	0.0%	$0	0.0%	34.8%	0	0.0%	36.6%	$0	0.0%	19.5%	0	0.0%	35.5%	$0	0.0%	18.4%
	Upper	2	100.0%	$1,214	100.0%	44.7%	0	0.0%	46.1%	$0	0.0%	69.1%	2	100.0%	50.2%	$1,214	100.0%	74.6%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.3%	$0	0.0%	0.5%	0	0.0%	0.3%	$0	0.0%	0.1%
	Total	2	100.0%	$1,214	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	2	100.0%	100.0%	$1,214	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	4.8%	0	0.0%	5.3%	$0	0.0%	3.9%	0	0.0%	3.8%	$0	0.0%	4.0%
	Moderate	0	0.0%	$0	0.0%	15.5%	0	0.0%	21.4%	$0	0.0%	16.6%	0	0.0%	22.4%	$0	0.0%	14.0%
	Middle	0	0.0%	$0	0.0%	34.8%	0	0.0%	43.5%	$0	0.0%	35.1%	0	0.0%	44.0%	$0	0.0%	37.0%
	Upper	0	0.0%	$0	0.0%	44.7%	0	0.0%	29.4%	$0	0.0%	44.2%	0	0.0%	29.5%	$0	0.0%	44.7%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.5%	$0	0.0%	0.3%	0	0.0%	0.3%	$0	0.0%	0.2%
	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	4	2.7%	$443	1.1%	4.8%	3	3.5%	4.6%	$395	2.0%	5.8%	1	1.6%	4.3%	$48	0.2%	5.2%
	Moderate	12	8.1%	$1,310	3.2%	15.5%	8	9.3%	14.2%	$967	4.9%	10.8%	4	6.5%	13.8%	$343	1.7%	11.5%
	Middle	51	34.5%	$8,867	22.0%	34.8%	27	31.4%	38.6%	$3,641	18.6%	33.6%	24	38.7%	36.9%	$5,226	25.2%	30.3%
	Upper	80	54.1%	$29,700	73.6%	44.7%	48	55.8%	42.3%	$14,583	74.5%	49.3%	32	51.6%	44.7%	$15,117	72.8%	52.0%
	Unknown	1	0.7%	$33	0.1%	0.2%	0	0.0%	0.3%	$0	0.0%	0.5%	1	1.6%	0.3%	$33	0.2%	1.0%
	Total	148	100.0%	$40,353	100.0%	100.0%	86	100.0%	100.0%	$19,586	100.0%	100.0%	62	100.0%	100.0%	$20,767	100.0%	100.0%
SMALL BUSINESSES						Total Businesses												
	Low	43	15.8%	$12,944	18.3%	7.3%	22	13.5%	7.8%	$4,916	13.8%	8.4%	21	19.1%	7.6%	$8,028	22.8%	8.3%
	Moderate	29	10.6%	$8,994	12.7%	12.6%	14	8.6%	13.1%	$5,395	15.1%	12.9%	15	13.6%	12.6%	$3,599	10.2%	13.6%
	Middle	67	24.5%	$18,509	26.1%	30.2%	42	25.8%	30.1%	$9,441	26.4%	29.5%	25	22.7%	30.0%	$9,068	25.8%	28.7%
	Upper	133	48.7%	$29,995	42.3%	48.4%	85	52.1%	46.9%	$15,942	44.7%	47.1%	48	43.6%	47.6%	$14,053	40.0%	47.3%
	Unknown	1	0.4%	$400	0.6%	1.3%	0	0.0%	0.9%	$0	0.0%	1.3%	1	0.9%	0.9%	$400	1.1%	1.3%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	1.2%	$0	0.0%	0.8%	0	0.0%	1.2%	$0	0.0%	0.8%
	Total	273	100.0%	$70,842	100.0%	100.0%	163	100.0%	100.0%	$35,694	100.0%	100.0%	110	100.0%	100.0%	$35,148	100.0%	100.0%
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	4.5%	0	0.0%	4.9%	$0	0.0%	4.6%	0	0.0%	4.9%	$0	0.0%	5.4%
	Moderate	0	0.0%	$0	0.0%	11.0%	0	0.0%	8.5%	$0	0.0%	12.1%	0	0.0%	11.7%	$0	0.0%	6.1%
	Middle	0	0.0%	$0	0.0%	31.7%	0	0.0%	44.3%	$0	0.0%	51.7%	0	0.0%	42.9%	$0	0.0%	46.1%
	Upper	0	0.0%	$0	0.0%	52.3%	0	0.0%	41.9%	$0	0.0%	31.5%	0	0.0%	37.7%	$0	0.0%	41.7%
	Unknown	0	0.0%	$0	0.0%	0.5%	0	0.0%	0.4%	$0	0.0%	0.1%	0	0.0%	0.4%	$0	0.0%	0.1%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	2.4%	$0	0.0%	0.5%
	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%

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: TX - Austin

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
HOME PURCHASE	Low	0	0.0%	$0	0.0%	22.6%	0	0.0%	2.4%	$0	0.0%	1.3%	0	0.0%	3.2%	$0	0.0%	1.6%
	Moderate	2	8.7%	$644	6.0%	16.0%	0	0.0%	13.7%	$0	0.0%	9.3%	2	18.2%	16.6%	$644	14.6%	11.4%
	Middle	5	21.7%	$1,268	11.7%	19.3%	4	33.3%	21.8%	$1,092	17.0%	18.5%	1	9.1%	22.5%	$176	4.0%	19.3%
	Upper	14	60.9%	$7,222	66.8%	42.1%	6	50.0%	49.0%	$3,637	56.7%	59.2%	8	72.7%	45.8%	$3,585	81.4%	56.2%
	Unknown	2	8.7%	$1,685	15.6%	0.0%	2	16.7%	12.9%	$1,685	26.3%	11.7%	0	0.0%	11.9%	$0	0.0%	11.5%
	Total	*23*	*100.0%*	*$10,819*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$6,414*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$4,405*	*100.0%*	*100.0%*
REFINANCE	Low	5	8.3%	$1,189	6.2%	22.6%	2	6.1%	6.7%	$111	1.6%	3.6%	3	11.1%	4.8%	$1,078	9.0%	2.3%
	Moderate	16	26.7%	$2,049	10.8%	16.0%	11	33.3%	16.9%	$1,436	20.4%	10.6%	5	18.5%	13.4%	$613	5.1%	8.0%
	Middle	11	18.3%	$2,942	15.4%	19.3%	6	18.2%	22.2%	$2,170	30.8%	16.9%	5	18.5%	20.6%	$772	6.4%	16.1%
	Upper	28	46.7%	$12,867	67.6%	42.1%	14	42.4%	43.5%	$3,327	47.2%	58.0%	14	51.9%	46.3%	$9,540	79.5%	58.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	10.7%	$0	0.0%	10.9%	0	0.0%	14.8%	$0	0.0%	15.6%
	Total	*60*	*100.0%*	*$19,047*	*100.0%*	*100.0%*	*33*	*100.0%*	*100.0%*	*$7,044*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*$12,003*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	2	6.5%	$117	2.6%	22.6%	0	0.0%	3.9%	$0	0.0%	2.9%	2	20.0%	5.0%	$117	8.5%	2.9%
	Moderate	4	12.9%	$457	10.3%	16.0%	3	14.3%	11.0%	$265	8.7%	8.4%	1	10.0%	13.6%	$192	14.0%	8.3%
	Middle	7	22.6%	$764	17.3%	19.3%	5	23.8%	21.6%	$643	21.0%	16.4%	2	20.0%	19.8%	$121	8.8%	14.4%
	Upper	18	58.1%	$3,089	69.8%	42.1%	13	61.9%	59.9%	$2,150	70.3%	65.4%	5	50.0%	59.5%	$939	68.6%	71.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	3.6%	$0	0.0%	6.9%	0	0.0%	2.2%	$0	0.0%	3.4%
	Total	*31*	*100.0%*	*$4,427*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$3,058*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$1,369*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	22.6%	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%	16.0%	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%	19.3%	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%	42.1%	0	0.0%	2.0%	$0	0.0%	0.1%	0	0.0%	2.6%	$0	0.0%	0.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	98.0%	$0	0.0%	99.9%	0	0.0%	97.4%	$0	0.0%	99.9%
	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%*
OTHER PURPOSE LOC	Low	2	6.3%	$120	2.5%	22.6%	1	5.0%	4.7%	$72	2.3%	3.8%	1	8.3%	6.3%	$48	2.7%	3.3%
	Moderate	5	15.6%	$597	12.3%	16.0%	4	20.0%	10.7%	$347	11.3%	5.6%	1	8.3%	12.5%	$250	14.1%	7.4%
	Middle	10	31.3%	$1,150	23.7%	19.3%	6	30.0%	16.8%	$729	23.7%	9.1%	4	33.3%	16.2%	$421	23.7%	9.0%
	Upper	15	46.9%	$2,979	61.5%	42.1%	9	45.0%	65.6%	$1,922	62.6%	79.9%	6	50.0%	61.6%	$1,057	59.5%	77.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	2.2%	$0	0.0%	1.6%	0	0.0%	3.4%	$0	0.0%	2.9%
	Total	*32*	*100.0%*	*$4,846*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*$3,070*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$1,776*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2

Assessment Area: TX - Austin

Product Type	Borrower Income Levels	Bank Count #	Bank %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	22.6%	0	0.0%	5.5%	$0	0.0%	2.3%	0	0.0%	7.2%	$0	0.0%	2.6%
	Moderate	0	0.0%	$0	0.0%	16.0%	0	0.0%	13.8%	$0	0.0%	6.2%	0	0.0%	13.8%	$0	0.0%	4.8%
	Middle	0	0.0%	$0	0.0%	19.3%	0	0.0%	23.4%	$0	0.0%	13.3%	0	0.0%	22.2%	$0	0.0%	9.8%
	Upper	2	100.0%	$1,214	100.0%	42.1%	0	0.0%	51.7%	$0	0.0%	68.2%	2	100.0%	50.9%	$1,214	100.0%	72.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	5.6%	$0	0.0%	10.1%	0	0.0%	5.9%	$0	0.0%	10.7%
	Total	*2*	*100.0%*	*$1,214*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$1,214*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	22.6%	0	0.0%	2.5%	$0	0.0%	1.3%	0	0.0%	1.4%	$0	0.0%	0.7%
	Moderate	0	0.0%	$0	0.0%	16.0%	0	0.0%	3.4%	$0	0.0%	2.0%	0	0.0%	2.0%	$0	0.0%	1.2%
	Middle	0	0.0%	$0	0.0%	19.3%	0	0.0%	3.0%	$0	0.0%	2.7%	0	0.0%	1.0%	$0	0.0%	1.2%
	Upper	0	0.0%	$0	0.0%	42.1%	0	0.0%	7.8%	$0	0.0%	11.2%	0	0.0%	7.7%	$0	0.0%	8.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	83.3%	$0	0.0%	82.8%	0	0.0%	87.9%	$0	0.0%	88.0%
	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	9	6.1%	$1,426	3.5%	22.6%	3	3.5%	3.4%	$183	0.9%	1.5%	6	9.7%	3.7%	$1,243	6.0%	1.7%
	Moderate	27	18.2%	$3,747	9.3%	16.0%	18	20.9%	14.0%	$2,048	10.5%	8.2%	9	14.5%	15.4%	$1,699	8.2%	9.3%
	Middle	33	22.3%	$6,124	15.2%	19.3%	21	24.4%	21.5%	$4,634	23.7%	15.7%	12	19.4%	21.5%	$1,490	7.2%	16.4%
	Upper	77	52.0%	$27,371	67.8%	42.1%	42	48.8%	47.7%	$11,036	56.3%	51.6%	35	56.5%	45.9%	$16,335	78.7%	51.2%
	Unknown	2	1.4%	$1,685	4.2%	0.0%	2	2.3%	13.5%	$1,685	8.6%	23.0%	0	0.0%	13.5%	$0	0.0%	21.5%
	Total	*148*	*100.0%*	*$40,353*	*100.0%*	*100.0%*	*86*	*100.0%*	*100.0%*	*$19,586*	*100.0%*	*100.0%*	*62*	*100.0%*	*100.0%*	*$20,767*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	39	14.3%	$9,086	12.8%	92.2%	13	8.0%	42.9%	$2,685	7.5%	33.4%	26	23.6%	47.8%	$6,401	18.2%	35.7%
	Over $1 Million	140	51.3%	$48,980	69.1%	6.5%	76	46.6%					64	58.2%				
	Total Rev. available	*179*	*65.6%*	*$58,066*	*81.9%*	*98.7%*	*89*	*54.6%*					*90*	*81.8%*				
	Rev. Not Known	94	34.4%	$12,776	18.0%	1.4%	74	45.4%					20	18.2%				
	Total	*273*	*100.0%*	*$70,842*	*100.0%*	*100.0%*	*163*	*100.0%*					*110*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	137	50.2%	$6,742	9.5%		99	60.7%	94.6%	$4,784	13.4%	43.1%	38	34.5%	95.0%	$1,958	5.6%	45.2%
	$100,001 - $250,000	45	16.5%	$8,676	12.2%		20	12.3%	2.7%	$3,880	10.9%	14.0%	25	22.7%	2.6%	$4,796	13.6%	13.9%
	$250,001 - $1 Million	91	33.3%	$55,424	78.2%		44	27.0%	2.6%	$27,030	75.7%	42.8%	47	42.7%	2.4%	$28,394	80.8%	40.8%
	Total	*273*	*100.0%*	*$70,842*	*100.0%*		*163*	*100.0%*	*100.0%*	*$35,694*	*100.0%*	*100.0%*	*110*	*100.0%*	*100.0%*	*$35,148*	*100.0%*	*100.0%*
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	99.3%	0	0.0%	42.7%	$0	0.0%	47.5%	0	0.0%	54.7%	$0	0.0%	74.5%
	Over $1 Million	0	0.0%	$0	0.0%	0.6%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.1%	0	0.0%					0	0.0%				
	Total	*0*	*0.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*					*0*	*0.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	91.1%	$0	0.0%	44.3%	0	0.0%	91.5%	$0	0.0%	42.2%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	7.3%	$0	0.0%	34.9%	0	0.0%	5.7%	$0	0.0%	26.1%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	1.6%	$0	0.0%	20.8%	0	0.0%	2.8%	$0	0.0%	31.7%
	Total	*0*	*0.0%*	*$0*	*0.0%*		*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count		Dollar			Count		Dollar				
							Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg		
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	4	4.1%	$596	2.0%	5.7%	0	0.0%	4.0%	$0	0.0%	2.6%	4	8.9%	4.2%	$596	4.0%	2.8%
	Moderate	12	12.4%	$2,446	8.3%	20.2%	7	13.5%	14.0%	$945	6.5%	9.5%	5	11.1%	14.6%	$1,501	10.2%	10.2%
	Middle	21	21.6%	$3,737	12.8%	28.6%	12	23.1%	29.7%	$2,174	14.9%	24.0%	9	20.0%	29.9%	$1,563	10.6%	24.5%
	Upper	60	61.9%	$22,530	76.9%	45.4%	33	63.5%	52.3%	$11,466	78.6%	63.9%	27	60.0%	51.1%	$11,064	75.1%	62.3%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.2%	$0	0.0%	0.2%
	Total	*97*	*100.0%*	*$29,309*	*100.0%*	*100.0%*	*52*	*100.0%*	*100.0%*	*$14,585*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*$14,724*	*100.0%*	*100.0%*
REFINANCE	Low	32	4.0%	$3,014	1.7%	5.7%	19	4.7%	2.6%	$1,609	1.9%	1.5%	13	3.2%	2.4%	$1,405	1.6%	1.7%
	Moderate	139	17.3%	$16,923	9.6%	20.2%	67	16.7%	14.7%	$7,619	8.8%	9.3%	72	18.0%	12.0%	$9,304	10.4%	7.4%
	Middle	209	26.1%	$29,730	16.9%	28.6%	112	27.9%	31.5%	$14,950	17.3%	24.4%	97	24.2%	27.5%	$14,780	16.5%	20.8%
	Upper	422	52.6%	$126,354	71.8%	45.4%	203	50.6%	51.1%	$62,449	72.1%	64.7%	219	54.6%	58.0%	$63,905	71.5%	70.0%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%
	Total	*802*	*100.0%*	*$176,021*	*100.0%*	*100.0%*	*401*	*100.0%*	*100.0%*	*$86,627*	*100.0%*	*100.0%*	*401*	*100.0%*	*100.0%*	*$89,394*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	22	7.6%	$1,910	5.7%	5.7%	9	6.0%	2.5%	$554	3.2%	1.9%	13	9.2%	3.1%	$1,356	8.4%	2.2%
	Moderate	69	23.7%	$5,360	15.9%	20.2%	42	28.2%	12.5%	$3,302	18.9%	10.0%	27	19.0%	12.4%	$2,058	12.8%	9.5%
	Middle	82	28.2%	$8,938	26.6%	28.6%	39	26.2%	26.1%	$4,561	26.1%	22.3%	43	30.3%	25.6%	$4,377	27.1%	21.9%
	Upper	118	40.5%	$17,402	51.8%	45.4%	59	39.6%	58.9%	$9,060	51.8%	65.6%	59	41.5%	58.9%	$8,342	51.7%	66.2%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.1%
	Total	*291*	*100.0%*	*$33,610*	*100.0%*	*100.0%*	*149*	*100.0%*	*100.0%*	*$17,477*	*100.0%*	*100.0%*	*142*	*100.0%*	*100.0%*	*$16,133*	*100.0%*	*100.0%*
MULTI FAMILY						**Multi-Family Units**												
	Low	0	0.0%	$0	0.0%	22.6%	0	0.0%	24.8%	$0	0.0%	19.1%	0	0.0%	23.2%	$0	0.0%	17.0%
	Moderate	0	0.0%	$0	0.0%	27.8%	0	0.0%	32.2%	$0	0.0%	23.5%	0	0.0%	33.4%	$0	0.0%	23.3%
	Middle	1	50.0%	$9,500	95.1%	25.7%	1	100.0%	23.1%	$9,500	100.0%	25.1%	0	0.0%	22.1%	$0	0.0%	25.6%
	Upper	1	50.0%	$491	4.9%	23.3%	0	0.0%	19.0%	$0	0.0%	29.9%	1	100.0%	21.2%	$491	100.0%	34.1%
	Unknown	0	0.0%	$0	0.0%	0.6%	0	0.0%	0.9%	$0	0.0%	2.3%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*2*	*100.0%*	*$9,991*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$9,500*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$491*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	14	4.0%	$956	2.0%	5.7%	4	2.2%	2.1%	$334	1.3%	1.4%	10	6.1%	2.0%	$622	2.9%	1.0%
	Moderate	53	15.3%	$4,609	9.7%	20.2%	28	15.3%	10.2%	$2,406	9.2%	6.6%	25	15.2%	11.0%	$2,203	10.3%	6.6%
	Middle	92	26.5%	$8,714	18.3%	28.6%	48	26.2%	23.9%	$4,357	16.7%	17.3%	44	26.8%	24.0%	$4,357	20.3%	16.8%
	Upper	187	53.9%	$33,245	69.9%	45.4%	102	55.7%	63.7%	$18,978	72.6%	74.6%	85	51.8%	62.9%	$14,267	66.5%	75.4%
	Unknown	1	0.3%	$67	0.1%	0.1%	1	0.5%	0.2%	$67	0.3%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%
	Total	*347*	*100.0%*	*$47,591*	*100.0%*	*100.0%*	*183*	*100.0%*	*100.0%*	*$26,142*	*100.0%*	*100.0%*	*164*	*100.0%*	*100.0%*	*$21,449*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	5.7%	0	0.0%	4.2%	$0	0.0%	2.1%	0	0.0%	3.7%	$0	0.0%	1.8%
	Moderate	3	23.1%	$363	9.4%	20.2%	0	0.0%	17.2%	$0	0.0%	10.1%	3	37.5%	14.4%	$363	32.7%	8.1%
	Middle	4	30.8%	$585	15.2%	28.6%	1	20.0%	27.0%	$144	5.3%	18.3%	3	37.5%	27.4%	$441	39.8%	19.0%
	Upper	6	46.2%	$2,898	75.4%	45.4%	4	80.0%	51.7%	$2,593	94.7%	69.4%	2	25.0%	54.5%	$305	27.5%	71.1%
	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%
	Total	*13*	*100.0%*	*$3,846*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$2,737*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$1,109*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	5.7%	0	0.0%	5.3%	$0	0.0%	3.0%	0	0.0%	4.7%	$0	0.0%	2.5%
	Moderate	0	0.0%	$0	0.0%	20.2%	0	0.0%	25.5%	$0	0.0%	17.4%	0	0.0%	25.1%	$0	0.0%	20.2%
	Middle	0	0.0%	$0	0.0%	28.6%	0	0.0%	36.5%	$0	0.0%	31.4%	0	0.0%	38.9%	$0	0.0%	31.5%
	Upper	0	0.0%	$0	0.0%	45.4%	0	0.0%	32.7%	$0	0.0%	48.2%	0	0.0%	31.3%	$0	0.0%	45.7%
	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%
	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	72	4.6%	$6,476	2.2%	5.7%	32	4.0%	3.6%	$2,497	1.6%	4.4%	40	5.3%	3.6%	$3,979	2.8%	3.9%
	Moderate	276	17.8%	$29,701	9.9%	20.2%	144	18.2%	14.5%	$14,272	9.1%	11.2%	132	17.3%	13.9%	$15,429	10.8%	10.8%
	Middle	409	26.4%	$61,204	20.4%	28.6%	213	26.9%	30.0%	$35,686	22.7%	24.2%	196	25.8%	29.0%	$25,518	17.8%	23.5%
	Upper	794	51.2%	$202,920	67.6%	45.4%	401	50.7%	51.8%	$104,546	66.6%	59.8%	393	51.6%	53.3%	$98,374	68.6%	61.8%
	Unknown	1	0.1%	$67	0.0%	0.1%	1	0.1%	0.1%	$67	0.0%	0.4%	0	0.0%	0.1%	$0	0.0%	0.1%
	Total	*1,552*	*100.0%*	*$300,368*	*100.0%*	*100.0%*	*791*	*100.0%*	*100.0%*	*$157,068*	*100.0%*	*100.0%*	*761*	*100.0%*	*100.0%*	*$143,300*	*100.0%*	*100.0%*
SMALL BUSINESSES						**Total Businesses**												
	Low	222	14.3%	$56,570	13.9%	7.9%	117	13.2%	7.5%	$27,200	12.2%	8.9%	105	15.7%	7.3%	$29,370	15.9%	8.5%
	Moderate	414	26.6%	$118,454	29.0%	20.1%	246	27.8%	19.4%	$69,644	31.1%	22.2%	168	25.1%	19.5%	$48,810	26.4%	22.0%
	Middle	349	22.4%	$89,468	21.9%	25.8%	204	23.0%	24.2%	$50,005	22.4%	23.6%	145	21.6%	23.6%	$39,463	21.4%	21.9%
	Upper	535	34.4%	$132,299	32.4%	45.6%	297	33.5%	47.2%	$69,861	31.2%	43.1%	238	35.5%	47.9%	$62,438	33.8%	45.6%
	Unknown	36	2.3%	$11,646	2.9%	0.6%	22	2.5%	0.8%	$6,950	3.1%	1.6%	14	2.1%	0.7%	$4,696	2.5%	1.4%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.9%	$0	0.0%	0.5%	0	0.0%	1.0%	$0	0.0%	0.5%
	Total	*1,556*	*100.0%*	*$408,437*	*100.0%*	*100.0%*	*886*	*100.0%*	*100.0%*	*$223,660*	*100.0%*	*100.0%*	*670*	*100.0%*	*100.0%*	*$184,777*	*100.0%*	*100.0%*
SMALL FARM						**Total Farms**												
	Low	2	28.6%	$500	57.4%	4.4%	1	25.0%	1.8%	$250	48.4%	3.1%	1	33.3%	1.9%	$250	70.4%	4.4%
	Moderate	5	71.4%	$371	42.6%	13.2%	3	75.0%	15.9%	$266	51.6%	15.6%	2	66.7%	11.8%	$105	29.6%	9.2%
	Middle	0	0.0%	$0	0.0%	26.3%	0	0.0%	31.0%	$0	0.0%	31.0%	0	0.0%	33.8%	$0	0.0%	38.8%
	Upper	0	0.0%	$0	0.0%	55.6%	0	0.0%	49.8%	$0	0.0%	49.1%	0	0.0%	50.7%	$0	0.0%	46.2%
	Unknown	0	0.0%	$0	0.0%	0.5%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	1.6%	$0	0.0%	1.2%	0	0.0%	1.9%	$0	0.0%	1.4%
	Total	*7*	*100.0%*	*$871*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$516*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$355*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count		Bank Dollar		Families by Family Income	2018 Count Bank		Agg	2018 Dollar Bank		Agg	2019 Count Bank		Agg	2019 Dollar Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	12	12.4%	$1,124	3.8%	23.8%	7	13.5%	3.2%	$655	4.5%	1.6%	5	11.1%	3.4%	$469	3.2%	1.6%
	Moderate	10	10.3%	$1,786	6.1%	16.4%	6	11.5%	13.9%	$890	6.1%	8.9%	4	8.9%	16.2%	$896	6.1%	10.4%
	Middle	17	17.5%	$3,898	13.3%	17.9%	7	13.5%	20.8%	$1,371	9.4%	17.4%	10	22.2%	22.3%	$2,527	17.2%	18.4%
	Upper	49	50.5%	$17,792	60.7%	42.0%	29	55.8%	46.9%	$10,259	70.3%	59.2%	20	44.4%	44.7%	$7,533	51.2%	56.8%
	Unknown	9	9.3%	$4,709	16.1%	0.0%	3	5.8%	15.2%	$1,410	9.7%	13.0%	6	13.3%	13.4%	$3,299	22.4%	12.8%
	Total	97	100.0%	$29,309	100.0%	100.0%	52	100.0%	100.0%	$14,585	100.0%	100.0%	45	100.0%	100.0%	$14,724	100.0%	100.0%
REFINANCE	Low	85	10.6%	$8,087	4.6%	23.8%	47	11.7%	6.9%	$4,154	4.8%	3.5%	38	9.5%	4.6%	$3,933	4.4%	2.1%
	Moderate	148	18.5%	$17,933	10.2%	16.4%	73	18.2%	14.9%	$8,058	9.3%	9.6%	75	18.7%	11.9%	$9,875	11.0%	6.8%
	Middle	153	19.1%	$22,828	13.0%	17.9%	84	20.9%	20.6%	$11,645	13.4%	16.4%	69	17.2%	18.2%	$11,183	12.5%	13.4%
	Upper	380	47.4%	$118,431	67.3%	42.0%	181	45.1%	44.3%	$59,805	69.0%	58.1%	199	49.6%	48.4%	$58,626	65.6%	60.2%
	Unknown	36	4.5%	$8,742	5.0%	0.0%	16	4.0%	13.3%	$2,965	3.4%	12.3%	20	5.0%	16.9%	$5,777	6.5%	17.5%
	Total	802	100.0%	$176,021	100.0%	100.0%	401	100.0%	100.0%	$86,627	100.0%	100.0%	401	100.0%	100.0%	$89,394	100.0%	100.0%
HOME IMPROVEMENT	Low	42	14.4%	$2,550	7.6%	23.8%	27	18.1%	5.1%	$1,655	9.5%	3.3%	15	10.6%	5.1%	$895	5.5%	3.1%
	Moderate	57	19.6%	$4,122	12.3%	16.4%	28	18.8%	10.3%	$1,842	10.5%	7.5%	29	20.4%	11.8%	$2,280	14.1%	8.6%
	Middle	71	24.4%	$7,947	23.6%	17.9%	35	23.5%	16.6%	$4,563	26.1%	13.0%	36	25.4%	18.0%	$3,384	21.0%	14.5%
	Upper	112	38.5%	$18,037	53.7%	42.0%	55	36.9%	60.9%	$9,133	52.3%	65.2%	57	40.1%	60.8%	$8,904	55.2%	68.1%
	Unknown	9	3.1%	$954	2.8%	0.0%	4	2.7%	7.2%	$284	1.6%	11.0%	5	3.5%	4.2%	$670	4.2%	5.7%
	Total	291	100.0%	$33,610	100.0%	100.0%	149	100.0%	100.0%	$17,477	100.0%	100.0%	142	100.0%	100.0%	$16,133	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	23.8%	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%	16.4%	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%	17.9%	0	0.0%	0.3%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	42.0%	0	0.0%	1.7%	$0	0.0%	0.2%	0	0.0%	2.0%	$0	0.0%	0.1%
	Unknown	2	100.0%	$9,991	100.0%	0.0%	1	100.0%	97.9%	$9,500	100.0%	99.8%	1	100.0%	98.0%	$491	100.0%	99.9%
	Total	2	100.0%	$9,991	100.0%	100.0%	1	100.0%	100.0%	$9,500	100.0%	100.0%	1	100.0%	100.0%	$491	100.0%	100.0%
OTHER PURPOSE LOC	Low	49	14.1%	$4,031	8.5%	23.8%	23	12.6%	6.0%	$1,405	5.4%	3.7%	26	15.9%	6.0%	$2,626	12.2%	3.6%
	Moderate	59	17.0%	$6,435	13.5%	16.4%	31	16.9%	12.1%	$3,791	14.5%	8.2%	28	17.1%	11.5%	$2,644	12.3%	6.9%
	Middle	60	17.3%	$6,839	14.4%	17.9%	30	16.4%	19.0%	$3,617	13.8%	13.0%	30	18.3%	17.6%	$3,222	15.0%	11.5%
	Upper	166	47.8%	$28,686	60.3%	42.0%	93	50.8%	59.6%	$16,516	63.2%	72.0%	73	44.5%	61.2%	$12,170	56.7%	74.2%
	Unknown	13	3.7%	$1,600	3.4%	0.0%	6	3.3%	3.3%	$813	3.1%	3.1%	7	4.3%	3.8%	$787	3.7%	3.8%
	Total	347	100.0%	$47,591	100.0%	100.0%	183	100.0%	100.0%	$26,142	100.0%	100.0%	164	100.0%	100.0%	$21,449	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: TX - Dallas-Fort Worth Metroplex

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count		Bank Dollar		Families by Family Income	2018					2019						
							Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	3	23.1%	$394	10.2%	23.8%	0	0.0%	5.5%	$0	0.0%	2.9%	3	37.5%	7.1%	$394	35.5%	3.0%
	Moderate	4	30.8%	$539	14.0%	16.4%	1	20.0%	13.6%	$135	4.9%	7.8%	3	37.5%	15.1%	$404	36.4%	8.2%
	Middle	2	15.4%	$311	8.1%	17.9%	0	0.0%	18.7%	$0	0.0%	11.8%	2	25.0%	18.3%	$311	28.0%	10.8%
	Upper	3	23.1%	$2,302	59.9%	42.0%	3	60.0%	50.3%	$2,302	84.1%	63.2%	0	0.0%	51.6%	$0	0.0%	66.5%
	Unknown	1	7.7%	$300	7.8%	0.0%	1	20.0%	12.0%	$300	11.0%	14.3%	0	0.0%	8.0%	$0	0.0%	11.4%
	Total	*13*	*100.0%*	*$3,846*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$2,737*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$1,109*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	23.8%	0	0.0%	1.2%	$0	0.0%	0.7%	0	0.0%	0.3%	$0	0.0%	0.1%
	Moderate	0	0.0%	$0	0.0%	16.4%	0	0.0%	1.8%	$0	0.0%	1.0%	0	0.0%	0.5%	$0	0.0%	0.3%
	Middle	0	0.0%	$0	0.0%	17.9%	0	0.0%	2.0%	$0	0.0%	1.0%	0	0.0%	0.4%	$0	0.0%	0.5%
	Upper	0	0.0%	$0	0.0%	42.0%	0	0.0%	3.4%	$0	0.0%	3.6%	0	0.0%	2.8%	$0	0.0%	3.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	91.6%	$0	0.0%	93.8%	0	0.0%	96.0%	$0	0.0%	95.2%
	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	191	12.3%	$16,186	5.4%	23.8%	104	13.1%	4.2%	$7,869	5.0%	1.8%	87	11.4%	3.8%	$8,317	5.8%	1.6%
	Moderate	278	17.9%	$30,815	10.3%	16.4%	139	17.6%	13.5%	$14,716	9.4%	7.8%	139	18.3%	14.2%	$16,099	11.2%	8.1%
	Middle	303	19.5%	$41,823	13.9%	17.9%	156	19.7%	19.9%	$21,196	13.5%	14.7%	147	19.3%	20.3%	$20,627	14.4%	14.8%
	Upper	710	45.7%	$185,248	61.7%	42.0%	361	45.6%	45.7%	$98,015	62.4%	51.3%	349	45.9%	45.7%	$87,233	60.9%	51.9%
	Unknown	70	4.5%	$26,296	8.8%	0.0%	31	3.9%	16.6%	$15,272	9.7%	24.5%	39	5.1%	16.0%	$11,024	7.7%	23.7%
	Total	*1,552*	*100.0%*	*$300,368*	*100.0%*	*100.0%*	*791*	*100.0%*	*100.0%*	*$157,068*	*100.0%*	*100.0%*	*761*	*100.0%*	*100.0%*	*$143,300*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	341	21.9%	$59,193	14.5%	91.9%	174	19.6%	42.2%	$31,110	13.9%	33.8%	167	24.9%	47.0%	$28,083	15.2%	34.0%
	Over $1 Million	732	47.0%	$244,362	59.8%	7.0%	417	47.1%					315	47.0%				
	Total Rev. available	*1,073*	*68.9%*	*$303,555*	*74.3%*	*98.9%*	*591*	*66.7%*					*482*	*71.9%*				
	Rev. Not Known	483	31.0%	$104,882	25.7%	1.1%	295	33.3%					188	28.1%				
	Total	1,556	100.0%	$408,437	100.0%	100.0%	886	100.0%					670	100.0%				
Small Business — Loan Size	$100,000 or Less	677	43.5%	$42,848	10.5%		416	47.0%	93.4%	$25,501	11.4%	38.2%	261	39.0%	93.9%	$17,347	9.4%	40.3%
	$100,001 - $250,000	346	22.2%	$70,351	17.2%		177	20.0%	3.3%	$36,418	16.3%	14.7%	169	25.2%	3.1%	$33,933	18.4%	14.4%
	$250,001 - $1 Million	533	34.3%	$295,238	72.3%		293	33.1%	3.4%	$161,741	72.3%	47.2%	240	35.8%	3.1%	$133,497	72.2%	45.3%
	Total	1,556	100.0%	$408,437	100.0%		886	100.0%	100.0%	$223,660	100.0%	100.0%	670	100.0%	100.0%	$184,777	100.0%	100.0%
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	98.7%	0	0.0%	46.8%	$0	0.0%	53.5%	0	0.0%	52.9%	$0	0.0%	57.3%
	Over $1 Million	6	85.7%	$621	71.3%	1.2%	3	75.0%					3	100.0%				
	Not Known	1	14.3%	$250	28.7%	0.1%	1	25.0%					0	0.0%				
	Total	7	100.0%	$871	100.0%	100.0%	4	100.0%					3	100.0%				
Small Farm — Loan Size	$100,000 or Less	5	71.4%	$371	42.6%		3	75.0%	92.1%	$266	51.6%	45.1%	2	66.7%	92.2%	$105	29.6%	46.6%
	$100,001 - $250,000	2	28.6%	$500	57.4%		1	25.0%	5.0%	$250	48.4%	25.1%	1	33.3%	4.9%	$250	70.4%	21.9%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	2.9%	$0	0.0%	29.8%	0	0.0%	2.9%	$0	0.0%	31.4%
	Total	7	100.0%	$871	100.0%		4	100.0%	100.0%	$516	100.0%	100.0%	3	100.0%	100.0%	$355	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Appendix G – Metropolitan Limited-Scope Assessment Area Loan Tables

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - Inland Empire

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		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%	2.3%	0	0.0%	2.4%	$0	0.0%	1.4%	0	0.0%	2.3%	$0	0.0%	1.5%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	18.4%	$0	0.0%	14.2%	0	0.0%	17.2%	$0	0.0%	13.4%
	Middle	0	0.0%	$0	0.0%	32.3%	0	0.0%	30.9%	$0	0.0%	28.5%	0	0.0%	29.9%	$0	0.0%	27.5%
	Upper	5	100.0%	$2,132	100.0%	47.9%	1	100.0%	48.3%	$200	100.0%	56.0%	4	100.0%	50.6%	$1,932	100.0%	57.6%
	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	5	100.0%	$2,132	100.0%	100.0%	1	100.0%	100.0%	$200	100.0%	100.0%	4	100.0%	100.0%	$1,932	100.0%	100.0%
REFINANCE	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	1.7%	$0	0.0%	1.1%	0	0.0%	1.2%	$0	0.0%	0.8%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	16.0%	$0	0.0%	12.0%	0	0.0%	13.4%	$0	0.0%	10.4%
	Middle	5	21.7%	$3,690	53.9%	32.3%	2	18.2%	31.8%	$3,419	69.7%	28.5%	3	25.0%	30.2%	$271	13.9%	27.4%
	Upper	18	78.3%	$3,158	46.1%	47.9%	9	81.8%	50.5%	$1,485	30.3%	58.5%	9	75.0%	55.2%	$1,673	86.1%	61.4%
	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	23	100.0%	$6,848	100.0%	100.0%	11	100.0%	100.0%	$4,904	100.0%	100.0%	12	100.0%	100.0%	$1,944	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	0.9%	$0	0.0%	1.0%	0	0.0%	0.7%	$0	0.0%	0.9%
	Moderate	6	11.8%	$452	8.4%	17.6%	1	5.0%	10.5%	$83	4.2%	10.1%	5	16.1%	10.3%	$369	10.9%	9.4%
	Middle	16	31.4%	$1,650	30.8%	32.3%	6	30.0%	27.0%	$474	24.1%	25.2%	10	32.3%	25.7%	$1,176	34.6%	23.2%
	Upper	29	56.9%	$3,261	60.8%	47.9%	13	65.0%	61.6%	$1,406	71.6%	63.7%	16	51.6%	63.3%	$1,855	54.6%	66.5%
	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	51	100.0%	$5,363	100.0%	100.0%	20	100.0%	100.0%	$1,963	100.0%	100.0%	31	100.0%	100.0%	$3,400	100.0%	100.0%
MULTI FAMILY				**Multi-Family Units**														
	Low	0	0.0%	$0	0.0%	9.4%	0	0.0%	16.3%	$0	0.0%	7.8%	0	0.0%	14.6%	$0	0.0%	5.9%
	Moderate	0	0.0%	$0	0.0%	40.6%	0	0.0%	46.7%	$0	0.0%	30.3%	0	0.0%	50.7%	$0	0.0%	36.4%
	Middle	0	0.0%	$0	0.0%	31.4%	0	0.0%	27.1%	$0	0.0%	35.8%	0	0.0%	27.9%	$0	0.0%	40.3%
	Upper	0	0.0%	$0	0.0%	18.7%	0	0.0%	10.0%	$0	0.0%	26.1%	0	0.0%	6.8%	$0	0.0%	17.4%
	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	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%
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	0.6%	$0	0.0%	0.6%	0	0.0%	0.6%	$0	0.0%	0.4%
	Moderate	1	2.2%	$126	2.5%	17.6%	0	0.0%	9.4%	$0	0.0%	6.4%	1	4.8%	8.8%	$126	5.6%	6.7%
	Middle	11	24.4%	$1,041	20.7%	32.3%	6	25.0%	24.2%	$448	16.2%	20.2%	5	23.8%	26.1%	$593	26.3%	22.5%
	Upper	33	73.3%	$3,850	76.7%	47.9%	18	75.0%	65.8%	$2,312	83.8%	72.8%	15	71.4%	64.4%	$1,538	68.1%	70.4%
	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	45	100.0%	$5,017	100.0%	100.0%	24	100.0%	100.0%	$2,760	100.0%	100.0%	21	100.0%	100.0%	$2,257	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: CA - Inland Empire

PRODUCT TYPE	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	1.1%	$0	0.0%	1.3%	0	0.0%	1.8%	$0	0.0%	1.7%
	Moderate	1	50.0%	$50	30.3%	17.6%	1	100.0%	14.0%	$50	100.0%	14.4%	0	0.0%	15.5%	$0	0.0%	13.9%
	Middle	0	0.0%	$0	0.0%	32.3%	0	0.0%	28.3%	$0	0.0%	26.5%	0	0.0%	28.9%	$0	0.0%	26.0%
	Upper	1	50.0%	$115	69.7%	47.9%	0	0.0%	56.5%	$0	0.0%	57.8%	1	100.0%	53.9%	$115	100.0%	58.4%
	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	*2*	*100.0%*	*$165*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$50*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$115*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	1.9%	$0	0.0%	1.5%	0	0.0%	2.1%	$0	0.0%	1.5%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	18.3%	$0	0.0%	15.5%	0	0.0%	18.2%	$0	0.0%	15.1%
	Middle	0	0.0%	$0	0.0%	32.3%	0	0.0%	33.4%	$0	0.0%	29.4%	0	0.0%	30.9%	$0	0.0%	28.3%
	Upper	0	0.0%	$0	0.0%	47.9%	0	0.0%	46.3%	$0	0.0%	53.6%	0	0.0%	48.9%	$0	0.0%	55.2%
	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%	2.3%	0	0.0%	2.0%	$0	0.0%	1.8%	0	0.0%	1.6%	$0	0.0%	1.3%
	Moderate	8	6.3%	$628	3.2%	17.6%	2	3.5%	16.9%	$133	1.3%	14.6%	6	8.7%	14.9%	$495	5.1%	12.7%
	Middle	32	25.4%	$6,381	32.7%	32.3%	14	24.6%	30.9%	$4,341	44.0%	28.9%	18	26.1%	29.9%	$2,040	21.1%	27.9%
	Upper	86	68.3%	$12,516	64.1%	47.9%	41	71.9%	50.1%	$5,403	54.7%	54.7%	45	65.2%	53.6%	$7,113	73.7%	58.1%
	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	*126*	*100.0%*	*$19,525*	*100.0%*	*100.0%*	*57*	*100.0%*	*100.0%*	*$9,877*	*100.0%*	*100.0%*	*69*	*100.0%*	*100.0%*	*$9,648*	*100.0%*	*100.0%*
SMALL BUSINESSES						**Total Businesses**												
	Low	4	5.9%	$291	1.1%	4.7%	2	5.0%	3.5%	$131	0.9%	4.6%	2	7.1%	3.6%	$160	1.6%	4.8%
	Moderate	16	23.5%	$7,510	29.7%	22.9%	6	15.0%	21.3%	$3,500	23.0%	28.2%	10	35.7%	21.3%	$4,010	39.8%	27.9%
	Middle	23	33.8%	$7,412	29.3%	33.4%	16	40.0%	32.3%	$5,382	35.4%	34.6%	7	25.0%	32.3%	$2,030	20.1%	34.0%
	Upper	25	36.8%	$10,096	39.9%	39.0%	16	40.0%	42.9%	$6,208	40.8%	32.6%	9	32.1%	42.8%	$3,888	38.5%	33.3%
	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%	0.1%
	Tr 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%
	Total	*68*	*100.0%*	*$25,309*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*$15,221*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*$10,088*	*100.0%*	*100.0%*
SMALL FARM						**Total Farms**												
	Low	0	0.0%	$0	0.0%	1.5%	0	0.0%	2.0%	$0	0.0%	0.4%	0	0.0%	1.0%	$0	0.0%	0.3%
	Moderate	0	0.0%	$0	0.0%	14.0%	0	0.0%	13.3%	$0	0.0%	14.0%	0	0.0%	15.1%	$0	0.0%	8.5%
	Middle	0	0.0%	$0	0.0%	34.2%	0	0.0%	29.6%	$0	0.0%	27.3%	0	0.0%	30.7%	$0	0.0%	25.7%
	Upper	0	0.0%	$0	0.0%	50.3%	0	0.0%	55.2%	$0	0.0%	58.3%	0	0.0%	53.2%	$0	0.0%	65.5%
	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%
	Tr 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%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: CA - Inland Empire

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	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%	20.8%	0	0.0%	1.6%	$0	0.0%	1.2%	0	0.0%	1.1%	$0	0.0%	0.6%
	Moderate	0	0.0%	$0	0.0%	16.1%	0	0.0%	5.4%	$0	0.0%	3.4%	0	0.0%	5.7%	$0	0.0%	3.5%
	Middle	0	0.0%	$0	0.0%	18.8%	0	0.0%	18.0%	$0	0.0%	15.7%	0	0.0%	20.8%	$0	0.0%	17.5%
	Upper	5	100.0%	$2,132	100.0%	44.2%	1	100.0%	53.6%	$200	100.0%	61.6%	4	100.0%	50.6%	$1,932	100.0%	56.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	21.4%	$0	0.0%	18.1%	0	0.0%	21.7%	$0	0.0%	22.1%
	Total	*5*	*100.0%*	*$2,132*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$200*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$1,932*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	20.8%	0	0.0%	4.3%	$0	0.0%	3.0%	0	0.0%	2.4%	$0	0.0%	1.5%
	Moderate	0	0.0%	$0	0.0%	16.1%	0	0.0%	10.2%	$0	0.0%	6.9%	0	0.0%	7.4%	$0	0.0%	4.8%
	Middle	2	8.7%	$328	4.8%	18.8%	0	0.0%	19.0%	$0	0.0%	16.5%	2	16.7%	17.1%	$328	16.9%	14.4%
	Upper	20	87.0%	$3,420	49.9%	44.2%	10	90.9%	51.4%	$1,804	36.8%	58.6%	10	83.3%	48.0%	$1,616	83.1%	52.1%
	Unknown	1	4.3%	$3,100	45.3%	0.0%	1	9.1%	15.0%	$3,100	63.2%	15.0%	0	0.0%	25.1%	$0	0.0%	27.1%
	Total	*23*	*100.0%*	*$6,848*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$4,904*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$1,944*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	1	2.0%	$50	0.9%	20.8%	0	0.0%	2.1%	$0	0.0%	1.6%	1	3.2%	2.0%	$50	1.5%	1.6%
	Moderate	3	5.9%	$341	6.4%	16.1%	2	10.0%	6.8%	$291	14.8%	5.6%	1	3.2%	7.6%	$50	1.5%	6.7%
	Middle	11	21.6%	$826	15.4%	18.8%	3	15.0%	16.3%	$153	7.8%	14.1%	8	25.8%	16.4%	$673	19.8%	16.1%
	Upper	35	68.6%	$4,096	76.4%	44.2%	14	70.0%	66.8%	$1,469	74.8%	63.8%	21	67.7%	69.9%	$2,627	77.3%	68.0%
	Unknown	1	2.0%	$50	0.9%	0.0%	1	5.0%	7.9%	$50	2.5%	15.0%	0	0.0%	4.1%	$0	0.0%	7.5%
	Total	*51*	*100.0%*	*$5,363*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*$1,963*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*$3,400*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	20.8%	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%	16.1%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.5%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	18.8%	0	0.0%	0.4%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	44.2%	0	0.0%	1.3%	$0	0.0%	0.2%	0	0.0%	0.5%	$0	0.0%	0.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	98.3%	$0	0.0%	99.8%	0	0.0%	99.1%	$0	0.0%	100.0%
	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%*
OTHER PURPOSE LOC	Low	1	2.2%	$57	1.1%	20.8%	1	4.2%	3.2%	$57	2.1%	3.2%	0	0.0%	3.0%	$0	0.0%	1.8%
	Moderate	2	4.4%	$200	4.0%	16.1%	2	8.3%	7.2%	$200	7.2%	5.1%	0	0.0%	7.4%	$0	0.0%	5.6%
	Middle	6	13.3%	$502	10.0%	18.8%	2	8.3%	17.5%	$120	4.3%	12.5%	4	19.0%	18.1%	$382	16.9%	14.3%
	Upper	36	80.0%	$4,258	84.9%	44.2%	19	79.2%	70.3%	$2,383	86.3%	76.1%	17	81.0%	68.6%	$1,875	83.1%	75.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.8%	$0	0.0%	3.1%	0	0.0%	2.9%	$0	0.0%	3.1%
	Total	*45*	*100.0%*	*$5,017*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*$2,760*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$2,257*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - Inland Empire

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	20.8%	0	0.0%	3.9%	$0	0.0%	2.8%	0	0.0%	3.6%	$0	0.0%	3.2%
	Moderate	0	0.0%	$0	0.0%	16.1%	0	0.0%	8.9%	$0	0.0%	7.7%	0	0.0%	9.6%	$0	0.0%	8.5%
	Middle	0	0.0%	$0	0.0%	18.8%	0	0.0%	17.7%	$0	0.0%	15.6%	0	0.0%	19.5%	$0	0.0%	15.8%
	Upper	2	100.0%	$165	100.0%	44.2%	1	100.0%	59.9%	$50	100.0%	58.0%	1	100.0%	58.5%	$115	100.0%	57.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	9.6%	$0	0.0%	15.9%	0	0.0%	8.8%	$0	0.0%	15.2%
	Total	*2*	*100.0%*	*$165*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$50*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$115*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	20.8%	0	0.0%	1.0%	$0	0.0%	0.4%	0	0.0%	0.4%	$0	0.0%	0.1%
	Moderate	0	0.0%	$0	0.0%	16.1%	0	0.0%	3.2%	$0	0.0%	1.6%	0	0.0%	0.4%	$0	0.0%	0.2%
	Middle	0	0.0%	$0	0.0%	18.8%	0	0.0%	4.3%	$0	0.0%	2.0%	0	0.0%	1.1%	$0	0.0%	1.1%
	Upper	0	0.0%	$0	0.0%	44.2%	0	0.0%	5.7%	$0	0.0%	4.5%	0	0.0%	2.1%	$0	0.0%	3.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	85.7%	$0	0.0%	91.5%	0	0.0%	96.0%	$0	0.0%	95.5%
	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	2	1.6%	$107	0.5%	20.8%	1	1.8%	2.7%	$57	0.6%	1.8%	1	1.4%	1.9%	$50	0.5%	1.1%
	Moderate	5	4.0%	$541	2.8%	16.1%	4	7.0%	7.3%	$491	5.0%	4.4%	1	1.4%	6.7%	$50	0.5%	4.1%
	Middle	19	15.1%	$1,656	8.5%	18.8%	5	8.8%	17.9%	$273	2.8%	14.5%	14	20.3%	18.3%	$1,383	14.3%	15.0%
	Upper	98	77.8%	$14,071	72.1%	44.2%	45	78.9%	52.6%	$5,906	59.8%	55.0%	53	76.8%	49.4%	$8,165	84.6%	51.4%
	Unknown	2	1.6%	$3,150	16.1%	0.0%	2	3.5%	19.5%	$3,150	31.9%	24.5%	0	0.0%	23.8%	$0	0.0%	28.4%
	Total	*126*	*100.0%*	*$19,525*	*100.0%*	*100.0%*	*57*	*100.0%*	*100.0%*	*$9,877*	*100.0%*	*100.0%*	*69*	*100.0%*	*100.0%*	*$9,648*	*100.0%*	*100.0%*
Small Business — Revenue (Total Businesses)	$1 Million or Less	15	22.1%	$5,036	19.9%	92.2%	4	10.0%	46.6%	$1,963	12.9%	26.6%	11	39.3%	49.1%	$3,073	30.5%	28.6%
	Over $1 Million	42	61.8%	$15,428	61.0%	7.3%	27	67.5%					15	53.6%				
	Total Rev. available	*57*	*83.9%*	*$20,464*	*80.9%*	*99.5%*	*31*	*77.5%*					*26*	*92.9%*				
	Rev. Not Known	11	16.2%	$4,845	19.1%	0.5%	9	22.5%					2	7.1%				
	Total	*68*	*100.0%*	*$25,309*	*100.0%*	*100.0%*	*40*	*100.0%*					*28*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	19	27.9%	$1,465	5.8%		10	25.0%	95.7%	$660	4.3%	46.7%	9	32.1%	95.7%	$805	8.0%	47.4%
	$100,001 - $250,000	16	23.5%	$3,201	12.6%		10	25.0%	2.3%	$1,981	13.0%	13.3%	6	21.4%	2.3%	$1,220	12.1%	13.3%
	$250,001 - $1 Million	33	48.5%	$20,643	81.6%		20	50.0%	2.1%	$12,580	82.6%	40.0%	13	46.4%	2.0%	$8,063	79.9%	39.3%
	Total	*68*	*100.0%*	*$25,309*	*100.0%*		*40*	*100.0%*	*100.0%*	*$15,221*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*$10,088*	*100.0%*	*100.0%*
Small Farm — Revenue (Total Farms)	$1 Million or Less	0	0.0%	$0	0.0%	94.8%	0	0.0%	46.8%	$0	0.0%	32.4%	0	0.0%	50.2%	$0	0.0%	33.4%
	Over $1 Million	0	0.0%	$0	0.0%	5.0%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.2%	0	0.0%					0	0.0%				
	Total	*0*	*0.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*					*0*	*0.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	93.1%	$0	0.0%	43.4%	0	0.0%	93.7%	$0	0.0%	53.2%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	3.4%	$0	0.0%	15.3%	0	0.0%	4.9%	$0	0.0%	24.8%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	3.4%	$0	0.0%	41.4%	0	0.0%	1.5%	$0	0.0%	22.0%
	Total	*0*	*0.0%*	*$0*	*0.0%*		*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - Salinas

Product Type	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
HOME PURCHASE	Low	0	0.0%	$0	0.0%	0.7%	0	0.0%	0.7%	$0	0.0%	0.4%	0	0.0%	1.0%	$0	0.0%	0.7%
	Moderate	0	0.0%	$0	0.0%	11.6%	0	0.0%	15.1%	$0	0.0%	11.4%	0	0.0%	15.5%	$0	0.0%	11.9%
	Middle	0	0.0%	$0	0.0%	31.0%	0	0.0%	35.8%	$0	0.0%	28.8%	0	0.0%	35.4%	$0	0.0%	27.4%
	Upper	4	100.0%	$1,401	100.0%	56.7%	3	100.0%	48.0%	$1,180	100.0%	58.9%	1	100.0%	47.9%	$221	100.0%	59.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.4%	$0	0.0%	0.4%	0	0.0%	0.2%	$0	0.0%	0.3%
	Total	*4*	*100.0%*	*$1,401*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$1,180*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$221*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	0.7%	0	0.0%	0.7%	$0	0.0%	0.4%	0	0.0%	0.7%	$0	0.0%	0.4%
	Moderate	2	10.0%	$293	6.5%	11.6%	1	12.5%	11.7%	$108	7.5%	7.7%	1	8.3%	11.4%	$185	6.0%	8.6%
	Middle	5	25.0%	$820	18.1%	31.0%	0	0.0%	33.5%	$0	0.0%	26.5%	5	41.7%	33.8%	$820	26.7%	27.4%
	Upper	13	65.0%	$3,410	75.4%	56.7%	7	87.5%	54.1%	$1,341	92.5%	65.4%	6	50.0%	54.1%	$2,069	67.3%	63.5%
	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%	0.1%
	Total	*20*	*100.0%*	*$4,523*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$1,449*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$3,074*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	1	4.0%	$184	5.1%	0.7%	0	0.0%	1.0%	$0	0.0%	0.8%	1	7.1%	0.6%	$184	10.2%	0.4%
	Moderate	2	8.0%	$112	3.1%	11.6%	2	18.2%	6.2%	$112	6.2%	4.2%	0	0.0%	8.8%	$0	0.0%	5.9%
	Middle	7	28.0%	$1,286	35.6%	31.0%	3	27.3%	26.3%	$877	48.6%	18.6%	4	28.6%	30.5%	$409	22.7%	21.2%
	Upper	15	60.0%	$2,026	56.2%	56.7%	6	54.5%	66.3%	$814	45.1%	76.4%	9	64.3%	60.2%	$1,212	67.1%	72.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*25*	*100.0%*	*$3,608*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$1,803*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$1,805*	*100.0%*	*100.0%*
MULTI FAMILY						**Multi-Family Units**												
	Low	0	0.0%	$0	0.0%	5.9%	0	0.0%	9.7%	$0	0.0%	0.9%	0	0.0%	5.5%	$0	0.0%	1.4%
	Moderate	0	0.0%	$0	0.0%	24.1%	0	0.0%	29.0%	$0	0.0%	8.7%	0	0.0%	18.2%	$0	0.0%	21.3%
	Middle	0	0.0%	$0	0.0%	37.5%	0	0.0%	19.4%	$0	0.0%	63.5%	0	0.0%	32.7%	$0	0.0%	43.3%
	Upper	0	0.0%	$0	0.0%	32.5%	0	0.0%	41.9%	$0	0.0%	27.0%	0	0.0%	43.6%	$0	0.0%	33.9%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	0.7%	0	0.0%	0.8%	$0	0.0%	0.3%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	2	6.3%	$154	3.1%	11.6%	1	7.1%	7.2%	$74	5.3%	3.5%	1	5.6%	9.8%	$80	2.2%	5.8%
	Middle	10	31.3%	$920	18.5%	31.0%	4	28.6%	27.4%	$367	26.4%	16.7%	6	33.3%	21.5%	$553	15.5%	10.7%
	Upper	20	62.5%	$3,893	78.4%	56.7%	9	64.3%	64.6%	$949	68.3%	79.5%	11	61.1%	68.7%	$2,944	82.3%	83.5%
	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	*32*	*100.0%*	*$4,967*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$1,390*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*$3,577*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: CA - Salinas

PRODUCT TYPE	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	0.7%	0	0.0%	0.9%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	11.6%	0	0.0%	10.2%	$0	0.0%	2.7%	0	0.0%	9.7%	$0	0.0%	3.6%
	Middle	0	0.0%	$0	0.0%	31.0%	0	0.0%	22.2%	$0	0.0%	4.7%	0	0.0%	22.4%	$0	0.0%	8.5%
	Upper	0	0.0%	$0	0.0%	56.7%	0	0.0%	66.7%	$0	0.0%	92.5%	0	0.0%	67.9%	$0	0.0%	87.9%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	0.7%	0	0.0%	0.7%	$0	0.0%	0.0%	0	0.0%	2.1%	$0	0.0%	2.0%
	Moderate	0	0.0%	$0	0.0%	11.6%	0	0.0%	14.8%	$0	0.0%	5.4%	0	0.0%	8.6%	$0	0.0%	6.1%
	Middle	0	0.0%	$0	0.0%	31.0%	0	0.0%	29.5%	$0	0.0%	20.8%	0	0.0%	32.1%	$0	0.0%	28.2%
	Upper	0	0.0%	$0	0.0%	56.7%	0	0.0%	55.0%	$0	0.0%	73.8%	0	0.0%	57.1%	$0	0.0%	63.7%
	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	1	1.2%	$184	1.3%	0.7%	0	0.0%	0.8%	$0	0.0%	0.4%	1	2.2%	0.8%	$184	2.1%	0.6%
	Moderate	6	7.4%	$559	3.9%	11.6%	4	11.1%	12.9%	$294	5.0%	9.4%	2	4.4%	12.6%	$265	3.1%	10.5%
	Middle	22	27.2%	$3,026	20.9%	31.0%	7	19.4%	33.6%	$1,244	21.4%	28.1%	15	33.3%	33.8%	$1,782	20.5%	28.0%
	Upper	52	64.2%	$10,730	74.0%	56.7%	25	69.4%	52.5%	$4,284	73.6%	61.9%	27	60.0%	52.7%	$6,446	74.3%	60.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.2%	0	0.0%	0.1%	$0	0.0%	0.1%
	Total	*81*	*100.0%*	*$14,499*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*$5,822*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*$8,677*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	0	0.0%	$0	0.0%	4.3%	0	0.0%	3.8%	$0	0.0%	2.3%	0	0.0%	3.5%	$0	0.0%	3.3%
	Moderate	6	16.2%	$3,650	30.6%	10.0%	3	18.8%	9.4%	$1,750	32.7%	8.1%	3	14.3%	9.7%	$1,900	28.8%	7.9%
	Middle	8	21.6%	$3,394	28.4%	29.8%	3	18.8%	30.8%	$1,269	23.7%	33.4%	5	23.8%	32.1%	$2,125	32.2%	34.9%
	Upper	23	62.2%	$4,900	41.0%	55.5%	10	62.5%	55.7%	$2,325	43.5%	55.5%	13	61.9%	54.2%	$2,575	39.0%	53.5%
	Unknown	0	0.0%	$0	0.0%	0.5%	0	0.0%	0.3%	$0	0.0%	0.7%	0	0.0%	0.5%	$0	0.0%	0.4%
	Tr 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%
	Total	*37*	*100.0%*	*$11,944*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*$5,344*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$6,600*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	1.7%	$0	0.0%	0.3%	0	0.0%	2.5%	$0	0.0%	0.2%
	Moderate	2	40.0%	$990	60.4%	9.3%	1	50.0%	8.6%	$495	68.8%	10.9%	1	33.3%	9.2%	$495	53.8%	6.9%
	Middle	3	60.0%	$650	39.6%	42.5%	1	50.0%	49.1%	$225	31.3%	68.3%	2	66.7%	53.8%	$425	46.2%	62.7%
	Upper	0	0.0%	$0	0.0%	45.0%	0	0.0%	40.5%	$0	0.0%	20.5%	0	0.0%	32.8%	$0	0.0%	29.9%
	Unknown	0	0.0%	$0	0.0%	1.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	1.7%	$0	0.0%	0.3%
	Tr 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%
	Total	*5*	*100.0%*	*$1,640*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$720*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$920*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: CA - Salinas

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	20.5%	0	0.0%	0.5%	$0	0.0%	0.4%	0	0.0%	0.2%	$0	0.0%	0.1%
	Moderate	1	25.0%	$250	17.8%	17.3%	1	33.3%	2.6%	$250	21.2%	1.1%	0	0.0%	2.9%	$0	0.0%	1.4%
	Middle	1	25.0%	$49	3.5%	18.4%	1	33.3%	11.5%	$49	4.2%	7.2%	0	0.0%	13.2%	$0	0.0%	7.9%
	Upper	2	50.0%	$1,102	78.7%	43.8%	1	33.3%	70.1%	$881	74.7%	77.7%	1	100.0%	69.6%	$221	100.0%	76.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	15.3%	$0	0.0%	13.7%	0	0.0%	14.1%	$0	0.0%	13.7%
	Total	*4*	*100.0%*	*$1,401*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$1,180*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$221*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	20.5%	0	0.0%	4.0%	$0	0.0%	2.5%	0	0.0%	2.0%	$0	0.0%	1.7%
	Moderate	4	20.0%	$498	11.0%	17.3%	3	37.5%	8.8%	$358	24.7%	5.1%	1	8.3%	5.5%	$140	4.6%	3.0%
	Middle	4	20.0%	$795	17.6%	18.4%	1	12.5%	17.3%	$100	6.9%	12.3%	3	25.0%	16.0%	$695	22.6%	11.2%
	Upper	12	60.0%	$3,230	71.4%	43.8%	4	50.0%	57.7%	$991	68.4%	66.3%	8	66.7%	60.4%	$2,239	72.8%	67.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	12.2%	$0	0.0%	13.7%	0	0.0%	16.0%	$0	0.0%	17.2%
	Total	*20*	*100.0%*	*$4,523*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$1,449*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$3,074*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	2	8.0%	$104	2.9%	20.5%	1	9.1%	1.7%	$50	2.8%	1.1%	1	7.1%	2.8%	$54	3.0%	1.6%
	Moderate	1	4.0%	$184	5.1%	17.3%	0	0.0%	4.5%	$0	0.0%	3.5%	1	7.1%	5.9%	$184	10.2%	3.1%
	Middle	3	12.0%	$192	5.3%	18.4%	0	0.0%	11.2%	$0	0.0%	8.1%	3	21.4%	13.3%	$192	10.6%	8.8%
	Upper	19	76.0%	$3,128	86.7%	43.8%	10	90.9%	78.5%	$1,753	97.2%	75.0%	9	64.3%	72.3%	$1,375	76.2%	75.6%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	4.1%	$0	0.0%	12.4%	0	0.0%	5.6%	$0	0.0%	10.9%
	Total	*25*	*100.0%*	*$3,608*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$1,803*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$1,805*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	20.5%	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%	17.3%	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%	18.4%	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%	43.8%	0	0.0%	3.2%	$0	0.0%	0.3%	0	0.0%	3.6%	$0	0.0%	0.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	96.8%	$0	0.0%	99.7%	0	0.0%	96.4%	$0	0.0%	99.7%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	20.5%	0	0.0%	4.2%	$0	0.0%	2.4%	0	0.0%	2.8%	$0	0.0%	2.4%
	Moderate	2	6.3%	$142	2.9%	17.3%	1	7.1%	4.9%	$42	3.0%	2.2%	1	5.6%	6.5%	$100	2.8%	2.9%
	Middle	5	15.6%	$337	6.8%	18.4%	2	14.3%	16.7%	$174	12.5%	8.3%	3	16.7%	11.2%	$163	4.6%	5.5%
	Upper	25	78.1%	$4,488	90.4%	43.8%	11	78.6%	73.4%	$1,174	84.5%	85.9%	14	77.8%	72.9%	$3,314	92.6%	80.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.8%	$0	0.0%	1.2%	0	0.0%	6.5%	$0	0.0%	8.4%
	Total	*32*	*100.0%*	*$4,967*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$1,390*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*$3,577*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - Salinas

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count		Bank Dollar		Families by Family Income	2018						2019					
							Count Bank		Agg	Dollar Bank		Agg	Count Bank		Agg	Dollar Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	20.5%	0	0.0%	1.9%	$0	0.0%	0.3%	0	0.0%	3.7%	$0	0.0%	1.6%
	Moderate	0	0.0%	$0	0.0%	17.3%	0	0.0%	5.6%	$0	0.0%	1.3%	0	0.0%	3.7%	$0	0.0%	0.8%
	Middle	0	0.0%	$0	0.0%	18.4%	0	0.0%	13.9%	$0	0.0%	2.9%	0	0.0%	15.7%	$0	0.0%	5.0%
	Upper	0	0.0%	$0	0.0%	43.8%	0	0.0%	73.1%	$0	0.0%	81.5%	0	0.0%	67.9%	$0	0.0%	76.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	5.6%	$0	0.0%	14.1%	0	0.0%	9.0%	$0	0.0%	16.2%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	20.5%	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%	17.3%	0	0.0%	4.0%	$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%	2.0%	$0	0.0%	0.0%	0	0.0%	0.7%	$0	0.0%	0.7%
	Upper	0	0.0%	$0	0.0%	43.8%	0	0.0%	6.7%	$0	0.0%	3.9%	0	0.0%	1.4%	$0	0.0%	1.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	87.2%	$0	0.0%	96.1%	0	0.0%	97.9%	$0	0.0%	97.8%
	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	2	2.5%	$104	0.7%	20.5%	1	2.8%	2.1%	$50	0.9%	1.2%	1	2.2%	1.5%	$54	0.6%	1.0%
	Moderate	8	9.9%	$1,074	7.4%	17.3%	5	13.9%	5.3%	$650	11.2%	2.6%	3	6.7%	4.6%	$424	4.9%	2.1%
	Middle	13	16.0%	$1,373	9.5%	18.4%	4	11.1%	13.8%	$323	5.5%	8.7%	9	20.0%	14.6%	$1,050	12.1%	8.9%
	Upper	58	71.6%	$11,948	82.4%	43.8%	26	72.2%	64.2%	$4,799	82.4%	69.9%	32	71.1%	63.1%	$7,149	82.4%	65.6%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	14.6%	$0	0.0%	17.7%	0	0.0%	16.3%	$0	0.0%	22.4%
	Total	*81*	*100.0%*	*$14,499*	*100.0%*	*100.0%*	*36*	*100.0%*	*100.0%*	*$5,822*	*100.0%*	*100.0%*	*45*	*100.0%*	*100.0%*	*$8,677*	*100.0%*	*100.0%*
Small Business — Revenue						Total Businesses												
	$1 Million or Less	5	13.5%	$710	5.9%	92.4%	1	6.3%	45.6%	$30	0.6%	32.7%	4	19.0%	47.8%	$680	10.3%	32.5%
	Over $1 Million	21	56.8%	$10,194	85.3%	7.2%	9	56.3%					12	57.1%				
	Total Rev. available	*26*	*70.3%*	*$10,904*	*91.2%*	*99.6%*	*10*	*62.6%*					*16*	*76.1%*				
	Rev. Not Known	11	29.7%	$1,040	8.7%	0.4%	6	37.5%					5	23.8%				
	Total	*37*	*100.0%*	*$11,944*	*100.0%*	*100.0%*	*16*	*100.0%*					*21*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	13	35.1%	$725	6.1%		6	37.5%	96.1%	$325	6.1%	52.4%	7	33.3%	96.2%	$400	6.1%	53.7%
	$100,001 - $250,000	8	21.6%	$1,669	14.0%		4	25.0%	2.2%	$819	15.3%	13.8%	4	19.0%	2.2%	$850	12.9%	13.3%
	$250,001 - $1 Million	16	43.2%	$9,550	80.0%		6	37.5%	1.6%	$4,200	78.6%	33.9%	10	47.6%	1.6%	$5,350	81.1%	33.0%
	Total	*37*	*100.0%*	*$11,944*	*100.0%*		*16*	*100.0%*	*100.0%*	*$5,344*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$6,600*	*100.0%*	*100.0%*
Small Farm — Revenue						Total Farms												
	$1 Million or Less	1	20.0%	$200	12.2%	78.9%	0	0.0%	50.9%	$0	0.0%	28.7%	1	33.3%	51.3%	$200	21.7%	25.5%
	Over $1 Million	3	60.0%	$1,215	74.1%	21.1%	1	50.0%					2	66.7%				
	Not Known	1	20.0%	$225	13.7%	0.0%	1	50.0%					0	0.0%				
	Total	*5*	*100.0%*	*$1,640*	*100.0%*	*100.0%*	*2*	*100.0%*					*3*	*100.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	83.6%	$0	0.0%	18.1%	0	0.0%	90.8%	$0	0.0%	36.8%
	$100,001 - $250,000	3	60.0%	$650	39.6%		1	50.0%	2.6%	$225	31.3%	5.4%	2	66.7%	3.4%	$425	46.2%	11.6%
	$250,001 - $500,000	2	40.0%	$990	60.4%		1	50.0%	13.8%	$495	68.8%	76.5%	1	33.3%	5.9%	$495	53.8%	51.6%
	Total	*5*	*100.0%*	*$1,640*	*100.0%*		*2*	*100.0%*	*100.0%*	*$720*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$920*	*100.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - San Diego

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		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%	2.9%	0	0.0%	3.9%	$0	0.0%	2.8%	0	0.0%	3.6%	$0	0.0%	2.6%
	Moderate	0	0.0%	$0	0.0%	14.7%	0	0.0%	17.3%	$0	0.0%	12.2%	0	0.0%	17.5%	$0	0.0%	12.5%
	Middle	1	9.1%	$2,175	18.1%	34.3%	0	0.0%	35.5%	$0	0.0%	30.9%	1	12.5%	34.6%	$2,175	22.3%	30.1%
	Upper	10	90.9%	$9,873	81.9%	48.1%	3	100.0%	43.3%	$2,312	100.0%	54.1%	7	87.5%	44.2%	$7,561	77.7%	54.9%
	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%*	*$12,048*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$2,312*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$9,736*	*100.0%*	*100.0%*
REFINANCE	Low	1	0.9%	$101	0.3%	2.9%	0	0.0%	4.0%	$0	0.0%	2.9%	1	2.0%	3.0%	$101	0.6%	2.2%
	Moderate	6	5.3%	$1,522	4.0%	14.7%	4	6.3%	16.6%	$878	3.9%	12.5%	2	3.9%	14.6%	$644	4.0%	11.0%
	Middle	33	28.9%	$7,448	19.4%	34.3%	18	28.6%	34.0%	$4,171	18.7%	29.9%	15	29.4%	34.9%	$3,277	20.2%	30.5%
	Upper	74	64.9%	$29,367	76.4%	48.1%	41	65.1%	45.4%	$17,202	77.3%	54.8%	33	64.7%	47.5%	$12,165	75.2%	56.2%
	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	*114*	*100.0%*	*$38,438*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*$22,251*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*$16,187*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	4	2.4%	$294	1.1%	2.9%	1	1.2%	2.2%	$46	0.4%	1.9%	3	3.7%	2.5%	$248	1.6%	2.4%
	Moderate	15	9.0%	$1,385	5.0%	14.7%	11	13.1%	12.0%	$1,164	9.2%	10.2%	4	4.9%	11.0%	$221	1.5%	8.3%
	Middle	50	30.1%	$7,311	26.2%	34.3%	28	33.3%	33.1%	$3,703	29.1%	28.5%	22	26.8%	32.2%	$3,608	23.8%	27.1%
	Upper	97	58.4%	$18,880	67.7%	48.1%	44	52.4%	52.7%	$7,799	61.4%	59.4%	53	64.6%	54.2%	$11,081	73.1%	62.2%
	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	*166*	*100.0%*	*$27,870*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*$12,712*	*100.0%*	*100.0%*	*82*	*100.0%*	*100.0%*	*$15,158*	*100.0%*	*100.0%*
MULTI FAMILY				Multi-Family Units														
	Low	0	0.0%	$0	0.0%	12.7%	0	0.0%	25.8%	$0	0.0%	9.5%	0	0.0%	26.8%	$0	0.0%	14.6%
	Moderate	0	0.0%	$0	0.0%	24.5%	0	0.0%	33.9%	$0	0.0%	27.9%	0	0.0%	30.5%	$0	0.0%	20.9%
	Middle	0	0.0%	$0	0.0%	34.2%	0	0.0%	29.6%	$0	0.0%	37.7%	0	0.0%	27.9%	$0	0.0%	32.3%
	Upper	0	0.0%	$0	0.0%	28.6%	0	0.0%	10.7%	$0	0.0%	24.8%	0	0.0%	14.9%	$0	0.0%	32.3%
	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%*
OTHER PURPOSE LOC	Low	4	4.1%	$464	2.4%	2.9%	1	1.7%	1.3%	$200	1.5%	0.8%	3	7.5%	1.5%	$264	4.0%	0.9%
	Moderate	10	10.2%	$1,713	8.8%	14.7%	7	12.1%	9.2%	$1,509	11.7%	4.9%	3	7.5%	9.4%	$204	3.1%	5.4%
	Middle	26	26.5%	$2,630	13.5%	34.3%	14	24.1%	29.4%	$1,320	10.2%	20.5%	12	30.0%	29.6%	$1,310	19.7%	22.5%
	Upper	58	59.2%	$14,736	75.4%	48.1%	36	62.1%	60.1%	$9,879	76.5%	73.8%	22	55.0%	59.5%	$4,857	73.2%	71.3%
	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	*98*	*100.0%*	*$19,543*	*100.0%*	*100.0%*	*58*	*100.0%*	*100.0%*	*$12,908*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*$6,635*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2

Assessment Area: CA - San Diego

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.9%	0	0.0%	2.9%	$0	0.0%	1.9%	0	0.0%	2.8%	$0	0.0%	1.7%
	Moderate	0	0.0%	$0	0.0%	14.7%	0	0.0%	13.9%	$0	0.0%	6.6%	0	0.0%	14.1%	$0	0.0%	7.1%
	Middle	0	0.0%	$0	0.0%	34.3%	0	0.0%	32.5%	$0	0.0%	20.2%	0	0.0%	35.5%	$0	0.0%	20.8%
	Upper	4	100.0%	$9,974	100.0%	48.1%	3	100.0%	50.7%	$8,568	100.0%	71.3%	1	100.0%	47.6%	$1,406	100.0%	70.4%
	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	*4*	*100.0%*	*$9,974*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$8,568*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$1,406*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.9%	0	0.0%	4.4%	$0	0.0%	2.6%	0	0.0%	3.2%	$0	0.0%	2.6%
	Moderate	0	0.0%	$0	0.0%	14.7%	0	0.0%	18.1%	$0	0.0%	13.1%	0	0.0%	14.1%	$0	0.0%	14.5%
	Middle	0	0.0%	$0	0.0%	34.3%	0	0.0%	30.3%	$0	0.0%	23.9%	0	0.0%	29.0%	$0	0.0%	23.9%
	Upper	0	0.0%	$0	0.0%	48.1%	0	0.0%	47.3%	$0	0.0%	60.5%	0	0.0%	53.6%	$0	0.0%	59.1%
	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	*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	9	2.3%	$859	0.8%	2.9%	2	0.9%	3.9%	$246	0.4%	3.5%	7	3.8%	3.3%	$613	1.2%	3.3%
	Moderate	31	7.9%	$4,620	4.3%	14.7%	22	10.4%	16.4%	$3,551	6.0%	13.9%	9	4.9%	15.4%	$1,069	2.2%	12.2%
	Middle	110	28.0%	$19,564	18.1%	34.3%	60	28.4%	34.3%	$9,194	15.6%	31.0%	50	27.5%	34.4%	$10,370	21.1%	30.3%
	Upper	243	61.8%	$82,830	76.8%	48.1%	127	60.2%	45.4%	$45,760	77.9%	51.6%	116	63.7%	46.9%	$37,070	75.5%	54.2%
	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	*393*	*100.0%*	*$107,873*	*100.0%*	*100.0%*	*211*	*100.0%*	*100.0%*	*$58,751*	*100.0%*	*100.0%*	*182*	*100.0%*	*100.0%*	*$49,122*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	13	6.4%	$2,806	4.8%	5.6%	7	6.4%	4.6%	$1,499	4.6%	4.8%	6	6.4%	4.8%	$1,307	5.1%	4.9%
	Moderate	25	12.3%	$4,024	6.9%	14.8%	11	10.0%	13.3%	$1,180	3.6%	12.4%	14	14.9%	13.6%	$2,844	11.0%	13.7%
	Middle	77	37.7%	$25,807	44.3%	34.8%	42	38.2%	33.5%	$15,808	48.7%	35.4%	35	37.2%	33.5%	$9,999	38.7%	34.7%
	Upper	89	43.6%	$25,653	44.0%	44.7%	50	45.5%	48.5%	$13,991	43.1%	47.2%	39	41.5%	47.9%	$11,662	45.2%	46.6%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.2%	0	0.0%	0.1%	$0	0.0%	0.1%
	Tr 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%
	Total	*204*	*100.0%*	*$58,290*	*100.0%*	*100.0%*	*110*	*100.0%*	*100.0%*	*$32,478*	*100.0%*	*100.0%*	*94*	*100.0%*	*100.0%*	*$25,812*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	0.5%	$0	0.0%	0.5%	0	0.0%	2.9%	$0	0.0%	1.4%
	Moderate	0	0.0%	$0	0.0%	12.3%	0	0.0%	15.4%	$0	0.0%	11.7%	0	0.0%	9.6%	$0	0.0%	12.6%
	Middle	0	0.0%	$0	0.0%	38.2%	0	0.0%	38.5%	$0	0.0%	30.4%	0	0.0%	36.5%	$0	0.0%	35.1%
	Upper	0	0.0%	$0	0.0%	47.8%	0	0.0%	45.1%	$0	0.0%	56.9%	0	0.0%	49.5%	$0	0.0%	48.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.5%	$0	0.0%	0.4%	0	0.0%	1.4%	$0	0.0%	2.0%
	Tr 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%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: CA - San Diego

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	0.9%	$0	0.0%	0.5%	0	0.0%	0.9%	$0	0.0%	0.4%
	Moderate	0	0.0%	$0	0.0%	16.7%	0	0.0%	5.6%	$0	0.0%	2.8%	0	0.0%	6.8%	$0	0.0%	3.5%
	Middle	1	9.1%	$293	2.4%	17.4%	1	33.3%	17.2%	$293	12.7%	12.3%	0	0.0%	18.5%	$0	0.0%	13.3%
	Upper	8	72.7%	$8,930	74.1%	42.3%	1	33.3%	60.2%	$1,369	59.2%	70.4%	7	87.5%	59.0%	$7,561	77.7%	69.1%
	Unknown	2	18.2%	$2,825	23.4%	0.0%	1	33.3%	16.0%	$650	28.1%	14.0%	1	12.5%	14.8%	$2,175	22.3%	13.6%
	Total	*11*	*100.0%*	*$12,048*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$2,312*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$9,736*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	4.8%	$0	0.0%	2.9%	0	0.0%	2.9%	$0	0.0%	1.6%
	Moderate	4	3.5%	$805	2.1%	16.7%	3	4.8%	10.2%	$680	3.1%	6.4%	1	2.0%	7.6%	$125	0.8%	4.3%
	Middle	10	8.8%	$2,019	5.3%	17.4%	7	11.1%	19.0%	$1,223	5.5%	15.1%	3	5.9%	16.3%	$796	4.9%	12.1%
	Upper	99	86.8%	$34,614	90.1%	42.3%	52	82.5%	53.2%	$19,348	87.0%	63.2%	47	92.2%	53.5%	$15,266	94.3%	61.4%
	Unknown	1	0.9%	$1,000	2.6%	0.0%	1	1.6%	12.7%	$1,000	4.5%	12.5%	0	0.0%	19.8%	$0	0.0%	20.6%
	Total	*114*	*100.0%*	*$38,438*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*$22,251*	*100.0%*	*100.0%*	*51*	*100.0%*	*100.0%*	*$16,187*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	4	2.4%	$267	1.0%	23.6%	2	2.4%	2.3%	$175	1.4%	1.8%	2	2.4%	3.1%	$92	0.6%	2.6%
	Moderate	6	3.6%	$497	1.8%	16.7%	4	4.8%	7.1%	$329	2.6%	5.3%	2	2.4%	7.8%	$168	1.1%	5.4%
	Middle	26	15.7%	$3,258	11.7%	17.4%	13	15.5%	16.3%	$1,413	11.1%	12.2%	13	15.9%	16.8%	$1,845	12.2%	12.8%
	Upper	128	77.1%	$23,298	83.6%	42.3%	63	75.0%	70.2%	$10,245	80.6%	72.8%	65	79.3%	69.1%	$13,053	86.1%	71.4%
	Unknown	2	1.2%	$550	2.0%	0.0%	2	2.4%	4.1%	$550	4.3%	7.8%	0	0.0%	3.4%	$0	0.0%	7.8%
	Total	*166*	*100.0%*	*$27,870*	*100.0%*	*100.0%*	*84*	*100.0%*	*100.0%*	*$12,712*	*100.0%*	*100.0%*	*82*	*100.0%*	*100.0%*	*$15,158*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	16.7%	0	0.0%	0.1%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	17.4%	0	0.0%	0.3%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	42.3%	0	0.0%	1.1%	$0	0.0%	0.3%	0	0.0%	0.7%	$0	0.0%	0.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	98.3%	$0	0.0%	99.5%	0	0.0%	99.3%	$0	0.0%	99.6%
	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%*
OTHER PURPOSE LOC	Low	3	3.1%	$270	1.4%	23.6%	1	1.7%	3.5%	$50	0.4%	2.9%	2	5.0%	3.4%	$220	3.3%	3.2%
	Moderate	6	6.1%	$351	1.8%	16.7%	2	3.4%	7.2%	$81	0.6%	3.7%	4	10.0%	6.9%	$270	4.1%	3.9%
	Middle	17	17.3%	$1,584	8.1%	17.4%	9	15.5%	16.9%	$781	6.1%	9.2%	8	20.0%	16.9%	$803	12.1%	10.1%
	Upper	68	69.4%	$11,916	61.0%	42.3%	44	75.9%	71.0%	$8,066	62.5%	80.8%	24	60.0%	70.6%	$3,850	58.0%	79.9%
	Unknown	4	4.1%	$5,422	27.7%	0.0%	2	3.4%	1.4%	$3,930	30.4%	3.4%	2	5.0%	2.2%	$1,492	22.5%	2.9%
	Total	*98*	*100.0%*	*$19,543*	*100.0%*	*100.0%*	*58*	*100.0%*	*100.0%*	*$12,908*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*$6,635*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - San Diego

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Bank #	2018 Bank %	2018 Agg %	2018 Bank $(000s)	2018 Bank $%	2018 Agg $%	2019 Bank #	2019 Bank %	2019 Agg %	2019 Bank $(000s)	2019 Bank $%	2019 Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	4.0%	$0	0.0%	3.1%	0	0.0%	5.9%	$0	0.0%	2.9%
	Moderate	0	0.0%	$0	0.0%	16.7%	0	0.0%	9.1%	$0	0.0%	3.5%	0	0.0%	9.6%	$0	0.0%	3.9%
	Middle	0	0.0%	$0	0.0%	17.4%	0	0.0%	18.7%	$0	0.0%	9.7%	0	0.0%	18.2%	$0	0.0%	9.6%
	Upper	4	100.0%	$9,974	100.0%	42.3%	3	100.0%	60.5%	$8,568	100.0%	70.0%	1	100.0%	60.6%	$1,406	100.0%	71.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	7.7%	$0	0.0%	13.8%	0	0.0%	5.7%	$0	0.0%	11.7%
	Total	*4*	*100.0%*	*$9,974*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$8,568*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$1,406*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	2.6%	$0	0.0%	1.0%	0	0.0%	0.4%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	16.7%	0	0.0%	4.4%	$0	0.0%	0.9%	0	0.0%	0.1%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	17.4%	0	0.0%	3.5%	$0	0.0%	1.1%	0	0.0%	0.8%	$0	0.0%	0.8%
	Upper	0	0.0%	$0	0.0%	42.3%	0	0.0%	6.4%	$0	0.0%	2.6%	0	0.0%	1.3%	$0	0.0%	2.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	83.0%	$0	0.0%	94.4%	0	0.0%	97.3%	$0	0.0%	96.7%
	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	7	1.8%	$537	0.5%	23.6%	3	1.4%	2.7%	$225	0.4%	1.3%	4	2.2%	2.2%	$312	0.6%	1.1%
	Moderate	16	4.1%	$1,653	1.5%	16.7%	9	4.3%	7.5%	$1,090	1.9%	3.6%	7	3.8%	7.2%	$563	1.1%	3.7%
	Middle	54	13.7%	$7,154	6.6%	17.4%	30	14.2%	17.4%	$3,710	6.3%	11.5%	24	13.2%	16.8%	$3,444	7.0%	11.4%
	Upper	307	78.1%	$88,732	82.3%	42.3%	163	77.3%	57.3%	$47,596	81.0%	59.2%	144	79.1%	55.7%	$41,136	83.7%	59.1%
	Unknown	9	2.3%	$9,797	9.1%	0.0%	6	2.8%	15.1%	$6,130	10.4%	24.3%	3	1.6%	18.1%	$3,667	7.5%	24.7%
	Total	*393*	*100.0%*	*$107,873*	*100.0%*	*100.0%*	*211*	*100.0%*	*100.0%*	*$58,751*	*100.0%*	*100.0%*	*182*	*100.0%*	*100.0%*	*$49,122*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	48	23.5%	$6,268	10.8%	92.2%	20	18.2%	45.6%	$2,181	6.7%	30.2%	28	29.8%	49.4%	$4,087	15.8%	32.3%
	Over $1 Million	113	55.4%	$42,310	72.6%	7.3%	63	57.3%					50	53.2%				
	Total Rev. available	*161*	*78.9%*	*$48,578*	*83.4%*	*99.5%*	*83*	*75.5%*					*78*	*83.0%*				
	Rev. Not Known	43	21.1%	$9,712	16.7%	0.5%	27	24.5%					16	17.0%				
	Total	204	100.0%	$58,290	100.0%	100.0%	110	100.0%					94	100.0%				
Small Business — Loan Size	$100,000 or Less	93	45.6%	$5,497	9.4%		51	46.4%	95.7%	$2,898	8.9%	49.4%	42	44.7%	95.7%	$2,599	10.1%	49.7%
	$100,001 - $250,000	41	20.1%	$7,849	13.5%		19	17.3%	2.3%	$3,443	10.6%	13.5%	22	23.4%	2.4%	$4,406	17.1%	14.0%
	$250,001 - $1 Million	70	34.3%	$44,944	77.1%		40	36.4%	1.9%	$26,137	80.5%	37.2%	30	31.9%	1.9%	$18,807	72.9%	36.3%
	Total	204	100.0%	$58,290	100.0%		110	100.0%	100.0%	$32,478	100.0%	100.0%	94	100.0%	100.0%	$25,812	100.0%	100.0%
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	95.6%	0	0.0%	55.9%	$0	0.0%	54.9%	0	0.0%	63.5%	$0	0.0%	52.6%
	Over $1 Million	0	0.0%	$0	0.0%	4.4%	0	0.0%					0	0.0%				
	Not Known	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%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	94.9%	$0	0.0%	55.1%	0	0.0%	97.1%	$0	0.0%	75.5%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	2.6%	$0	0.0%	13.7%	0	0.0%	2.4%	$0	0.0%	18.5%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	2.6%	$0	0.0%	31.2%	0	0.0%	0.5%	$0	0.0%	6.0%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - San Jose

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019				Bank & Aggregate Lending Comparison											
						2018						2019					
		Bank			Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar		Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	1	4.8%	$381	1.0%	4.4%	1	6.3%	5.9%	$381	1.1%	3.8%	0	0.0%	4.3%	$0	0.0%	2.9%
	Moderate	2	9.5%	$747	1.9%	15.5%	2	12.5%	18.5%	$747	2.1%	12.9%	0	0.0%	18.1%	$0	0.0%	12.8%
	Middle	7	33.3%	$3,818	9.6%	36.7%	4	25.0%	41.8%	$2,310	6.4%	36.9%	3	60.0%	44.0%	$1,508	41.8%	37.8%
	Upper	11	52.4%	$34,822	87.6%	43.5%	9	56.3%	33.8%	$32,722	90.5%	46.3%	2	40.0%	33.6%	$2,100	58.2%	46.5%
	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	21	100.0%	$39,768	100.0%	100.0%	16	100.0%	100.0%	$36,160	100.0%	100.0%	5	100.0%	100.0%	$3,608	100.0%	100.0%
REFINANCE	Low	4	2.9%	$1,099	1.7%	4.4%	3	4.4%	4.9%	$999	3.3%	3.7%	1	1.4%	4.7%	$100	0.3%	3.3%
	Moderate	21	15.2%	$6,811	10.5%	15.5%	12	17.6%	17.6%	$3,919	12.9%	13.7%	9	12.9%	16.8%	$2,892	8.4%	12.5%
	Middle	42	30.4%	$16,814	26.0%	36.7%	18	26.5%	36.7%	$7,685	25.4%	32.4%	24	34.3%	38.2%	$9,129	26.5%	34.1%
	Upper	71	51.4%	$39,980	61.8%	43.5%	35	51.5%	40.8%	$17,664	58.4%	50.2%	36	51.4%	40.3%	$22,316	64.8%	50.1%
	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	138	100.0%	$64,704	100.0%	100.0%	68	100.0%	100.0%	$30,267	100.0%	100.0%	70	100.0%	100.0%	$34,437	100.0%	100.0%
HOME IMPROVEMENT	Low	3	2.4%	$528	1.7%	4.4%	2	2.6%	3.4%	$458	2.2%	2.5%	1	2.0%	3.7%	$70	0.6%	2.7%
	Moderate	15	11.8%	$2,442	7.7%	15.5%	12	15.4%	14.7%	$1,844	8.9%	10.7%	3	6.1%	14.4%	$598	5.4%	10.5%
	Middle	50	39.4%	$9,492	29.9%	36.7%	31	39.7%	38.6%	$6,402	31.1%	33.7%	19	38.8%	37.0%	$3,090	27.7%	32.1%
	Upper	59	46.5%	$19,305	60.8%	43.5%	33	42.3%	43.3%	$11,907	57.8%	53.2%	26	53.1%	44.8%	$7,398	66.3%	54.7%
	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	127	100.0%	$31,767	100.0%	100.0%	78	100.0%	100.0%	$20,611	100.0%	100.0%	49	100.0%	100.0%	$11,156	100.0%	100.0%
MULTI FAMILY				Multi-Family Units													
	Low	0	0.0%	$0	0.0%	12.1%	0	0.0%	23.4%	$0	0.0%	23.9%	0	0.0%	21.6%	$0	0.0%	8.0%
	Moderate	0	0.0%	$0	0.0%	22.7%	0	0.0%	25.1%	$0	0.0%	24.5%	0	0.0%	23.8%	$0	0.0%	30.3%
	Middle	2	66.7%	$4,970	8.6%	41.9%	1	50.0%	34.9%	$4,250	7.4%	29.1%	1	100.0%	37.4%	$720	100.0%	36.1%
	Upper	1	33.3%	$53,000	91.4%	23.3%	1	50.0%	16.6%	$53,000	92.6%	22.6%	0	0.0%	17.2%	$0	0.0%	25.7%
	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%	$57,970	100.0%	100.0%	2	100.0%	100.0%	$57,250	100.0%	100.0%	1	100.0%	100.0%	$720	100.0%	100.0%
OTHER PURPOSE LOC	Low	3	2.7%	$613	1.9%	4.4%	0	0.0%	3.2%	$0	0.0%	2.1%	3	4.8%	2.7%	$613	4.1%	1.7%
	Moderate	14	12.5%	$4,863	15.0%	15.5%	5	10.0%	14.0%	$3,102	17.9%	9.2%	9	14.5%	11.2%	$1,761	11.7%	7.7%
	Middle	54	48.2%	$11,013	34.0%	36.7%	27	54.0%	38.5%	$5,551	31.9%	32.4%	27	43.5%	37.0%	$5,462	36.3%	31.8%
	Upper	41	36.6%	$15,930	49.1%	43.5%	18	36.0%	44.4%	$8,724	50.2%	56.3%	23	37.1%	49.1%	$7,206	47.9%	58.8%
	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	112	100.0%	$32,419	100.0%	100.0%	50	100.0%	100.0%	$17,377	100.0%	100.0%	62	100.0%	100.0%	$15,042	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: CA - San Jose

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	4.4%	0	0.0%	3.6%	$0	0.0%	1.8%	0	0.0%	5.3%	$0	0.0%	2.7%
	Moderate	0	0.0%	$0	0.0%	15.5%	0	0.0%	19.1%	$0	0.0%	10.7%	0	0.0%	15.8%	$0	0.0%	9.6%
	Middle	1	50.0%	$501	63.0%	36.7%	0	0.0%	36.7%	$0	0.0%	25.7%	1	100.0%	40.1%	$501	100.0%	28.5%
	Upper	1	50.0%	$294	37.0%	43.5%	1	100.0%	40.6%	$294	100.0%	61.8%	0	0.0%	38.8%	$0	0.0%	59.1%
	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	*2*	*100.0%*	*$795*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$294*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$501*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	4.4%	0	0.0%	4.4%	$0	0.0%	3.6%	0	0.0%	3.6%	$0	0.0%	3.3%
	Moderate	0	0.0%	$0	0.0%	15.5%	0	0.0%	20.5%	$0	0.0%	15.0%	0	0.0%	15.2%	$0	0.0%	10.7%
	Middle	0	0.0%	$0	0.0%	36.7%	0	0.0%	37.7%	$0	0.0%	30.0%	0	0.0%	34.5%	$0	0.0%	29.9%
	Upper	0	0.0%	$0	0.0%	43.5%	0	0.0%	37.3%	$0	0.0%	51.5%	0	0.0%	46.7%	$0	0.0%	56.1%
	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	*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	11	2.7%	$2,621	1.2%	4.4%	6	2.8%	5.1%	$1,838	1.1%	5.1%	5	2.7%	4.5%	$783	1.2%	3.5%
	Moderate	52	12.9%	$14,863	6.5%	15.5%	31	14.4%	17.6%	$9,612	5.9%	13.8%	21	11.2%	16.8%	$5,251	8.0%	13.6%
	Middle	156	38.7%	$46,608	20.5%	36.7%	81	37.7%	39.0%	$26,198	16.2%	34.4%	75	39.9%	39.6%	$20,410	31.2%	35.2%
	Upper	184	45.7%	$163,331	71.8%	43.5%	97	45.1%	38.4%	$124,311	76.8%	46.7%	87	46.3%	39.1%	$39,020	59.6%	47.7%
	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	*403*	*100.0%*	*$227,423*	*100.0%*	*100.0%*	*215*	*100.0%*	*100.0%*	*$161,959*	*100.0%*	*100.0%*	*188*	*100.0%*	*100.0%*	*$65,464*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	35	7.3%	$5,912	4.8%	5.8%	19	7.3%	5.6%	$2,990	4.7%	6.2%	16	7.3%	6.0%	$2,922	5.0%	7.1%
	Moderate	108	22.5%	$29,395	24.0%	18.4%	61	23.4%	18.2%	$15,365	24.1%	19.2%	47	21.6%	18.9%	$14,030	23.9%	20.5%
	Middle	196	40.9%	$52,540	42.9%	36.0%	101	38.7%	37.3%	$27,663	43.4%	37.4%	95	43.6%	37.1%	$24,877	42.3%	36.5%
	Upper	140	29.2%	$34,587	28.2%	39.6%	80	30.7%	37.9%	$17,650	27.7%	36.3%	60	27.5%	37.1%	$16,937	28.8%	34.9%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.9%	$0	0.0%	0.9%	0	0.0%	0.9%	$0	0.0%	0.9%
	Total	*479*	*100.0%*	*$122,434*	*100.0%*	*100.0%*	*261*	*100.0%*	*100.0%*	*$63,668*	*100.0%*	*100.0%*	*218*	*100.0%*	*100.0%*	*$58,766*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	2.6%	0	0.0%	3.2%	$0	0.0%	1.7%	0	0.0%	4.8%	$0	0.0%	2.9%
	Moderate	0	0.0%	$0	0.0%	17.9%	0	0.0%	18.2%	$0	0.0%	17.9%	0	0.0%	10.3%	$0	0.0%	10.5%
	Middle	0	0.0%	$0	0.0%	34.9%	0	0.0%	31.2%	$0	0.0%	44.0%	0	0.0%	44.5%	$0	0.0%	38.7%
	Upper	0	0.0%	$0	0.0%	44.6%	0	0.0%	43.5%	$0	0.0%	34.7%	0	0.0%	37.7%	$0	0.0%	45.2%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	3.9%	$0	0.0%	1.7%	0	0.0%	2.7%	$0	0.0%	2.8%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: CA - San Jose

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	1	4.8%	$120	0.3%	23.8%	1	6.3%	1.0%	$120	0.3%	0.4%	0	0.0%	0.9%	$0	0.0%	0.3%
	Moderate	2	9.5%	$1,400	3.5%	15.5%	2	12.5%	4.4%	$1,400	3.9%	1.9%	0	0.0%	5.5%	$0	0.0%	2.5%
	Middle	1	4.8%	$360	0.9%	18.5%	1	6.3%	15.0%	$360	1.0%	9.6%	0	0.0%	16.3%	$0	0.0%	10.9%
	Upper	16	76.2%	$12,688	31.9%	42.2%	11	68.8%	71.7%	$9,080	25.1%	81.2%	5	100.0%	69.2%	$3,608	100.0%	79.6%
	Unknown	1	4.8%	$25,200	63.4%	0.0%	1	6.3%	7.9%	$25,200	69.7%	7.0%	0	0.0%	8.0%	$0	0.0%	6.6%
	Total	*21*	*100.0%*	*$39,768*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*$36,160*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$3,608*	*100.0%*	*100.0%*
REFINANCE	Low	6	4.3%	$1,630	2.5%	23.8%	3	4.4%	6.6%	$1,030	3.4%	4.5%	3	4.3%	4.1%	$600	1.7%	2.4%
	Moderate	6	4.3%	$1,492	2.3%	15.5%	3	4.4%	12.6%	$762	2.5%	7.9%	3	4.3%	10.0%	$730	2.1%	5.7%
	Middle	19	13.8%	$4,392	6.8%	18.5%	9	13.2%	20.1%	$2,099	6.9%	16.4%	10	14.3%	19.7%	$2,293	6.7%	14.5%
	Upper	102	73.9%	$55,768	86.2%	42.2%	51	75.0%	51.5%	$25,804	85.3%	61.5%	51	72.9%	59.2%	$29,964	87.0%	70.7%
	Unknown	5	3.6%	$1,422	2.2%	0.0%	2	2.9%	9.2%	$572	1.9%	9.6%	3	4.3%	7.0%	$850	2.5%	6.7%
	Total	*138*	*100.0%*	*$64,704*	*100.0%*	*100.0%*	*68*	*100.0%*	*100.0%*	*$30,267*	*100.0%*	*100.0%*	*70*	*100.0%*	*100.0%*	*$34,437*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	5	3.9%	$368	1.2%	23.8%	2	2.6%	3.5%	$82	0.4%	1.8%	3	6.1%	4.6%	$286	2.6%	3.4%
	Moderate	13	10.2%	$1,623	5.1%	15.5%	5	6.4%	8.8%	$782	3.8%	5.0%	8	16.3%	9.6%	$841	7.5%	5.8%
	Middle	26	20.5%	$4,235	13.3%	18.5%	15	19.2%	19.5%	$2,296	11.1%	13.3%	11	22.4%	18.8%	$1,939	17.4%	13.4%
	Upper	81	63.8%	$25,162	79.2%	42.2%	55	70.5%	64.3%	$17,401	84.4%	72.2%	26	53.1%	63.7%	$7,761	69.6%	72.8%
	Unknown	2	1.6%	$379	1.2%	0.0%	1	1.3%	3.9%	$50	0.2%	7.8%	1	2.0%	3.2%	$329	2.9%	4.6%
	Total	*127*	*100.0%*	*$31,767*	*100.0%*	*100.0%*	*78*	*100.0%*	*100.0%*	*$20,611*	*100.0%*	*100.0%*	*49*	*100.0%*	*100.0%*	*$11,156*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	23.8%	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%	15.5%	0	0.0%	0.4%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	18.5%	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%	42.2%	0	0.0%	3.8%	$0	0.0%	0.7%	0	0.0%	2.6%	$0	0.0%	0.3%
	Unknown	3	100.0%	$57,970	100.0%	0.0%	2	100.0%	95.7%	$57,250	100.0%	99.3%	1	100.0%	97.4%	$720	100.0%	99.7%
	Total	*3*	*100.0%*	*$57,970*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$57,250*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$720*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	4	3.6%	$606	1.9%	23.8%	1	2.0%	4.8%	$168	1.0%	2.8%	3	4.8%	4.7%	$438	2.9%	4.3%
	Moderate	7	6.3%	$746	2.3%	15.5%	2	4.0%	9.5%	$160	0.9%	4.9%	5	8.1%	9.0%	$586	3.9%	5.0%
	Middle	21	18.8%	$3,716	11.5%	18.5%	8	16.0%	19.9%	$1,423	8.2%	14.1%	13	21.0%	19.2%	$2,293	15.2%	13.5%
	Upper	76	67.9%	$21,251	65.6%	42.2%	35	70.0%	63.7%	$9,526	54.8%	74.9%	41	66.1%	64.2%	$11,725	77.9%	74.8%
	Unknown	4	3.6%	$6,100	18.8%	0.0%	4	8.0%	2.1%	$6,100	35.1%	3.3%	0	0.0%	2.9%	$0	0.0%	2.5%
	Total	*112*	*100.0%*	*$32,419*	*100.0%*	*100.0%*	*50*	*100.0%*	*100.0%*	*$17,377*	*100.0%*	*100.0%*	*62*	*100.0%*	*100.0%*	*$15,042*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - San Jose

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison												
		Bank				Families by Family Income	2018						2019						
		Count		Dollar			Count		Dollar				Count		Dollar				
							Bank	Agg	Bank		Agg		Bank	Agg	Bank		Agg		
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	23.8%	0	0.0%	7.4%	$0	0.0%	4.7%	0	0.0%	7.1%	$0	0.0%	4.1%	
	Moderate	0	0.0%	$0	0.0%	15.5%	0	0.0%	12.2%	$0	0.0%	5.9%	0	0.0%	10.3%	$0	0.0%	4.6%	
	Middle	0	0.0%	$0	0.0%	18.5%	0	0.0%	19.3%	$0	0.0%	10.4%	0	0.0%	19.3%	$0	0.0%	11.4%	
	Upper	2	100.0%	$795	100.0%	42.2%	1	100.0%	54.4%	$294	100.0%	69.1%	1	100.0%	56.1%	$501	100.0%	69.6%	
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	6.8%	$0	0.0%	10.0%	0	0.0%	7.1%	$0	0.0%	10.3%	
	Total	*2*	*100.0%*	*$795*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$294*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$501*	*100.0%*	*100.0%*	
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	23.8%	0	0.0%	3.1%	$0	0.0%	0.5%	0	0.0%	0.2%	$0	0.0%	0.1%	
	Moderate	0	0.0%	$0	0.0%	15.5%	0	0.0%	5.7%	$0	0.0%	1.6%	0	0.0%	0.7%	$0	0.0%	0.5%	
	Middle	0	0.0%	$0	0.0%	18.5%	0	0.0%	4.7%	$0	0.0%	1.4%	0	0.0%	0.5%	$0	0.0%	0.6%	
	Upper	0	0.0%	$0	0.0%	42.2%	0	0.0%	3.7%	$0	0.0%	3.1%	0	0.0%	0.2%	$0	0.0%	0.3%	
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	82.8%	$0	0.0%	93.3%	0	0.0%	98.3%	$0	0.0%	98.5%	
	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	16	4.0%	$2,724	1.2%	23.8%	7	3.3%	3.9%	$1,400	0.9%	1.9%	9	4.8%	3.3%	$1,324	2.0%	1.7%	
	Moderate	28	6.9%	$5,261	2.3%	15.5%	12	5.6%	8.7%	$3,104	1.9%	4.1%	16	8.5%	8.6%	$2,157	3.3%	4.3%	
	Middle	67	16.6%	$12,703	5.6%	18.5%	33	15.3%	17.6%	$6,178	3.8%	11.4%	34	18.1%	18.4%	$6,525	10.0%	12.2%	
	Upper	277	68.7%	$115,664	50.9%	42.2%	153	71.2%	60.1%	$62,105	38.3%	67.0%	124	66.0%	61.2%	$53,559	81.8%	68.3%	
	Unknown	15	3.7%	$91,071	40.0%	0.0%	10	4.7%	9.7%	$89,172	55.1%	15.6%	5	2.7%	8.5%	$1,899	2.9%	13.6%	
	Total	*403*	*100.0%*	*$227,423*	*100.0%*	*100.0%*	*215*	*100.0%*	*100.0%*	*$161,959*	*100.0%*	*100.0%*	*188*	*100.0%*	*100.0%*	*$65,464*	*100.0%*	*100.0%*	
Small Business — Revenue						Total Businesses													
	$1 Million or Less	69	14.4%	$13,315	10.9%	91.2%	28	10.7%	47.1%	$3,890	6.1%	34.5%	41	18.8%	53.1%	$9,425	16.0%	34.8%	
	Over $1 Million	232	48.4%	$84,536	69.0%	8.4%	122	46.7%					110	50.5%					
	Total Rev. available	*301*	*62.8%*	*$97,851*	*79.9%*	*99.6%*	*150*	*57.4%*					*151*	*69.3%*					
	Rev. Not Known	178	37.2%	$24,583	20.1%	0.4%	111	42.5%					67	30.7%					
	Total	479	100.0%	$122,434	100.0%	100.0%	261	100.0%					218	100.0%					
Small Business — Loan Size	$100,000 or Less	226	47.2%	$13,316	10.9%		135	51.7%	96.2%	$7,527	11.8%	52.4%	91	41.7%	96.2%	$5,789	9.9%	51.7%	
	$100,001 - $250,000	109	22.8%	$22,227	18.2%		51	19.5%	2.0%	$10,631	16.7%	12.3%	58	26.6%	2.0%	$11,596	19.7%	12.5%	
	$250,001 - $1 Million	144	30.1%	$86,891	71.0%		75	28.7%	1.7%	$45,510	71.5%	35.3%	69	31.7%	1.7%	$41,381	70.4%	35.8%	
	Total	479	100.0%	$122,434	100.0%		261	100.0%	100.0%	$63,668	100.0%	100.0%	218	100.0%	100.0%	$58,766	100.0%	100.0%	
Small Farm — Revenue						Total Farms													
	$1 Million or Less	0	0.0%	$0	0.0%	95.8%	0	0.0%	46.1%	$0	0.0%	40.5%	0	0.0%	57.5%	$0	0.0%	40.1%	
	Over $1 Million	0	0.0%	$0	0.0%	4.0%	0	0.0%					0	0.0%					
	Not Known	0	0.0%	$0	0.0%	0.2%	0	0.0%					0	0.0%					
	Total	0	0.0%	$0	0.0%	100.0%	0	0.0%					0	0.0%					
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	94.2%	$0	0.0%	58.0%	0	0.0%	95.9%	$0	0.0%	70.1%	
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	4.5%	$0	0.0%	24.5%	0	0.0%	4.1%	$0	0.0%	29.9%	
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	1.3%	$0	0.0%	17.4%	0	0.0%	0.0%	$0	0.0%	0.0%	
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - Santa Cruz-Watsonville MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		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%	2.5%	0	0.0%	3.3%	$0	0.0%	2.7%	0	0.0%	3.3%	$0	0.0%	2.5%
	Moderate	0	0.0%	$0	0.0%	17.2%	0	0.0%	14.5%	$0	0.0%	11.7%	0	0.0%	15.2%	$0	0.0%	12.3%
	Middle	4	50.0%	$1,133	49.3%	41.1%	2	40.0%	42.6%	$282	20.9%	42.5%	2	66.7%	40.1%	$851	89.5%	39.9%
	Upper	4	50.0%	$1,167	50.7%	39.1%	3	60.0%	39.5%	$1,067	79.1%	43.1%	1	33.3%	41.5%	$100	10.5%	45.3%
	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	8	100.0%	$2,300	100.0%	100.0%	5	100.0%	100.0%	$1,349	100.0%	100.0%	3	100.0%	100.0%	$951	100.0%	100.0%
REFINANCE	Low	2	3.6%	$305	1.6%	2.5%	1	4.3%	2.5%	$142	2.2%	2.2%	1	3.0%	2.6%	$163	1.3%	2.2%
	Moderate	3	5.4%	$760	4.0%	17.2%	2	8.7%	17.6%	$563	8.6%	14.8%	1	3.0%	16.4%	$197	1.6%	13.6%
	Middle	28	50.0%	$11,383	59.3%	41.1%	10	43.5%	42.3%	$3,127	47.6%	42.8%	18	54.5%	41.6%	$8,256	65.4%	41.7%
	Upper	23	41.1%	$6,745	35.1%	39.1%	10	43.5%	37.5%	$2,731	41.6%	40.2%	13	39.4%	39.4%	$4,014	31.8%	42.5%
	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	56	100.0%	$19,193	100.0%	100.0%	23	100.0%	100.0%	$6,563	100.0%	100.0%	33	100.0%	100.0%	$12,630	100.0%	100.0%
HOME IMPROVEMENT	Low	1	1.0%	$150	1.0%	2.5%	1	1.8%	1.4%	$150	1.9%	1.1%	0	0.0%	2.1%	$0	0.0%	1.9%
	Moderate	14	14.6%	$1,367	9.1%	17.2%	10	18.2%	12.6%	$829	10.5%	12.6%	4	9.8%	9.7%	$538	7.5%	8.0%
	Middle	44	45.8%	$7,026	46.7%	41.1%	24	43.6%	44.1%	$3,423	43.3%	43.3%	20	48.8%	43.0%	$3,603	50.5%	44.0%
	Upper	37	38.5%	$6,490	43.2%	39.1%	20	36.4%	41.9%	$3,496	44.3%	43.0%	17	41.5%	45.2%	$2,994	42.0%	46.1%
	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	96	100.0%	$15,033	100.0%	100.0%	55	100.0%	100.0%	$7,898	100.0%	100.0%	41	100.0%	100.0%	$7,135	100.0%	100.0%
MULTI FAMILY						Multi-Family Units												
	Low	0	0.0%	$0	0.0%	17.8%	0	0.0%	13.2%	$0	0.0%	3.6%	0	0.0%	26.7%	$0	0.0%	24.7%
	Moderate	0	0.0%	$0	0.0%	23.0%	0	0.0%	23.7%	$0	0.0%	12.0%	0	0.0%	10.0%	$0	0.0%	33.3%
	Middle	0	0.0%	$0	0.0%	47.8%	0	0.0%	50.0%	$0	0.0%	55.3%	0	0.0%	50.0%	$0	0.0%	33.4%
	Upper	0	0.0%	$0	0.0%	11.5%	0	0.0%	13.2%	$0	0.0%	29.1%	0	0.0%	13.3%	$0	0.0%	8.6%
	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	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%
OTHER PURPOSE LOC	Low	2	4.3%	$200	2.2%	2.5%	1	5.6%	2.7%	$50	1.8%	1.7%	1	3.6%	2.3%	$150	2.4%	1.8%
	Moderate	7	15.2%	$1,136	12.6%	17.2%	1	5.6%	8.7%	$50	1.8%	7.0%	6	21.4%	11.7%	$1,086	17.7%	9.7%
	Middle	22	47.8%	$4,585	51.0%	41.1%	9	50.0%	44.3%	$1,626	57.0%	46.7%	13	46.4%	37.1%	$2,959	48.2%	35.9%
	Upper	15	32.6%	$3,072	34.2%	39.1%	7	38.9%	44.3%	$1,129	39.5%	44.6%	8	28.6%	48.8%	$1,943	31.7%	52.6%
	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	46	100.0%	$8,993	100.0%	100.0%	18	100.0%	100.0%	$2,855	100.0%	100.0%	28	100.0%	100.0%	$6,138	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: CA - Santa Cruz-Watsonville MSA

Product Type	Tract Income Levels	Bank Count #	Bank %	Dollar $ (000s)	$ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.5%	0	0.0%	2.3%	$0	0.0%	2.1%	0	0.0%	0.8%	$0	0.0%	0.4%
	Moderate	0	0.0%	$0	0.0%	17.2%	0	0.0%	17.3%	$0	0.0%	12.9%	0	0.0%	15.9%	$0	0.0%	9.8%
	Middle	0	0.0%	$0	0.0%	41.1%	0	0.0%	40.6%	$0	0.0%	46.8%	0	0.0%	43.7%	$0	0.0%	45.1%
	Upper	0	0.0%	$0	0.0%	39.1%	0	0.0%	39.8%	$0	0.0%	38.3%	0	0.0%	39.7%	$0	0.0%	44.7%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.5%	0	0.0%	1.3%	$0	0.0%	1.2%	0	0.0%	4.2%	$0	0.0%	2.5%
	Moderate	0	0.0%	$0	0.0%	17.2%	0	0.0%	18.5%	$0	0.0%	14.7%	0	0.0%	11.8%	$0	0.0%	11.8%
	Middle	0	0.0%	$0	0.0%	41.1%	0	0.0%	40.8%	$0	0.0%	44.3%	0	0.0%	43.7%	$0	0.0%	45.3%
	Upper	0	0.0%	$0	0.0%	39.1%	0	0.0%	39.5%	$0	0.0%	39.7%	0	0.0%	40.3%	$0	0.0%	40.4%
	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	*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	5	2.4%	$655	1.4%	2.5%	3	3.0%	2.8%	$342	1.8%	2.5%	2	1.9%	2.9%	$313	1.2%	2.5%
	Moderate	24	11.7%	$3,263	7.2%	17.2%	13	12.9%	15.6%	$1,442	7.7%	12.9%	11	10.5%	15.4%	$1,821	6.8%	13.2%
	Middle	98	47.6%	$24,127	53.0%	41.1%	45	44.6%	42.7%	$8,458	45.3%	43.5%	53	50.5%	41.2%	$15,669	58.3%	41.0%
	Upper	79	38.3%	$17,474	38.4%	39.1%	40	39.6%	39.0%	$8,423	45.1%	41.1%	39	37.1%	40.6%	$9,051	33.7%	43.2%
	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	*206*	*100.0%*	*$45,519*	*100.0%*	*100.0%*	*101*	*100.0%*	*100.0%*	*$18,665*	*100.0%*	*100.0%*	*105*	*100.0%*	*100.0%*	*$26,854*	*100.0%*	*100.0%*
SMALL BUSINESSES						**Total Businesses**												
	Low	8	4.9%	$735	2.2%	4.0%	4	4.9%	3.5%	$285	1.8%	3.8%	4	4.9%	3.4%	$450	2.5%	3.3%
	Moderate	38	23.3%	$7,890	23.3%	15.6%	19	23.5%	15.4%	$3,390	21.7%	16.6%	19	23.2%	14.8%	$4,500	24.7%	18.7%
	Middle	68	41.7%	$8,717	25.8%	48.2%	31	38.3%	46.4%	$3,640	23.3%	43.8%	37	45.1%	46.8%	$5,077	27.9%	43.9%
	Upper	49	30.1%	$16,490	48.7%	32.2%	27	33.3%	31.9%	$8,305	53.2%	32.4%	22	26.8%	32.3%	$8,185	44.9%	31.1%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	2.7%	$0	0.0%	3.4%	0	0.0%	2.6%	$0	0.0%	3.0%
	Total	*163*	*100.0%*	*$33,832*	*100.0%*	*100.0%*	*81*	*100.0%*	*100.0%*	*$15,620*	*100.0%*	*100.0%*	*82*	*100.0%*	*100.0%*	*$18,212*	*100.0%*	*100.0%*
SMALL FARM						**Total Farms**												
	Low	0	0.0%	$0	0.0%	2.9%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	3.2%	$0	0.0%	13.2%
	Moderate	1	33.3%	$400	71.4%	22.3%	0	0.0%	35.5%	$0	0.0%	55.2%	1	50.0%	31.2%	$400	83.3%	30.2%
	Middle	2	66.7%	$160	28.6%	48.9%	1	100.0%	39.8%	$80	100.0%	33.4%	1	50.0%	40.9%	$80	16.7%	39.9%
	Upper	0	0.0%	$0	0.0%	25.8%	0	0.0%	19.4%	$0	0.0%	9.1%	0	0.0%	18.3%	$0	0.0%	13.0%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	5.4%	$0	0.0%	2.3%	0	0.0%	6.5%	$0	0.0%	3.7%
	Total	*3*	*100.0%*	*$560*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$80*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$480*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: CA - Santa Cruz-Watsonville MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	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%	23.1%	0	0.0%	0.6%	$0	0.0%	0.3%	0	0.0%	1.1%	$0	0.0%	0.4%
	Moderate	2	25.0%	$282	12.3%	17.0%	2	40.0%	3.3%	$282	20.9%	1.5%	0	0.0%	5.0%	$0	0.0%	2.5%
	Middle	1	12.5%	$217	9.4%	18.0%	1	20.0%	9.7%	$217	16.1%	6.2%	0	0.0%	15.3%	$0	0.0%	10.9%
	Upper	5	62.5%	$1,801	78.3%	41.9%	2	40.0%	74.0%	$850	63.0%	81.0%	3	100.0%	69.8%	$951	100.0%	78.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	12.4%	$0	0.0%	11.1%	0	0.0%	8.7%	$0	0.0%	8.3%
	Total	8	100.0%	$2,300	100.0%	100.0%	5	100.0%	100.0%	$1,349	100.0%	100.0%	3	100.0%	100.0%	$951	100.0%	100.0%
REFINANCE	Low	2	3.6%	$243	1.3%	23.1%	0	0.0%	3.8%	$0	0.0%	2.3%	2	6.1%	3.5%	$243	1.9%	2.0%
	Moderate	6	10.7%	$910	4.7%	17.0%	2	8.7%	7.9%	$160	2.4%	4.5%	4	12.1%	9.1%	$750	5.9%	5.1%
	Middle	7	12.5%	$1,184	6.2%	18.0%	4	17.4%	17.4%	$836	12.7%	13.3%	3	9.1%	18.6%	$348	2.8%	15.2%
	Upper	39	69.6%	$14,356	74.8%	41.9%	17	73.9%	61.7%	$5,567	84.8%	70.0%	22	66.7%	58.2%	$8,789	69.6%	66.2%
	Unknown	2	3.6%	$2,500	13.0%	0.0%	0	0.0%	9.3%	$0	0.0%	9.9%	2	6.1%	10.7%	$2,500	19.8%	11.4%
	Total	56	100.0%	$19,193	100.0%	100.0%	23	100.0%	100.0%	$6,563	100.0%	100.0%	33	100.0%	100.0%	$12,630	100.0%	100.0%
HOME IMPROVEMENT	Low	3	3.1%	$289	1.9%	23.1%	1	1.8%	1.2%	$99	1.3%	0.9%	2	4.9%	3.5%	$190	2.7%	4.1%
	Moderate	8	8.3%	$866	5.8%	17.0%	4	7.3%	6.0%	$278	3.5%	4.5%	4	9.8%	7.9%	$588	8.2%	5.0%
	Middle	20	20.8%	$2,439	16.2%	18.0%	12	21.8%	13.1%	$1,454	18.4%	11.9%	8	19.5%	18.0%	$985	13.8%	14.4%
	Upper	64	66.7%	$11,361	75.6%	41.9%	38	69.1%	74.4%	$6,067	76.8%	74.4%	26	63.4%	67.8%	$5,294	74.2%	72.2%
	Unknown	1	1.0%	$78	0.5%	0.0%	0	0.0%	5.3%	$0	0.0%	8.3%	1	2.4%	2.7%	$78	1.1%	4.3%
	Total	96	100.0%	$15,033	100.0%	100.0%	55	100.0%	100.0%	$7,898	100.0%	100.0%	41	100.0%	100.0%	$7,135	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	23.1%	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%	17.0%	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%	18.0%	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%	41.9%	0	0.0%	5.3%	$0	0.0%	1.7%	0	0.0%	0.0%	$0	0.0%	0.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	94.7%	$0	0.0%	98.3%	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%	0	0.0%	100.0%	$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	23.1%	0	0.0%	4.2%	$0	0.0%	4.2%	0	0.0%	6.3%	$0	0.0%	8.8%
	Moderate	3	6.5%	$200	2.2%	17.0%	1	5.6%	4.2%	$50	1.8%	2.5%	2	7.1%	7.0%	$150	2.4%	4.0%
	Middle	11	23.9%	$1,410	15.7%	18.0%	5	27.8%	11.7%	$666	23.3%	7.3%	6	21.4%	14.1%	$744	12.1%	9.1%
	Upper	31	67.4%	$7,283	81.0%	41.9%	12	66.7%	78.0%	$2,139	74.9%	84.5%	19	67.9%	68.8%	$5,144	83.8%	75.1%
	Unknown	1	2.2%	$100	1.1%	0.0%	0	0.0%	1.9%	$0	0.0%	1.6%	1	3.6%	3.9%	$100	1.6%	3.0%
	Total	46	100.0%	$8,993	100.0%	100.0%	18	100.0%	100.0%	$2,855	100.0%	100.0%	28	100.0%	100.0%	$6,138	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - Santa Cruz-Watsonville MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count		Dollar				Count		Dollar			
		Count		Dollar			Bank	Agg	Bank		Agg		Bank	Agg	Bank		Agg	
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	23.1%	0	0.0%	6.0%	$0	0.0%	2.6%	0	0.0%	3.2%	$0	0.0%	1.3%
	Moderate	0	0.0%	$0	0.0%	17.0%	0	0.0%	7.5%	$0	0.0%	3.5%	0	0.0%	14.3%	$0	0.0%	5.4%
	Middle	0	0.0%	$0	0.0%	18.0%	0	0.0%	11.3%	$0	0.0%	7.9%	0	0.0%	20.6%	$0	0.0%	11.9%
	Upper	0	0.0%	$0	0.0%	41.9%	0	0.0%	58.6%	$0	0.0%	76.8%	0	0.0%	54.8%	$0	0.0%	70.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	16.5%	$0	0.0%	9.1%	0	0.0%	7.1%	$0	0.0%	10.8%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	23.1%	0	0.0%	1.9%	$0	0.0%	1.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.0%	0	0.0%	3.2%	$0	0.0%	0.0%	0	0.0%	1.7%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	18.0%	0	0.0%	4.5%	$0	0.0%	0.6%	0	0.0%	1.7%	$0	0.0%	2.4%
	Upper	0	0.0%	$0	0.0%	41.9%	0	0.0%	5.1%	$0	0.0%	1.3%	0	0.0%	2.5%	$0	0.0%	4.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	85.4%	$0	0.0%	97.1%	0	0.0%	94.1%	$0	0.0%	93.3%
	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	5	2.4%	$532	1.2%	23.1%	1	1.0%	2.3%	$99	0.5%	1.2%	4	3.8%	2.8%	$433	1.6%	1.5%
	Moderate	19	9.2%	$2,258	5.0%	17.0%	9	8.9%	5.5%	$770	4.1%	2.7%	10	9.5%	7.7%	$1,488	5.5%	4.1%
	Middle	39	18.9%	$5,250	11.5%	18.0%	22	21.8%	13.1%	$3,173	17.0%	8.6%	17	16.2%	17.2%	$2,077	7.7%	13.2%
	Upper	139	67.5%	$34,801	76.5%	41.9%	69	68.3%	66.8%	$14,623	78.3%	71.0%	70	66.7%	61.5%	$20,178	75.1%	69.2%
	Unknown	4	1.9%	$2,678	5.9%	0.0%	0	0.0%	12.4%	$0	0.0%	16.5%	4	3.8%	10.8%	$2,678	10.0%	12.0%
	Total	206	100.0%	$45,519	100.0%	100.0%	101	100.0%	100.0%	$18,665	100.0%	100.0%	105	100.0%	100.0%	$26,854	100.0%	100.0%
Small Business — Revenue						Total Businesses												
	$1 Million or Less	33	20.2%	$5,815	17.2%	92.9%	9	11.1%	50.2%	$1,933	12.4%	39.7%	24	29.3%	53.2%	$3,882	21.3%	37.8%
	Over $1 Million	70	42.9%	$21,770	64.3%	6.7%	42	51.9%					28	34.1%				
	Total Rev. available	103	63.1%	$27,585	81.5%	99.6%	51	63.0%					52	63.4%				
	Rev. Not Known	60	36.8%	$6,247	18.5%	0.4%	30	37.0%					30	36.6%				
	Total	163	100.0%	$33,832	100.0%	100.0%	81	100.0%					82	100.0%				
Small Business — Loan Size	$100,000 or Less	97	59.5%	$5,992	17.7%		52	64.2%	97.3%	$3,157	20.2%	62.3%	45	54.9%	97.1%	$2,835	15.6%	62.0%
	$100,001 - $250,000	34	20.9%	$6,965	20.6%		15	18.5%	1.6%	$3,173	20.3%	11.8%	19	23.2%	1.8%	$3,792	20.8%	12.3%
	$250,001 - $1 Million	32	19.6%	$20,875	61.7%		14	17.3%	1.1%	$9,290	59.5%	26.0%	18	22.0%	1.1%	$11,585	63.6%	25.6%
	Total	163	100.0%	$33,832	100.0%		81	100.0%	100.0%	$15,620	100.0%	100.0%	82	100.0%	100.0%	$18,212	100.0%	100.0%
Small Farm — Revenue						Total Farms												
	$1 Million or Less	0	0.0%	$0	0.0%	89.9%	0	0.0%	45.2%	$0	0.0%	19.7%	0	0.0%	51.6%	$0	0.0%	29.6%
	Over $1 Million	1	33.3%	$400	71.4%	10.1%	0	0.0%					1	50.0%				
	Not Known	2	66.7%	$160	28.6%	0.0%	1	100.0%					1	50.0%				
	Total	3	100.0%	$560	100.0%	100.0%	1	100.0%					2	100.0%				
Small Farm — Loan Size	$100,000 or Less	2	66.7%	$160	28.6%		1	100.0%	91.4%	$80	100.0%	35.6%	1	50.0%	93.5%	$80	16.7%	53.5%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	3.2%	$0	0.0%	13.5%	0	0.0%	4.3%	$0	0.0%	20.5%
	$250,001 - $500,000	1	33.3%	$400	71.4%		0	0.0%	5.4%	$0	0.0%	50.8%	1	50.0%	2.2%	$400	83.3%	26.0%
	Total	3	100.0%	$560	100.0%		1	100.0%	100.0%	$80	100.0%	100.0%	2	100.0%	100.0%	$480	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: CA - Ventura

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
							2018						2019					
		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%	1.7%	0	0.0%	1.2%	$0	0.0%	0.7%	0	0.0%	1.0%	$0	0.0%	0.7%
	Moderate	0	0.0%	$0	0.0%	18.1%	0	0.0%	19.2%	$0	0.0%	14.0%	0	0.0%	20.3%	$0	0.0%	15.5%
	Middle	0	0.0%	$0	0.0%	35.6%	0	0.0%	35.3%	$0	0.0%	32.0%	0	0.0%	37.6%	$0	0.0%	34.8%
	Upper	0	0.0%	$0	0.0%	44.6%	0	0.0%	44.3%	$0	0.0%	53.3%	0	0.0%	41.2%	$0	0.0%	49.0%
	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%
	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%*
REFINANCE	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	1.4%	$0	0.0%	1.0%	0	0.0%	1.1%	$0	0.0%	0.8%
	Moderate	0	0.0%	$0	0.0%	18.1%	0	0.0%	20.1%	$0	0.0%	15.1%	0	0.0%	17.7%	$0	0.0%	13.9%
	Middle	2	18.2%	$347	14.7%	35.6%	2	28.6%	35.1%	$347	25.7%	32.2%	0	0.0%	36.2%	$0	0.0%	33.1%
	Upper	9	81.8%	$2,006	85.3%	44.6%	5	71.4%	43.4%	$1,004	74.3%	51.8%	4	100.0%	44.9%	$1,002	100.0%	52.2%
	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%*	*$2,353*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$1,351*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$1,002*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	0.9%	$0	0.0%	0.9%	0	0.0%	0.8%	$0	0.0%	0.6%
	Moderate	2	10.0%	$202	7.2%	18.1%	0	0.0%	10.8%	$0	0.0%	8.0%	2	20.0%	10.1%	$202	13.4%	7.6%
	Middle	6	30.0%	$346	12.3%	35.6%	2	20.0%	35.0%	$83	6.4%	32.0%	4	40.0%	35.6%	$263	17.4%	32.1%
	Upper	12	60.0%	$2,257	80.5%	44.6%	8	80.0%	53.3%	$1,209	93.6%	59.1%	4	40.0%	53.5%	$1,048	69.3%	59.6%
	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	*20*	*100.0%*	*$2,805*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$1,292*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$1,513*	*100.0%*	*100.0%*
MULTI FAMILY						Multi-Family Units												
	Low	0	0.0%	$0	0.0%	7.0%	0	0.0%	16.7%	$0	0.0%	1.3%	0	0.0%	14.0%	$0	0.0%	1.4%
	Moderate	0	0.0%	$0	0.0%	47.0%	0	0.0%	52.4%	$0	0.0%	13.3%	0	0.0%	62.0%	$0	0.0%	31.6%
	Middle	0	0.0%	$0	0.0%	29.4%	0	0.0%	21.4%	$0	0.0%	81.9%	0	0.0%	20.0%	$0	0.0%	61.6%
	Upper	0	0.0%	$0	0.0%	16.6%	0	0.0%	9.5%	$0	0.0%	3.6%	0	0.0%	4.0%	$0	0.0%	5.4%
	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	*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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	0.8%	$0	0.0%	0.3%	0	0.0%	0.2%	$0	0.0%	0.1%
	Moderate	1	4.3%	$20	0.7%	18.1%	1	8.3%	12.0%	$20	2.1%	7.5%	0	0.0%	10.8%	$0	0.0%	6.9%
	Middle	16	69.6%	$2,126	79.4%	35.6%	9	75.0%	33.7%	$804	84.0%	25.6%	7	63.6%	34.8%	$1,322	76.8%	31.5%
	Upper	6	26.1%	$533	19.9%	44.6%	2	16.7%	53.5%	$133	13.9%	66.6%	4	36.4%	54.2%	$400	23.2%	61.4%
	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	*23*	*100.0%*	*$2,679*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$957*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$1,722*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: CA - Ventura

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	0.6%	$0	0.0%	0.2%	0	0.0%	1.1%	$0	0.0%	0.6%
	Moderate	0	0.0%	$0	0.0%	18.1%	0	0.0%	19.0%	$0	0.0%	9.4%	0	0.0%	12.3%	$0	0.0%	7.7%
	Middle	0	0.0%	$0	0.0%	35.6%	0	0.0%	34.5%	$0	0.0%	27.8%	0	0.0%	37.1%	$0	0.0%	26.8%
	Upper	0	0.0%	$0	0.0%	44.6%	0	0.0%	45.8%	$0	0.0%	62.5%	0	0.0%	49.6%	$0	0.0%	64.8%
	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	*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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	5.7%	$0	0.0%	2.5%	0	0.0%	0.9%	$0	0.0%	0.4%
	Moderate	0	0.0%	$0	0.0%	18.1%	0	0.0%	20.4%	$0	0.0%	13.4%	0	0.0%	17.9%	$0	0.0%	14.1%
	Middle	0	0.0%	$0	0.0%	35.6%	0	0.0%	31.2%	$0	0.0%	23.4%	0	0.0%	34.6%	$0	0.0%	30.9%
	Upper	0	0.0%	$0	0.0%	44.6%	0	0.0%	42.8%	$0	0.0%	60.7%	0	0.0%	46.7%	$0	0.0%	54.6%
	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	*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%	1.7%	0	0.0%	1.4%	$0	0.0%	0.9%	0	0.0%	1.1%	$0	0.0%	0.8%
	Moderate	3	5.6%	$222	2.8%	18.1%	1	3.4%	18.6%	$20	0.6%	13.9%	2	8.0%	18.0%	$202	4.8%	14.9%
	Middle	24	44.4%	$2,819	36.0%	35.6%	13	44.8%	35.0%	$1,234	34.3%	38.4%	11	44.0%	36.6%	$1,585	37.4%	34.8%
	Upper	27	50.0%	$4,796	61.2%	44.6%	15	51.7%	45.1%	$2,346	65.2%	46.8%	12	48.0%	44.4%	$2,450	57.8%	49.6%
	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	*54*	*100.0%*	*$7,837*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*$3,600*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*$4,237*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	2	10.5%	$800	15.1%	5.2%	1	11.1%	5.5%	$400	18.0%	10.7%	1	10.0%	5.7%	$400	13.0%	11.5%
	Moderate	2	10.5%	$175	3.3%	20.9%	1	11.1%	18.4%	$75	3.4%	18.3%	1	10.0%	19.1%	$100	3.2%	18.0%
	Middle	9	47.4%	$2,954	55.7%	33.8%	4	44.4%	33.6%	$1,350	60.7%	35.1%	5	50.0%	33.1%	$1,604	52.1%	34.4%
	Upper	6	31.6%	$1,375	25.9%	40.0%	3	33.3%	42.5%	$400	18.0%	35.9%	3	30.0%	42.0%	$975	31.7%	36.0%
	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%
	Tr 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%
	Total	*19*	*100.0%*	*$5,304*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$2,225*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$3,079*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	8.5%	0	0.0%	13.4%	$0	0.0%	20.0%	0	0.0%	8.0%	$0	0.0%	20.3%
	Moderate	0	0.0%	$0	0.0%	24.0%	0	0.0%	16.9%	$0	0.0%	21.6%	0	0.0%	22.7%	$0	0.0%	22.9%
	Middle	0	0.0%	$0	0.0%	36.8%	0	0.0%	45.9%	$0	0.0%	37.7%	0	0.0%	39.9%	$0	0.0%	42.9%
	Upper	0	0.0%	$0	0.0%	30.6%	0	0.0%	23.8%	$0	0.0%	20.6%	0	0.0%	29.4%	$0	0.0%	13.9%
	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%
	Tr 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%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: CA - Ventura

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	1.6%	$0	0.0%	0.9%	0	0.0%	1.7%	$0	0.0%	0.9%
	Moderate	0	0.0%	$0	0.0%	16.5%	0	0.0%	8.7%	$0	0.0%	5.1%	0	0.0%	9.3%	$0	0.0%	5.8%
	Middle	0	0.0%	$0	0.0%	19.5%	0	0.0%	22.8%	$0	0.0%	18.7%	0	0.0%	23.2%	$0	0.0%	19.6%
	Upper	0	0.0%	$0	0.0%	42.4%	0	0.0%	51.7%	$0	0.0%	61.8%	0	0.0%	51.1%	$0	0.0%	59.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	15.3%	$0	0.0%	13.5%	0	0.0%	14.7%	$0	0.0%	14.4%
	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%*
REFINANCE	Low	1	9.1%	$136	5.8%	21.7%	1	14.3%	7.1%	$136	10.1%	4.1%	0	0.0%	3.6%	$0	0.0%	2.1%
	Moderate	0	0.0%	$0	0.0%	16.5%	0	0.0%	14.2%	$0	0.0%	10.0%	0	0.0%	10.7%	$0	0.0%	7.1%
	Middle	2	18.2%	$215	9.1%	19.5%	1	14.3%	23.2%	$105	7.8%	20.5%	1	25.0%	22.5%	$110	11.0%	19.1%
	Upper	8	72.7%	$2,002	85.1%	42.4%	5	71.4%	43.5%	$1,110	82.2%	53.2%	3	75.0%	46.7%	$892	89.0%	54.6%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	11.9%	$0	0.0%	12.2%	0	0.0%	16.5%	$0	0.0%	17.1%
	Total	*11*	*100.0%*	*$2,353*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$1,351*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$1,002*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	4.2%	$0	0.0%	3.3%	0	0.0%	4.8%	$0	0.0%	3.4%
	Moderate	1	5.0%	$33	1.2%	16.5%	1	10.0%	9.4%	$33	2.6%	8.0%	0	0.0%	9.7%	$0	0.0%	8.7%
	Middle	2	10.0%	$235	8.4%	19.5%	1	10.0%	21.4%	$104	8.0%	18.2%	1	10.0%	22.9%	$131	8.7%	20.1%
	Upper	17	85.0%	$2,537	90.4%	42.4%	8	80.0%	60.1%	$1,155	89.4%	61.7%	9	90.0%	59.4%	$1,382	91.3%	64.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	4.9%	$0	0.0%	8.9%	0	0.0%	3.1%	$0	0.0%	3.9%
	Total	*20*	*100.0%*	*$2,805*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$1,292*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$1,513*	*100.0%*	*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	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	16.5%	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%	19.5%	0	0.0%	2.4%	$0	0.0%	0.0%	0	0.0%	2.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	42.4%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	2.0%	$0	0.0%	0.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	97.6%	$0	0.0%	100.0%	0	0.0%	96.0%	$0	0.0%	99.6%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	5.9%	$0	0.0%	3.8%	0	0.0%	4.7%	$0	0.0%	3.8%
	Moderate	2	8.7%	$96	3.6%	16.5%	2	16.7%	12.2%	$96	10.0%	7.8%	0	0.0%	11.9%	$0	0.0%	8.5%
	Middle	3	13.0%	$150	5.6%	19.5%	3	25.0%	22.9%	$150	15.7%	14.6%	0	0.0%	21.5%	$0	0.0%	16.6%
	Upper	18	78.3%	$2,433	90.8%	42.4%	7	58.3%	57.3%	$711	74.3%	71.8%	11	100.0%	58.6%	$1,722	100.0%	67.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.8%	$0	0.0%	2.0%	0	0.0%	3.3%	$0	0.0%	3.7%
	Total	*23*	*100.0%*	*$2,679*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$957*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$1,722*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: CA - Ventura

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison												
		2018, 2019				2018						2019						
		Bank			Families by Family Income	Count			Dollar			Count			Dollar			
		Count		Dollar		Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	3.9%	$0	0.0%	2.3%	0	0.0%	7.5%	$0	0.0%	3.9%
	Moderate	0	0.0%	$0	0.0%	16.5%	0	0.0%	10.7%	$0	0.0%	4.7%	0	0.0%	10.7%	$0	0.0%	6.4%
	Middle	0	0.0%	$0	0.0%	19.5%	0	0.0%	27.1%	$0	0.0%	14.8%	0	0.0%	20.8%	$0	0.0%	13.1%
	Upper	0	0.0%	$0	0.0%	42.4%	0	0.0%	52.7%	$0	0.0%	66.9%	0	0.0%	54.4%	$0	0.0%	64.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	5.7%	$0	0.0%	11.2%	0	0.0%	6.7%	$0	0.0%	11.7%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	2.5%	$0	0.0%	0.6%	0	0.0%	0.3%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	16.5%	0	0.0%	7.2%	$0	0.0%	2.4%	0	0.0%	0.9%	$0	0.0%	0.7%
	Middle	0	0.0%	$0	0.0%	19.5%	0	0.0%	4.3%	$0	0.0%	0.9%	0	0.0%	1.2%	$0	0.0%	1.4%
	Upper	0	0.0%	$0	0.0%	42.4%	0	0.0%	5.0%	$0	0.0%	2.0%	0	0.0%	2.9%	$0	0.0%	3.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	81.0%	$0	0.0%	94.0%	0	0.0%	94.8%	$0	0.0%	94.2%
	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	1	1.9%	$136	1.7%	21.7%	1	3.4%	4.2%	$136	3.8%	2.0%	0	0.0%	3.1%	$0	0.0%	1.6%
	Moderate	3	5.6%	$129	1.6%	16.5%	3	10.3%	11.1%	$129	3.6%	6.1%	0	0.0%	10.1%	$0	0.0%	6.3%
	Middle	7	13.0%	$600	7.7%	19.5%	5	17.2%	22.5%	$359	10.0%	16.4%	2	8.0%	22.4%	$241	5.7%	18.2%
	Upper	43	79.6%	$6,972	89.0%	42.4%	20	69.0%	48.3%	$2,976	82.7%	50.2%	23	92.0%	48.5%	$3,996	94.3%	53.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	14.0%	$0	0.0%	25.3%	0	0.0%	15.9%	$0	0.0%	19.9%
	Total	*54*	*100.0%*	*$7,837*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*$3,600*	*100.0%*	*100.0%*	*25*	*100.0%*	*100.0%*	*$4,237*	*100.0%*	*100.0%*
Small Business — Revenue	*Total Businesses*																	
	$1 Million or Less	3	15.8%	$429	8.1%	92.3%	1	11.1%	44.8%	$50	2.2%	32.3%	2	20.0%	45.8%	$379	12.3%	31.5%
	Over $1 Million	10	52.6%	$3,875	73.1%	7.3%	5	55.6%					5	50.0%				
	Total Rev. available	13	68.4%	$4,304	81.2%	99.6%	6	66.7%					7	70.0%				
	Rev. Not Known	6	31.6%	$1,000	18.9%	0.4%	3	33.3%					3	30.0%				
	Total	19	100.0%	$5,304	100.0%	100.0%	9	100.0%					10	100.0%				
Small Business — Loan Size	$100,000 or Less	8	42.1%	$600	11.3%		4	44.4%	96.0%	$275	12.4%	52.3%	4	40.0%	96.1%	$325	10.6%	52.5%
	$100,001 - $250,000	5	26.3%	$1,200	22.6%		3	33.3%	2.2%	$750	33.7%	13.1%	2	20.0%	2.1%	$450	14.6%	13.0%
	$250,001 - $1 Million	6	31.6%	$3,504	66.1%		2	22.2%	1.8%	$1,200	53.9%	34.6%	4	40.0%	1.8%	$2,304	74.8%	34.5%
	Total	19	100.0%	$5,304	100.0%		9	100.0%	100.0%	$2,225	100.0%	100.0%	10	100.0%	100.0%	$3,079	100.0%	100.0%
Small Farm — Revenue	*Total Farms*																	
	$1 Million or Less	0	0.0%	$0	0.0%	85.5%	0	0.0%	42.4%	$0	0.0%	39.1%	0	0.0%	46.6%	$0	0.0%	35.9%
	Over $1 Million	0	0.0%	$0	0.0%	14.5%	0	0.0%					0	0.0%				
	Not Known	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%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	90.1%	$0	0.0%	37.7%	0	0.0%	96.3%	$0	0.0%	64.7%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	4.1%	$0	0.0%	15.9%	0	0.0%	1.8%	$0	0.0%	12.6%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	5.8%	$0	0.0%	46.4%	0	0.0%	1.8%	$0	0.0%	22.8%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: FL - Naples-Immokalee-Marco Island MSA

Product Type	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	2	8.0%	$710	12.7%	2.3%	0	0.0%	1.3%	$0	0.0%	0.9%	2	20.0%	1.6%	$710	22.5%	1.4%
	Moderate	10	40.0%	$1,657	29.7%	16.3%	8	53.3%	16.4%	$1,190	49.0%	11.4%	2	20.0%	16.7%	$467	14.8%	11.8%
	Middle	6	24.0%	$1,075	19.3%	41.3%	3	20.0%	42.1%	$615	25.3%	36.2%	3	30.0%	42.2%	$460	14.6%	35.3%
	Upper	7	28.0%	$2,140	38.3%	40.1%	4	26.7%	40.3%	$625	25.7%	51.6%	3	30.0%	39.5%	$1,515	48.1%	51.5%
	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	*25*	*100.0%*	*$5,582*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*$2,430*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$3,152*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	1.3%	$0	0.0%	0.7%	0	0.0%	0.8%	$0	0.0%	0.7%
	Moderate	5	45.5%	$1,241	32.8%	16.3%	2	50.0%	16.3%	$515	81.1%	10.0%	3	42.9%	13.7%	$726	23.1%	8.7%
	Middle	3	27.3%	$245	6.5%	41.3%	2	50.0%	42.7%	$120	18.9%	32.9%	1	14.3%	42.8%	$125	4.0%	33.9%
	Upper	3	27.3%	$2,296	60.7%	40.1%	0	0.0%	39.6%	$0	0.0%	56.3%	3	42.9%	42.7%	$2,296	73.0%	56.7%
	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%*	*$3,782*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$635*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$3,147*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	0.7%	$0	0.0%	0.4%	0	0.0%	0.6%	$0	0.0%	0.3%
	Moderate	0	0.0%	$0	0.0%	16.3%	0	0.0%	13.6%	$0	0.0%	9.8%	0	0.0%	13.7%	$0	0.0%	9.4%
	Middle	2	40.0%	$397	47.9%	41.3%	0	0.0%	46.0%	$0	0.0%	35.9%	2	100.0%	45.1%	$397	100.0%	38.6%
	Upper	3	60.0%	$431	52.1%	40.1%	3	100.0%	39.8%	$431	100.0%	53.9%	0	0.0%	40.6%	$0	0.0%	51.7%
	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	*5*	*100.0%*	*$828*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$431*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$397*	*100.0%*	*100.0%*
MULTI FAMILY						**Multi-Family Units**												
	Low	0	0.0%	$0	0.0%	2.0%	0	0.0%	10.0%	$0	0.0%	4.7%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	16.3%	0	0.0%	70.0%	$0	0.0%	45.1%	0	0.0%	34.8%	$0	0.0%	26.3%
	Middle	0	0.0%	$0	0.0%	33.6%	0	0.0%	15.0%	$0	0.0%	31.5%	0	0.0%	34.8%	$0	0.0%	36.6%
	Upper	0	0.0%	$0	0.0%	48.1%	0	0.0%	5.0%	$0	0.0%	18.7%	0	0.0%	30.4%	$0	0.0%	37.1%
	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	*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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	0.7%	$0	0.0%	0.2%	0	0.0%	1.7%	$0	0.0%	0.6%
	Moderate	0	0.0%	$0	0.0%	16.3%	0	0.0%	12.7%	$0	0.0%	8.5%	0	0.0%	13.2%	$0	0.0%	9.0%
	Middle	2	66.7%	$224	42.7%	41.3%	0	0.0%	42.1%	$0	0.0%	30.3%	2	66.7%	44.2%	$224	42.7%	28.7%
	Upper	1	33.3%	$300	57.3%	40.1%	0	0.0%	44.6%	$0	0.0%	60.9%	1	33.3%	40.9%	$300	57.3%	61.7%
	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%*	*$524*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$524*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: FL - Naples-Immokalee-Marco Island MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	0.4%	$0	0.0%	0.5%	0	0.0%	1.3%	$0	0.0%	0.6%
	Moderate	0	0.0%	$0	0.0%	16.3%	0	0.0%	10.0%	$0	0.0%	4.1%	0	0.0%	12.6%	$0	0.0%	5.3%
	Middle	1	100.0%	$201	100.0%	41.3%	0	0.0%	28.4%	$0	0.0%	16.4%	1	100.0%	37.9%	$201	100.0%	19.4%
	Upper	0	0.0%	$0	0.0%	40.1%	0	0.0%	61.2%	$0	0.0%	79.0%	0	0.0%	48.2%	$0	0.0%	74.7%
	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	*1*	*100.0%*	*$201*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$201*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.3%	0	0.0%	2.3%	$0	0.0%	2.3%	0	0.0%	1.7%	$0	0.0%	1.1%
	Moderate	1	50.0%	$191	74.6%	16.3%	1	50.0%	24.5%	$191	74.6%	18.8%	0	0.0%	14.9%	$0	0.0%	9.8%
	Middle	1	50.0%	$65	25.4%	41.3%	1	50.0%	37.7%	$65	25.4%	38.8%	0	0.0%	42.5%	$0	0.0%	43.9%
	Upper	0	0.0%	$0	0.0%	40.1%	0	0.0%	35.4%	$0	0.0%	40.1%	0	0.0%	40.8%	$0	0.0%	45.3%
	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	*2*	*100.0%*	*$256*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$256*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
HMDA TOTALS	Low	2	4.3%	$710	6.4%	2.3%	0	0.0%	1.2%	$0	0.0%	1.1%	2	8.7%	1.4%	$710	9.6%	1.0%
	Moderate	16	34.0%	$3,089	27.6%	16.3%	11	45.8%	16.2%	$1,896	50.5%	13.2%	5	21.7%	15.6%	$1,193	16.1%	11.5%
	Middle	15	31.9%	$2,207	19.8%	41.3%	6	25.0%	42.0%	$800	21.3%	34.7%	9	39.1%	42.4%	$1,407	19.0%	34.6%
	Upper	14	29.8%	$5,167	46.2%	40.1%	7	29.2%	40.5%	$1,056	28.1%	51.0%	7	30.4%	40.6%	$4,111	55.4%	52.8%
	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	*47*	*100.0%*	*$11,173*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*$3,752*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*$7,421*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	0	0.0%	$0	0.0%	2.8%	0	0.0%	2.5%	$0	0.0%	3.0%	0	0.0%	2.5%	$0	0.0%	3.3%
	Moderate	1	33.3%	$10	1.0%	13.5%	0	0.0%	10.8%	$0	0.0%	8.0%	1	50.0%	10.6%	$10	2.4%	7.1%
	Middle	1	33.3%	$600	59.4%	39.8%	1	100.0%	39.5%	$600	100.0%	33.6%	0	0.0%	40.0%	$0	0.0%	36.8%
	Upper	1	33.3%	$400	39.6%	43.8%	0	0.0%	46.5%	$0	0.0%	54.9%	1	50.0%	45.2%	$400	97.6%	52.3%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.7%	$0	0.0%	0.5%	0	0.0%	1.7%	$0	0.0%	0.5%
	Total	*3*	*100.0%*	*$1,010*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$600*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$410*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	11.5%	0	0.0%	27.0%	$0	0.0%	8.7%	0	0.0%	9.8%	$0	0.0%	3.3%
	Moderate	0	0.0%	$0	0.0%	17.2%	0	0.0%	31.7%	$0	0.0%	32.4%	0	0.0%	27.5%	$0	0.0%	9.3%
	Middle	0	0.0%	$0	0.0%	37.3%	0	0.0%	20.6%	$0	0.0%	42.4%	0	0.0%	27.5%	$0	0.0%	21.4%
	Upper	0	0.0%	$0	0.0%	34.0%	0	0.0%	19.0%	$0	0.0%	16.4%	0	0.0%	31.4%	$0	0.0%	63.7%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	1.6%	$0	0.0%	0.1%	0	0.0%	3.9%	$0	0.0%	2.4%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: FL - Naples-Immokalee-Marco Island MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	1	4.0%	$80	1.4%	20.8%	1	6.7%	2.1%	$80	3.3%	1.0%	0	0.0%	2.9%	$0	0.0%	1.3%
	Moderate	11	44.0%	$1,734	31.1%	17.7%	7	46.7%	11.8%	$984	40.5%	7.0%	4	40.0%	14.6%	$750	23.8%	8.7%
	Middle	4	16.0%	$769	13.8%	19.3%	3	20.0%	17.9%	$490	20.2%	12.6%	1	10.0%	19.4%	$279	8.9%	13.9%
	Upper	9	36.0%	$2,999	53.7%	42.2%	4	26.7%	52.4%	$876	36.0%	65.1%	5	50.0%	52.4%	$2,123	67.4%	64.6%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	15.8%	$0	0.0%	14.4%	0	0.0%	10.7%	$0	0.0%	11.5%
	Total	*25*	*100.0%*	*$5,582*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*$2,430*	*100.0%*	*100.0%*	*10*	*100.0%*	*100.0%*	*$3,152*	*100.0%*	*100.0%*
REFINANCE	Low	2	18.2%	$167	4.4%	20.8%	2	50.0%	7.4%	$167	26.3%	3.2%	0	0.0%	4.4%	$0	0.0%	1.9%
	Moderate	2	18.2%	$298	7.9%	17.7%	0	0.0%	15.1%	$0	0.0%	8.3%	2	28.6%	12.8%	$298	9.5%	6.5%
	Middle	1	9.1%	$204	5.4%	19.3%	0	0.0%	20.0%	$0	0.0%	13.3%	1	14.3%	16.9%	$204	6.5%	10.7%
	Upper	6	54.5%	$3,113	82.3%	42.2%	2	50.0%	44.9%	$468	73.7%	59.8%	4	57.1%	49.1%	$2,645	84.0%	63.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	12.6%	$0	0.0%	15.3%	0	0.0%	16.8%	$0	0.0%	17.7%
	Total	*11*	*100.0%*	*$3,782*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$635*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$3,147*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	20.8%	0	0.0%	4.7%	$0	0.0%	4.5%	0	0.0%	5.0%	$0	0.0%	1.9%
	Moderate	0	0.0%	$0	0.0%	17.7%	0	0.0%	13.4%	$0	0.0%	7.9%	0	0.0%	15.0%	$0	0.0%	7.7%
	Middle	0	0.0%	$0	0.0%	19.3%	0	0.0%	21.5%	$0	0.0%	13.9%	0	0.0%	21.3%	$0	0.0%	14.6%
	Upper	4	80.0%	$628	75.8%	42.2%	3	100.0%	55.8%	$431	100.0%	67.5%	1	50.0%	55.4%	$197	49.6%	67.6%
	Unknown	1	20.0%	$200	24.2%	0.0%	0	0.0%	4.6%	$0	0.0%	6.1%	1	50.0%	3.2%	$200	50.4%	8.2%
	Total	*5*	*100.0%*	*$828*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$431*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$397*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	20.8%	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%
	Middle	0	0.0%	$0	0.0%	19.3%	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%	42.2%	0	0.0%	10.0%	$0	0.0%	0.3%	0	0.0%	4.3%	$0	0.0%	2.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	90.0%	$0	0.0%	99.7%	0	0.0%	95.7%	$0	0.0%	98.0%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	20.8%	0	0.0%	4.6%	$0	0.0%	3.8%	0	0.0%	4.7%	$0	0.0%	1.7%
	Moderate	0	0.0%	$0	0.0%	17.7%	0	0.0%	13.9%	$0	0.0%	6.4%	0	0.0%	14.9%	$0	0.0%	7.1%
	Middle	1	33.3%	$124	23.7%	19.3%	0	0.0%	20.9%	$0	0.0%	12.5%	1	33.3%	17.9%	$124	23.7%	10.2%
	Upper	2	66.7%	$400	76.3%	42.2%	0	0.0%	59.3%	$0	0.0%	76.0%	2	66.7%	59.4%	$400	76.3%	78.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.4%	$0	0.0%	1.2%	0	0.0%	3.0%	$0	0.0%	2.2%
	Total	*3*	*100.0%*	*$524*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$524*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: FL - Naples-Immokalee-Marco Island MSA

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	20.8%	0	0.0%	4.4%	$0	0.0%	1.0%	0	0.0%	6.3%	$0	0.0%	2.2%
	Moderate	1	100.0%	$201	100.0%	17.7%	0	0.0%	8.4%	$0	0.0%	4.4%	1	100.0%	13.0%	$201	100.0%	2.9%
	Middle	0	0.0%	$0	0.0%	19.3%	0	0.0%	13.2%	$0	0.0%	5.0%	0	0.0%	13.6%	$0	0.0%	4.1%
	Upper	0	0.0%	$0	0.0%	42.2%	0	0.0%	65.6%	$0	0.0%	76.9%	0	0.0%	61.5%	$0	0.0%	80.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	8.4%	$0	0.0%	12.7%	0	0.0%	5.6%	$0	0.0%	10.5%
	Total	*1*	*100.0%*	*$201*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$201*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	1	50.0%	$65	25.4%	20.8%	1	50.0%	3.0%	$65	25.4%	1.6%	0	0.0%	1.1%	$0	0.0%	0.6%
	Moderate	0	0.0%	$0	0.0%	17.7%	0	0.0%	6.3%	$0	0.0%	4.2%	0	0.0%	5.7%	$0	0.0%	6.3%
	Middle	0	0.0%	$0	0.0%	19.3%	0	0.0%	3.0%	$0	0.0%	3.1%	0	0.0%	4.6%	$0	0.0%	4.0%
	Upper	1	50.0%	$191	74.6%	42.2%	1	50.0%	6.3%	$191	74.6%	6.1%	0	0.0%	2.9%	$0	0.0%	4.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	81.5%	$0	0.0%	85.1%	0	0.0%	85.6%	$0	0.0%	85.0%
	Total	*2*	*100.0%*	*$256*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$256*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
HMDA TOTALS	Low	4	8.5%	$312	2.8%	20.8%	4	16.7%	3.5%	$312	8.3%	1.4%	0	0.0%	3.5%	$0	0.0%	1.4%
	Moderate	14	29.8%	$2,233	20.0%	17.7%	7	29.2%	12.5%	$984	26.2%	6.7%	7	30.4%	13.9%	$1,249	16.8%	7.3%
	Middle	6	12.8%	$1,097	9.8%	19.3%	3	12.5%	18.2%	$490	13.1%	11.6%	3	13.0%	18.5%	$607	8.2%	11.8%
	Upper	22	46.8%	$7,331	65.6%	42.2%	10	41.7%	50.5%	$1,966	52.4%	59.7%	12	52.2%	51.4%	$5,365	72.3%	60.7%
	Unknown	1	2.1%	$200	1.8%	0.0%	0	0.0%	15.3%	$0	0.0%	20.6%	1	4.3%	12.7%	$200	2.7%	18.7%
	Total	*47*	*100.0%*	*$11,173*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*$3,752*	*100.0%*	*100.0%*	*23*	*100.0%*	*100.0%*	*$7,421*	*100.0%*	*100.0%*
Small Business — Revenue	*(Total Businesses)*																	
	$1 Million or Less	1	33.3%	$10	1.0%	94.0%	0	0.0%	45.9%	$0	0.0%	34.5%	1	50.0%	45.9%	$10	2.4%	33.1%
	Over $1 Million	1	33.3%	$600	59.4%	5.1%	1	100.0%					0	0.0%				
	Total Rev. available	2	66.6%	$610	60.4%	99.1%	1	100.0%					1	50.0%				
	Rev. Not Known	1	33.3%	$400	39.6%	0.9%	0	0.0%					1	50.0%				
	Total	*3*	*100.0%*	*$1,010*	*100.0%*	*100.0%*	*1*	*100.0%*					*2*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	1	33.3%	$10	1.0%		0	0.0%	95.2%	$0	0.0%	44.6%	1	50.0%	95.3%	$10	2.4%	46.0%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	2.4%	$0	0.0%	13.4%	0	0.0%	2.5%	$0	0.0%	14.6%
	$250,001 - $1 Million	2	66.7%	$1,000	99.0%		1	100.0%	2.4%	$600	100.0%	42.0%	1	50.0%	2.2%	$400	97.6%	39.5%
	Total	*3*	*100.0%*	*$1,010*	*100.0%*		*1*	*100.0%*	*100.0%*	*$600*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$410*	*100.0%*	*100.0%*
Small Farm — Revenue	*(Total Farms)*																	
	$1 Million or Less	0	0.0%	$0	0.0%	93.4%	0	0.0%	55.6%	$0	0.0%	80.3%	0	0.0%	54.9%	$0	0.0%	40.9%
	Over $1 Million	0	0.0%	$0	0.0%	6.6%	0	0.0%					0	0.0%				
	Not Known	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%*					*0*	*0.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	93.7%	$0	0.0%	42.5%	0	0.0%	98.0%	$0	0.0%	63.6%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	3.2%	$0	0.0%	10.9%	0	0.0%	0.0%	$0	0.0%	0.0%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	3.2%	$0	0.0%	46.6%	0	0.0%	2.0%	$0	0.0%	36.4%
	Total	*0*	*0.0%*	*$0*	*0.0%*		*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: MI - Ann Arbor MSA

Product Type	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	2	8.0%	$252	5.9%	6.6%	2	12.5%	8.5%	$252	9.4%	4.4%	0	0.0%	8.2%	$0	0.0%	4.3%
	Moderate	3	12.0%	$340	7.9%	12.0%	2	12.5%	13.8%	$124	4.6%	9.8%	1	11.1%	14.4%	$216	13.4%	10.8%
	Middle	9	36.0%	$1,202	27.9%	44.7%	5	31.3%	46.5%	$867	32.2%	44.6%	4	44.4%	45.7%	$335	20.8%	43.4%
	Upper	11	44.0%	$2,507	58.3%	36.5%	7	43.8%	30.9%	$1,448	53.8%	40.9%	4	44.4%	31.4%	$1,059	65.8%	41.0%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.3%	$0	0.0%	0.3%	0	0.0%	0.5%	$0	0.0%	0.5%
	Total	*25*	*100.0%*	*$4,301*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*$2,691*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$1,610*	*100.0%*	*100.0%*
REFINANCE	Low	3	2.3%	$320	1.4%	6.6%	0	0.0%	6.7%	$0	0.0%	4.5%	3	5.1%	5.0%	$320	2.8%	3.1%
	Moderate	6	4.7%	$788	3.4%	12.0%	5	7.2%	10.8%	$728	6.3%	8.1%	1	1.7%	10.3%	$60	0.5%	7.2%
	Middle	64	50.0%	$9,808	42.5%	44.7%	33	47.8%	46.8%	$4,266	36.7%	43.1%	31	52.5%	46.9%	$5,542	48.3%	42.5%
	Upper	55	43.0%	$12,183	52.7%	36.5%	31	44.9%	35.5%	$6,634	57.1%	44.0%	24	40.7%	37.7%	$5,549	48.4%	47.1%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.3%	0	0.0%	0.1%	$0	0.0%	0.2%
	Total	*128*	*100.0%*	*$23,099*	*100.0%*	*100.0%*	*69*	*100.0%*	*100.0%*	*$11,628*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*$11,471*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	6.6%	0	0.0%	4.0%	$0	0.0%	3.0%	0	0.0%	4.0%	$0	0.0%	2.1%
	Moderate	5	9.8%	$456	8.2%	12.0%	4	13.8%	9.3%	$406	15.1%	6.4%	1	4.5%	9.1%	$50	1.8%	5.6%
	Middle	24	47.1%	$2,196	39.7%	44.7%	15	51.7%	42.3%	$1,474	54.7%	37.3%	9	40.9%	41.6%	$722	25.5%	37.9%
	Upper	22	43.1%	$2,877	52.0%	36.5%	10	34.5%	44.4%	$815	30.2%	53.4%	12	54.5%	45.2%	$2,062	72.8%	54.2%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.1%	$0	0.0%	0.2%
	Total	*51*	*100.0%*	*$5,529*	*100.0%*	*100.0%*	*29*	*100.0%*	*100.0%*	*$2,695*	*100.0%*	*100.0%*	*22*	*100.0%*	*100.0%*	*$2,834*	*100.0%*	*100.0%*
MULTI FAMILY						**Multi-Family Units**												
	Low	0	0.0%	$0	0.0%	28.1%	0	0.0%	29.6%	$0	0.0%	8.4%	0	0.0%	39.4%	$0	0.0%	17.3%
	Moderate	1	100.0%	$225	100.0%	18.6%	0	0.0%	0.0%	$0	0.0%	0.0%	1	100.0%	18.2%	$225	100.0%	24.0%
	Middle	0	0.0%	$0	0.0%	34.6%	0	0.0%	44.4%	$0	0.0%	52.6%	0	0.0%	30.3%	$0	0.0%	53.4%
	Upper	0	0.0%	$0	0.0%	11.8%	0	0.0%	22.2%	$0	0.0%	27.7%	0	0.0%	9.1%	$0	0.0%	4.5%
	Unknown	0	0.0%	$0	0.0%	6.8%	0	0.0%	3.7%	$0	0.0%	11.4%	0	0.0%	3.0%	$0	0.0%	0.9%
	Total	*1*	*100.0%*	*$225*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$225*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	1	1.7%	$67	1.1%	6.6%	0	0.0%	4.1%	$0	0.0%	2.2%	1	3.8%	6.0%	$67	2.5%	3.5%
	Moderate	2	3.4%	$144	2.3%	12.0%	0	0.0%	8.5%	$0	0.0%	5.9%	2	7.7%	7.0%	$144	5.3%	3.5%
	Middle	27	46.6%	$2,529	39.7%	44.7%	16	50.0%	41.9%	$1,933	52.6%	32.8%	11	42.3%	45.3%	$596	22.1%	42.0%
	Upper	28	48.3%	$3,630	57.0%	36.5%	16	50.0%	45.3%	$1,742	47.4%	58.6%	12	46.2%	41.7%	$1,888	70.1%	51.0%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.5%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*58*	*100.0%*	*$6,370*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*$3,675*	*100.0%*	*100.0%*	*26*	*100.0%*	*100.0%*	*$2,695*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
							2018						2019					
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	6.6%	0	0.0%	5.6%	$0	0.0%	4.4%	0	0.0%	4.8%	$0	0.0%	3.2%
	Moderate	0	0.0%	$0	0.0%	12.0%	0	0.0%	11.9%	$0	0.0%	4.2%	0	0.0%	10.1%	$0	0.0%	3.9%
	Middle	1	50.0%	$194	24.4%	44.7%	1	100.0%	47.5%	$194	100.0%	37.8%	0	0.0%	51.0%	$0	0.0%	39.8%
	Upper	1	50.0%	$600	75.6%	36.5%	0	0.0%	35.0%	$0	0.0%	53.6%	1	100.0%	33.7%	$600	100.0%	51.8%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.5%	$0	0.0%	1.3%
	Total	*2*	*100.0%*	*$794*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$194*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$600*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	6.6%	0	0.0%	8.4%	$0	0.0%	5.1%	0	0.0%	5.4%	$0	0.0%	1.3%
	Moderate	0	0.0%	$0	0.0%	12.0%	0	0.0%	16.9%	$0	0.0%	17.3%	0	0.0%	13.5%	$0	0.0%	6.2%
	Middle	0	0.0%	$0	0.0%	44.7%	0	0.0%	46.1%	$0	0.0%	40.1%	0	0.0%	58.1%	$0	0.0%	29.9%
	Upper	0	0.0%	$0	0.0%	36.5%	0	0.0%	28.7%	$0	0.0%	37.5%	0	0.0%	23.0%	$0	0.0%	62.6%
	Unknown	0	0.0%	$0	0.0%	0.2%	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	6	2.3%	$639	1.6%	6.6%	2	1.4%	7.5%	$252	1.2%	4.7%	4	3.4%	6.5%	$387	2.0%	5.0%
	Moderate	17	6.4%	$1,953	4.8%	12.0%	11	7.5%	12.3%	$1,258	6.0%	8.3%	6	5.1%	12.0%	$695	3.6%	10.3%
	Middle	125	47.2%	$15,929	39.5%	44.7%	70	47.6%	46.1%	$8,734	41.8%	44.4%	55	46.6%	46.0%	$7,195	37.0%	43.7%
	Upper	117	44.2%	$21,797	54.1%	36.5%	64	43.5%	33.9%	$10,639	50.9%	41.3%	53	44.9%	35.2%	$11,158	57.4%	40.6%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	1.3%	0	0.0%	0.3%	$0	0.0%	0.4%
	Total	*265*	*100.0%*	*$40,318*	*100.0%*	*100.0%*	*147*	*100.0%*	*100.0%*	*$20,883*	*100.0%*	*100.0%*	*118*	*100.0%*	*100.0%*	*$19,435*	*100.0%*	*100.0%*
SMALL BUSINESSES						**Total Businesses**												
	Low	26	8.5%	$9,456	12.3%	8.6%	15	8.9%	7.2%	$5,663	12.8%	6.7%	11	8.1%	7.2%	$3,793	11.6%	7.3%
	Moderate	24	7.9%	$5,818	7.6%	9.3%	16	9.5%	10.1%	$3,740	8.5%	7.3%	8	5.9%	9.7%	$2,078	6.3%	7.3%
	Middle	124	40.7%	$28,098	36.5%	43.2%	68	40.2%	44.8%	$15,796	35.8%	45.2%	56	41.2%	44.7%	$12,302	37.5%	45.3%
	Upper	105	34.4%	$26,823	34.9%	32.5%	56	33.1%	31.6%	$14,691	33.3%	31.3%	49	36.0%	32.3%	$12,132	37.0%	32.7%
	Unknown	26	8.5%	$6,747	8.8%	6.5%	14	8.3%	5.6%	$4,287	9.7%	9.1%	12	8.8%	5.2%	$2,460	7.5%	7.1%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.6%	$0	0.0%	0.3%	0	0.0%	0.9%	$0	0.0%	0.3%
	Total	*305*	*100.0%*	*$76,942*	*100.0%*	*100.0%*	*169*	*100.0%*	*100.0%*	*$44,177*	*100.0%*	*100.0%*	*136*	*100.0%*	*100.0%*	*$32,765*	*100.0%*	*100.0%*
SMALL FARM						**Total Farms**												
	Low	0	0.0%	$0	0.0%	0.3%	0	0.0%	1.4%	$0	0.0%	1.0%	0	0.0%	1.6%	$0	0.0%	0.4%
	Moderate	0	0.0%	$0	0.0%	4.1%	0	0.0%	1.4%	$0	0.0%	2.3%	0	0.0%	3.3%	$0	0.0%	4.8%
	Middle	2	100.0%	$120	100.0%	64.4%	1	100.0%	54.9%	$60	100.0%	68.8%	1	100.0%	60.7%	$60	100.0%	66.7%
	Upper	0	0.0%	$0	0.0%	31.2%	0	0.0%	42.3%	$0	0.0%	27.8%	0	0.0%	34.4%	$0	0.0%	28.2%
	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%
	Tr 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%
	Total	*2*	*100.0%*	*$120*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$60*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$60*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: MI - Ann Arbor MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	3	12.0%	$152	3.5%	22.7%	2	12.5%	8.4%	$124	4.6%	3.8%	1	11.1%	11.4%	$28	1.7%	5.4%
	Moderate	9	36.0%	$1,363	31.7%	17.0%	6	37.5%	20.9%	$1,099	40.8%	14.5%	3	33.3%	22.5%	$264	16.4%	16.5%
	Middle	6	24.0%	$1,116	25.9%	19.6%	3	18.8%	22.7%	$457	17.0%	21.2%	3	33.3%	23.7%	$659	40.9%	22.3%
	Upper	6	24.0%	$1,623	37.7%	40.7%	4	25.0%	37.4%	$964	35.8%	50.3%	2	22.2%	34.5%	$659	40.9%	47.5%
	Unknown	1	4.0%	$47	1.1%	0.0%	1	6.3%	10.6%	$47	1.7%	10.2%	0	0.0%	8.0%	$0	0.0%	8.2%
	Total	25	100.0%	$4,301	100.0%	100.0%	16	100.0%	100.0%	$2,691	100.0%	100.0%	9	100.0%	100.0%	$1,610	100.0%	100.0%
REFINANCE	Low	17	13.3%	$1,481	6.4%	22.7%	11	15.9%	10.7%	$915	7.9%	6.2%	6	10.2%	9.0%	$566	4.9%	4.7%
	Moderate	27	21.1%	$3,904	16.9%	17.0%	17	24.6%	22.1%	$2,322	20.0%	17.2%	10	16.9%	20.0%	$1,582	13.8%	14.6%
	Middle	27	21.1%	$4,035	17.5%	19.6%	14	20.3%	23.3%	$2,133	18.3%	21.5%	13	22.0%	24.7%	$1,902	16.6%	22.5%
	Upper	54	42.2%	$12,629	54.7%	40.7%	26	37.7%	34.6%	$6,208	53.4%	44.8%	28	47.5%	36.2%	$6,421	56.0%	47.5%
	Unknown	3	2.3%	$1,050	4.5%	0.0%	1	1.4%	9.3%	$50	0.4%	10.3%	2	3.4%	10.0%	$1,000	8.7%	10.6%
	Total	128	100.0%	$23,099	100.0%	100.0%	69	100.0%	100.0%	$11,628	100.0%	100.0%	59	100.0%	100.0%	$11,471	100.0%	100.0%
HOME IMPROVEMENT	Low	7	13.7%	$778	14.1%	22.7%	4	13.8%	6.8%	$403	15.0%	3.6%	3	13.6%	9.6%	$375	13.2%	6.1%
	Moderate	11	21.6%	$867	15.7%	17.0%	6	20.7%	15.8%	$586	21.7%	12.7%	5	22.7%	19.7%	$281	9.9%	13.6%
	Middle	9	17.6%	$1,287	23.3%	19.6%	5	17.2%	23.3%	$370	13.7%	17.9%	4	18.2%	23.0%	$917	32.4%	20.5%
	Upper	23	45.1%	$2,347	42.4%	40.7%	13	44.8%	51.0%	$1,086	40.3%	59.5%	10	45.5%	45.9%	$1,261	44.5%	57.6%
	Unknown	1	2.0%	$250	4.5%	0.0%	1	3.4%	3.2%	$250	9.3%	6.4%	0	0.0%	1.8%	$0	0.0%	2.3%
	Total	51	100.0%	$5,529	100.0%	100.0%	29	100.0%	100.0%	$2,695	100.0%	100.0%	22	100.0%	100.0%	$2,834	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	22.7%	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%	17.0%	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%	19.6%	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%	40.7%	0	0.0%	7.4%	$0	0.0%	0.3%	0	0.0%	6.1%	$0	0.0%	0.2%
	Unknown	1	100.0%	$225	100.0%	0.0%	0	0.0%	92.6%	$0	0.0%	99.7%	1	100.0%	93.9%	$225	100.0%	99.8%
	Total	1	100.0%	$225	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	1	100.0%	100.0%	$225	100.0%	100.0%
OTHER PURPOSE LOC	Low	10	17.2%	$786	12.3%	22.7%	6	18.8%	12.1%	$549	14.9%	6.7%	4	15.4%	12.2%	$237	8.8%	7.6%
	Moderate	10	17.2%	$813	12.8%	17.0%	5	15.6%	15.1%	$504	13.7%	10.7%	5	19.2%	19.5%	$309	11.5%	14.9%
	Middle	9	15.5%	$1,279	20.1%	19.6%	5	15.6%	21.7%	$749	20.4%	18.7%	4	15.4%	23.8%	$530	19.7%	17.7%
	Upper	29	50.0%	$3,492	54.8%	40.7%	16	50.0%	50.1%	$1,873	51.0%	63.2%	13	50.0%	43.9%	$1,619	60.1%	59.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.9%	$0	0.0%	0.6%	0	0.0%	0.5%	$0	0.0%	0.3%
	Total	58	100.0%	$6,370	100.0%	100.0%	32	100.0%	100.0%	$3,675	100.0%	100.0%	26	100.0%	100.0%	$2,695	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Ann Arbor MSA

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	22.7%	0	0.0%	11.3%	$0	0.0%	6.2%	0	0.0%	10.6%	$0	0.0%	5.3%
	Moderate	0	0.0%	$0	0.0%	17.0%	0	0.0%	20.9%	$0	0.0%	13.5%	0	0.0%	18.8%	$0	0.0%	13.0%
	Middle	0	0.0%	$0	0.0%	19.6%	0	0.0%	25.4%	$0	0.0%	20.1%	0	0.0%	29.3%	$0	0.0%	19.2%
	Upper	2	100.0%	$794	100.0%	40.7%	1	100.0%	36.7%	$194	100.0%	46.6%	1	100.0%	35.1%	$600	100.0%	43.6%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	5.6%	$0	0.0%	13.6%	0	0.0%	6.3%	$0	0.0%	18.9%
	Total	*2*	*100.0%*	*$794*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$194*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$600*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	22.7%	0	0.0%	5.1%	$0	0.0%	2.7%	0	0.0%	2.7%	$0	0.0%	0.9%
	Moderate	0	0.0%	$0	0.0%	17.0%	0	0.0%	2.2%	$0	0.0%	1.8%	0	0.0%	4.1%	$0	0.0%	1.8%
	Middle	0	0.0%	$0	0.0%	19.6%	0	0.0%	3.4%	$0	0.0%	3.4%	0	0.0%	12.2%	$0	0.0%	8.5%
	Upper	0	0.0%	$0	0.0%	40.7%	0	0.0%	6.2%	$0	0.0%	8.2%	0	0.0%	13.5%	$0	0.0%	13.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	83.1%	$0	0.0%	83.9%	0	0.0%	67.6%	$0	0.0%	74.9%
	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	37	14.0%	$3,197	7.9%	22.7%	23	15.6%	9.1%	$1,991	9.5%	4.1%	14	11.9%	10.2%	$1,206	6.2%	4.6%
	Moderate	57	21.5%	$6,947	17.2%	17.0%	34	23.1%	20.3%	$4,511	21.6%	13.6%	23	19.5%	21.0%	$2,436	12.5%	14.0%
	Middle	51	19.2%	$7,717	19.1%	19.6%	27	18.4%	22.6%	$3,709	17.8%	19.0%	24	20.3%	24.1%	$4,008	20.6%	20.0%
	Upper	114	43.0%	$20,885	51.8%	40.7%	60	40.8%	37.6%	$10,325	49.4%	44.3%	54	45.8%	36.0%	$10,560	54.3%	43.1%
	Unknown	6	2.3%	$1,572	3.9%	0.0%	3	2.0%	10.5%	$347	1.7%	18.9%	3	2.5%	8.8%	$1,225	6.3%	18.2%
	Total	*265*	*100.0%*	*$40,318*	*100.0%*	*100.0%*	*147*	*100.0%*	*100.0%*	*$20,883*	*100.0%*	*100.0%*	*118*	*100.0%*	*100.0%*	*$19,435*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	83	27.2%	$15,851	20.6%	90.9%	45	26.6%	45.8%	$9,926	22.5%	34.9%	38	27.9%	47.8%	$5,925	18.1%	32.8%
	Over $1 Million	123	40.3%	$43,801	56.9%	8.5%	63	37.3%					60	44.1%				
	Total Rev. available	*206*	*67.5%*	*$59,652*	*77.5%*	*99.4%*	*108*	*63.9%*					*98*	*72.0%*				
	Rev. Not Known	99	32.5%	$17,290	22.5%	0.6%	61	36.1%					38	27.9%				
	Total	*305*	*100.0%*	*$76,942*	*100.0%*	*100.0%*	*169*	*100.0%*					*136*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	153	50.2%	$8,338	10.8%		88	52.1%	94.8%	$4,694	10.6%	37.6%	65	47.8%	94.0%	$3,644	11.1%	35.9%
	$100,001 - $250,000	60	19.7%	$11,795	15.3%		29	17.2%	2.2%	$5,778	13.1%	11.6%	31	22.8%	2.8%	$6,017	18.4%	14.5%
	$250,001 - $1 Million	92	30.2%	$56,809	73.8%		52	30.8%	3.0%	$33,705	76.3%	50.7%	40	29.4%	3.2%	$23,104	70.5%	49.5%
	Total	*305*	*100.0%*	*$76,942*	*100.0%*		*169*	*100.0%*	*100.0%*	*$44,177*	*100.0%*	*100.0%*	*136*	*100.0%*	*100.0%*	*$32,765*	*100.0%*	*100.0%*
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	98.9%	0	0.0%	47.9%	$0	0.0%	65.8%	0	0.0%	59.0%	$0	0.0%	60.4%
	Over $1 Million	0	0.0%	$0	0.0%	0.8%	0	0.0%					0	0.0%				
	Not Known	2	100.0%	$120	100.0%	0.3%	1	100.0%					1	100.0%				
	Total	*2*	*100.0%*	*$120*	*100.0%*	*100.0%*	*1*	*100.0%*					*1*	*100.0%*				
Small Farm — Loan Size	$100,000 or Less	2	100.0%	$120	100.0%		1	100.0%	98.6%	$60	100.0%	78.3%	1	100.0%	95.1%	$60	100.0%	56.3%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	1.4%	$0	0.0%	21.7%	0	0.0%	3.3%	$0	0.0%	20.9%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	1.6%	$0	0.0%	22.8%
	Total	*2*	*100.0%*	*$120*	*100.0%*		*1*	*100.0%*	*100.0%*	*$60*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$60*	*100.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
		#	%	$ (000s)	$ %	%	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %
HOME PURCHASE	Low	1	11.1%	$52	4.3%	5.2%	1	33.3%	2.6%	$52	12.0%	1.2%	0	0.0%	2.1%	$0	0.0%	1.1%
	Moderate	1	11.1%	$81	6.7%	21.1%	1	33.3%	20.5%	$81	18.7%	12.8%	0	0.0%	20.7%	$0	0.0%	12.9%
	Middle	1	11.1%	$127	10.5%	42.7%	0	0.0%	41.0%	$0	0.0%	42.2%	1	16.7%	40.9%	$127	16.5%	41.5%
	Upper	6	66.7%	$945	78.4%	31.0%	1	33.3%	35.9%	$300	69.3%	43.8%	5	83.3%	36.3%	$645	83.5%	44.4%
	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	9	100.0%	$1,205	100.0%	100.0%	3	100.0%	100.0%	$433	100.0%	100.0%	6	100.0%	100.0%	$772	100.0%	100.0%
REFINANCE	Low	0	0.0%	$0	0.0%	5.2%	0	0.0%	1.5%	$0	0.0%	0.6%	0	0.0%	1.9%	$0	0.0%	0.6%
	Moderate	3	10.7%	$219	7.0%	21.1%	2	13.3%	15.8%	$147	8.9%	9.8%	1	7.7%	12.6%	$72	4.9%	6.8%
	Middle	7	25.0%	$713	22.8%	42.7%	4	26.7%	45.1%	$483	29.2%	45.7%	3	23.1%	45.6%	$230	15.6%	44.9%
	Upper	18	64.3%	$2,194	70.2%	31.0%	9	60.0%	37.6%	$1,023	61.9%	44.0%	9	69.2%	39.8%	$1,171	79.5%	47.6%
	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	28	100.0%	$3,126	100.0%	100.0%	15	100.0%	100.0%	$1,653	100.0%	100.0%	13	100.0%	100.0%	$1,473	100.0%	100.0%
HOME IMPROVEMENT	Low	3	8.6%	$87	4.4%	5.2%	2	11.1%	3.8%	$37	3.3%	2.1%	1	5.9%	3.3%	$50	5.8%	2.2%
	Moderate	7	20.0%	$118	5.9%	21.1%	1	5.6%	14.8%	$10	0.9%	10.8%	6	35.3%	18.2%	$108	12.4%	12.2%
	Middle	7	20.0%	$441	22.2%	42.7%	4	22.2%	37.2%	$202	18.0%	35.6%	3	17.6%	32.0%	$239	27.5%	34.9%
	Upper	18	51.4%	$1,342	67.5%	31.0%	11	61.1%	44.2%	$871	77.8%	51.5%	7	41.2%	46.5%	$471	54.3%	50.7%
	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	35	100.0%	$1,988	100.0%	100.0%	18	100.0%	100.0%	$1,120	100.0%	100.0%	17	100.0%	100.0%	$868	100.0%	100.0%
MULTI FAMILY					Multi-Family Units													
	Low	0	0.0%	$0	0.0%	10.2%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	7.1%	$0	0.0%	1.1%
	Moderate	0	0.0%	$0	0.0%	36.5%	0	0.0%	36.4%	$0	0.0%	9.9%	0	0.0%	42.9%	$0	0.0%	24.5%
	Middle	1	100.0%	$9,500	100.0%	29.5%	0	0.0%	54.5%	$0	0.0%	52.2%	1	100.0%	28.6%	$9,500	100.0%	18.7%
	Upper	0	0.0%	$0	0.0%	23.8%	0	0.0%	9.1%	$0	0.0%	37.9%	0	0.0%	21.4%	$0	0.0%	55.6%
	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	1	100.0%	$9,500	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	1	100.0%	100.0%	$9,500	100.0%	100.0%
OTHER PURPOSE LOC	Low	1	12.5%	$39	9.7%	5.2%	0	0.0%	1.5%	$0	0.0%	0.9%	1	33.3%	3.9%	$39	24.7%	3.5%
	Moderate	1	12.5%	$25	6.2%	21.1%	0	0.0%	22.7%	$0	0.0%	19.4%	1	33.3%	13.2%	$25	15.8%	11.7%
	Middle	3	37.5%	$189	46.9%	42.7%	2	40.0%	36.4%	$95	38.8%	48.1%	1	33.3%	43.4%	$94	59.5%	39.4%
	Upper	3	37.5%	$150	37.2%	31.0%	3	60.0%	39.4%	$150	61.2%	31.6%	0	0.0%	39.5%	$0	0.0%	45.3%
	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	8	100.0%	$403	100.0%	100.0%	5	100.0%	100.0%	$245	100.0%	100.0%	3	100.0%	100.0%	$158	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	5.2%	0	0.0%	6.7%	$0	0.0%	2.7%	0	0.0%	3.4%	$0	0.0%	2.2%
	Moderate	0	0.0%	$0	0.0%	21.1%	0	0.0%	13.5%	$0	0.0%	8.9%	0	0.0%	19.7%	$0	0.0%	15.7%
	Middle	0	0.0%	$0	0.0%	42.7%	0	0.0%	39.4%	$0	0.0%	30.6%	0	0.0%	33.3%	$0	0.0%	25.0%
	Upper	0	0.0%	$0	0.0%	31.0%	0	0.0%	40.4%	$0	0.0%	57.7%	0	0.0%	43.6%	$0	0.0%	57.1%
	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	*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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	5.2%	0	0.0%	6.7%	$0	0.0%	4.8%	0	0.0%	6.8%	$0	0.0%	4.9%
	Moderate	0	0.0%	$0	0.0%	21.1%	0	0.0%	34.8%	$0	0.0%	29.1%	0	0.0%	40.9%	$0	0.0%	34.5%
	Middle	0	0.0%	$0	0.0%	42.7%	0	0.0%	38.2%	$0	0.0%	41.7%	0	0.0%	40.9%	$0	0.0%	46.0%
	Upper	0	0.0%	$0	0.0%	31.0%	0	0.0%	20.2%	$0	0.0%	24.3%	0	0.0%	11.4%	$0	0.0%	14.7%
	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	5	6.2%	$178	1.1%	5.2%	3	7.3%	2.6%	$89	2.6%	1.0%	2	5.0%	2.3%	$89	0.7%	1.0%
	Moderate	12	14.8%	$443	2.7%	21.1%	4	9.8%	18.9%	$238	6.9%	12.0%	8	20.0%	18.0%	$205	1.6%	13.2%
	Middle	19	23.5%	$10,970	67.6%	42.7%	10	24.4%	41.6%	$780	22.6%	43.6%	9	22.5%	41.6%	$10,190	79.8%	38.4%
	Upper	45	55.6%	$4,631	28.5%	31.0%	24	58.5%	36.8%	$2,344	67.9%	43.3%	21	52.5%	38.2%	$2,287	17.9%	47.4%
	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	*81*	*100.0%*	*$16,222*	*100.0%*	*100.0%*	*41*	*100.0%*	*100.0%*	*$3,451*	*100.0%*	*100.0%*	*40*	*100.0%*	*100.0%*	*$12,771*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	22	15.6%	$2,874	9.2%	8.3%	12	16.2%	8.6%	$1,762	10.9%	8.0%	10	14.9%	6.3%	$1,112	7.3%	5.9%
	Moderate	68	48.2%	$15,906	50.6%	25.8%	34	45.9%	25.5%	$7,246	45.0%	32.4%	34	50.7%	24.4%	$8,660	56.6%	27.5%
	Middle	17	12.1%	$3,793	12.1%	34.9%	8	10.8%	33.2%	$1,463	9.1%	26.5%	9	13.4%	35.2%	$2,330	15.2%	33.9%
	Upper	34	24.1%	$8,832	28.1%	31.0%	20	27.0%	31.9%	$5,622	34.9%	32.8%	14	20.9%	32.7%	$3,210	21.0%	32.4%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.9%	$0	0.0%	0.3%	0	0.0%	1.4%	$0	0.0%	0.3%
	Total	*141*	*100.0%*	*$31,405*	*100.0%*	*100.0%*	*74*	*100.0%*	*100.0%*	*$16,093*	*100.0%*	*100.0%*	*67*	*100.0%*	*100.0%*	*$15,312*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	1.1%	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%	3.2%	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%	73.7%	0	0.0%	82.6%	$0	0.0%	74.7%	0	0.0%	77.6%	$0	0.0%	85.8%
	Upper	0	0.0%	$0	0.0%	22.0%	0	0.0%	17.4%	$0	0.0%	25.3%	0	0.0%	22.4%	$0	0.0%	14.2%
	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%
	Tr 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%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	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%	21.7%	0	0.0%	5.9%	$0	0.0%	3.1%	0	0.0%	9.7%	$0	0.0%	5.4%
	Moderate	2	22.2%	$133	11.0%	17.8%	2	66.7%	21.9%	$133	30.7%	14.7%	0	0.0%	26.0%	$0	0.0%	19.6%
	Middle	2	22.2%	$179	14.9%	19.6%	0	0.0%	24.0%	$0	0.0%	22.1%	2	33.3%	26.4%	$179	23.2%	26.5%
	Upper	5	55.6%	$893	74.1%	40.9%	1	33.3%	34.1%	$300	69.3%	45.8%	4	66.7%	27.2%	$593	76.8%	37.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	14.1%	$0	0.0%	14.3%	0	0.0%	10.6%	$0	0.0%	10.6%
	Total	*9*	*100.0%*	*$1,205*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$433*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$772*	*100.0%*	*100.0%*
REFINANCE	Low	4	14.3%	$243	7.8%	21.7%	2	13.3%	8.3%	$72	4.4%	4.1%	2	15.4%	9.8%	$171	11.6%	5.1%
	Moderate	3	10.7%	$237	7.6%	17.8%	2	13.3%	15.1%	$165	10.0%	10.5%	1	7.7%	17.6%	$72	4.9%	12.3%
	Middle	4	14.3%	$577	18.5%	19.6%	3	20.0%	22.6%	$406	24.6%	19.1%	1	7.7%	23.3%	$171	11.6%	20.3%
	Upper	16	57.1%	$1,959	62.7%	40.9%	7	46.7%	43.9%	$900	54.4%	56.1%	9	69.2%	35.3%	$1,059	71.9%	44.3%
	Unknown	1	3.6%	$110	3.5%	0.0%	1	6.7%	10.1%	$110	6.7%	10.3%	0	0.0%	14.1%	$0	0.0%	18.0%
	Total	*28*	*100.0%*	*$3,126*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*$1,653*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*$1,473*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	9	25.7%	$297	14.9%	21.7%	2	11.1%	12.6%	$28	2.5%	8.6%	7	41.2%	14.2%	$269	31.0%	9.7%
	Moderate	9	25.7%	$172	8.7%	17.8%	4	22.2%	20.2%	$67	6.0%	14.5%	5	29.4%	21.8%	$105	12.1%	18.6%
	Middle	7	20.0%	$334	16.8%	19.6%	6	33.3%	22.7%	$275	24.6%	20.0%	1	5.9%	22.9%	$59	6.8%	25.1%
	Upper	10	28.6%	$1,185	59.6%	40.9%	6	33.3%	43.2%	$750	67.0%	55.9%	4	23.5%	39.3%	$435	50.1%	44.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.3%	$0	0.0%	1.1%	0	0.0%	1.8%	$0	0.0%	1.8%
	Total	*35*	*100.0%*	*$1,988*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*$1,120*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*$868*	*100.0%*	*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	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.8%	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%	19.6%	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%	40.9%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Unknown	1	100.0%	$9,500	100.0%	0.0%	0	0.0%	100.0%	$0	0.0%	100.0%	1	100.0%	100.0%	$9,500	100.0%	100.0%
	Total	*1*	*100.0%*	*$9,500*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$9,500*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	2	25.0%	$49	12.2%	21.7%	1	20.0%	18.2%	$10	4.1%	12.0%	1	33.3%	11.8%	$39	24.7%	11.6%
	Moderate	2	25.0%	$119	29.5%	17.8%	0	0.0%	19.7%	$0	0.0%	16.4%	2	66.7%	21.1%	$119	75.3%	23.1%
	Middle	2	25.0%	$150	37.2%	19.6%	2	40.0%	21.2%	$150	61.2%	19.5%	0	0.0%	38.2%	$0	0.0%	41.8%
	Upper	2	25.0%	$85	21.1%	40.9%	2	40.0%	39.4%	$85	34.7%	51.2%	0	0.0%	28.9%	$0	0.0%	23.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.5%	$0	0.0%	1.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*8*	*100.0%*	*$403*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$245*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$158*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Battle Creek MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison												
		2018, 2019				2018						2019						
		Bank			Families by Family Income	Count			Dollar			Count			Dollar			
		Count		Dollar		Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	12.5%	$0	0.0%	7.4%	0	0.0%	12.8%	$0	0.0%	8.5%
	Moderate	0	0.0%	$0	0.0%	17.8%	0	0.0%	12.5%	$0	0.0%	8.7%	0	0.0%	19.7%	$0	0.0%	18.6%
	Middle	0	0.0%	$0	0.0%	19.6%	0	0.0%	24.0%	$0	0.0%	30.5%	0	0.0%	30.8%	$0	0.0%	29.3%
	Upper	0	0.0%	$0	0.0%	40.9%	0	0.0%	49.0%	$0	0.0%	50.6%	0	0.0%	33.3%	$0	0.0%	40.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.9%	$0	0.0%	2.8%	0	0.0%	3.4%	$0	0.0%	3.3%
	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%
PURPOSE NOT APPLICABLE	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	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.8%	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%	19.6%	0	0.0%	1.1%	$0	0.0%	2.4%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	40.9%	0	0.0%	1.1%	$0	0.0%	1.4%	0	0.0%	0.0%	$0	0.0%	0.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	97.8%	$0	0.0%	96.1%	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%	0	0.0%	100.0%	$0	0.0%	100.0%
HMDA TOTALS	Low	15	18.5%	$589	3.6%	21.7%	5	12.2%	7.4%	$110	3.2%	3.3%	10	25.0%	10.1%	$479	3.8%	4.6%
	Moderate	16	19.8%	$661	4.1%	17.8%	8	19.5%	19.0%	$365	10.6%	12.0%	8	20.0%	22.2%	$296	2.3%	14.1%
	Middle	15	18.5%	$1,240	7.6%	19.6%	11	26.8%	22.8%	$831	24.1%	19.2%	4	10.0%	25.1%	$409	3.2%	20.3%
	Upper	33	40.7%	$4,122	25.4%	40.9%	16	39.0%	37.2%	$2,035	59.0%	43.9%	17	42.5%	30.6%	$2,087	16.3%	33.4%
	Unknown	2	2.5%	$9,610	59.2%	0.0%	1	2.4%	13.7%	$110	3.2%	21.6%	1	2.5%	12.1%	$9,500	74.4%	27.6%
	Total	81	100.0%	$16,222	100.0%	100.0%	41	100.0%	100.0%	$3,451	100.0%	100.0%	40	100.0%	100.0%	$12,771	100.0%	100.0%
Small Business — Revenue					Total Businesses													
	$1 Million or Less	40	28.4%	$3,923	12.5%	89.0%	15	20.3%	42.9%	$1,089	6.8%	28.7%	25	37.3%	39.2%	$2,834	18.5%	29.2%
	Over $1 Million	73	51.8%	$22,071	70.3%	10.0%	42	56.8%					31	46.3%				
	Total Rev. available	113	80.2%	$25,994	82.8%	99.0%	57	77.1%					56	83.6%				
	Rev. Not Known	28	19.9%	$5,411	17.2%	1.0%	17	23.0%					11	16.4%				
	Total	141	100.0%	$31,405	100.0%	100.0%	74	100.0%					67	100.0%				
Small Business — Loan Size	$100,000 or Less	76	53.9%	$4,723	15.0%		44	59.5%	92.9%	$2,663	16.5%	35.6%	32	47.8%	92.1%	$2,060	13.5%	29.5%
	$100,001 - $250,000	25	17.7%	$4,657	14.8%		9	12.2%	4.4%	$1,728	10.7%	21.5%	16	23.9%	3.5%	$2,929	19.1%	13.9%
	$250,001 - $1 Million	40	28.4%	$22,025	70.1%		21	28.4%	2.7%	$11,702	72.7%	42.9%	19	28.4%	4.4%	$10,323	67.4%	56.6%
	Total	141	100.0%	$31,405	100.0%		74	100.0%	100.0%	$16,093	100.0%	100.0%	67	100.0%	100.0%	$15,312	100.0%	100.0%
Small Farm — Revenue					Total Farms													
	$1 Million or Less	0	0.0%	$0	0.0%	95.2%	0	0.0%	28.3%	$0	0.0%	47.4%	0	0.0%	32.7%	$0	0.0%	36.8%
	Over $1 Million	0	0.0%	$0	0.0%	4.3%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.5%	0	0.0%					0	0.0%				
	Total	0	0.0%	$0	0.0%	100.0%	0	0.0%					0	0.0%				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	87.0%	$0	0.0%	22.1%	0	0.0%	85.7%	$0	0.0%	23.1%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	8.7%	$0	0.0%	41.8%	0	0.0%	12.2%	$0	0.0%	63.0%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	4.3%	$0	0.0%	36.2%	0	0.0%	2.0%	$0	0.0%	13.9%
	Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: MI - Flint MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2018						2019					
		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%	8.5%	0	0.0%	1.6%	$0	0.0%	0.7%	0	0.0%	1.7%	$0	0.0%	0.7%
	Moderate	1	14.3%	$19	1.9%	14.9%	0	0.0%	5.1%	$0	0.0%	3.1%	1	16.7%	6.1%	$19	2.5%	3.3%
	Middle	2	28.6%	$192	18.8%	38.5%	0	0.0%	42.7%	$0	0.0%	33.3%	2	33.3%	42.9%	$192	24.9%	33.7%
	Upper	4	57.1%	$808	79.3%	38.1%	1	100.0%	50.5%	$247	100.0%	62.9%	3	50.0%	49.2%	$561	72.7%	62.3%
	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	*7*	*100.0%*	*$1,019*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$247*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$772*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	8.5%	0	0.0%	0.6%	$0	0.0%	0.2%	0	0.0%	0.7%	$0	0.0%	0.2%
	Moderate	0	0.0%	$0	0.0%	14.9%	0	0.0%	4.2%	$0	0.0%	1.9%	0	0.0%	3.4%	$0	0.0%	1.9%
	Middle	5	50.0%	$387	33.5%	38.5%	0	0.0%	37.2%	$0	0.0%	28.7%	5	55.6%	33.2%	$387	42.3%	24.3%
	Upper	5	50.0%	$767	66.5%	38.1%	1	100.0%	58.1%	$240	100.0%	69.1%	4	44.4%	62.7%	$527	57.7%	73.6%
	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	*10*	*100.0%*	*$1,154*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$240*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$914*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	8.5%	0	0.0%	2.1%	$0	0.0%	1.1%	0	0.0%	1.5%	$0	0.0%	0.6%
	Moderate	0	0.0%	$0	0.0%	14.9%	0	0.0%	6.7%	$0	0.0%	4.8%	0	0.0%	6.4%	$0	0.0%	3.1%
	Middle	2	33.3%	$195	48.4%	38.5%	1	25.0%	34.3%	$180	64.3%	28.3%	1	50.0%	35.8%	$15	12.2%	26.9%
	Upper	4	66.7%	$208	51.6%	38.1%	3	75.0%	56.9%	$100	35.7%	65.8%	1	50.0%	56.3%	$108	87.8%	69.3%
	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	*6*	*100.0%*	*$403*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$280*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$123*	*100.0%*	*100.0%*
MULTI FAMILY						**Multi-Family Units**												
	Low	0	0.0%	$0	0.0%	14.8%	0	0.0%	11.8%	$0	0.0%	1.1%	0	0.0%	20.0%	$0	0.0%	5.7%
	Moderate	0	0.0%	$0	0.0%	24.3%	0	0.0%	5.9%	$0	0.0%	2.8%	0	0.0%	25.0%	$0	0.0%	2.0%
	Middle	0	0.0%	$0	0.0%	35.7%	0	0.0%	47.1%	$0	0.0%	29.4%	0	0.0%	40.0%	$0	0.0%	84.1%
	Upper	0	0.0%	$0	0.0%	25.2%	0	0.0%	35.3%	$0	0.0%	66.7%	0	0.0%	15.0%	$0	0.0%	8.2%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	8.5%	0	0.0%	1.3%	$0	0.0%	0.5%	0	0.0%	1.1%	$0	0.0%	0.3%
	Moderate	0	0.0%	$0	0.0%	14.9%	0	0.0%	4.2%	$0	0.0%	1.9%	0	0.0%	8.7%	$0	0.0%	6.0%
	Middle	0	0.0%	$0	0.0%	38.5%	0	0.0%	35.0%	$0	0.0%	25.8%	0	0.0%	33.9%	$0	0.0%	27.5%
	Upper	3	100.0%	$259	100.0%	38.1%	2	100.0%	59.5%	$59	100.0%	71.8%	1	100.0%	56.3%	$200	100.0%	66.2%
	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%*	*$259*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$59*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$200*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Flint MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	8.5%	0	0.0%	3.7%	$0	0.0%	1.6%	0	0.0%	1.8%	$0	0.0%	1.4%
	Moderate	0	0.0%	$0	0.0%	14.9%	0	0.0%	6.0%	$0	0.0%	4.4%	0	0.0%	7.1%	$0	0.0%	6.7%
	Middle	1	100.0%	$47	100.0%	38.5%	0	0.0%	36.1%	$0	0.0%	30.1%	1	100.0%	43.1%	$47	100.0%	33.2%
	Upper	0	0.0%	$0	0.0%	38.1%	0	0.0%	54.2%	$0	0.0%	63.9%	0	0.0%	48.0%	$0	0.0%	58.7%
	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	*1*	*100.0%*	*$47*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$47*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	8.5%	0	0.0%	4.3%	$0	0.0%	2.0%	0	0.0%	6.1%	$0	0.0%	3.1%
	Moderate	0	0.0%	$0	0.0%	14.9%	0	0.0%	12.9%	$0	0.0%	6.8%	0	0.0%	16.1%	$0	0.0%	8.9%
	Middle	0	0.0%	$0	0.0%	38.5%	0	0.0%	42.7%	$0	0.0%	38.1%	0	0.0%	44.4%	$0	0.0%	43.1%
	Upper	0	0.0%	$0	0.0%	38.1%	0	0.0%	40.1%	$0	0.0%	53.1%	0	0.0%	33.3%	$0	0.0%	44.9%
	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%	8.5%	0	0.0%	1.5%	$0	0.0%	0.6%	0	0.0%	1.4%	$0	0.0%	1.0%
	Moderate	1	3.7%	$19	0.7%	14.9%	0	0.0%	5.1%	$0	0.0%	2.9%	1	5.3%	5.4%	$19	0.9%	2.8%
	Middle	10	37.0%	$821	28.5%	38.5%	1	12.5%	40.3%	$180	21.8%	31.7%	9	47.4%	38.9%	$641	31.2%	34.7%
	Upper	16	59.3%	$2,042	70.9%	38.1%	7	87.5%	53.0%	$646	78.2%	64.8%	9	47.4%	54.3%	$1,396	67.9%	61.5%
	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	*27*	*100.0%*	*$2,882*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$826*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*$2,056*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	6	10.3%	$1,022	5.6%	9.8%	2	6.5%	7.1%	$350	3.6%	7.2%	4	14.8%	6.5%	$672	7.7%	6.9%
	Moderate	3	5.2%	$613	3.3%	13.2%	1	3.2%	9.6%	$85	0.9%	11.5%	2	7.4%	10.2%	$528	6.0%	10.6%
	Middle	34	58.6%	$12,318	66.9%	43.0%	21	67.7%	42.4%	$7,517	77.9%	50.1%	13	48.1%	41.5%	$4,801	54.9%	50.5%
	Upper	14	24.1%	$3,619	19.7%	33.7%	7	22.6%	39.5%	$1,700	17.6%	30.7%	7	25.9%	40.4%	$1,919	21.9%	31.0%
	Unknown	1	1.7%	$831	4.5%	0.3%	0	0.0%	0.2%	$0	0.0%	0.1%	1	3.7%	0.2%	$831	9.5%	0.6%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	1.2%	$0	0.0%	0.3%	0	0.0%	1.1%	$0	0.0%	0.4%
	Total	*58*	*100.0%*	*$18,403*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*$9,652*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*$8,751*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	3.3%	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%	2.9%	0	0.0%	1.6%	$0	0.0%	1.3%	0	0.0%	3.8%	$0	0.0%	2.0%
	Middle	0	0.0%	$0	0.0%	39.7%	0	0.0%	38.7%	$0	0.0%	69.8%	0	0.0%	32.7%	$0	0.0%	59.6%
	Upper	0	0.0%	$0	0.0%	54.1%	0	0.0%	58.1%	$0	0.0%	28.8%	0	0.0%	61.5%	$0	0.0%	37.9%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	1.6%	$0	0.0%	0.3%	0	0.0%	1.9%	$0	0.0%	0.4%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Flint MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison				Bank & Aggregate Lending Comparison												
		2018, 2019				2018						2019						
		Bank			Families by Family Income	Count			Dollar			Count			Dollar			
		Count		Dollar		Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	1	14.3%	$19	1.9%	23.6%	0	0.0%	5.8%	$0	0.0%	2.7%	1	16.7%	5.3%	$19	2.5%	2.3%
	Moderate	3	42.9%	$270	26.5%	15.4%	0	0.0%	19.3%	$0	0.0%	13.1%	3	50.0%	19.6%	$270	35.0%	13.1%
	Middle	0	0.0%	$0	0.0%	20.0%	0	0.0%	25.1%	$0	0.0%	22.5%	0	0.0%	25.5%	$0	0.0%	22.6%
	Upper	0	0.0%	$0	0.0%	41.0%	0	0.0%	34.7%	$0	0.0%	47.6%	0	0.0%	36.9%	$0	0.0%	49.6%
	Unknown	3	42.9%	$730	71.6%	0.0%	1	100.0%	15.2%	$247	100.0%	14.1%	2	33.3%	12.7%	$483	62.6%	12.4%
	Total	7	100.0%	$1,019	100.0%	100.0%	1	100.0%	100.0%	$247	100.0%	100.0%	6	100.0%	100.0%	$772	100.0%	100.0%
REFINANCE	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	5.8%	$0	0.0%	3.1%	0	0.0%	3.9%	$0	0.0%	1.8%
	Moderate	7	70.0%	$509	44.1%	15.4%	0	0.0%	16.5%	$0	0.0%	11.9%	7	77.8%	12.5%	$509	55.7%	7.5%
	Middle	1	10.0%	$100	8.7%	20.0%	0	0.0%	24.4%	$0	0.0%	21.3%	1	11.1%	22.7%	$100	10.9%	18.0%
	Upper	1	10.0%	$240	20.8%	41.0%	1	100.0%	43.6%	$240	100.0%	53.1%	0	0.0%	46.5%	$0	0.0%	55.9%
	Unknown	1	10.0%	$305	26.4%	0.0%	0	0.0%	9.6%	$0	0.0%	10.6%	1	11.1%	14.3%	$305	33.4%	16.7%
	Total	10	100.0%	$1,154	100.0%	100.0%	1	100.0%	100.0%	$240	100.0%	100.0%	9	100.0%	100.0%	$914	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	8.0%	$0	0.0%	4.9%	0	0.0%	6.5%	$0	0.0%	3.6%
	Moderate	0	0.0%	$0	0.0%	15.4%	0	0.0%	13.4%	$0	0.0%	11.4%	0	0.0%	17.8%	$0	0.0%	11.4%
	Middle	3	50.0%	$245	60.8%	20.0%	2	50.0%	24.4%	$230	82.1%	21.5%	1	50.0%	24.1%	$15	12.2%	20.9%
	Upper	2	33.3%	$128	31.8%	41.0%	1	25.0%	50.7%	$20	7.1%	55.9%	1	50.0%	49.8%	$108	87.8%	62.0%
	Unknown	1	16.7%	$30	7.4%	0.0%	1	25.0%	3.5%	$30	10.7%	6.2%	0	0.0%	1.8%	$0	0.0%	2.1%
	Total	6	100.0%	$403	100.0%	100.0%	4	100.0%	100.0%	$280	100.0%	100.0%	2	100.0%	100.0%	$123	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	23.6%	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%	15.4%	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%	20.0%	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%	41.0%	0	0.0%	11.8%	$0	0.0%	0.2%	0	0.0%	5.0%	$0	0.0%	0.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	88.2%	$0	0.0%	99.8%	0	0.0%	95.0%	$0	0.0%	99.9%
	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%
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	6.5%	$0	0.0%	4.2%	0	0.0%	6.1%	$0	0.0%	5.2%
	Moderate	0	0.0%	$0	0.0%	15.4%	0	0.0%	17.2%	$0	0.0%	12.5%	0	0.0%	17.7%	$0	0.0%	13.4%
	Middle	0	0.0%	$0	0.0%	20.0%	0	0.0%	23.0%	$0	0.0%	17.6%	0	0.0%	21.3%	$0	0.0%	21.4%
	Upper	3	100.0%	$259	100.0%	41.0%	2	100.0%	52.4%	$59	100.0%	64.8%	1	100.0%	53.4%	$200	100.0%	59.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.0%	$0	0.0%	0.9%	0	0.0%	1.4%	$0	0.0%	0.9%
	Total	3	100.0%	$259	100.0%	100.0%	2	100.0%	100.0%	$59	100.0%	100.0%	1	100.0%	100.0%	$200	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Flint MSA

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	1	100.0%	$47	100.0%	23.6%	0	0.0%	5.4%	$0	0.0%	3.6%	1	100.0%	5.6%	$47	100.0%	3.6%
	Moderate	0	0.0%	$0	0.0%	15.4%	0	0.0%	18.3%	$0	0.0%	13.2%	0	0.0%	17.8%	$0	0.0%	14.8%
	Middle	0	0.0%	$0	0.0%	20.0%	0	0.0%	23.8%	$0	0.0%	17.5%	0	0.0%	26.0%	$0	0.0%	24.4%
	Upper	0	0.0%	$0	0.0%	41.0%	0	0.0%	44.4%	$0	0.0%	46.9%	0	0.0%	48.2%	$0	0.0%	52.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	8.0%	$0	0.0%	18.8%	0	0.0%	2.4%	$0	0.0%	4.9%
	Total	*1*	*100.0%*	*$47*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$47*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	23.6%	0	0.0%	0.7%	$0	0.0%	0.6%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	15.4%	0	0.0%	1.8%	$0	0.0%	1.2%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	20.0%	0	0.0%	3.6%	$0	0.0%	3.7%	0	0.0%	1.1%	$0	0.0%	1.8%
	Upper	0	0.0%	$0	0.0%	41.0%	0	0.0%	3.2%	$0	0.0%	2.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	90.7%	$0	0.0%	92.4%	0	0.0%	98.9%	$0	0.0%	98.2%
	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	2	7.4%	$66	2.3%	23.6%	0	0.0%	5.8%	$0	0.0%	2.6%	2	10.5%	4.8%	$66	3.2%	2.0%
	Moderate	10	37.0%	$779	27.0%	15.4%	0	0.0%	17.6%	$0	0.0%	11.5%	10	52.6%	16.5%	$779	37.9%	9.8%
	Middle	4	14.8%	$345	12.0%	20.0%	2	25.0%	24.2%	$230	27.8%	19.9%	2	10.5%	24.0%	$115	5.6%	18.8%
	Upper	6	22.2%	$627	21.8%	41.0%	4	50.0%	38.0%	$319	38.6%	44.9%	2	10.5%	41.2%	$308	15.0%	47.4%
	Unknown	5	18.5%	$1,065	37.0%	0.0%	2	25.0%	14.4%	$277	33.5%	21.1%	3	15.8%	13.5%	$788	38.3%	22.0%
	Total	*27*	*100.0%*	*$2,882*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$826*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*$2,056*	*100.0%*	*100.0%*
Small Business — Revenue (Total Businesses)	$1 Million or Less	12	20.7%	$2,405	13.1%	91.5%	6	19.4%	43.4%	$785	8.1%	27.1%	6	22.2%	45.6%	$1,620	18.5%	27.1%
	Over $1 Million	38	65.5%	$14,713	79.9%	7.8%	21	67.7%					17	63.0%				
	Total Rev. available	*50*	*86.2%*	*$17,118*	*93.0%*	*99.3%*	*27*	*87.1%*					*23*	*85.2%*				
	Rev. Not Known	8	13.8%	$1,285	7.0%	0.7%	4	12.9%					4	14.8%				
	Total	*58*	*100.0%*	*$18,403*	*100.0%*	*100.0%*	*31*	*100.0%*					*27*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	22	37.9%	$1,489	8.1%		13	41.9%	93.5%	$902	9.3%	36.4%	9	33.3%	94.1%	$587	6.7%	35.5%
	$100,001 - $250,000	14	24.1%	$2,884	15.7%		6	19.4%	3.6%	$1,275	13.2%	17.4%	8	29.6%	3.0%	$1,609	18.4%	14.6%
	$250,001 - $1 Million	22	37.9%	$14,030	76.2%		12	38.7%	2.9%	$7,475	77.4%	46.2%	10	37.0%	2.9%	$6,555	74.9%	49.9%
	Total	*58*	*100.0%*	*$18,403*	*100.0%*		*31*	*100.0%*	*100.0%*	*$9,652*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*$8,751*	*100.0%*	*100.0%*
Small Farm — Revenue (Total Farms)	$1 Million or Less	0	0.0%	$0	0.0%	98.6%	0	0.0%	43.5%	$0	0.0%	22.0%	0	0.0%	42.3%	$0	0.0%	18.9%
	Over $1 Million	0	0.0%	$0	0.0%	1.4%	0	0.0%					0	0.0%				
	Not Known	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%*					*0*	*0.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	95.2%	$0	0.0%	43.8%	0	0.0%	86.5%	$0	0.0%	25.4%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	3.2%	$0	0.0%	25.0%	0	0.0%	7.7%	$0	0.0%	30.6%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	1.6%	$0	0.0%	31.3%	0	0.0%	5.8%	$0	0.0%	43.9%
	Total	*0*	*0.0%*	*$0*	*0.0%*		*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count		Dollar			Count		Dollar			
							Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg	
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	1	2.6%	$103	1.0%	2.0%	1	4.2%	3.1%	$103	2.0%	1.8%	0	0.0%	3.0%	$0	0.0%	1.8%
	Moderate	5	12.8%	$633	6.2%	12.3%	3	12.5%	15.1%	$418	8.2%	10.6%	2	13.3%	14.7%	$215	4.3%	10.4%
	Middle	22	56.4%	$4,113	40.6%	53.4%	11	45.8%	53.0%	$2,142	42.0%	50.0%	11	73.3%	52.2%	$1,971	39.1%	48.8%
	Upper	11	28.2%	$5,285	52.2%	32.4%	9	37.5%	28.8%	$2,435	47.8%	37.6%	2	13.3%	30.2%	$2,850	56.6%	39.1%
	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	39	100.0%	$10,134	100.0%	100.0%	24	100.0%	100.0%	$5,098	100.0%	100.0%	15	100.0%	100.0%	$5,036	100.0%	100.0%
REFINANCE	Low	1	0.8%	$57	0.4%	2.0%	1	1.7%	1.8%	$57	0.8%	1.0%	0	0.0%	1.1%	$0	0.0%	0.6%
	Moderate	18	14.6%	$2,159	13.4%	12.3%	6	10.3%	13.2%	$643	9.2%	9.4%	12	18.5%	10.4%	$1,516	16.6%	6.9%
	Middle	66	53.7%	$7,813	48.5%	53.4%	32	55.2%	52.7%	$3,393	48.7%	49.1%	34	52.3%	51.3%	$4,420	48.4%	46.8%
	Upper	38	30.9%	$6,066	37.7%	32.4%	19	32.8%	32.3%	$2,868	41.2%	40.6%	19	29.2%	37.1%	$3,198	35.0%	45.7%
	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	123	100.0%	$16,095	100.0%	100.0%	58	100.0%	100.0%	$6,961	100.0%	100.0%	65	100.0%	100.0%	$9,134	100.0%	100.0%
HOME IMPROVEMENT	Low	1	1.5%	$42	0.9%	2.0%	0	0.0%	1.6%	$0	0.0%	1.5%	1	2.9%	1.7%	$42	1.7%	1.3%
	Moderate	7	10.8%	$350	7.3%	12.3%	6	20.0%	9.3%	$319	14.0%	6.9%	1	2.9%	9.6%	$31	1.2%	6.9%
	Middle	38	58.5%	$2,162	44.9%	53.4%	15	50.0%	52.0%	$789	34.5%	47.2%	23	65.7%	51.6%	$1,373	54.4%	46.5%
	Upper	19	29.2%	$2,256	46.9%	32.4%	9	30.0%	37.1%	$1,178	51.5%	44.4%	10	28.6%	37.2%	$1,078	42.7%	45.3%
	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	65	100.0%	$4,810	100.0%	100.0%	30	100.0%	100.0%	$2,286	100.0%	100.0%	35	100.0%	100.0%	$2,524	100.0%	100.0%
MULTI FAMILY					Multi-Family Units													
	Low	0	0.0%	$0	0.0%	4.4%	0	0.0%	8.4%	$0	0.0%	6.5%	0	0.0%	1.3%	$0	0.0%	0.1%
	Moderate	1	50.0%	$300	52.6%	31.3%	0	0.0%	22.1%	$0	0.0%	6.9%	1	50.0%	30.7%	$300	52.6%	11.7%
	Middle	0	0.0%	$0	0.0%	49.9%	0	0.0%	56.8%	$0	0.0%	76.2%	0	0.0%	52.0%	$0	0.0%	65.9%
	Upper	1	50.0%	$270	47.4%	14.4%	0	0.0%	12.6%	$0	0.0%	10.4%	1	50.0%	16.0%	$270	47.4%	22.3%
	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	2	100.0%	$570	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%	2	100.0%	100.0%	$570	100.0%	100.0%
OTHER PURPOSE LOC	Low	1	1.3%	$80	1.0%	2.0%	1	2.9%	1.9%	$80	2.3%	1.1%	0	0.0%	0.6%	$0	0.0%	0.2%
	Moderate	8	10.4%	$427	5.4%	12.3%	3	8.6%	9.4%	$215	6.3%	5.1%	5	11.9%	8.8%	$212	4.7%	4.5%
	Middle	49	63.6%	$5,120	65.0%	53.4%	25	71.4%	52.2%	$2,153	63.1%	46.3%	24	57.1%	49.1%	$2,967	66.4%	43.8%
	Upper	19	24.7%	$2,253	28.6%	32.4%	6	17.1%	36.4%	$965	28.3%	47.4%	13	31.0%	41.5%	$1,288	28.8%	51.4%
	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	77	100.0%	$7,880	100.0%	100.0%	35	100.0%	100.0%	$3,413	100.0%	100.0%	42	100.0%	100.0%	$4,467	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2

Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison										
		Bank				Owner Occupied Units	2018						2019				
		Count		Dollar			Count			Dollar			Count			Dollar	
							Bank	Agg		Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	2.0%	0	0.0%	2.5%	$0	0.0%	1.7%	0	0.0%	1.4%	$0	0.0%	1.2%
	Moderate	1	33.3%	$165	6.4%	12.3%	1	50.0%	12.0%	$165	7.6%	9.2%	0	0.0%	11.5%	$0	0.0%	6.4%
	Middle	1	33.3%	$425	16.4%	53.4%	0	0.0%	52.3%	$0	0.0%	47.9%	1	100.0%	55.1%	$425	100.0%	47.9%
	Upper	1	33.3%	$2,000	77.2%	32.4%	1	50.0%	33.2%	$2,000	92.4%	41.2%	0	0.0%	32.0%	$0	0.0%	44.5%
	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%*	*$2,590*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$2,165*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$425*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	2.0%	0	0.0%	5.2%	$0	0.0%	3.5%	0	0.0%	3.1%	$0	0.0%	1.1%
	Moderate	0	0.0%	$0	0.0%	12.3%	0	0.0%	20.8%	$0	0.0%	15.4%	0	0.0%	17.7%	$0	0.0%	12.5%
	Middle	0	0.0%	$0	0.0%	53.4%	0	0.0%	53.8%	$0	0.0%	53.2%	0	0.0%	59.2%	$0	0.0%	58.3%
	Upper	0	0.0%	$0	0.0%	32.4%	0	0.0%	20.2%	$0	0.0%	27.9%	0	0.0%	20.1%	$0	0.0%	28.0%
	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%
	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	4	1.3%	$282	0.7%	2.0%	3	2.0%	2.5%	$240	1.2%	2.0%	1	0.6%	2.0%	$42	0.2%	1.2%
	Moderate	40	12.9%	$4,034	9.6%	12.3%	19	12.8%	13.7%	$1,760	8.8%	9.8%	21	13.1%	12.4%	$2,274	10.3%	8.9%
	Middle	176	57.0%	$19,633	46.7%	53.4%	83	55.7%	52.8%	$8,477	42.5%	51.9%	93	58.1%	51.8%	$11,156	50.4%	48.8%
	Upper	89	28.8%	$18,130	43.1%	32.4%	44	29.5%	31.0%	$9,446	47.4%	36.3%	45	28.1%	33.9%	$8,684	39.2%	41.1%
	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	*309*	*100.0%*	*$42,079*	*100.0%*	*100.0%*	*149*	*100.0%*	*100.0%*	*$19,923*	*100.0%*	*100.0%*	*160*	*100.0%*	*100.0%*	*$22,156*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	25	6.2%	$6,343	5.3%	3.4%	15	7.2%	3.6%	$4,023	6.5%	4.4%	10	5.1%	3.6%	$2,320	4.0%	4.8%
	Moderate	68	16.7%	$22,997	19.2%	14.1%	35	16.8%	13.7%	$11,137	17.9%	16.5%	33	16.7%	14.0%	$11,860	20.6%	15.6%
	Middle	185	45.6%	$57,936	48.4%	49.2%	92	44.2%	48.6%	$28,200	45.4%	48.3%	93	47.0%	47.3%	$29,736	51.6%	48.1%
	Upper	128	31.5%	$32,489	27.1%	33.3%	66	31.7%	33.3%	$18,779	30.2%	30.7%	62	31.3%	34.0%	$13,710	23.8%	31.4%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.8%	$0	0.0%	0.2%	0	0.0%	1.1%	$0	0.0%	0.2%
	Total	*406*	*100.0%*	*$119,765*	*100.0%*	*100.0%*	*208*	*100.0%*	*100.0%*	*$62,139*	*100.0%*	*100.0%*	*198*	*100.0%*	*100.0%*	*$57,626*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.6%	$0	0.0%	1.8%	0	0.0%	0.9%	$0	0.0%	0.7%
	Moderate	0	0.0%	$0	0.0%	3.3%	0	0.0%	2.6%	$0	0.0%	1.0%	0	0.0%	3.1%	$0	0.0%	0.5%
	Middle	0	0.0%	$0	0.0%	60.7%	0	0.0%	68.4%	$0	0.0%	75.8%	0	0.0%	61.6%	$0	0.0%	69.0%
	Upper	0	0.0%	$0	0.0%	35.7%	0	0.0%	27.8%	$0	0.0%	21.3%	0	0.0%	33.7%	$0	0.0%	29.7%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.6%	$0	0.0%	0.1%	0	0.0%	0.6%	$0	0.0%	0.1%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	5	12.8%	$580	5.7%	18.7%	5	20.8%	8.7%	$580	11.4%	4.9%	0	0.0%	7.8%	$0	0.0%	4.4%
	Moderate	14	35.9%	$1,981	19.5%	17.4%	10	41.7%	23.4%	$1,450	28.4%	17.0%	4	26.7%	23.9%	$531	10.5%	17.4%
	Middle	4	10.3%	$674	6.7%	22.1%	1	4.2%	23.4%	$217	4.3%	21.3%	3	20.0%	25.2%	$457	9.1%	22.4%
	Upper	13	33.3%	$5,726	56.5%	41.8%	7	29.2%	33.6%	$2,101	41.2%	46.6%	6	40.0%	35.1%	$3,625	72.0%	47.8%
	Unknown	3	7.7%	$1,173	11.6%	0.0%	1	4.2%	10.9%	$750	14.7%	10.1%	2	13.3%	8.0%	$423	8.4%	8.0%
	Total	*39*	*100.0%*	*$10,134*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*$5,098*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*$5,036*	*100.0%*	*100.0%*
REFINANCE	Low	19	15.4%	$1,427	8.9%	18.7%	8	13.8%	10.2%	$497	7.1%	6.4%	11	16.9%	6.7%	$930	10.2%	3.5%
	Moderate	32	26.0%	$3,109	19.3%	17.4%	17	29.3%	22.8%	$1,584	22.8%	18.1%	15	23.1%	19.1%	$1,525	16.7%	13.4%
	Middle	25	20.3%	$3,492	21.7%	22.1%	10	17.2%	23.2%	$1,090	15.7%	21.2%	15	23.1%	23.9%	$2,402	26.3%	20.5%
	Upper	38	30.9%	$6,772	42.1%	41.8%	19	32.8%	33.9%	$3,140	45.1%	44.2%	19	29.2%	40.2%	$3,632	39.8%	51.5%
	Unknown	9	7.3%	$1,295	8.0%	0.0%	4	6.9%	10.0%	$650	9.3%	10.2%	5	7.7%	10.0%	$645	7.1%	11.2%
	Total	*123*	*100.0%*	*$16,095*	*100.0%*	*100.0%*	*58*	*100.0%*	*100.0%*	*$6,961*	*100.0%*	*100.0%*	*65*	*100.0%*	*100.0%*	*$9,134*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	12	18.5%	$599	12.5%	18.7%	5	16.7%	6.7%	$276	12.1%	4.5%	7	20.0%	6.6%	$323	12.8%	4.7%
	Moderate	15	23.1%	$776	16.1%	17.4%	4	13.3%	18.9%	$135	5.9%	13.9%	11	31.4%	18.7%	$641	25.4%	14.0%
	Middle	15	23.1%	$1,183	24.6%	22.1%	11	36.7%	27.3%	$953	41.7%	23.3%	4	11.4%	26.1%	$230	9.1%	21.9%
	Upper	21	32.3%	$2,167	45.1%	41.8%	9	30.0%	44.6%	$887	38.8%	53.4%	12	34.3%	46.4%	$1,280	50.7%	56.7%
	Unknown	2	3.1%	$85	1.8%	0.0%	1	3.3%	2.6%	$35	1.5%	4.9%	1	2.9%	2.2%	$50	2.0%	2.7%
	Total	*65*	*100.0%*	*$4,810*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*$2,286*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*$2,524*	*100.0%*	*100.0%*
MULTI FAMILY	Low	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%
	Moderate	0	0.0%	$0	0.0%	17.4%	0	0.0%	1.1%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	22.1%	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%	41.8%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	6.7%	$0	0.0%	0.6%
	Unknown	2	100.0%	$570	100.0%	0.0%	0	0.0%	98.9%	$0	0.0%	100.0%	2	100.0%	93.3%	$570	100.0%	99.4%
	Total	*2*	*100.0%*	*$570*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$570*	*100.0%*	*100.0%*
OTHER PURPOSE LOC	Low	9	11.7%	$501	6.4%	18.7%	6	17.1%	8.7%	$365	10.7%	4.5%	3	7.1%	8.3%	$136	3.0%	4.4%
	Moderate	19	24.7%	$1,452	18.4%	17.4%	6	17.1%	18.6%	$423	12.4%	11.7%	13	31.0%	18.3%	$1,029	23.0%	12.3%
	Middle	15	19.5%	$1,114	14.1%	22.1%	9	25.7%	25.1%	$533	15.6%	20.6%	6	14.3%	23.9%	$581	13.0%	19.2%
	Upper	32	41.6%	$4,702	59.7%	41.8%	14	40.0%	45.4%	$2,092	61.3%	61.6%	18	42.9%	47.0%	$2,610	58.4%	61.4%
	Unknown	2	2.6%	$111	1.4%	0.0%	0	0.0%	2.2%	$0	0.0%	1.6%	2	4.8%	2.6%	$111	2.5%	2.6%
	Total	*77*	*100.0%*	*$7,880*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*$3,413*	*100.0%*	*100.0%*	*42*	*100.0%*	*100.0%*	*$4,467*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Grand Rapids-Wyoming

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count		Bank Dollar		Families by Family Income	2018 Count Bank		Agg	2018 Dollar Bank		Agg	2019 Count Bank		Agg	2019 Dollar Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	18.7%	0	0.0%	8.8%	$0	0.0%	5.4%	0	0.0%	8.4%	$0	0.0%	5.6%
	Moderate	0	0.0%	$0	0.0%	17.4%	0	0.0%	21.4%	$0	0.0%	13.7%	0	0.0%	19.2%	$0	0.0%	12.7%
	Middle	0	0.0%	$0	0.0%	22.1%	0	0.0%	25.9%	$0	0.0%	16.6%	0	0.0%	28.6%	$0	0.0%	19.5%
	Upper	3	100.0%	$2,590	100.0%	41.8%	2	100.0%	39.5%	$2,165	100.0%	55.9%	1	100.0%	41.1%	$425	100.0%	58.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	4.4%	$0	0.0%	8.4%	0	0.0%	2.6%	$0	0.0%	4.0%
	Total	*3*	*100.0%*	*$2,590*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$2,165*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$425*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	18.7%	0	0.0%	2.6%	$0	0.0%	1.7%	0	0.0%	1.0%	$0	0.0%	0.3%
	Moderate	0	0.0%	$0	0.0%	17.4%	0	0.0%	6.3%	$0	0.0%	4.9%	0	0.0%	1.4%	$0	0.0%	2.1%
	Middle	0	0.0%	$0	0.0%	22.1%	0	0.0%	4.0%	$0	0.0%	2.0%	0	0.0%	1.0%	$0	0.0%	1.0%
	Upper	0	0.0%	$0	0.0%	41.8%	0	0.0%	4.6%	$0	0.0%	3.4%	0	0.0%	2.0%	$0	0.0%	3.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	82.5%	$0	0.0%	87.9%	0	0.0%	94.6%	$0	0.0%	92.9%
	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	45	14.6%	$3,107	7.4%	18.7%	24	16.1%	8.8%	$1,718	8.6%	4.8%	21	13.1%	7.2%	$1,389	6.3%	3.8%
	Moderate	80	25.9%	$7,318	17.4%	17.4%	37	24.8%	22.2%	$3,592	18.0%	15.3%	43	26.9%	21.1%	$3,726	16.8%	14.7%
	Middle	59	19.1%	$6,463	15.4%	22.1%	31	20.8%	23.5%	$2,793	14.0%	19.2%	28	17.5%	24.6%	$3,670	16.6%	20.3%
	Upper	107	34.6%	$21,957	52.2%	41.8%	51	34.2%	35.1%	$10,385	52.1%	42.3%	56	35.0%	38.4%	$11,572	52.2%	47.1%
	Unknown	18	5.8%	$3,234	7.7%	0.0%	6	4.0%	10.5%	$1,435	7.2%	18.4%	12	7.5%	8.7%	$1,799	8.1%	14.2%
	Total	*309*	*100.0%*	*$42,079*	*100.0%*	*100.0%*	*149*	*100.0%*	*100.0%*	*$19,923*	*100.0%*	*100.0%*	*160*	*100.0%*	*100.0%*	*$22,156*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	55	13.5%	$9,974	8.3%	88.1%	28	13.5%	42.1%	$4,990	8.0%	27.1%	27	13.6%	43.2%	$4,984	8.6%	24.0%
	Over $1 Million	270	66.5%	$93,962	78.5%	11.2%	135	64.9%					135	68.2%				
	Total Rev. available	*325*	*80.0%*	*$103,936*	*86.8%*	*99.3%*	*163*	*78.4%*					*162*	*81.8%*				
	Rev. Not Known	81	20.0%	$15,829	13.2%	0.7%	45	21.6%					36	18.2%				
	Total	*406*	*100.0%*	*$119,765*	*100.0%*	*100.0%*	*208*	*100.0%*					*198*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	187	46.1%	$10,947	9.1%		100	48.1%	85.8%	$5,872	9.4%	21.5%	87	43.9%	86.8%	$5,075	8.8%	21.6%
	$100,001 - $250,000	68	16.7%	$13,278	11.1%		31	14.9%	6.6%	$5,980	9.6%	16.9%	37	18.7%	5.4%	$7,298	12.7%	14.4%
	$250,001 - $1 Million	151	37.2%	$95,540	79.8%		77	37.0%	7.7%	$50,287	80.9%	61.5%	74	37.4%	7.7%	$45,253	78.5%	64.0%
	Total	*406*	*100.0%*	*$119,765*	*100.0%*		*208*	*100.0%*	*100.0%*	*$62,139*	*100.0%*	*100.0%*	*198*	*100.0%*	*100.0%*	*$57,626*	*100.0%*	*100.0%*
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	92.3%	0	0.0%	39.3%	$0	0.0%	39.4%	0	0.0%	44.6%	$0	0.0%	44.8%
	Over $1 Million	0	0.0%	$0	0.0%	7.7%	0	0.0%					0	0.0%				
	Not Known	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%*					*0*	*0.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	81.8%	$0	0.0%	21.1%	0	0.0%	85.8%	$0	0.0%	27.2%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	8.9%	$0	0.0%	24.0%	0	0.0%	9.0%	$0	0.0%	33.2%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	9.3%	$0	0.0%	54.9%	0	0.0%	5.3%	$0	0.0%	39.6%
	Total	*0*	*0.0%*	*$0*	*0.0%*		*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
							2018						2019					
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg		Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	3	10.0%	$218	6.5%	5.7%	1	6.7%	4.2%	$106	6.2%	1.7%	2	13.3%	4.3%	$112	6.9%	1.9%
	Moderate	8	26.7%	$516	15.5%	15.6%	3	20.0%	17.0%	$229	13.4%	10.9%	5	33.3%	16.9%	$287	17.7%	11.4%
	Middle	15	50.0%	$2,079	62.3%	53.7%	9	60.0%	52.5%	$1,099	64.1%	55.0%	6	40.0%	50.7%	$980	60.4%	52.2%
	Upper	4	13.3%	$524	15.7%	25.0%	2	13.3%	26.2%	$281	16.4%	32.4%	2	13.3%	28.1%	$243	15.0%	34.6%
	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	*30*	*100.0%*	*$3,337*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*$1,715*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*$1,622*	*100.0%*	*100.0%*
REFINANCE	Low	1	1.6%	$50	0.9%	5.7%	1	3.1%	1.9%	$50	1.7%	0.7%	0	0.0%	1.6%	$0	0.0%	0.6%
	Moderate	8	12.5%	$490	8.4%	15.6%	5	15.6%	12.9%	$314	10.9%	9.8%	3	9.4%	11.3%	$176	6.0%	7.8%
	Middle	41	64.1%	$3,695	63.4%	53.7%	22	68.8%	56.6%	$2,035	70.6%	55.2%	19	59.4%	55.0%	$1,660	56.4%	54.4%
	Upper	14	21.9%	$1,593	27.3%	25.0%	4	12.5%	28.7%	$485	16.8%	34.3%	10	31.3%	32.1%	$1,108	37.6%	37.3%
	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	*64*	*100.0%*	*$5,828*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*$2,884*	*100.0%*	*100.0%*	*32*	*100.0%*	*100.0%*	*$2,944*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	4	6.5%	$92	2.6%	5.7%	3	7.9%	6.8%	$66	3.6%	3.2%	1	4.2%	3.2%	$26	1.6%	1.8%
	Moderate	5	8.1%	$172	4.9%	15.6%	5	13.2%	14.2%	$172	9.3%	10.3%	0	0.0%	11.1%	$0	0.0%	8.8%
	Middle	40	64.5%	$2,584	73.8%	53.7%	21	55.3%	50.5%	$1,218	66.2%	51.8%	19	79.2%	60.1%	$1,366	82.4%	66.8%
	Upper	13	21.0%	$651	18.6%	25.0%	9	23.7%	28.5%	$385	20.9%	34.8%	4	16.7%	25.6%	$266	16.0%	22.6%
	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	*62*	*100.0%*	*$3,499*	*100.0%*	*100.0%*	*38*	*100.0%*	*100.0%*	*$1,841*	*100.0%*	*100.0%*	*24*	*100.0%*	*100.0%*	*$1,658*	*100.0%*	*100.0%*
MULTI FAMILY					**Multi-Family Units**													
	Low	0	0.0%	$0	0.0%	11.2%	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%	43.9%	0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	44.4%	$0	0.0%	22.8%
	Middle	0	0.0%	$0	0.0%	29.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	55.6%	$0	0.0%	77.2%
	Upper	0	0.0%	$0	0.0%	15.9%	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%
	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%*
OTHER PURPOSE LOC	Low	1	1.6%	$23	0.5%	5.7%	1	2.9%	2.4%	$23	0.9%	1.3%	0	0.0%	3.3%	$0	0.0%	1.5%
	Moderate	9	14.3%	$335	6.9%	15.6%	6	17.1%	9.5%	$211	8.0%	5.6%	3	10.7%	12.7%	$124	5.6%	8.3%
	Middle	31	49.2%	$2,753	56.7%	53.7%	18	51.4%	56.2%	$1,655	62.9%	61.1%	13	46.4%	46.7%	$1,098	49.4%	51.2%
	Upper	22	34.9%	$1,742	35.9%	25.0%	10	28.6%	32.0%	$741	28.2%	32.0%	12	42.9%	37.3%	$1,001	45.0%	39.0%
	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%
	Total	*63*	*100.0%*	*$4,853*	*100.0%*	*100.0%*	*35*	*100.0%*	*100.0%*	*$2,630*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*$2,223*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Jackson MSA

Product Type	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	5.7%	0	0.0%	3.9%	$0	0.0%	3.3%	0	0.0%	1.3%	$0	0.0%	1.0%
	Moderate	0	0.0%	$0	0.0%	15.6%	0	0.0%	12.7%	$0	0.0%	7.9%	0	0.0%	12.9%	$0	0.0%	7.8%
	Middle	2	66.7%	$230	71.2%	53.7%	1	50.0%	55.8%	$160	63.2%	56.8%	1	100.0%	60.0%	$70	100.0%	58.9%
	Upper	1	33.3%	$93	28.8%	25.0%	1	50.0%	27.6%	$93	36.8%	32.0%	0	0.0%	25.8%	$0	0.0%	32.3%
	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	3	100.0%	$323	100.0%	100.0%	2	100.0%	100.0%	$253	100.0%	100.0%	1	100.0%	100.0%	$70	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	5.7%	0	0.0%	8.2%	$0	0.0%	3.9%	0	0.0%	10.7%	$0	0.0%	7.1%
	Moderate	0	0.0%	$0	0.0%	15.6%	0	0.0%	17.3%	$0	0.0%	15.7%	0	0.0%	19.6%	$0	0.0%	13.1%
	Middle	0	0.0%	$0	0.0%	53.7%	0	0.0%	46.9%	$0	0.0%	50.3%	0	0.0%	48.2%	$0	0.0%	55.7%
	Upper	0	0.0%	$0	0.0%	25.0%	0	0.0%	27.6%	$0	0.0%	30.1%	0	0.0%	21.4%	$0	0.0%	24.1%
	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	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	9	4.1%	$383	2.1%	5.7%	6	4.9%	3.8%	$245	2.6%	1.6%	3	3.0%	3.2%	$138	1.6%	1.3%
	Moderate	30	13.5%	$1,513	8.5%	15.6%	19	15.6%	15.2%	$926	9.9%	11.3%	11	11.0%	14.4%	$587	6.9%	10.2%
	Middle	129	58.1%	$11,341	63.6%	53.7%	71	58.2%	53.5%	$6,167	66.1%	54.5%	58	58.0%	52.9%	$5,174	60.7%	54.0%
	Upper	54	24.3%	$4,603	25.8%	25.0%	26	21.3%	27.4%	$1,985	21.3%	32.6%	28	28.0%	29.5%	$2,618	30.7%	34.5%
	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	222	100.0%	$17,840	100.0%	100.0%	122	100.0%	100.0%	$9,323	100.0%	100.0%	100	100.0%	100.0%	$8,517	100.0%	100.0%
SMALL BUSINESSES	Total Businesses → Low	53	17.7%	$16,653	22.9%	10.2%	33	21.7%	10.2%	$10,483	29.6%	23.1%	20	13.5%	9.9%	$6,170	16.5%	13.9%
	Moderate	102	34.0%	$21,281	29.3%	28.2%	49	32.2%	24.2%	$9,355	26.4%	26.5%	53	35.8%	26.6%	$11,926	32.0%	29.0%
	Middle	84	28.0%	$22,409	30.8%	40.7%	41	27.0%	41.8%	$10,273	29.0%	35.8%	43	29.1%	41.2%	$12,136	32.5%	39.6%
	Upper	61	20.3%	$12,403	17.0%	20.9%	29	19.1%	22.8%	$5,342	15.1%	14.1%	32	21.6%	21.1%	$7,061	18.9%	16.9%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	1.0%	$0	0.0%	0.4%	0	0.0%	1.3%	$0	0.0%	0.6%
	Total	300	100.0%	$72,746	100.0%	100.0%	152	100.0%	100.0%	$35,453	100.0%	100.0%	148	100.0%	100.0%	$37,293	100.0%	100.0%
SMALL FARM	Total Farms → Low	0	0.0%	$0	0.0%	0.5%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	2	28.6%	$900	56.1%	2.4%	1	33.3%	5.7%	$450	50.2%	16.5%	1	25.0%	2.1%	$450	63.7%	5.3%
	Middle	5	71.4%	$703	43.9%	70.5%	2	66.7%	74.3%	$447	49.8%	68.4%	3	75.0%	78.7%	$256	36.3%	40.8%
	Upper	0	0.0%	$0	0.0%	26.6%	0	0.0%	20.0%	$0	0.0%	15.2%	0	0.0%	19.1%	$0	0.0%	53.8%
	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%
	Tr 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%
	Total	7	100.0%	$1,603	100.0%	100.0%	3	100.0%	100.0%	$897	100.0%	100.0%	4	100.0%	100.0%	$706	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Jackson MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	6	20.0%	$482	14.4%	22.3%	1	6.7%	8.9%	$70	4.1%	4.3%	5	33.3%	8.9%	$412	25.4%	4.9%
	Moderate	7	23.3%	$506	15.2%	17.5%	3	20.0%	19.1%	$319	18.6%	14.1%	4	26.7%	24.0%	$187	11.5%	17.5%
	Middle	10	33.3%	$1,139	34.1%	20.2%	8	53.3%	27.6%	$932	54.3%	25.9%	2	13.3%	25.0%	$207	12.8%	24.8%
	Upper	7	23.3%	$1,210	36.3%	40.0%	3	20.0%	31.5%	$394	23.0%	42.9%	4	26.7%	30.8%	$816	50.3%	42.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	12.9%	$0	0.0%	12.8%	0	0.0%	11.3%	$0	0.0%	10.8%
	Total	30	100.0%	$3,337	100.0%	100.0%	15	100.0%	100.0%	$1,715	100.0%	100.0%	15	100.0%	100.0%	$1,622	100.0%	100.0%
REFINANCE	Low	6	9.4%	$230	3.9%	22.3%	3	9.4%	9.2%	$88	3.1%	5.4%	3	9.4%	7.5%	$142	4.8%	3.6%
	Moderate	19	29.7%	$1,508	25.9%	17.5%	11	34.4%	18.5%	$998	34.6%	14.6%	8	25.0%	17.5%	$510	17.3%	12.7%
	Middle	11	17.2%	$1,000	17.2%	20.2%	5	15.6%	23.9%	$537	18.6%	23.2%	6	18.8%	21.1%	$463	15.7%	18.4%
	Upper	25	39.1%	$2,868	49.2%	40.0%	13	40.6%	38.6%	$1,261	43.7%	46.7%	12	37.5%	38.2%	$1,607	54.6%	47.9%
	Unknown	3	4.7%	$222	3.8%	0.0%	0	0.0%	9.7%	$0	0.0%	10.1%	3	9.4%	15.7%	$222	7.5%	17.5%
	Total	64	100.0%	$5,828	100.0%	100.0%	32	100.0%	100.0%	$2,884	100.0%	100.0%	32	100.0%	100.0%	$2,944	100.0%	100.0%
HOME IMPROVEMENT	Low	10	16.1%	$370	10.6%	22.3%	7	18.4%	12.1%	$279	15.2%	6.2%	3	12.5%	7.9%	$91	5.5%	4.7%
	Moderate	9	14.5%	$512	14.6%	17.5%	6	15.8%	18.0%	$212	11.5%	12.8%	3	12.5%	16.8%	$300	18.1%	14.6%
	Middle	20	32.3%	$1,180	33.7%	20.2%	12	31.6%	25.8%	$556	30.2%	22.1%	8	33.3%	26.3%	$624	37.6%	25.1%
	Upper	23	37.1%	$1,437	41.1%	40.0%	13	34.2%	41.2%	$794	43.1%	54.8%	10	41.7%	47.8%	$643	38.8%	55.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	3.0%	$0	0.0%	4.2%	0	0.0%	1.3%	$0	0.0%	0.6%
	Total	62	100.0%	$3,499	100.0%	100.0%	38	100.0%	100.0%	$1,841	100.0%	100.0%	24	100.0%	100.0%	$1,658	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	22.3%	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%	17.5%	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%	20.2%	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%	40.0%	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%	100.0%	$0	0.0%	100.0%	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%	0	0.0%	100.0%	$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	10	15.9%	$409	8.4%	22.3%	5	14.3%	10.7%	$175	6.7%	7.8%	5	17.9%	12.7%	$234	10.5%	9.2%
	Moderate	11	17.5%	$491	10.1%	17.5%	8	22.9%	25.4%	$366	13.9%	20.1%	3	10.7%	18.0%	$125	5.6%	11.9%
	Middle	18	28.6%	$1,205	24.8%	20.2%	9	25.7%	23.1%	$525	20.0%	23.6%	9	32.1%	26.7%	$680	30.6%	31.1%
	Upper	21	33.3%	$2,649	54.6%	40.0%	10	28.6%	39.1%	$1,465	55.7%	47.5%	11	39.3%	42.0%	$1,184	53.3%	47.6%
	Unknown	3	4.8%	$99	2.0%	0.0%	3	8.6%	1.8%	$99	3.8%	1.0%	0	0.0%	0.7%	$0	0.0%	0.2%
	Total	63	100.0%	$4,853	100.0%	100.0%	35	100.0%	100.0%	$2,630	100.0%	100.0%	28	100.0%	100.0%	$2,223	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Jackson MSA

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	1	33.3%	$70	21.7%	22.3%	0	0.0%	11.6%	$0	0.0%	10.4%	1	100.0%	7.7%	$70	100.0%	4.3%
	Moderate	0	0.0%	$0	0.0%	17.5%	0	0.0%	19.9%	$0	0.0%	13.6%	0	0.0%	17.4%	$0	0.0%	14.1%
	Middle	1	33.3%	$160	49.5%	20.2%	1	50.0%	25.4%	$160	63.2%	21.3%	0	0.0%	27.1%	$0	0.0%	19.3%
	Upper	1	33.3%	$93	28.8%	40.0%	1	50.0%	39.8%	$93	36.8%	48.6%	0	0.0%	45.8%	$0	0.0%	60.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	3.3%	$0	0.0%	6.0%	0	0.0%	1.9%	$0	0.0%	1.8%
	Total	*3*	*100.0%*	*$323*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$253*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$70*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	22.3%	0	0.0%	1.0%	$0	0.0%	0.8%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.5%	0	0.0%	6.1%	$0	0.0%	4.4%	0	0.0%	1.8%	$0	0.0%	1.5%
	Middle	0	0.0%	$0	0.0%	20.2%	0	0.0%	4.1%	$0	0.0%	2.7%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	40.0%	0	0.0%	3.1%	$0	0.0%	5.6%	0	0.0%	1.8%	$0	0.0%	4.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	85.7%	$0	0.0%	86.5%	0	0.0%	96.4%	$0	0.0%	94.3%
	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	33	14.9%	$1,561	8.8%	22.3%	16	13.1%	9.3%	$612	6.6%	4.8%	17	17.0%	8.3%	$949	11.1%	4.3%
	Moderate	46	20.7%	$3,017	16.9%	17.5%	28	23.0%	18.8%	$1,895	20.3%	14.1%	18	18.0%	20.7%	$1,122	13.2%	15.0%
	Middle	60	27.0%	$4,684	26.3%	20.2%	35	28.7%	25.7%	$2,710	29.1%	24.3%	25	25.0%	23.5%	$1,974	23.2%	21.6%
	Upper	77	34.7%	$8,257	46.3%	40.0%	40	32.8%	34.3%	$4,007	43.0%	43.6%	37	37.0%	34.8%	$4,250	49.9%	43.5%
	Unknown	6	2.7%	$321	1.8%	0.0%	3	2.5%	11.8%	$99	1.1%	13.3%	3	3.0%	12.7%	$222	2.6%	15.5%
	Total	*222*	*100.0%*	*$17,840*	*100.0%*	*100.0%*	*122*	*100.0%*	*100.0%*	*$9,323*	*100.0%*	*100.0%*	*100*	*100.0%*	*100.0%*	*$8,517*	*100.0%*	*100.0%*
Small Business — Revenue	*Total Businesses*																	
	$1 Million or Less	83	27.7%	$16,107	22.1%	89.1%	41	27.0%	44.5%	$7,648	21.6%	25.8%	42	28.4%	40.2%	$8,459	22.7%	28.1%
	Over $1 Million	129	43.0%	$39,883	54.8%	10.0%	62	40.8%					67	45.3%				
	Total Rev. available	212	70.7%	$55,990	76.9%	99.1%	103	67.8%					109	73.7%				
	Rev. Not Known	88	29.3%	$16,756	23.0%	0.9%	49	32.2%					39	26.4%				
	Total	300	100.0%	$72,746	100.0%	100.0%	152	100.0%					148	100.0%				
Small Business — Loan Size	$100,000 or Less	123	41.0%	$8,130	11.2%		70	46.1%	94.4%	$4,567	12.9%	36.0%	53	35.8%	95.6%	$3,563	9.6%	43.3%
	$100,001 - $250,000	75	25.0%	$14,300	19.7%		32	21.1%	3.2%	$6,292	17.7%	18.0%	43	29.1%	2.7%	$8,008	21.5%	16.9%
	$250,001 - $1 Million	102	34.0%	$50,316	69.2%		50	32.9%	2.4%	$24,594	69.4%	46.0%	52	35.1%	1.7%	$25,722	69.0%	39.8%
	Total	300	100.0%	$72,746	100.0%		152	100.0%	100.0%	$35,453	100.0%	100.0%	148	100.0%	100.0%	$37,293	100.0%	100.0%
Small Farm — Revenue	*Total Farms*																	
	$1 Million or Less	5	71.4%	$1,105	68.9%	98.1%	2	66.7%	28.6%	$495	55.2%	21.3%	3	75.0%	36.2%	$610	86.4%	55.7%
	Over $1 Million	1	14.3%	$402	25.1%	1.9%	1	33.3%					0	0.0%				
	Not Known	1	14.3%	$96	6.0%	0.0%	0	0.0%					1	25.0%				
	Total	7	100.0%	$1,603	100.0%	100.0%	3	100.0%					4	100.0%				
Small Farm — Loan Size	$100,000 or Less	3	42.9%	$186	11.6%		1	33.3%	100.0%	$45	5.0%	100.0%	2	50.0%	97.9%	$141	20.0%	54.8%
	$100,001 - $250,000	1	14.3%	$115	7.2%		0	0.0%	0.0%	$0	0.0%	0.0%	1	25.0%	0.0%	$115	16.3%	0.0%
	$250,001 - $500,000	3	42.9%	$1,302	81.2%		2	66.7%	0.0%	$852	95.0%	0.0%	1	25.0%	2.1%	$450	63.7%	45.2%
	Total	7	100.0%	$1,603	100.0%		3	100.0%	100.0%	$897	100.0%	100.0%	4	100.0%	100.0%	$706	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		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%	4.9%	0	0.0%	3.9%	$0	0.0%	2.2%	0	0.0%	4.2%	$0	0.0%	2.0%
	Moderate	2	11.1%	$227	7.6%	11.1%	1	8.3%	12.3%	$114	6.0%	7.9%	1	16.7%	12.3%	$113	10.1%	8.1%
	Middle	7	38.9%	$1,130	37.6%	50.7%	5	41.7%	48.3%	$878	46.5%	42.1%	2	33.3%	48.9%	$252	22.6%	43.9%
	Upper	9	50.0%	$1,648	54.8%	33.3%	6	50.0%	35.5%	$897	47.5%	47.7%	3	50.0%	34.4%	$751	67.3%	45.9%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%
	Total	*18*	*100.0%*	*$3,005*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$1,889*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$1,116*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	4.9%	0	0.0%	1.8%	$0	0.0%	0.8%	0	0.0%	1.1%	$0	0.0%	0.6%
	Moderate	1	2.7%	$65	1.3%	11.1%	0	0.0%	9.4%	$0	0.0%	5.8%	1	5.3%	7.3%	$65	2.6%	4.4%
	Middle	19	51.4%	$2,235	45.3%	50.7%	8	44.4%	48.2%	$1,016	42.3%	41.3%	11	57.9%	51.0%	$1,219	48.1%	42.8%
	Upper	17	45.9%	$2,636	53.4%	33.3%	10	55.6%	40.5%	$1,387	57.7%	52.0%	7	36.8%	40.5%	$1,249	49.3%	52.2%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.2%	0	0.0%	0.1%	$0	0.0%	0.0%
	Total	*37*	*100.0%*	*$4,936*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*$2,403*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*$2,533*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	4.9%	0	0.0%	1.3%	$0	0.0%	0.4%	0	0.0%	2.6%	$0	0.0%	1.8%
	Moderate	2	10.0%	$225	12.9%	11.1%	2	22.2%	7.1%	$225	27.8%	5.3%	0	0.0%	9.1%	$0	0.0%	6.6%
	Middle	13	65.0%	$1,204	68.8%	50.7%	5	55.6%	48.4%	$463	57.3%	44.2%	8	72.7%	51.1%	$741	78.7%	47.2%
	Upper	5	25.0%	$320	18.3%	33.3%	2	22.2%	43.1%	$120	14.9%	49.7%	3	27.3%	37.2%	$200	21.3%	44.5%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.2%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*20*	*100.0%*	*$1,749*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$808*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$941*	*100.0%*	*100.0%*
MULTI FAMILY						Multi-Family Units												
	Low	0	0.0%	$0	0.0%	20.2%	0	0.0%	8.7%	$0	0.0%	21.1%	0	0.0%	17.1%	$0	0.0%	34.5%
	Moderate	0	0.0%	$0	0.0%	19.0%	0	0.0%	30.4%	$0	0.0%	2.1%	0	0.0%	25.7%	$0	0.0%	29.6%
	Middle	0	0.0%	$0	0.0%	47.3%	0	0.0%	47.8%	$0	0.0%	61.6%	0	0.0%	42.9%	$0	0.0%	21.4%
	Upper	0	0.0%	$0	0.0%	12.3%	0	0.0%	8.7%	$0	0.0%	14.4%	0	0.0%	14.3%	$0	0.0%	14.5%
	Unknown	0	0.0%	$0	0.0%	1.3%	0	0.0%	4.3%	$0	0.0%	0.7%	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	4.9%	0	0.0%	4.5%	$0	0.0%	2.2%	0	0.0%	2.2%	$0	0.0%	1.0%
	Moderate	1	4.5%	$76	3.1%	11.1%	0	0.0%	6.5%	$0	0.0%	4.7%	1	7.7%	7.9%	$76	4.0%	6.1%
	Middle	9	40.9%	$605	24.5%	50.7%	3	33.3%	46.0%	$122	20.4%	38.6%	6	46.2%	49.6%	$483	25.7%	47.2%
	Upper	12	54.5%	$1,793	72.5%	33.3%	6	66.7%	42.8%	$475	79.6%	54.5%	6	46.2%	40.2%	$1,318	70.2%	45.7%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.2%	$0	0.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*22*	*100.0%*	*$2,474*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$597*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*$1,877*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	4.9%	0	0.0%	5.7%	$0	0.0%	3.1%	0	0.0%	5.3%	$0	0.0%	2.6%
	Moderate	0	0.0%	$0	0.0%	11.1%	0	0.0%	9.5%	$0	0.0%	6.6%	0	0.0%	12.9%	$0	0.0%	10.6%
	Middle	0	0.0%	$0	0.0%	50.7%	0	0.0%	49.4%	$0	0.0%	35.3%	0	0.0%	50.9%	$0	0.0%	41.9%
	Upper	0	0.0%	$0	0.0%	33.3%	0	0.0%	35.4%	$0	0.0%	55.0%	0	0.0%	31.0%	$0	0.0%	44.9%
	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%
	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%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	4.9%	0	0.0%	7.2%	$0	0.0%	1.8%	0	0.0%	7.7%	$0	0.0%	3.5%
	Moderate	0	0.0%	$0	0.0%	11.1%	0	0.0%	11.1%	$0	0.0%	4.8%	0	0.0%	19.8%	$0	0.0%	13.4%
	Middle	1	100.0%	$141	100.0%	50.7%	1	100.0%	58.2%	$141	100.0%	31.0%	0	0.0%	50.5%	$0	0.0%	41.7%
	Upper	0	0.0%	$0	0.0%	33.3%	0	0.0%	23.5%	$0	0.0%	62.4%	0	0.0%	22.0%	$0	0.0%	41.4%
	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%
	Total	1	100.0%	$141	100.0%	100.0%	1	100.0%	100.0%	$141	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	$0	0.0%	4.9%	0	0.0%	3.3%	$0	0.0%	3.4%	0	0.0%	3.0%	$0	0.0%	3.7%
	Moderate	6	6.1%	$593	4.8%	11.1%	3	6.1%	10.8%	$339	5.8%	6.8%	3	6.1%	10.3%	$254	3.9%	8.2%
	Middle	49	50.0%	$5,315	43.2%	50.7%	22	44.9%	48.4%	$2,620	44.9%	43.3%	27	55.1%	49.9%	$2,695	41.7%	42.1%
	Upper	43	43.9%	$6,397	52.0%	33.3%	24	49.0%	37.5%	$2,879	49.3%	46.4%	19	38.8%	36.7%	$3,518	54.4%	45.9%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.1%
	Total	98	100.0%	$12,305	100.0%	100.0%	49	100.0%	100.0%	$5,838	100.0%	100.0%	49	100.0%	100.0%	$6,467	100.0%	100.0%
SMALL BUSINESSES						Total Businesses												
	Low	12	7.8%	$2,775	7.8%	8.1%	7	9.3%	7.9%	$852	5.5%	11.0%	5	6.3%	7.8%	$1,923	9.5%	10.2%
	Moderate	47	30.5%	$14,277	39.9%	20.0%	18	24.0%	17.7%	$5,971	38.3%	17.4%	29	36.7%	20.9%	$8,306	41.1%	20.2%
	Middle	63	40.9%	$12,524	35.0%	46.2%	32	42.7%	42.4%	$5,130	32.9%	44.4%	31	39.2%	41.5%	$7,394	36.6%	46.2%
	Upper	32	20.8%	$6,183	17.3%	25.2%	18	24.0%	31.0%	$3,621	23.3%	26.4%	14	17.7%	28.8%	$2,562	12.7%	22.4%
	Unknown	0	0.0%	$0	0.0%	0.6%	0	0.0%	0.2%	$0	0.0%	0.5%	0	0.0%	0.2%	$0	0.0%	0.6%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.9%	$0	0.0%	0.2%	0	0.0%	0.8%	$0	0.0%	0.2%
	Total	154	100.0%	$35,759	100.0%	100.0%	75	100.0%	100.0%	$15,574	100.0%	100.0%	79	100.0%	100.0%	$20,185	100.0%	100.0%
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	0.4%	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%	11.6%	0	0.0%	11.8%	$0	0.0%	4.8%	0	0.0%	12.3%	$0	0.0%	4.2%
	Middle	0	0.0%	$0	0.0%	58.0%	0	0.0%	52.9%	$0	0.0%	63.0%	0	0.0%	56.1%	$0	0.0%	70.5%
	Upper	0	0.0%	$0	0.0%	29.9%	0	0.0%	33.3%	$0	0.0%	32.0%	0	0.0%	31.6%	$0	0.0%	25.3%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	2.0%	$0	0.0%	0.2%	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%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018						2019					
		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%	21.7%	0	0.0%	8.6%	$0	0.0%	4.4%	0	0.0%	11.6%	$0	0.0%	6.2%
	Moderate	4	22.2%	$489	16.3%	17.1%	3	25.0%	22.2%	$376	19.9%	15.8%	1	16.7%	23.5%	$113	10.1%	17.5%
	Middle	3	16.7%	$438	14.6%	20.3%	3	25.0%	21.6%	$438	23.2%	19.3%	0	0.0%	22.7%	$0	0.0%	21.8%
	Upper	9	50.0%	$1,877	62.5%	40.9%	6	50.0%	33.9%	$1,075	56.9%	47.7%	3	50.0%	31.8%	$802	71.9%	44.3%
	Unknown	2	11.1%	$201	6.7%	0.0%	0	0.0%	13.8%	$0	0.0%	12.9%	2	33.3%	10.4%	$201	18.0%	10.3%
	Total	*18*	*100.0%*	*$3,005*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$1,889*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$1,116*	*100.0%*	*100.0%*
REFINANCE	Low	4	10.8%	$336	6.8%	21.7%	1	5.6%	11.9%	$100	4.2%	6.3%	3	15.8%	8.2%	$236	9.3%	4.0%
	Moderate	6	16.2%	$628	12.7%	17.1%	4	22.2%	19.2%	$381	15.9%	14.0%	2	10.5%	17.5%	$247	9.8%	11.7%
	Middle	7	18.9%	$699	14.2%	20.3%	4	22.2%	22.2%	$438	18.2%	19.5%	3	15.8%	22.5%	$261	10.3%	18.5%
	Upper	19	51.4%	$3,142	63.7%	40.9%	9	50.0%	37.9%	$1,484	61.8%	49.4%	10	52.6%	39.2%	$1,658	65.5%	51.7%
	Unknown	1	2.7%	$131	2.7%	0.0%	0	0.0%	8.8%	$0	0.0%	10.6%	1	5.3%	12.7%	$131	5.2%	14.2%
	Total	*37*	*100.0%*	*$4,936*	*100.0%*	*100.0%*	*18*	*100.0%*	*100.0%*	*$2,403*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*$2,533*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	5	25.0%	$246	14.1%	21.7%	3	33.3%	18.4%	$146	18.1%	12.1%	2	18.2%	10.1%	$100	10.6%	7.2%
	Moderate	2	10.0%	$100	5.7%	17.1%	1	11.1%	16.2%	$50	6.2%	12.4%	1	9.1%	18.9%	$50	5.3%	16.1%
	Middle	6	30.0%	$537	30.7%	20.3%	2	22.2%	18.7%	$225	27.8%	15.6%	4	36.4%	24.9%	$312	33.2%	19.5%
	Upper	7	35.0%	$866	49.5%	40.9%	3	33.3%	45.1%	$387	47.9%	57.0%	4	36.4%	43.9%	$479	50.9%	55.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	1.6%	$0	0.0%	2.9%	0	0.0%	2.2%	$0	0.0%	1.4%
	Total	*20*	*100.0%*	*$1,749*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$808*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$941*	*100.0%*	*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	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.1%	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%	20.3%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	2.9%	$0	0.0%	0.1%
	Upper	0	0.0%	$0	0.0%	40.9%	0	0.0%	8.7%	$0	0.0%	0.7%	0	0.0%	2.9%	$0	0.0%	0.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	91.3%	$0	0.0%	99.3%	0	0.0%	94.3%	$0	0.0%	99.7%
	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%*
OTHER PURPOSE LOC	Low	3	13.6%	$139	5.6%	21.7%	1	11.1%	24.2%	$50	8.4%	18.8%	2	15.4%	12.8%	$89	4.7%	8.8%
	Moderate	6	27.3%	$380	15.4%	17.1%	3	33.3%	15.0%	$200	33.5%	10.8%	3	23.1%	21.5%	$180	9.6%	18.2%
	Middle	3	13.6%	$141	5.7%	20.3%	2	22.2%	20.4%	$41	6.9%	17.5%	1	7.7%	23.5%	$100	5.3%	18.8%
	Upper	9	40.9%	$1,664	67.3%	40.9%	2	22.2%	39.5%	$156	26.1%	51.9%	7	53.8%	40.0%	$1,508	80.3%	51.2%
	Unknown	1	4.5%	$150	6.1%	0.0%	1	11.1%	0.9%	$150	25.1%	1.0%	0	0.0%	2.2%	$0	0.0%	3.1%
	Total	*22*	*100.0%*	*$2,474*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$597*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*$1,877*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2

Assessment Area: MI - Kalamazoo-Portage

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019 Bank Count #	%	Dollar $ (000s)	$ %	Families by Family Income %	2018 Count Bank #	%	Agg %	2018 Dollar Bank $(000s)	$ %	Agg $ %	2019 Count Bank #	%	Agg %	2019 Dollar Bank $(000s)	$ %	Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	10.8%	$0	0.0%	4.6%	0	0.0%	10.5%	$0	0.0%	8.3%
	Moderate	0	0.0%	$0	0.0%	17.1%	0	0.0%	17.7%	$0	0.0%	12.5%	0	0.0%	19.9%	$0	0.0%	11.8%
	Middle	0	0.0%	$0	0.0%	20.3%	0	0.0%	22.8%	$0	0.0%	15.5%	0	0.0%	27.5%	$0	0.0%	21.5%
	Upper	0	0.0%	$0	0.0%	40.9%	0	0.0%	43.0%	$0	0.0%	60.7%	0	0.0%	38.0%	$0	0.0%	54.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	5.7%	$0	0.0%	6.6%	0	0.0%	4.1%	$0	0.0%	4.3%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	1.3%	$0	0.0%	0.1%	0	0.0%	1.1%	$0	0.0%	0.1%
	Moderate	1	100.0%	$141	100.0%	17.1%	1	100.0%	3.3%	$141	100.0%	1.5%	0	0.0%	1.1%	$0	0.0%	1.4%
	Middle	0	0.0%	$0	0.0%	20.3%	0	0.0%	0.7%	$0	0.0%	0.0%	0	0.0%	2.2%	$0	0.0%	4.0%
	Upper	0	0.0%	$0	0.0%	40.9%	0	0.0%	3.9%	$0	0.0%	8.5%	0	0.0%	2.2%	$0	0.0%	13.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	90.8%	$0	0.0%	89.9%	0	0.0%	93.4%	$0	0.0%	81.1%
	Total	*1*	*100.0%*	*$141*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$141*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
HMDA TOTALS	Low	12	12.2%	$721	5.9%	21.7%	5	10.2%	11.0%	$296	5.1%	4.9%	7	14.3%	10.2%	$425	6.6%	5.1%
	Moderate	19	19.4%	$1,738	14.1%	17.1%	12	24.5%	20.0%	$1,148	19.7%	13.5%	7	14.3%	20.6%	$590	9.1%	14.2%
	Middle	19	19.4%	$1,815	14.8%	20.3%	11	22.4%	21.0%	$1,142	19.6%	17.1%	8	16.3%	22.7%	$673	10.4%	19.0%
	Upper	44	44.9%	$7,549	61.3%	40.9%	20	40.8%	35.7%	$3,102	53.1%	43.8%	24	49.0%	35.5%	$4,447	68.8%	44.2%
	Unknown	4	4.1%	$482	3.9%	0.0%	1	2.0%	12.2%	$150	2.6%	20.7%	3	6.1%	11.0%	$332	5.1%	17.6%
	Total	*98*	*100.0%*	*$12,305*	*100.0%*	*100.0%*	*49*	*100.0%*	*100.0%*	*$5,838*	*100.0%*	*100.0%*	*49*	*100.0%*	*100.0%*	*$6,467*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	46	29.9%	$10,126	28.3%	89.2%	19	25.3%	43.9%	$4,223	27.1%	30.8%	27	34.2%	41.9%	$5,903	29.2%	26.4%
	Over $1 Million	65	42.2%	$20,002	55.9%	10.1%	33	44.0%					32	40.5%				
	Total Rev. available	*111*	*72.1%*	*$30,128*	*84.2%*	*99.3%*	*52*	*69.3%*					*59*	*74.7%*				
	Rev. Not Known	43	27.9%	$5,631	15.7%	0.7%	23	30.7%					20	25.3%				
	Total	*154*	*100.0%*	*$35,759*	*100.0%*	*100.0%*	*75*	*100.0%*					*79*	*100.0%*				
Small Business — Loan Size	$100,000 or Less	74	48.1%	$4,407	12.3%		44	58.7%	88.9%	$2,746	17.6%	25.9%	30	38.0%	89.2%	$1,661	8.2%	24.5%
	$100,001 - $250,000	38	24.7%	$6,723	18.8%		13	17.3%	5.3%	$2,442	15.7%	17.0%	25	31.6%	5.1%	$4,281	21.2%	16.6%
	$250,001 - $1 Million	42	27.3%	$24,629	68.9%		18	24.0%	5.8%	$10,386	66.7%	57.1%	24	30.4%	5.7%	$14,243	70.6%	59.0%
	Total	*154*	*100.0%*	*$35,759*	*100.0%*		*75*	*100.0%*	*100.0%*	*$15,574*	*100.0%*	*100.0%*	*79*	*100.0%*	*100.0%*	*$20,185*	*100.0%*	*100.0%*
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	89.3%	0	0.0%	37.3%	$0	0.0%	56.0%	0	0.0%	19.3%	$0	0.0%	28.4%
	Over $1 Million	0	0.0%	$0	0.0%	10.3%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.4%	0	0.0%					0	0.0%				
	Total	*0*	*0.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*					*0*	*0.0%*				
Small Farm — Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	92.2%	$0	0.0%	42.3%	0	0.0%	93.0%	$0	0.0%	38.3%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	2.0%	$0	0.0%	9.9%	0	0.0%	0.0%	$0	0.0%	0.0%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	5.9%	$0	0.0%	47.8%	0	0.0%	7.0%	$0	0.0%	61.7%
	Total	*0*	*0.0%*	*$0*	*0.0%*		*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: MI - Midland MSA

PRODUCT TYPE	Tract Income Levels	Bank Count #	Bank Count %	Dollar $ (000s)	Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	1	20.0%	$48	7.7%	1.7%	0	0.0%	1.6%	$0	0.0%	0.8%	1	25.0%	2.3%	$48	8.9%	1.3%
	Moderate	1	20.0%	$79	12.7%	17.5%	1	100.0%	15.6%	$79	100.0%	10.1%	0	0.0%	15.8%	$0	0.0%	10.7%
	Middle	2	40.0%	$405	65.3%	44.7%	0	0.0%	40.6%	$0	0.0%	38.0%	2	50.0%	40.9%	$405	74.9%	39.9%
	Upper	1	20.0%	$88	14.2%	36.1%	0	0.0%	42.2%	$0	0.0%	51.1%	1	25.0%	41.0%	$88	16.3%	48.1%
	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	*5*	*100.0%*	*$620*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$79*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$541*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	1.1%	$0	0.0%	0.6%	0	0.0%	1.0%	$0	0.0%	0.6%
	Moderate	2	28.6%	$139	20.4%	17.5%	1	25.0%	14.8%	$39	9.2%	10.3%	1	33.3%	13.5%	$100	38.8%	9.0%
	Middle	2	28.6%	$288	42.3%	44.7%	1	25.0%	48.1%	$150	35.5%	44.8%	1	33.3%	45.6%	$138	53.5%	43.2%
	Upper	3	42.9%	$254	37.3%	36.1%	2	50.0%	35.9%	$234	55.3%	44.3%	1	33.3%	40.0%	$20	7.8%	47.2%
	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	*7*	*100.0%*	*$681*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$423*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$258*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	1.1%	$0	0.0%	1.9%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.5%	0	0.0%	13.0%	$0	0.0%	9.1%	0	0.0%	16.2%	$0	0.0%	17.7%
	Middle	0	0.0%	$0	0.0%	44.7%	0	0.0%	35.9%	$0	0.0%	44.4%	0	0.0%	43.4%	$0	0.0%	39.2%
	Upper	5	100.0%	$185	100.0%	36.1%	3	100.0%	50.0%	$92	100.0%	44.6%	2	100.0%	40.4%	$93	100.0%	43.1%
	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	*5*	*100.0%*	*$185*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$92*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$93*	*100.0%*	*100.0%*
MULTI FAMILY						**Multi-Family Units**												
	Low	0	0.0%	$0	0.0%	3.3%	0	0.0%	12.5%	$0	0.0%	0.5%	0	0.0%	8.3%	$0	0.0%	0.8%
	Moderate	0	0.0%	$0	0.0%	31.1%	0	0.0%	37.5%	$0	0.0%	2.5%	0	0.0%	33.3%	$0	0.0%	8.1%
	Middle	0	0.0%	$0	0.0%	25.5%	0	0.0%	50.0%	$0	0.0%	97.1%	0	0.0%	25.0%	$0	0.0%	12.4%
	Upper	0	0.0%	$0	0.0%	40.1%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	33.3%	$0	0.0%	78.7%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	1.7%	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%	17.5%	0	0.0%	5.7%	$0	0.0%	2.6%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	44.7%	0	0.0%	51.4%	$0	0.0%	47.3%	0	0.0%	41.4%	$0	0.0%	45.4%
	Upper	1	100.0%	$35	100.0%	36.1%	1	100.0%	42.9%	$35	100.0%	50.1%	0	0.0%	58.6%	$0	0.0%	54.6%
	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	*1*	*100.0%*	*$35*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$35*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Midland MSA

PRODUCT TYPE	Tract Income Levels	Bank Count #	Bank Count %	Dollar $(000s)	Dollar $%	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	2.6%	$0	0.0%	0.5%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.5%	0	0.0%	28.9%	$0	0.0%	20.1%	0	0.0%	23.5%	$0	0.0%	21.5%
	Middle	0	0.0%	$0	0.0%	44.7%	0	0.0%	28.9%	$0	0.0%	26.3%	0	0.0%	50.0%	$0	0.0%	49.1%
	Upper	0	0.0%	$0	0.0%	36.1%	0	0.0%	39.5%	$0	0.0%	53.1%	0	0.0%	26.5%	$0	0.0%	29.4%
	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	*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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	1.7%	0	0.0%	4.7%	$0	0.0%	6.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.5%	0	0.0%	25.0%	$0	0.0%	21.7%	0	0.0%	20.0%	$0	0.0%	16.4%
	Middle	0	0.0%	$0	0.0%	44.7%	0	0.0%	54.7%	$0	0.0%	57.4%	0	0.0%	62.5%	$0	0.0%	54.1%
	Upper	0	0.0%	$0	0.0%	36.1%	0	0.0%	15.6%	$0	0.0%	14.7%	0	0.0%	17.5%	$0	0.0%	29.5%
	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	1	5.6%	$48	3.2%	1.7%	0	0.0%	1.5%	$0	0.0%	0.8%	1	11.1%	1.7%	$48	5.4%	1.0%
	Moderate	3	16.7%	$218	14.3%	17.5%	2	22.2%	15.6%	$118	18.8%	9.7%	1	11.1%	15.2%	$100	11.2%	10.2%
	Middle	4	22.2%	$693	45.6%	44.7%	1	11.1%	43.0%	$150	23.8%	44.5%	3	33.3%	42.9%	$543	60.9%	40.0%
	Upper	10	55.6%	$562	36.9%	36.1%	6	66.7%	39.8%	$361	57.4%	45.0%	4	44.4%	40.2%	$201	22.5%	48.7%
	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	*18*	*100.0%*	*$1,521*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$629*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$892*	*100.0%*	*100.0%*
SMALL BUSINESSES						**Total Businesses**												
	Low	9	32.1%	$2,989	45.6%	5.7%	8	42.1%	7.5%	$2,889	58.8%	19.7%	1	11.1%	6.9%	$100	6.1%	20.1%
	Moderate	3	10.7%	$175	2.7%	21.1%	2	10.5%	18.1%	$100	2.0%	15.6%	1	11.1%	20.0%	$75	4.6%	17.7%
	Middle	11	39.3%	$2,063	31.5%	32.1%	6	31.6%	35.3%	$798	16.2%	23.1%	5	55.6%	32.8%	$1,265	77.3%	18.7%
	Upper	5	17.9%	$1,325	20.2%	41.1%	3	15.8%	38.3%	$1,128	23.0%	41.4%	2	22.2%	39.3%	$197	12.0%	43.2%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.7%	$0	0.0%	0.3%	0	0.0%	1.1%	$0	0.0%	0.4%
	Total	*28*	*100.0%*	*$6,552*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*$4,915*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$1,637*	*100.0%*	*100.0%*
SMALL FARM						**Total Farms**												
	Low	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%	20.0%	0	0.0%	9.3%	$0	0.0%	3.8%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	2	100.0%	$100	100.0%	61.9%	1	100.0%	79.1%	$50	100.0%	84.8%	1	100.0%	93.9%	$50	100.0%	99.4%
	Upper	0	0.0%	$0	0.0%	18.1%	0	0.0%	11.6%	$0	0.0%	11.4%	0	0.0%	6.1%	$0	0.0%	0.6%
	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%
	Tr 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%
	Total	*2*	*100.0%*	*$100*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$50*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$50*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Midland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count		Bank Dollar		Families by Family Income %	2018 Count			2018 Dollar			2019 Count			2019 Dollar		
		#	%	$ (000s)	$ %	%	Bank #	Bank %	Agg %	Bank $(000s)	Bank $ %	Agg $ %	Bank #	Bank %	Agg %	Bank $(000s)	Bank $ %	Agg $ %
HOME PURCHASE	Low	2	40.0%	$127	20.5%	20.1%	1	100.0%	11.8%	$79	100.0%	5.9%	1	25.0%	11.8%	$48	8.9%	6.1%
	Moderate	0	0.0%	$0	0.0%	17.7%	0	0.0%	22.6%	$0	0.0%	15.9%	0	0.0%	23.9%	$0	0.0%	17.1%
	Middle	2	40.0%	$273	44.0%	20.7%	0	0.0%	21.7%	$0	0.0%	20.2%	2	50.0%	23.3%	$273	50.5%	21.4%
	Upper	1	20.0%	$220	35.5%	41.5%	0	0.0%	34.2%	$0	0.0%	49.7%	1	25.0%	34.2%	$220	40.7%	50.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	9.7%	$0	0.0%	8.3%	0	0.0%	6.8%	$0	0.0%	5.4%
	Total	*5*	*100.0%*	*$620*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$79*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$541*	*100.0%*	*100.0%*
REFINANCE	Low	1	14.3%	$20	2.9%	20.1%	0	0.0%	12.4%	$0	0.0%	6.9%	1	33.3%	11.3%	$20	7.8%	6.1%
	Moderate	2	28.6%	$177	26.0%	17.7%	1	25.0%	19.7%	$39	9.2%	14.2%	1	33.3%	19.6%	$138	53.5%	13.1%
	Middle	2	28.6%	$234	34.4%	20.7%	2	50.0%	24.4%	$234	55.3%	20.6%	0	0.0%	20.8%	$0	0.0%	17.0%
	Upper	2	28.6%	$250	36.7%	41.5%	1	25.0%	36.8%	$150	35.5%	49.2%	1	33.3%	35.8%	$100	38.8%	49.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	6.8%	$0	0.0%	9.1%	0	0.0%	12.4%	$0	0.0%	14.6%
	Total	*7*	*100.0%*	*$681*	*100.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$423*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$258*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	20.1%	0	0.0%	4.3%	$0	0.0%	0.9%	0	0.0%	9.1%	$0	0.0%	7.0%
	Moderate	2	40.0%	$88	47.6%	17.7%	1	33.3%	23.9%	$18	19.6%	19.2%	1	50.0%	26.3%	$70	75.3%	25.8%
	Middle	0	0.0%	$0	0.0%	20.7%	0	0.0%	18.5%	$0	0.0%	14.8%	0	0.0%	20.2%	$0	0.0%	13.3%
	Upper	2	40.0%	$73	39.5%	41.5%	1	33.3%	47.8%	$50	54.3%	58.5%	1	50.0%	42.4%	$23	24.7%	52.6%
	Unknown	1	20.0%	$24	13.0%	0.0%	1	33.3%	5.4%	$24	26.1%	6.5%	0	0.0%	2.0%	$0	0.0%	1.2%
	Total	*5*	*100.0%*	*$185*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$92*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$93*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	20.1%	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%
	Middle	0	0.0%	$0	0.0%	20.7%	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%	41.5%	0	0.0%	25.0%	$0	0.0%	2.1%	0	0.0%	8.3%	$0	0.0%	2.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	75.0%	$0	0.0%	97.9%	0	0.0%	91.7%	$0	0.0%	97.6%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	20.1%	0	0.0%	5.7%	$0	0.0%	4.7%	0	0.0%	6.9%	$0	0.0%	5.7%
	Moderate	0	0.0%	$0	0.0%	17.7%	0	0.0%	14.3%	$0	0.0%	14.2%	0	0.0%	24.1%	$0	0.0%	11.7%
	Middle	1	100.0%	$35	100.0%	20.7%	1	100.0%	31.4%	$35	100.0%	29.1%	0	0.0%	20.7%	$0	0.0%	16.8%
	Upper	0	0.0%	$0	0.0%	41.5%	0	0.0%	45.7%	$0	0.0%	48.6%	0	0.0%	48.3%	$0	0.0%	65.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	2.9%	$0	0.0%	3.4%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*1*	*100.0%*	*$35*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$35*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: MI - Midland MSA

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	20.1%	0	0.0%	10.5%	$0	0.0%	5.5%	0	0.0%	17.6%	$0	0.0%	23.1%
	Moderate	0	0.0%	$0	0.0%	17.7%	0	0.0%	21.1%	$0	0.0%	10.0%	0	0.0%	11.8%	$0	0.0%	13.0%
	Middle	0	0.0%	$0	0.0%	20.7%	0	0.0%	26.3%	$0	0.0%	26.2%	0	0.0%	14.7%	$0	0.0%	11.2%
	Upper	0	0.0%	$0	0.0%	41.5%	0	0.0%	34.2%	$0	0.0%	49.6%	0	0.0%	52.9%	$0	0.0%	51.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	7.9%	$0	0.0%	8.7%	0	0.0%	2.9%	$0	0.0%	1.1%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	20.1%	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%	3.1%	$0	0.0%	3.9%	0	0.0%	2.5%	$0	0.0%	2.4%
	Middle	0	0.0%	$0	0.0%	20.7%	0	0.0%	1.6%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	41.5%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	5.0%	$0	0.0%	12.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	95.3%	$0	0.0%	96.1%	0	0.0%	92.5%	$0	0.0%	85.3%
	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	3	16.7%	$147	9.7%	20.1%	1	11.1%	11.2%	$79	12.6%	5.5%	2	22.2%	11.3%	$68	7.6%	5.9%
	Moderate	4	22.2%	$265	17.4%	17.7%	2	22.2%	21.1%	$57	9.1%	14.1%	2	22.2%	22.0%	$208	23.3%	15.1%
	Middle	5	27.8%	$542	35.6%	20.7%	3	33.3%	21.9%	$269	42.8%	18.5%	2	22.2%	21.8%	$273	30.6%	18.8%
	Upper	5	27.8%	$543	35.7%	41.5%	2	22.2%	34.7%	$200	31.8%	45.3%	3	33.3%	34.9%	$343	38.5%	47.7%
	Unknown	1	5.6%	$24	1.6%	0.0%	1	11.1%	11.1%	$24	3.8%	16.5%	0	0.0%	10.1%	$0	0.0%	12.5%
	Total	*18*	*100.0%*	*$1,521*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$629*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$892*	*100.0%*	*100.0%*
Small Business — Revenue						**Total Businesses**												
	$1 Million or Less	5	17.9%	$530	8.1%	90.5%	2	10.5%	50.5%	$83	1.7%	43.9%	3	33.3%	50.4%	$447	27.3%	43.5%
	Over $1 Million	13	46.4%	$4,539	69.3%	8.5%	10	52.6%					3	33.3%				
	Total Rev. available	18	64.3%	$5,069	77.4%	99.0%	12	63.1%					6	66.6%				
	Rev. Not Known	10	35.7%	$1,483	22.6%	1.1%	7	36.8%					3	33.3%				
	Total	28	100.0%	$6,552	100.0%	100.0%	19	100.0%					9	100.0%				
Small Business — Loan Size	$100,000 or Less	15	53.6%	$745	11.4%		10	52.6%	90.0%	$455	9.3%	28.9%	5	55.6%	90.9%	$290	17.7%	31.3%
	$100,001 - $250,000	6	21.4%	$1,232	18.8%		4	21.1%	5.3%	$835	17.0%	19.6%	2	22.2%	5.4%	$397	24.3%	20.7%
	$250,001 - $1 Million	7	25.0%	$4,575	69.8%		5	26.3%	4.7%	$3,625	73.8%	51.5%	2	22.2%	3.7%	$950	58.0%	48.0%
	Total	28	100.0%	$6,552	100.0%		19	100.0%	100.0%	$4,915	100.0%	100.0%	9	100.0%	100.0%	$1,637	100.0%	100.0%
Small Farm — Revenue						**Total Farms**												
	$1 Million or Less	2	100.0%	$100	100.0%	98.1%	1	100.0%	67.4%	$50	100.0%	85.6%	1	100.0%	54.5%	$50	100.0%	78.4%
	Over $1 Million	0	0.0%	$0	0.0%	1.9%	0	0.0%					0	0.0%				
	Not Known	0	0.0%	$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	2	100.0%	$100	100.0%	100.0%	1	100.0%					1	100.0%				
Small Farm — Loan Size	$100,000 or Less	2	100.0%	$100	100.0%		1	100.0%	95.3%	$50	100.0%	74.4%	1	100.0%	84.8%	$50	100.0%	45.3%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	2.3%	$0	0.0%	9.2%	0	0.0%	12.1%	$0	0.0%	35.2%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	2.3%	$0	0.0%	16.5%	0	0.0%	3.0%	$0	0.0%	19.5%
	Total	2	100.0%	$100	100.0%		1	100.0%	100.0%	$50	100.0%	100.0%	1	100.0%	100.0%	$50	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
		#	%	$ (000s)	$ %		Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %	Bank #	Bank %	Agg %	Bank $ (000s)	Bank $ %	Agg $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	2.5%	$0	0.0%	1.0%	0	0.0%	2.6%	$0	0.0%	1.0%
	Moderate	4	23.5%	$424	18.1%	18.8%	3	27.3%	20.4%	$252	17.8%	13.1%	1	16.7%	18.9%	$172	18.5%	13.0%
	Middle	9	52.9%	$1,116	47.6%	41.9%	5	45.5%	43.2%	$564	39.8%	44.1%	4	66.7%	42.3%	$552	59.5%	43.0%
	Upper	4	23.5%	$806	34.4%	34.3%	3	27.3%	33.9%	$602	42.5%	41.8%	1	16.7%	36.2%	$204	22.0%	42.9%
	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	17	100.0%	$2,346	100.0%	100.0%	11	100.0%	100.0%	$1,418	100.0%	100.0%	6	100.0%	100.0%	$928	100.0%	100.0%
REFINANCE	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	1.6%	$0	0.0%	0.7%	0	0.0%	1.4%	$0	0.0%	0.5%
	Moderate	9	22.5%	$666	10.8%	18.8%	5	26.3%	13.1%	$311	12.6%	9.3%	4	19.0%	13.3%	$355	9.6%	9.2%
	Middle	13	32.5%	$2,364	38.3%	41.9%	7	36.8%	45.3%	$1,222	49.6%	45.9%	6	28.6%	44.8%	$1,142	30.8%	43.5%
	Upper	18	45.0%	$3,139	50.9%	34.3%	7	36.8%	40.0%	$933	37.8%	44.1%	11	52.4%	40.4%	$2,206	59.6%	46.8%
	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	40	100.0%	$6,169	100.0%	100.0%	19	100.0%	100.0%	$2,466	100.0%	100.0%	21	100.0%	100.0%	$3,703	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	1.2%	$0	0.0%	0.6%	0	0.0%	1.2%	$0	0.0%	0.5%
	Moderate	11	32.4%	$410	25.3%	18.8%	5	29.4%	12.2%	$245	30.2%	8.9%	6	35.3%	15.6%	$165	20.4%	11.8%
	Middle	11	32.4%	$508	31.4%	41.9%	8	47.1%	43.6%	$388	47.9%	46.8%	3	17.6%	43.6%	$120	14.8%	43.0%
	Upper	12	35.3%	$702	43.3%	34.3%	4	23.5%	43.1%	$177	21.9%	43.7%	8	47.1%	39.6%	$525	64.8%	44.6%
	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	34	100.0%	$1,620	100.0%	100.0%	17	100.0%	100.0%	$810	100.0%	100.0%	17	100.0%	100.0%	$810	100.0%	100.0%
MULTI FAMILY						Multi-Family Units												
	Low	0	0.0%	$0	0.0%	14.4%	0	0.0%	10.5%	$0	0.0%	1.3%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	44.0%	0	0.0%	31.6%	$0	0.0%	17.5%	0	0.0%	38.5%	$0	0.0%	43.3%
	Middle	1	100.0%	$2,028	100.0%	16.2%	1	100.0%	36.8%	$2,028	100.0%	64.8%	0	0.0%	46.2%	$0	0.0%	21.9%
	Upper	0	0.0%	$0	0.0%	25.5%	0	0.0%	21.1%	$0	0.0%	16.4%	0	0.0%	15.4%	$0	0.0%	34.8%
	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	1	100.0%	$2,028	100.0%	100.0%	1	100.0%	100.0%	$2,028	100.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	1.8%	$0	0.0%	0.7%	0	0.0%	1.0%	$0	0.0%	0.3%
	Moderate	4	14.3%	$225	10.7%	18.8%	2	15.4%	12.7%	$125	16.2%	8.4%	2	13.3%	10.3%	$100	7.5%	5.8%
	Middle	8	28.6%	$421	20.0%	41.9%	2	15.4%	37.1%	$37	4.8%	32.9%	6	40.0%	35.6%	$384	28.9%	21.2%
	Upper	16	57.1%	$1,455	69.3%	34.3%	9	69.2%	48.4%	$610	79.0%	58.1%	7	46.7%	53.1%	$845	63.6%	72.7%
	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	28	100.0%	$2,101	100.0%	100.0%	13	100.0%	100.0%	$772	100.0%	100.0%	15	100.0%	100.0%	$1,329	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	3.7%	$0	0.0%	1.4%	0	0.0%	3.7%	$0	0.0%	1.9%
	Moderate	0	0.0%	$0	0.0%	18.8%	0	0.0%	15.7%	$0	0.0%	12.1%	0	0.0%	20.5%	$0	0.0%	13.7%
	Middle	0	0.0%	$0	0.0%	41.9%	0	0.0%	51.5%	$0	0.0%	59.8%	0	0.0%	46.6%	$0	0.0%	58.3%
	Upper	0	0.0%	$0	0.0%	34.3%	0	0.0%	29.1%	$0	0.0%	26.6%	0	0.0%	29.2%	$0	0.0%	26.1%
	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	*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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	5.0%	0	0.0%	4.7%	$0	0.0%	2.2%	0	0.0%	4.3%	$0	0.0%	2.2%
	Moderate	0	0.0%	$0	0.0%	18.8%	0	0.0%	22.7%	$0	0.0%	18.8%	0	0.0%	28.7%	$0	0.0%	24.8%
	Middle	0	0.0%	$0	0.0%	41.9%	0	0.0%	46.7%	$0	0.0%	51.3%	0	0.0%	42.6%	$0	0.0%	44.1%
	Upper	0	0.0%	$0	0.0%	34.3%	0	0.0%	26.0%	$0	0.0%	27.7%	0	0.0%	24.3%	$0	0.0%	28.9%
	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%	5.0%	0	0.0%	2.2%	$0	0.0%	1.0%	0	0.0%	2.1%	$0	0.0%	0.8%
	Moderate	28	23.3%	$1,725	12.1%	18.8%	15	24.6%	17.4%	$933	12.4%	12.0%	13	22.0%	16.7%	$792	11.7%	12.5%
	Middle	42	35.0%	$6,437	45.1%	41.9%	23	37.7%	43.9%	$4,239	56.6%	45.2%	19	32.2%	43.2%	$2,198	32.5%	42.4%
	Upper	50	41.7%	$6,102	42.8%	34.3%	23	37.7%	36.5%	$2,322	31.0%	41.8%	27	45.8%	38.0%	$3,780	55.8%	44.3%
	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	*120*	*100.0%*	*$14,264*	*100.0%*	*100.0%*	*61*	*100.0%*	*100.0%*	*$7,494*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*$6,770*	*100.0%*	*100.0%*
SMALL BUSINESSES	Low	18	13.8%	$4,965	15.9%	8.3% (Total Businesses)	11	14.3%	9.4%	$3,046	17.3%	16.8%	7	13.2%	8.8%	$1,919	14.0%	13.2%
	Moderate	45	34.6%	$8,365	26.7%	21.4%	24	31.2%	25.8%	$4,405	25.0%	25.6%	21	39.6%	26.0%	$3,960	29.0%	21.4%
	Middle	7	5.4%	$1,946	6.2%	35.3%	4	5.2%	33.2%	$996	5.7%	27.2%	3	5.7%	32.2%	$950	7.0%	31.6%
	Upper	60	46.2%	$16,000	51.2%	34.9%	38	49.4%	31.2%	$9,170	52.1%	30.2%	22	41.5%	32.6%	$6,830	50.0%	33.8%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.5%	$0	0.0%	0.1%	0	0.0%	0.4%	$0	0.0%	0.1%
	Total	*130*	*100.0%*	*$31,276*	*100.0%*	*100.0%*	*77*	*100.0%*	*100.0%*	*$17,617*	*100.0%*	*100.0%*	*53*	*100.0%*	*100.0%*	*$13,659*	*100.0%*	*100.0%*
SMALL FARM	Low	0	0.0%	$0	0.0%	0.0% (Total Farms)	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%	0.7%	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%	65.7%	0	0.0%	67.6%	$0	0.0%	97.3%	0	0.0%	70.6%	$0	0.0%	81.8%
	Upper	4	100.0%	$350	100.0%	33.6%	0	0.0%	32.4%	$0	0.0%	2.7%	4	100.0%	29.4%	$350	100.0%	18.2%
	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%
	Tr 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%
	Total	*4*	*100.0%*	*$350*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*4*	*100.0%*	*100.0%*	*$350*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019				Families by Family Income %	Bank & Aggregate Lending Comparison						2019					
		Bank Count #	%	Dollar $ (000s)	$ %		2018 Count Bank #	%	Agg %	Dollar Bank $(000s)	$ %	Agg $ %	Count Bank #	%	Agg %	Dollar Bank $(000s)	$ %	Agg $ %
HOME PURCHASE	Low	3	17.6%	$296	12.6%	21.7%	3	27.3%	10.0%	$296	20.9%	5.6%	0	0.0%	5.7%	$0	0.0%	3.0%
	Moderate	5	29.4%	$644	27.5%	17.0%	1	9.1%	26.1%	$28	2.0%	20.0%	4	66.7%	25.0%	$616	66.4%	17.7%
	Middle	4	23.5%	$454	19.4%	20.6%	4	36.4%	23.1%	$454	32.0%	22.6%	0	0.0%	27.3%	$0	0.0%	26.1%
	Upper	5	29.4%	$952	40.6%	40.7%	3	27.3%	25.0%	$640	45.1%	37.3%	2	33.3%	32.0%	$312	33.6%	43.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	15.8%	$0	0.0%	14.4%	0	0.0%	10.1%	$0	0.0%	9.7%
	Total	*17*	*100.0%*	*$2,346*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$1,418*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$928*	*100.0%*	*100.0%*
REFINANCE	Low	5	12.5%	$293	4.7%	21.7%	3	15.8%	11.1%	$172	7.0%	6.4%	2	9.5%	6.4%	$121	3.3%	2.9%
	Moderate	8	20.0%	$508	8.2%	17.0%	6	31.6%	20.0%	$383	15.5%	15.9%	2	9.5%	16.9%	$125	3.4%	10.8%
	Middle	7	17.5%	$762	12.4%	20.6%	5	26.3%	25.2%	$494	20.0%	23.5%	2	9.5%	23.1%	$268	7.2%	19.7%
	Upper	19	47.5%	$4,529	73.4%	40.7%	4	21.1%	31.6%	$1,340	54.3%	41.5%	15	71.4%	40.4%	$3,189	86.1%	51.2%
	Unknown	1	2.5%	$77	1.2%	0.0%	1	5.3%	12.1%	$77	3.1%	12.8%	0	0.0%	13.2%	$0	0.0%	15.3%
	Total	*40*	*100.0%*	*$6,169*	*100.0%*	*100.0%*	*19*	*100.0%*	*100.0%*	*$2,466*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$3,703*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	5	14.7%	$194	12.0%	21.7%	1	5.9%	9.4%	$25	3.1%	7.0%	4	23.5%	5.1%	$169	20.9%	3.8%
	Moderate	7	20.6%	$278	17.2%	17.0%	5	29.4%	26.2%	$210	25.9%	22.3%	2	11.8%	17.7%	$68	8.4%	13.4%
	Middle	10	29.4%	$388	24.0%	20.6%	7	41.2%	23.2%	$298	36.8%	20.8%	3	17.6%	24.0%	$90	11.1%	20.2%
	Upper	12	35.3%	$760	46.9%	40.7%	4	23.5%	38.2%	$277	34.2%	44.7%	8	47.1%	52.0%	$483	59.6%	61.6%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	3.0%	$0	0.0%	5.3%	0	0.0%	1.2%	$0	0.0%	1.0%
	Total	*34*	*100.0%*	*$1,620*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*$810*	*100.0%*	*100.0%*	*17*	*100.0%*	*100.0%*	*$810*	*100.0%*	*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	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.0%	0	0.0%	5.3%	$0	0.0%	0.4%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	20.6%	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%	40.7%	0	0.0%	5.3%	$0	0.0%	0.7%	0	0.0%	15.4%	$0	0.0%	1.4%
	Unknown	1	100.0%	$2,028	100.0%	0.0%	1	100.0%	89.5%	$2,028	100.0%	98.9%	0	0.0%	84.6%	$0	0.0%	98.6%
	Total	*1*	*100.0%*	*$2,028*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$2,028*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
OTHER PURPOSE LOC	Low	4	14.3%	$141	6.7%	21.7%	3	23.1%	11.3%	$121	15.7%	5.7%	1	6.7%	8.8%	$20	1.5%	3.5%
	Moderate	2	7.1%	$150	7.1%	17.0%	1	7.7%	18.6%	$50	6.5%	13.6%	1	6.7%	17.5%	$100	7.5%	9.9%
	Middle	8	28.6%	$376	17.9%	20.6%	2	15.4%	24.0%	$37	4.8%	18.0%	6	40.0%	26.3%	$339	25.5%	15.7%
	Upper	14	50.0%	$1,434	68.3%	40.7%	7	53.8%	45.7%	$564	73.1%	62.5%	7	46.7%	45.4%	$870	65.5%	66.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	0.5%	$0	0.0%	0.2%	0	0.0%	2.1%	$0	0.0%	4.6%
	Total	*28*	*100.0%*	*$2,101*	*100.0%*	*100.0%*	*13*	*100.0%*	*100.0%*	*$772*	*100.0%*	*100.0%*	*15*	*100.0%*	*100.0%*	*$1,329*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2

Assessment Area: MI - Muskegon MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	11.9%	$0	0.0%	7.5%	0	0.0%	7.5%	$0	0.0%	4.4%
	Moderate	0	0.0%	$0	0.0%	17.0%	0	0.0%	21.6%	$0	0.0%	20.1%	0	0.0%	15.5%	$0	0.0%	11.9%
	Middle	0	0.0%	$0	0.0%	20.6%	0	0.0%	23.9%	$0	0.0%	20.1%	0	0.0%	30.4%	$0	0.0%	20.2%
	Upper	0	0.0%	$0	0.0%	40.7%	0	0.0%	35.8%	$0	0.0%	40.8%	0	0.0%	42.2%	$0	0.0%	60.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	6.7%	$0	0.0%	11.5%	0	0.0%	4.3%	$0	0.0%	3.5%
	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%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	21.7%	0	0.0%	0.7%	$0	0.0%	0.7%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	17.0%	0	0.0%	2.7%	$0	0.0%	2.4%	0	0.0%	1.7%	$0	0.0%	1.0%
	Middle	0	0.0%	$0	0.0%	20.6%	0	0.0%	2.7%	$0	0.0%	1.0%	0	0.0%	1.7%	$0	0.0%	1.6%
	Upper	0	0.0%	$0	0.0%	40.7%	0	0.0%	3.3%	$0	0.0%	1.7%	0	0.0%	2.6%	$0	0.0%	5.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	90.7%	$0	0.0%	94.1%	0	0.0%	93.9%	$0	0.0%	92.3%
	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	17	14.2%	$924	6.5%	21.7%	10	16.4%	10.1%	$614	8.2%	5.7%	7	11.9%	5.9%	$310	4.6%	2.9%
	Moderate	22	18.3%	$1,580	11.1%	17.0%	13	21.3%	23.3%	$671	9.0%	18.1%	9	15.3%	20.7%	$909	13.4%	14.2%
	Middle	29	24.2%	$1,980	13.9%	20.6%	18	29.5%	23.1%	$1,283	17.1%	21.8%	11	18.6%	25.1%	$697	10.3%	22.3%
	Upper	50	41.7%	$7,675	53.8%	40.7%	18	29.5%	28.3%	$2,821	37.6%	37.8%	32	54.2%	36.4%	$4,854	71.7%	45.7%
	Unknown	2	1.7%	$2,105	14.8%	0.0%	2	3.3%	15.2%	$2,105	28.1%	16.6%	0	0.0%	11.9%	$0	0.0%	14.9%
	Total	*120*	*100.0%*	*$14,264*	*100.0%*	*100.0%*	*61*	*100.0%*	*100.0%*	*$7,494*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*$6,770*	*100.0%*	*100.0%*
Small Business — Revenue	**Total Businesses**																	
	$1 Million or Less	15	11.5%	$2,055	6.6%	89.2%	5	6.5%	46.1%	$685	3.9%	29.2%	10	18.9%	46.2%	$1,370	10.0%	29.6%
	Over $1 Million	84	64.6%	$25,042	80.1%	10.1%	50	64.9%					34	64.2%				
	Total Rev. available	*99*	*76.1%*	*$27,097*	*86.7%*	*99.3%*	*55*	*71.4%*					*44*	*83.1%*				
	Rev. Not Known	31	23.8%	$4,179	13.4%	0.7%	22	28.6%					9	17.0%				
	Total	130	100.0%	$31,276	100.0%	100.0%	77	100.0%					53	100.0%				
Small Business — Loan Size	$100,000 or Less	60	46.2%	$3,547	11.3%		40	51.9%	90.2%	$2,257	12.8%	29.8%	20	37.7%	90.9%	$1,290	9.4%	28.6%
	$100,001 - $250,000	33	25.4%	$6,170	19.7%		15	19.5%	4.9%	$2,671	15.2%	18.8%	18	34.0%	4.4%	$3,499	25.6%	17.4%
	$250,001 - $1 Million	37	28.5%	$21,559	68.9%		22	28.6%	4.9%	$12,689	72.0%	51.4%	15	28.3%	4.7%	$8,870	64.9%	54.0%
	Total	130	100.0%	$31,276	100.0%		77	100.0%	100.0%	$17,617	100.0%	100.0%	53	100.0%	100.0%	$13,659	100.0%	100.0%
Small Farm — Revenue	**Total Farms**																	
	$1 Million or Less	0	0.0%	$0	0.0%	93.4%	0	0.0%	47.1%	$0	0.0%	23.1%	0	0.0%	17.6%	$0	0.0%	7.4%
	Over $1 Million	4	100.0%	$350	100.0%	6.6%	0	0.0%					4	100.0%				
	Not Known	0	0.0%	$0	0.0%	0.0%	0	0.0%					0	0.0%				
	Total	4	100.0%	$350	100.0%	100.0%	0	0.0%					4	100.0%				
Small Farm — Loan Size	$100,000 or Less	3	75.0%	$150	42.9%		0	0.0%	79.4%	$0	0.0%	19.6%	3	75.0%	79.4%	$150	42.9%	16.2%
	$100,001 - $250,000	1	25.0%	$200	57.1%		0	0.0%	11.8%	$0	0.0%	34.5%	1	25.0%	11.8%	$200	57.1%	32.7%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	8.8%	$0	0.0%	45.9%	0	0.0%	8.8%	$0	0.0%	51.1%
	Total	4	100.0%	$350	100.0%		0	0.0%	100.0%	$0	0.0%	100.0%	4	100.0%	100.0%	$350	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: TX - Houston

Product Type	Tract Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Owner Occupied Units %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $ (000s)	2018 Dollar $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $ (000s)	2019 Dollar $ %	2019 Dollar Agg $ %
HOME PURCHASE	Low	1	1.5%	$57	0.3%	5.5%	1	2.6%	2.8%	$57	0.4%	2.2%	0	0.0%	2.8%	$0	0.0%	2.1%
	Moderate	9	13.6%	$1,105	5.3%	21.2%	7	17.9%	12.8%	$893	5.6%	8.8%	2	7.4%	13.0%	$212	4.2%	9.0%
	Middle	15	22.7%	$2,006	9.6%	27.0%	10	25.6%	26.5%	$1,282	8.0%	20.6%	5	18.5%	26.5%	$724	14.5%	21.0%
	Upper	41	62.1%	$17,786	84.9%	46.3%	21	53.8%	57.9%	$13,722	86.0%	68.3%	20	74.1%	57.6%	$4,064	81.3%	67.8%
	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%
	Total	*66*	*100.0%*	*$20,954*	*100.0%*	*100.0%*	*39*	*100.0%*	*100.0%*	*$15,954*	*100.0%*	*100.0%*	*27*	*100.0%*	*100.0%*	*$5,000*	*100.0%*	*100.0%*
REFINANCE	Low	37	5.6%	$3,436	2.9%	5.5%	24	6.7%	3.0%	$2,450	4.0%	1.9%	13	4.4%	2.7%	$986	1.7%	1.8%
	Moderate	131	20.0%	$13,301	11.1%	21.2%	74	20.6%	15.7%	$7,223	11.9%	10.1%	57	19.3%	12.2%	$6,078	10.3%	7.7%
	Middle	171	26.1%	$25,849	21.6%	27.0%	96	26.7%	28.7%	$15,100	24.9%	21.6%	75	25.3%	24.3%	$10,749	18.2%	17.9%
	Upper	314	47.9%	$76,690	64.0%	46.3%	164	45.7%	52.6%	$35,686	58.7%	66.3%	150	50.7%	60.8%	$41,004	69.4%	72.6%
	Unknown	2	0.3%	$562	0.5%	0.1%	1	0.3%	0.1%	$294	0.5%	0.1%	1	0.3%	0.0%	$268	0.5%	0.0%
	Total	*655*	*100.0%*	*$119,838*	*100.0%*	*100.0%*	*359*	*100.0%*	*100.0%*	*$60,753*	*100.0%*	*100.0%*	*296*	*100.0%*	*100.0%*	*$59,085*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	6	3.2%	$505	2.3%	5.5%	4	4.3%	3.1%	$315	2.9%	2.4%	2	2.1%	3.2%	$190	1.8%	2.5%
	Moderate	34	18.2%	$2,582	12.0%	21.2%	17	18.3%	12.3%	$1,340	12.5%	9.9%	17	18.1%	13.1%	$1,242	11.5%	9.9%
	Middle	47	25.1%	$4,382	20.4%	27.0%	26	28.0%	22.4%	$2,752	25.6%	19.2%	21	22.3%	24.2%	$1,630	15.1%	18.7%
	Upper	100	53.5%	$14,048	65.3%	46.3%	46	49.5%	62.2%	$6,349	59.0%	68.4%	54	57.4%	59.5%	$7,699	71.5%	68.9%
	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%
	Total	*187*	*100.0%*	*$21,517*	*100.0%*	*100.0%*	*93*	*100.0%*	*100.0%*	*$10,756*	*100.0%*	*100.0%*	*94*	*100.0%*	*100.0%*	*$10,761*	*100.0%*	*100.0%*
MULTI FAMILY					Multi-Family Units													
	Low	0	0.0%	$0	0.0%	25.9%	0	0.0%	22.3%	$0	0.0%	14.3%	0	0.0%	21.5%	$0	0.0%	12.6%
	Moderate	0	0.0%	$0	0.0%	27.1%	0	0.0%	32.7%	$0	0.0%	28.0%	0	0.0%	27.8%	$0	0.0%	19.5%
	Middle	0	0.0%	$0	0.0%	20.4%	0	0.0%	18.9%	$0	0.0%	21.3%	0	0.0%	19.5%	$0	0.0%	23.3%
	Upper	0	0.0%	$0	0.0%	25.8%	0	0.0%	25.6%	$0	0.0%	35.8%	0	0.0%	31.2%	$0	0.0%	44.6%
	Unknown	0	0.0%	$0	0.0%	0.8%	0	0.0%	0.4%	$0	0.0%	0.6%	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%*
OTHER PURPOSE LOC	Low	11	3.2%	$1,081	2.4%	5.5%	5	2.9%	1.7%	$315	1.4%	0.9%	6	3.4%	2.8%	$766	3.5%	1.6%
	Moderate	73	21.1%	$6,067	13.6%	21.2%	33	19.3%	11.0%	$2,554	11.4%	6.1%	40	22.9%	10.4%	$3,513	15.9%	6.1%
	Middle	90	26.0%	$8,771	19.7%	27.0%	40	23.4%	20.9%	$3,919	17.5%	14.4%	50	28.6%	19.9%	$4,852	21.9%	15.7%
	Upper	171	49.4%	$28,143	63.2%	46.3%	92	53.8%	66.3%	$15,157	67.7%	78.4%	79	45.1%	66.9%	$12,986	58.7%	76.6%
	Unknown	1	0.3%	$440	1.0%	0.1%	1	0.6%	0.0%	$440	2.0%	0.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*346*	*100.0%*	*$44,502*	*100.0%*	*100.0%*	*171*	*100.0%*	*100.0%*	*$22,385*	*100.0%*	*100.0%*	*175*	*100.0%*	*100.0%*	*$22,117*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: TX - Houston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count		Dollar			Count		Dollar			
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	5.5%	0	0.0%	5.0%	$0	0.0%	3.6%	0	0.0%	4.0%	$0	0.0%	2.6%
	Moderate	0	0.0%	$0	0.0%	21.2%	0	0.0%	16.4%	$0	0.0%	10.9%	0	0.0%	16.1%	$0	0.0%	10.3%
	Middle	3	75.0%	$718	76.1%	27.0%	2	100.0%	29.2%	$550	100.0%	21.0%	1	50.0%	25.4%	$168	42.7%	17.7%
	Upper	1	25.0%	$225	23.9%	46.3%	0	0.0%	49.3%	$0	0.0%	64.4%	1	50.0%	54.5%	$225	57.3%	69.4%
	Unknown	0	0.0%	$0	0.0%	0.1%	0	0.0%	0.1%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*4*	*100.0%*	*$943*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$550*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$393*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	5.5%	0	0.0%	2.9%	$0	0.0%	2.4%	0	0.0%	2.8%	$0	0.0%	1.6%
	Moderate	0	0.0%	$0	0.0%	21.2%	0	0.0%	21.1%	$0	0.0%	15.3%	0	0.0%	20.2%	$0	0.0%	13.6%
	Middle	0	0.0%	$0	0.0%	27.0%	0	0.0%	37.7%	$0	0.0%	32.6%	0	0.0%	38.8%	$0	0.0%	32.6%
	Upper	0	0.0%	$0	0.0%	46.3%	0	0.0%	38.4%	$0	0.0%	49.8%	0	0.0%	38.2%	$0	0.0%	52.3%
	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%
	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	55	4.4%	$5,079	2.4%	5.5%	34	5.1%	2.9%	$3,137	2.8%	3.4%	21	3.5%	2.8%	$1,942	2.0%	3.1%
	Moderate	247	19.6%	$23,055	11.1%	21.2%	131	19.7%	13.7%	$12,010	10.9%	11.2%	116	19.5%	13.0%	$11,045	11.3%	9.9%
	Middle	326	25.9%	$41,726	20.1%	27.0%	174	26.2%	27.2%	$23,603	21.4%	21.1%	152	25.6%	26.2%	$18,123	18.6%	20.7%
	Upper	627	49.8%	$136,892	65.9%	46.3%	323	48.6%	56.1%	$70,914	64.2%	64.2%	304	51.2%	57.9%	$65,978	67.8%	66.3%
	Unknown	3	0.2%	$1,002	0.5%	0.1%	2	0.3%	0.0%	$734	0.7%	0.1%	1	0.2%	0.0%	$268	0.3%	0.0%
	Total	*1,258*	*100.0%*	*$207,754*	*100.0%*	*100.0%*	*664*	*100.0%*	*100.0%*	*$110,398*	*100.0%*	*100.0%*	*594*	*100.0%*	*100.0%*	*$97,356*	*100.0%*	*100.0%*
SMALL BUSINESSES						**Total Businesses**												
	Low	216	15.8%	$63,779	17.2%	10.1%	114	15.7%	10.1%	$33,222	17.7%	12.2%	102	15.9%	10.0%	$30,557	16.7%	11.9%
	Moderate	374	27.3%	$98,004	26.5%	18.9%	195	26.8%	17.6%	$46,296	24.7%	19.6%	179	27.8%	17.4%	$51,708	28.3%	19.0%
	Middle	327	23.9%	$85,741	23.2%	22.4%	173	23.8%	22.0%	$46,195	24.6%	21.7%	154	24.0%	22.2%	$39,546	21.6%	21.9%
	Upper	449	32.8%	$121,519	32.8%	48.4%	243	33.4%	49.1%	$60,643	32.4%	45.8%	206	32.0%	49.3%	$60,876	33.3%	46.3%
	Unknown	4	0.3%	$1,285	0.3%	0.2%	2	0.3%	0.2%	$1,050	0.6%	0.1%	2	0.3%	0.1%	$235	0.1%	0.2%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	1.0%	$0	0.0%	0.6%	0	0.0%	1.0%	$0	0.0%	0.6%
	Total	*1,370*	*100.0%*	*$370,328*	*100.0%*	*100.0%*	*727*	*100.0%*	*100.0%*	*$187,406*	*100.0%*	*100.0%*	*643*	*100.0%*	*100.0%*	*$182,922*	*100.0%*	*100.0%*
SMALL FARM						**Total Farms**												
	Low	0	0.0%	$0	0.0%	3.9%	0	0.0%	2.0%	$0	0.0%	1.7%	0	0.0%	2.3%	$0	0.0%	2.4%
	Moderate	0	0.0%	$0	0.0%	11.4%	0	0.0%	12.1%	$0	0.0%	13.8%	0	0.0%	13.8%	$0	0.0%	16.4%
	Middle	0	0.0%	$0	0.0%	24.2%	0	0.0%	26.2%	$0	0.0%	30.8%	0	0.0%	25.5%	$0	0.0%	37.6%
	Upper	0	0.0%	$0	0.0%	60.3%	0	0.0%	57.3%	$0	0.0%	52.5%	0	0.0%	56.1%	$0	0.0%	42.7%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	2.4%	$0	0.0%	1.2%	0	0.0%	2.3%	$0	0.0%	0.9%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: TX - Houston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
HOME PURCHASE	Low	6	9.1%	$558	2.7%	24.4%	3	7.7%	2.9%	$269	1.7%	1.5%	3	11.1%	2.9%	$289	5.8%	1.4%
	Moderate	10	15.2%	$1,096	5.2%	16.0%	8	20.5%	15.1%	$784	4.9%	9.8%	2	7.4%	16.3%	$312	6.2%	10.4%
	Middle	11	16.7%	$2,023	9.7%	16.9%	7	17.9%	20.7%	$1,392	8.7%	17.0%	4	14.8%	23.3%	$631	12.6%	18.6%
	Upper	36	54.5%	$16,112	76.9%	42.7%	19	48.7%	44.7%	$12,594	78.9%	57.5%	17	63.0%	44.6%	$3,518	70.4%	57.2%
	Unknown	3	4.5%	$1,165	5.6%	0.0%	2	5.1%	16.6%	$915	5.7%	14.2%	1	3.7%	12.9%	$250	5.0%	12.3%
	Total	66	100.0%	$20,954	100.0%	100.0%	39	100.0%	100.0%	$15,954	100.0%	100.0%	27	100.0%	100.0%	$5,000	100.0%	100.0%
REFINANCE	Low	71	10.8%	$6,719	5.6%	24.4%	38	10.6%	7.0%	$3,072	5.1%	3.6%	33	11.1%	4.3%	$3,647	6.2%	2.1%
	Moderate	122	18.6%	$15,934	13.3%	16.0%	78	21.7%	14.6%	$9,169	15.1%	9.4%	44	14.9%	10.2%	$6,765	11.4%	5.6%
	Middle	137	20.9%	$18,460	15.4%	16.9%	73	20.3%	20.0%	$9,820	16.2%	15.2%	64	21.6%	16.4%	$8,640	14.6%	11.2%
	Upper	310	47.3%	$72,074	60.1%	42.7%	164	45.7%	45.5%	$36,233	59.6%	59.2%	146	49.3%	49.5%	$35,841	60.7%	60.9%
	Unknown	15	2.3%	$6,651	5.5%	0.0%	6	1.7%	13.0%	$2,459	4.0%	12.5%	9	3.0%	19.6%	$4,192	7.1%	20.2%
	Total	655	100.0%	$119,838	100.0%	100.0%	359	100.0%	100.0%	$60,753	100.0%	100.0%	296	100.0%	100.0%	$59,085	100.0%	100.0%
HOME IMPROVEMENT	Low	21	11.2%	$1,497	7.0%	24.4%	8	8.6%	5.1%	$562	5.2%	3.6%	13	13.8%	5.2%	$935	8.7%	3.1%
	Moderate	31	16.6%	$2,557	11.9%	16.0%	18	19.4%	11.9%	$1,661	15.4%	9.2%	13	13.8%	11.8%	$896	8.3%	8.3%
	Middle	41	21.9%	$4,383	20.4%	16.9%	18	19.4%	16.2%	$2,147	20.0%	12.6%	23	24.5%	17.4%	$2,236	20.8%	12.7%
	Upper	86	46.0%	$12,519	58.2%	42.7%	42	45.2%	61.7%	$5,888	54.7%	65.8%	44	46.8%	62.0%	$6,631	61.6%	70.7%
	Unknown	8	4.3%	$561	2.6%	0.0%	7	7.5%	5.1%	$498	4.6%	8.9%	1	1.1%	3.6%	$63	0.6%	5.3%
	Total	187	100.0%	$21,517	100.0%	100.0%	93	100.0%	100.0%	$10,756	100.0%	100.0%	94	100.0%	100.0%	$10,761	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	$0	0.0%	24.4%	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%	16.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.0%
	Middle	0	0.0%	$0	0.0%	16.9%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.2%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	42.7%	0	0.0%	2.2%	$0	0.0%	0.1%	0	0.0%	1.1%	$0	0.0%	0.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	97.8%	$0	0.0%	99.9%	0	0.0%	98.4%	$0	0.0%	99.9%
	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%
OTHER PURPOSE LOC	Low	60	17.3%	$3,853	8.7%	24.4%	35	20.5%	8.1%	$2,272	10.1%	4.2%	25	14.3%	5.7%	$1,581	7.1%	2.7%
	Moderate	60	17.3%	$5,601	12.6%	16.0%	25	14.6%	11.7%	$2,393	10.7%	7.0%	35	20.0%	11.6%	$3,208	14.5%	6.7%
	Middle	64	18.5%	$7,075	15.9%	16.9%	28	16.4%	16.9%	$3,222	14.4%	11.6%	36	20.6%	16.4%	$3,853	17.4%	11.5%
	Upper	152	43.9%	$26,692	60.0%	42.7%	79	46.2%	60.6%	$13,883	62.0%	75.2%	73	41.7%	63.2%	$12,809	57.9%	75.6%
	Unknown	10	2.9%	$1,281	2.9%	0.0%	4	2.3%	2.8%	$615	2.7%	2.1%	6	3.4%	3.3%	$666	3.0%	3.5%
	Total	346	100.0%	$44,502	100.0%	100.0%	171	100.0%	100.0%	$22,385	100.0%	100.0%	175	100.0%	100.0%	$22,117	100.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: TX - Houston

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	24.4%	0	0.0%	6.0%	$0	0.0%	3.4%	0	0.0%	6.1%	$0	0.0%	3.3%
	Moderate	0	0.0%	$0	0.0%	16.0%	0	0.0%	14.4%	$0	0.0%	7.9%	0	0.0%	13.8%	$0	0.0%	8.0%
	Middle	1	25.0%	$76	8.1%	16.9%	1	50.0%	21.2%	$76	13.8%	13.0%	0	0.0%	22.4%	$0	0.0%	14.9%
	Upper	3	75.0%	$867	91.9%	42.7%	1	50.0%	45.8%	$474	86.2%	60.4%	2	100.0%	50.9%	$393	100.0%	65.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	12.7%	$0	0.0%	15.3%	0	0.0%	6.7%	$0	0.0%	8.8%
	Total	4	100.0%	$943	100.0%	100.0%	2	100.0%	100.0%	$550	100.0%	100.0%	2	100.0%	100.0%	$393	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	24.4%	0	0.0%	1.0%	$0	0.0%	0.5%	0	0.0%	1.1%	$0	0.0%	0.4%
	Moderate	0	0.0%	$0	0.0%	16.0%	0	0.0%	2.2%	$0	0.0%	1.4%	0	0.0%	1.3%	$0	0.0%	0.9%
	Middle	0	0.0%	$0	0.0%	16.9%	0	0.0%	1.8%	$0	0.0%	1.3%	0	0.0%	0.8%	$0	0.0%	0.9%
	Upper	0	0.0%	$0	0.0%	42.7%	0	0.0%	3.2%	$0	0.0%	3.9%	0	0.0%	2.3%	$0	0.0%	3.7%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	91.8%	$0	0.0%	92.9%	0	0.0%	94.5%	$0	0.0%	94.2%
	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	158	12.6%	$12,627	6.1%	24.4%	84	12.7%	3.7%	$6,175	5.6%	1.6%	74	12.5%	3.3%	$6,452	6.6%	1.4%
	Moderate	223	17.7%	$25,188	12.1%	16.0%	129	19.4%	14.2%	$14,007	12.7%	8.5%	94	15.8%	14.3%	$11,181	11.5%	8.2%
	Middle	254	20.2%	$32,017	15.4%	16.9%	127	19.1%	19.5%	$16,657	15.1%	14.4%	127	21.4%	20.8%	$15,360	15.8%	14.8%
	Upper	587	46.7%	$128,264	61.7%	42.7%	305	45.9%	43.5%	$69,072	62.6%	50.6%	282	47.5%	45.2%	$59,192	60.8%	51.8%
	Unknown	36	2.9%	$9,658	4.6%	0.0%	19	2.9%	19.1%	$4,487	4.1%	24.8%	17	2.9%	16.4%	$5,171	5.3%	23.8%
	Total	1,258	100.0%	$207,754	100.0%	100.0%	664	100.0%	100.0%	$110,398	100.0%	100.0%	594	100.0%	100.0%	$97,356	100.0%	100.0%

Total Businesses

PRODUCT TYPE		Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Total Businesses %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
Small Business	Revenue	$1 Million or Less	318	23.2%	$63,953	17.3%	91.2%	136	18.7%	40.7%	$25,495	13.6%	32.9%	182	28.3%	45.1%	$38,458	21.0%	34.2%
		Over $1 Million	681	49.7%	$225,404	60.9%	7.7%	360	49.5%					321	49.9%				
		Total Rev. available	999	72.9%	$289,357	78.2%	98.9%	496	68.2%					503	78.2%				
		Rev. Not Known	371	27.1%	$80,971	21.9%	1.1%	231	31.8%					140	21.8%				
		Total	1,370	100.0%	$370,328	100.0%	100.0%	727	100.0%					643	100.0%				
	Loan Size	$100,000 or Less	582	42.5%	$36,152	9.8%		335	46.1%	93.9%	$20,422	10.9%	39.9%	247	38.4%	94.4%	$15,730	8.6%	41.6%
		$100,001 - $250,000	326	23.8%	$66,311	17.9%		160	22.0%	3.1%	$32,701	17.4%	14.8%	166	25.8%	2.9%	$33,610	18.4%	14.1%
		$250,001 - $1 Million	462	33.7%	$267,865	72.3%		232	31.9%	3.0%	$134,283	71.7%	45.3%	230	35.8%	2.8%	$133,582	73.0%	44.2%
		Total	1,370	100.0%	$370,328	100.0%		727	100.0%	100.0%	$187,406	100.0%	100.0%	643	100.0%	100.0%	$182,922	100.0%	100.0%

Total Farms

PRODUCT TYPE		Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Total Farms %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
Small Farm	Revenue	$1 Million or Less	0	0.0%	$0	0.0%	98.0%	0	0.0%	48.3%	$0	0.0%	61.5%	0	0.0%	61.6%	$0	0.0%	66.7%
		Over $1 Million	0	0.0%	$0	0.0%	1.6%	0	0.0%					0	0.0%				
		Not Known	0	0.0%	$0	0.0%	0.4%	0	0.0%					0	0.0%				
		Total	0	0.0%	$0	0.0%	100.0%	0	0.0%					0	0.0%				
	Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	92.0%	$0	0.0%	46.1%	0	0.0%	92.4%	$0	0.0%	43.7%
		$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	5.3%	$0	0.0%	25.8%	0	0.0%	4.6%	$0	0.0%	22.4%
		$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	2.7%	$0	0.0%	28.1%	0	0.0%	3.0%	$0	0.0%	33.9%
		Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: TX - San Antonio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		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%	5.1%	0	0.0%	1.5%	$0	0.0%	1.0%	0	0.0%	1.6%	$0	0.0%	1.0%
	Moderate	0	0.0%	$0	0.0%	27.1%	0	0.0%	14.2%	$0	0.0%	9.3%	0	0.0%	14.5%	$0	0.0%	9.7%
	Middle	0	0.0%	$0	0.0%	27.4%	0	0.0%	32.7%	$0	0.0%	26.7%	0	0.0%	32.8%	$0	0.0%	27.3%
	Upper	1	100.0%	$227	100.0%	40.4%	1	100.0%	51.6%	$227	100.0%	63.0%	0	0.0%	51.1%	$0	0.0%	62.0%
	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%
	Total	*1*	*100.0%*	*$227*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$227*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
REFINANCE	Low	1	4.8%	$67	2.2%	5.1%	1	11.1%	1.9%	$67	6.5%	1.2%	0	0.0%	1.7%	$0	0.0%	1.0%
	Moderate	3	14.3%	$208	6.9%	27.1%	1	11.1%	19.4%	$65	6.3%	11.7%	2	16.7%	14.8%	$143	7.3%	8.7%
	Middle	5	23.8%	$412	13.7%	27.4%	2	22.2%	30.4%	$193	18.8%	23.7%	3	25.0%	28.0%	$219	11.1%	21.7%
	Upper	12	57.1%	$2,310	77.1%	40.4%	5	55.6%	48.2%	$703	68.4%	63.4%	7	58.3%	55.4%	$1,607	81.6%	68.5%
	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	*21*	*100.0%*	*$2,997*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$1,028*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$1,969*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	3	27.3%	$70	9.7%	5.1%	1	20.0%	2.8%	$20	12.3%	1.9%	2	33.3%	3.2%	$50	8.9%	2.3%
	Moderate	3	27.3%	$88	12.1%	27.1%	3	60.0%	20.8%	$88	54.0%	16.6%	0	0.0%	19.8%	$0	0.0%	14.0%
	Middle	2	18.2%	$155	21.4%	27.4%	1	20.0%	22.1%	$55	33.7%	18.4%	1	16.7%	22.8%	$100	17.8%	17.6%
	Upper	3	27.3%	$412	56.8%	40.4%	0	0.0%	54.3%	$0	0.0%	63.1%	3	50.0%	54.3%	$412	73.3%	66.0%
	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%
	Total	*11*	*100.0%*	*$725*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$163*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$562*	*100.0%*	*100.0%*
MULTI FAMILY				Multi-Family Units														
	Low	0	0.0%	$0	0.0%	7.0%	0	0.0%	4.0%	$0	0.0%	2.6%	0	0.0%	9.8%	$0	0.0%	5.5%
	Moderate	0	0.0%	$0	0.0%	38.4%	0	0.0%	46.4%	$0	0.0%	32.3%	0	0.0%	38.6%	$0	0.0%	32.4%
	Middle	0	0.0%	$0	0.0%	30.5%	0	0.0%	28.0%	$0	0.0%	26.1%	0	0.0%	30.3%	$0	0.0%	27.8%
	Upper	0	0.0%	$0	0.0%	24.1%	0	0.0%	21.6%	$0	0.0%	38.9%	0	0.0%	21.2%	$0	0.0%	34.3%
	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%*
OTHER PURPOSE LOC	Low	1	3.7%	$10	0.6%	5.1%	1	6.3%	1.3%	$10	0.8%	0.5%	0	0.0%	1.6%	$0	0.0%	0.9%
	Moderate	11	40.7%	$491	27.6%	27.1%	5	31.3%	13.7%	$228	18.3%	7.6%	6	54.5%	12.9%	$263	49.3%	7.5%
	Middle	4	14.8%	$228	12.8%	27.4%	2	12.5%	18.6%	$120	9.6%	12.7%	2	18.2%	18.8%	$108	20.3%	11.9%
	Upper	11	40.7%	$1,051	59.0%	40.4%	8	50.0%	66.3%	$889	71.3%	79.2%	3	27.3%	66.8%	$162	30.4%	79.7%
	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	*27*	*100.0%*	*$1,780*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*$1,247*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$533*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: TX - San Antonio

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					2018 Bank & Aggregate Lending Comparison						2019					
		Bank Count		Bank Dollar		Owner Occupied Units	Count Bank		Agg	Dollar Bank		Agg	Count Bank		Agg	Dollar Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	5.1%	0	0.0%	4.3%	$0	0.0%	3.2%	0	0.0%	4.5%	$0	0.0%	1.9%
	Moderate	0	0.0%	$0	0.0%	27.1%	0	0.0%	26.8%	$0	0.0%	19.6%	0	0.0%	27.6%	$0	0.0%	16.0%
	Middle	0	0.0%	$0	0.0%	27.4%	0	0.0%	29.1%	$0	0.0%	25.4%	0	0.0%	23.8%	$0	0.0%	15.5%
	Upper	1	100.0%	$114	100.0%	40.4%	0	0.0%	39.9%	$0	0.0%	51.8%	1	100.0%	44.1%	$114	100.0%	66.5%
	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	*1*	*100.0%*	*$114*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$114*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	5.1%	0	0.0%	2.9%	$0	0.0%	1.3%	0	0.0%	2.2%	$0	0.0%	1.1%
	Moderate	0	0.0%	$0	0.0%	27.1%	0	0.0%	25.3%	$0	0.0%	16.3%	0	0.0%	27.7%	$0	0.0%	18.6%
	Middle	0	0.0%	$0	0.0%	27.4%	0	0.0%	39.9%	$0	0.0%	36.8%	0	0.0%	39.8%	$0	0.0%	36.4%
	Upper	0	0.0%	$0	0.0%	40.4%	0	0.0%	31.9%	$0	0.0%	45.5%	0	0.0%	30.3%	$0	0.0%	43.8%
	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	*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	5	8.2%	$147	2.5%	5.1%	3	9.7%	1.7%	$97	3.6%	1.2%	2	6.7%	1.7%	$50	1.6%	1.4%
	Moderate	17	27.9%	$787	13.5%	27.1%	9	29.0%	16.1%	$381	14.3%	12.2%	8	26.7%	15.3%	$406	12.8%	11.8%
	Middle	11	18.0%	$795	13.6%	27.4%	5	16.1%	32.1%	$368	13.8%	26.3%	6	20.0%	31.4%	$427	13.4%	26.1%
	Upper	28	45.9%	$4,114	70.4%	40.4%	14	45.2%	50.2%	$1,819	68.3%	60.3%	14	46.7%	51.6%	$2,295	72.2%	60.7%
	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	*61*	*100.0%*	*$5,843*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*$2,665*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*$3,178*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	14	11.5%	$2,670	8.0%	5.0%	9	14.3%	4.5%	$1,600	10.6%	5.8%	5	8.5%	4.5%	$1,070	5.8%	6.0%
	Moderate	27	22.1%	$7,973	23.9%	22.8%	15	23.8%	21.9%	$3,818	25.3%	21.0%	12	20.3%	21.4%	$4,155	22.7%	21.4%
	Middle	26	21.3%	$6,097	18.3%	28.4%	10	15.9%	26.8%	$2,677	17.8%	27.6%	16	27.1%	26.2%	$3,420	18.7%	27.3%
	Upper	55	45.1%	$16,646	49.9%	43.5%	29	46.0%	45.7%	$6,982	46.3%	44.9%	26	44.1%	46.1%	$9,664	52.8%	44.2%
	Unknown	0	0.0%	$0	0.0%	0.2%	0	0.0%	0.3%	$0	0.0%	0.4%	0	0.0%	0.2%	$0	0.0%	0.2%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.8%	$0	0.0%	0.5%	0	0.0%	1.5%	$0	0.0%	0.8%
	Total	*122*	*100.0%*	*$33,386*	*100.0%*	*100.0%*	*63*	*100.0%*	*100.0%*	*$15,077*	*100.0%*	*100.0%*	*59*	*100.0%*	*100.0%*	*$18,309*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	0	0.0%	$0	0.0%	1.3%	0	0.0%	0.8%	$0	0.0%	0.3%	0	0.0%	2.1%	$0	0.0%	0.5%
	Moderate	0	0.0%	$0	0.0%	10.9%	0	0.0%	14.9%	$0	0.0%	6.4%	0	0.0%	12.2%	$0	0.0%	8.3%
	Middle	0	0.0%	$0	0.0%	24.3%	0	0.0%	9.9%	$0	0.0%	6.5%	0	0.0%	18.6%	$0	0.0%	14.7%
	Upper	0	0.0%	$0	0.0%	63.5%	0	0.0%	71.9%	$0	0.0%	85.5%	0	0.0%	64.9%	$0	0.0%	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	2.5%	$0	0.0%	1.3%	0	0.0%	2.1%	$0	0.0%	1.2%
	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%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2

Assessment Area: TX - San Antonio

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Bank Count #	2018 Bank Count %	2018 Agg Count %	2018 Bank Dollar $(000s)	2018 Bank Dollar $ %	2018 Agg Dollar $ %	2019 Bank Count #	2019 Bank Count %	2019 Agg Count %	2019 Bank Dollar $(000s)	2019 Bank Dollar $ %	2019 Agg Dollar $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	23.8%	0	0.0%	2.6%	$0	0.0%	1.3%	0	0.0%	3.0%	$0	0.0%	1.4%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	13.5%	$0	0.0%	9.0%	0	0.0%	16.1%	$0	0.0%	10.9%
	Middle	0	0.0%	$0	0.0%	19.1%	0	0.0%	23.2%	$0	0.0%	20.1%	0	0.0%	24.5%	$0	0.0%	21.2%
	Upper	1	100.0%	$227	100.0%	39.4%	1	100.0%	41.1%	$227	100.0%	52.1%	0	0.0%	38.7%	$0	0.0%	48.8%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	19.6%	$0	0.0%	17.5%	0	0.0%	17.7%	$0	0.0%	17.6%
	Total	*1*	*100.0%*	*$227*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$227*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
REFINANCE	Low	3	14.3%	$196	6.5%	23.8%	1	11.1%	7.2%	$67	6.5%	3.7%	2	16.7%	5.2%	$129	6.6%	2.5%
	Moderate	5	23.8%	$545	18.2%	17.6%	1	11.1%	14.0%	$132	12.8%	8.9%	4	33.3%	10.1%	$413	21.0%	5.4%
	Middle	5	23.8%	$643	21.5%	19.1%	3	33.3%	21.4%	$449	43.7%	16.5%	2	16.7%	15.8%	$194	9.9%	10.9%
	Upper	8	38.1%	$1,613	53.8%	39.4%	4	44.4%	41.3%	$380	37.0%	52.6%	4	33.3%	36.3%	$1,233	62.6%	42.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	16.1%	$0	0.0%	18.3%	0	0.0%	32.6%	$0	0.0%	38.8%
	Total	*21*	*100.0%*	*$2,997*	*100.0%*	*100.0%*	*9*	*100.0%*	*100.0%*	*$1,028*	*100.0%*	*100.0%*	*12*	*100.0%*	*100.0%*	*$1,969*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	3	27.3%	$98	13.5%	23.8%	3	60.0%	7.6%	$98	60.1%	4.3%	0	0.0%	7.8%	$0	0.0%	4.6%
	Moderate	2	18.2%	$140	19.3%	17.6%	0	0.0%	12.7%	$0	0.0%	8.7%	2	33.3%	13.2%	$140	24.9%	10.1%
	Middle	3	27.3%	$285	39.3%	19.1%	1	20.0%	19.5%	$10	6.1%	15.0%	2	33.3%	23.2%	$275	48.9%	17.3%
	Upper	3	27.3%	$202	27.9%	39.4%	1	20.0%	56.6%	$55	33.7%	65.0%	2	33.3%	53.5%	$147	26.2%	64.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	3.7%	$0	0.0%	7.0%	0	0.0%	2.4%	$0	0.0%	3.5%
	Total	*11*	*100.0%*	*$725*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$163*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$562*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	23.8%	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%	17.6%	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%	19.1%	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%	39.4%	0	0.0%	2.4%	$0	0.0%	0.1%	0	0.0%	3.0%	$0	0.0%	0.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	97.6%	$0	0.0%	99.9%	0	0.0%	97.0%	$0	0.0%	99.9%
	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%*
OTHER PURPOSE LOC	Low	5	18.5%	$144	8.1%	23.8%	4	25.0%	9.5%	$124	9.9%	6.4%	1	9.1%	5.5%	$20	3.8%	1.9%
	Moderate	9	33.3%	$536	30.1%	17.6%	5	31.3%	14.7%	$390	31.3%	10.3%	4	36.4%	15.2%	$146	27.4%	8.4%
	Middle	6	22.2%	$642	36.1%	19.1%	2	12.5%	18.0%	$323	25.9%	9.9%	4	36.4%	16.0%	$319	59.8%	10.4%
	Upper	6	22.2%	$448	25.2%	39.4%	4	25.0%	53.9%	$400	32.1%	70.7%	2	18.2%	60.2%	$48	9.0%	76.7%
	Unknown	1	3.7%	$10	0.6%	0.0%	1	6.3%	3.9%	$10	0.8%	2.6%	0	0.0%	3.1%	$0	0.0%	2.7%
	Total	*27*	*100.0%*	*$1,780*	*100.0%*	*100.0%*	*16*	*100.0%*	*100.0%*	*$1,247*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$533*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: TX - San Antonio

PRODUCT TYPE	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $ (000s)	Bank Dollar $ %	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $ %	2018 Dollar Agg $ %	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $ %	2019 Dollar Agg $ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	23.8%	0	0.0%	8.4%	$0	0.0%	5.8%	0	0.0%	10.5%	$0	0.0%	5.2%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	16.5%	$0	0.0%	10.6%	0	0.0%	18.6%	$0	0.0%	9.8%
	Middle	1	100.0%	$114	100.0%	19.1%	0	0.0%	24.5%	$0	0.0%	17.8%	1	100.0%	21.7%	$114	100.0%	14.7%
	Upper	0	0.0%	$0	0.0%	39.4%	0	0.0%	41.6%	$0	0.0%	52.6%	0	0.0%	43.1%	$0	0.0%	63.0%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	9.0%	$0	0.0%	13.2%	0	0.0%	6.0%	$0	0.0%	7.3%
	Total	*1*	*100.0%*	*$114*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$114*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	23.8%	0	0.0%	0.4%	$0	0.0%	0.2%	0	0.0%	0.2%	$0	0.0%	0.2%
	Moderate	0	0.0%	$0	0.0%	17.6%	0	0.0%	1.7%	$0	0.0%	1.5%	0	0.0%	0.5%	$0	0.0%	0.3%
	Middle	0	0.0%	$0	0.0%	19.1%	0	0.0%	1.1%	$0	0.0%	1.1%	0	0.0%	0.4%	$0	0.0%	0.4%
	Upper	0	0.0%	$0	0.0%	39.4%	0	0.0%	2.3%	$0	0.0%	2.8%	0	0.0%	0.9%	$0	0.0%	1.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	94.6%	$0	0.0%	94.4%	0	0.0%	98.0%	$0	0.0%	97.7%
	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	11	18.0%	$438	7.5%	23.8%	8	25.8%	3.7%	$289	10.8%	1.6%	3	10.0%	3.7%	$149	4.7%	1.6%
	Moderate	16	26.2%	$1,221	20.9%	17.6%	6	19.4%	13.1%	$522	19.6%	7.9%	10	33.3%	14.1%	$699	22.0%	8.6%
	Middle	15	24.6%	$1,684	28.8%	19.1%	6	19.4%	21.8%	$782	29.3%	17.1%	9	30.0%	21.5%	$902	28.4%	16.7%
	Upper	18	29.5%	$2,490	42.6%	39.4%	10	32.3%	40.1%	$1,062	39.8%	46.0%	8	26.7%	37.5%	$1,428	44.9%	42.5%
	Unknown	1	1.6%	$10	0.2%	0.0%	1	3.2%	21.4%	$10	0.4%	27.4%	0	0.0%	23.2%	$0	0.0%	30.6%
	Total	*61*	*100.0%*	*$5,843*	*100.0%*	*100.0%*	*31*	*100.0%*	*100.0%*	*$2,665*	*100.0%*	*100.0%*	*30*	*100.0%*	*100.0%*	*$3,178*	*100.0%*	*100.0%*

PRODUCT TYPE			#	%	$ (000s)	$ %	Total Businesses	#	%	Agg %	$(000s)	$ %	Agg $ %	#	%	Agg %	$(000s)	$ %	Agg $ %
Small Business	Revenue	$1 Million or Less	29	23.8%	$7,615	22.8%	92.4%	14	22.2%	43.2%	$4,365	29.0%	32.9%	15	25.4%	42.9%	$3,250	17.8%	31.7%
		Over $1 Million	67	54.9%	$21,476	64.3%	6.7%	31	49.2%					36	61.0%				
		Total Rev. available	96	78.7%	$29,091	87.1%	99.1%	45	71.4%					51	86.4%				
		Rev. Not Known	26	21.3%	$4,295	12.9%	0.9%	18	28.6%					8	13.6%				
		Total	122	100.0%	$33,386	100.0%	100.0%	63	100.0%					59	100.0%				
	Loan Size	$100,000 or Less	49	40.2%	$2,936	8.8%		28	44.4%	92.0%	$1,664	11.0%	35.2%	21	35.6%	93.2%	$1,272	6.9%	37.7%
		$100,001 - $250,000	34	27.9%	$6,289	18.8%		18	28.6%	4.1%	$3,377	22.4%	16.1%	16	27.1%	3.4%	$2,912	15.9%	15.1%
		$250,001 - $1 Million	39	32.0%	$24,161	72.4%		17	27.0%	3.9%	$10,036	66.6%	48.7%	22	37.3%	3.4%	$14,125	77.1%	47.1%
		Total	122	100.0%	$33,386	100.0%		63	100.0%	100.0%	$15,077	100.0%	100.0%	59	100.0%	100.0%	$18,309	100.0%	100.0%
Small Farm	Revenue	$1 Million or Less	0	0.0%	$0	0.0%	Total Farms 98.9%	0	0.0%	52.9%	$0	0.0%	39.5%	0	0.0%	61.2%	$0	0.0%	75.0%
		Over $1 Million	0	0.0%	$0	0.0%	1.1%	0	0.0%					0	0.0%				
		Not Known	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%					0	0.0%				
	Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	86.0%	$0	0.0%	30.9%	0	0.0%	91.0%	$0	0.0%	34.6%
		$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	6.6%	$0	0.0%	20.7%	0	0.0%	3.2%	$0	0.0%	12.8%
		$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	7.4%	$0	0.0%	48.5%	0	0.0%	5.9%	$0	0.0%	52.7%
		Total	0	0.0%	$0	0.0%		0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	100.0%	$0	0.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Appendix H – Nonmetropolitan Limited-Scope Assessment Area Loan Tables

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: MI - Lenawee County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019				Bank & Aggregate Lending Comparison											
		Bank			Owner Occupied Units %	2018						2019					
		Count		Dollar		Count			Dollar			Count			Dollar		
		#	%	$ (000s)	$ %	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
						#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	1	50.0%	$104	61.5%	51.6%	1	100.0%	55.9%	$104	100.0%	52.4%	0	0.0%	57.5%	$0	0.0%	54.1%
	Upper	1	50.0%	$65	38.5%	48.4%	0	0.0%	44.1%	$0	0.0%	47.6%	1	100.0%	42.5%	$65	100.0%	45.9%
	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%*	*$169*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$104*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$65*	*100.0%*	*100.0%*
REFINANCE	Low	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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	6	50.0%	$658	65.5%	51.6%	5	71.4%	57.5%	$598	84.5%	53.0%	1	20.0%	47.8%	$60	20.3%	42.9%
	Upper	6	50.0%	$346	34.5%	48.4%	2	28.6%	42.5%	$110	15.5%	47.0%	4	80.0%	52.2%	$236	79.7%	57.1%
	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	*12*	*100.0%*	*$1,004*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$708*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$296*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	7	87.5%	$691	92.0%	51.6%	4	80.0%	57.5%	$358	85.6%	44.7%	3	100.0%	51.9%	$333	100.0%	60.8%
	Upper	1	12.5%	$60	8.0%	48.4%	1	20.0%	42.5%	$60	14.4%	55.3%	0	0.0%	48.1%	$0	0.0%	39.2%
	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	*8*	*100.0%*	*$751*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$418*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$333*	*100.0%*	*100.0%*
MULTI FAMILY					**Multi-Family Units**													
	Low	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%	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%	86.4%	0	0.0%	33.3%	$0	0.0%	55.6%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	13.6%	0	0.0%	66.7%	$0	0.0%	44.4%	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%
	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*	*0.0%*	*0.0%*
OTHER PURPOSE LOC	Low	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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	6	35.3%	$305	26.8%	51.6%	3	50.0%	44.9%	$150	33.3%	49.1%	3	27.3%	37.7%	$155	22.5%	26.6%
	Upper	11	64.7%	$833	73.2%	48.4%	3	50.0%	55.1%	$300	66.7%	50.9%	8	72.7%	62.3%	$533	77.5%	73.4%
	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	*17*	*100.0%*	*$1,138*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$450*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$688*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: MI - Lenawee County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count		Dollar			Count		Dollar			
							Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg	
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	1	100.0%	$180	100.0%	51.6%	1	100.0%	52.0%	$180	100.0%	45.4%	0	0.0%	36.4%	$0	0.0%	11.3%
	Upper	0	0.0%	$0	0.0%	48.4%	0	0.0%	48.0%	$0	0.0%	54.6%	0	0.0%	63.6%	$0	0.0%	88.7%
	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	*1*	*100.0%*	*$180*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$180*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	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%	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%	51.6%	0	0.0%	63.6%	$0	0.0%	57.7%	0	0.0%	63.6%	$0	0.0%	60.2%
	Upper	0	0.0%	$0	0.0%	48.4%	0	0.0%	36.4%	$0	0.0%	42.3%	0	0.0%	36.4%	$0	0.0%	39.8%
	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	*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%	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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	21	52.5%	$1,938	59.8%	51.6%	14	70.0%	55.4%	$1,390	74.7%	52.3%	7	35.0%	52.3%	$548	39.7%	48.8%
	Upper	19	47.5%	$1,304	40.2%	48.4%	6	30.0%	44.6%	$470	25.3%	47.7%	13	65.0%	47.7%	$834	60.3%	51.2%
	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	*40*	*100.0%*	*$3,242*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*$1,860*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*$1,382*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Middle	7	87.5%	$1,345	87.1%	60.1%	3	100.0%	52.7%	$180	100.0%	42.8%	4	80.0%	54.4%	$1,165	85.3%	42.4%
	Upper	1	12.5%	$200	12.9%	39.9%	0	0.0%	47.3%	$0	0.0%	57.2%	1	20.0%	45.6%	$200	14.7%	57.6%
	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%
	Tr 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%
	Total	*8*	*100.0%*	*$1,545*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$180*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$1,365*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	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%	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%	40.4%	0	0.0%	9.1%	$0	0.0%	0.3%	0	0.0%	12.5%	$0	0.0%	2.1%
	Upper	3	100.0%	$1,033	100.0%	59.6%	2	100.0%	90.9%	$583	100.0%	99.7%	1	100.0%	87.5%	$450	100.0%	97.9%
	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%
	Tr 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%
	Total	*3*	*100.0%*	*$1,033*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$583*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$450*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: MI - Lenawee County

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	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%	13.9%	0	0.0%	3.6%	$0	0.0%	1.9%	0	0.0%	2.6%	$0	0.0%	1.5%
	Moderate	0	0.0%	$0	0.0%	13.0%	0	0.0%	15.4%	$0	0.0%	10.4%	0	0.0%	19.0%	$0	0.0%	13.3%
	Middle	1	50.0%	$65	38.5%	20.9%	0	0.0%	27.3%	$0	0.0%	22.7%	1	100.0%	22.3%	$65	100.0%	18.1%
	Upper	1	50.0%	$104	61.5%	52.3%	1	100.0%	38.5%	$104	100.0%	51.2%	0	0.0%	46.0%	$0	0.0%	56.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	15.2%	$0	0.0%	13.7%	0	0.0%	10.1%	$0	0.0%	10.4%
	Total	*2*	*100.0%*	*$169*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$104*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$65*	*100.0%*	*100.0%*
REFINANCE	Low	4	33.3%	$210	20.9%	13.9%	2	28.6%	4.9%	$110	15.5%	2.2%	2	40.0%	3.3%	$100	33.8%	2.0%
	Moderate	0	0.0%	$0	0.0%	13.0%	0	0.0%	12.0%	$0	0.0%	9.9%	0	0.0%	10.7%	$0	0.0%	6.0%
	Middle	2	16.7%	$110	11.0%	20.9%	0	0.0%	22.2%	$0	0.0%	20.7%	2	40.0%	24.2%	$110	37.2%	20.0%
	Upper	6	50.0%	$684	68.1%	52.3%	5	71.4%	42.1%	$598	84.5%	51.5%	1	20.0%	45.8%	$86	29.1%	54.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	18.8%	$0	0.0%	15.7%	0	0.0%	16.0%	$0	0.0%	17.0%
	Total	*12*	*100.0%*	*$1,004*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$708*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$296*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	1	12.5%	$75	10.0%	13.9%	1	20.0%	7.5%	$75	17.9%	6.6%	0	0.0%	3.8%	$0	0.0%	1.7%
	Moderate	1	12.5%	$108	14.4%	13.0%	1	20.0%	15.0%	$108	25.8%	14.4%	0	0.0%	11.5%	$0	0.0%	8.7%
	Middle	5	62.5%	$508	67.6%	20.9%	2	40.0%	17.5%	$175	41.9%	16.0%	3	100.0%	30.8%	$333	100.0%	20.5%
	Upper	1	12.5%	$60	8.0%	52.3%	1	20.0%	52.5%	$60	14.4%	59.0%	0	0.0%	50.0%	$0	0.0%	66.3%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	7.5%	$0	0.0%	3.9%	0	0.0%	3.8%	$0	0.0%	2.7%
	Total	*8*	*100.0%*	*$751*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$418*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$333*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	13.9%	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%	13.0%	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%	20.9%	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%	52.3%	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%	100.0%	$0	0.0%	100.0%	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%*	*0.0%*	*$0*	*0.0%*	*0.0%*
OTHER PURPOSE LOC	Low	1	5.9%	$50	4.4%	13.9%	1	16.7%	5.1%	$50	11.1%	3.6%	0	0.0%	5.7%	$0	0.0%	3.5%
	Moderate	4	23.5%	$170	14.9%	13.0%	3	50.0%	20.5%	$150	33.3%	13.6%	1	9.1%	17.0%	$20	2.9%	10.6%
	Middle	2	11.8%	$254	22.3%	20.9%	0	0.0%	20.5%	$0	0.0%	21.0%	2	18.2%	15.1%	$254	36.9%	22.1%
	Upper	10	58.8%	$664	58.3%	52.3%	2	33.3%	51.3%	$250	55.6%	60.8%	8	72.7%	62.3%	$414	60.2%	63.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	2.6%	$0	0.0%	0.9%	0	0.0%	0.0%	$0	0.0%	0.0%
	Total	*17*	*100.0%*	*$1,138*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$450*	*100.0%*	*100.0%*	*11*	*100.0%*	*100.0%*	*$688*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2

Assessment Area: MI - Lenawee County

Product Type	Borrower Income Levels	Bank Count #	Bank Count %	Bank Dollar $(000s)	Bank Dollar $%	Families by Family Income %	2018 Count Bank #	2018 Count Bank %	2018 Count Agg %	2018 Dollar Bank $(000s)	2018 Dollar Bank $%	2018 Dollar Agg $%	2019 Count Bank #	2019 Count Bank %	2019 Count Agg %	2019 Dollar Bank $(000s)	2019 Dollar Bank $%	2019 Dollar Agg $%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	13.9%	0	0.0%	4.0%	$0	0.0%	3.3%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	13.0%	0	0.0%	12.0%	$0	0.0%	9.0%	0	0.0%	9.1%	$0	0.0%	2.1%
	Middle	1	100.0%	$180	100.0%	20.9%	1	100.0%	16.0%	$180	100.0%	14.5%	0	0.0%	36.4%	$0	0.0%	12.3%
	Upper	0	0.0%	$0	0.0%	52.3%	0	0.0%	56.0%	$0	0.0%	50.7%	0	0.0%	45.5%	$0	0.0%	9.2%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	12.0%	$0	0.0%	22.6%	0	0.0%	9.1%	$0	0.0%	76.4%
	Total	*1*	*100.0%*	*$180*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$180*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	13.9%	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%	13.0%	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%	20.9%	0	0.0%	9.1%	$0	0.0%	9.5%	0	0.0%	0.0%	$0	0.0%	0.0%
	Upper	0	0.0%	$0	0.0%	52.3%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	18.2%	$0	0.0%	28.9%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	90.9%	$0	0.0%	90.5%	0	0.0%	81.8%	$0	0.0%	71.1%
	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	6	15.0%	$335	10.3%	13.9%	4	20.0%	4.2%	$235	12.6%	2.1%	2	10.0%	3.1%	$100	7.2%	1.7%
	Moderate	5	12.5%	$278	8.6%	13.0%	4	20.0%	14.5%	$258	13.9%	10.1%	1	5.0%	15.0%	$20	1.4%	10.0%
	Middle	11	27.5%	$1,117	34.5%	20.9%	3	15.0%	24.2%	$355	19.1%	21.1%	8	40.0%	23.0%	$762	55.1%	18.7%
	Upper	18	45.0%	$1,512	46.6%	52.3%	9	45.0%	41.1%	$1,012	54.4%	49.9%	9	45.0%	46.6%	$500	36.2%	55.5%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	15.9%	$0	0.0%	16.8%	0	0.0%	12.3%	$0	0.0%	14.1%
	Total	*40*	*100.0%*	*$3,242*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*$1,860*	*100.0%*	*100.0%*	*20*	*100.0%*	*100.0%*	*$1,382*	*100.0%*	*100.0%*
Small Business – Revenue	**Total Businesses**																	
	$1 Million or Less	3	37.5%	$690	44.7%	92.1%	1	33.3%	48.9%	$25	13.9%	38.3%	2	40.0%	42.0%	$665	48.7%	35.4%
	Over $1 Million	4	50.0%	$850	55.0%	6.8%	1	33.3%					3	60.0%				
	Total Rev. available	*7*	*87.5%*	*$1,540*	*99.7%*	*98.9%*	*2*	*66.6%*					*5*	*100.0%*				
	Rev. Not Known	1	12.5%	$5	0.3%	1.1%	1	33.3%					0	0.0%				
	Total	*8*	*100.0%*	*$1,545*	*100.0%*	*100.0%*	*3*	*100.0%*					*5*	*100.0%*				
Small Business – Loan Size	$100,000 or Less	3	37.5%	$130	8.4%		2	66.7%	90.9%	$30	16.7%	25.4%	1	20.0%	90.5%	$100	7.3%	28.6%
	$100,001 - $250,000	2	25.0%	$350	22.7%		1	33.3%	3.8%	$150	83.3%	15.6%	1	20.0%	5.3%	$200	14.7%	19.5%
	$250,001 - $1 Million	3	37.5%	$1,065	68.9%		0	0.0%	5.3%	$0	0.0%	59.0%	3	60.0%	4.2%	$1,065	78.0%	51.9%
	Total	*8*	*100.0%*	*$1,545*	*100.0%*		*3*	*100.0%*	*100.0%*	*$180*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$1,365*	*100.0%*	*100.0%*
Small Farm – Revenue	**Total Farms**																	
	$1 Million or Less	1	33.3%	$450	43.6%	97.9%	0	0.0%	18.2%	$0	0.0%	1.5%	1	100.0%	37.5%	$450	100.0%	33.6%
	Over $1 Million	1	33.3%	$450	43.6%	2.1%	1	50.0%					0	0.0%				
	Not Known	1	33.3%	$133	12.9%	0.0%	1	50.0%					0	0.0%				
	Total	*3*	*100.0%*	*$1,033*	*100.0%*	*100.0%*	*2*	*100.0%*					*1*	*100.0%*				
Small Farm – Loan Size	$100,000 or Less	0	0.0%	$0	0.0%		0	0.0%	72.7%	$0	0.0%	9.7%	0	0.0%	87.5%	$0	0.0%	53.1%
	$100,001 - $250,000	1	33.3%	$133	12.9%		1	50.0%	18.2%	$133	22.8%	50.2%	0	0.0%	12.5%	$0	0.0%	46.9%
	$250,001 - $500,000	2	66.7%	$900	87.1%		1	50.0%	9.1%	$450	77.2%	40.0%	1	100.0%	0.0%	$450	100.0%	0.0%
	Total	*3*	*100.0%*	*$1,033*	*100.0%*		*2*	*100.0%*	*100.0%*	*$583*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$450*	*100.0%*	*100.0%*

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 1 of 2
Assessment Area: TX - Kerr County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
		#	%	$ (000s)	$ %	%	Bank #	%	Agg %	Bank $ (000s)	$ %	Agg $ %	Bank #	%	Agg %	Bank $ (000s)	$ %	Agg $ %
HOME PURCHASE	Low	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	1	12.5%	$150	10.2%	26.0%	1	20.0%	31.1%	$150	13.0%	24.8%	0	0.0%	27.6%	$0	0.0%	24.1%
	Middle	0	0.0%	$0	0.0%	35.8%	0	0.0%	30.7%	$0	0.0%	32.7%	0	0.0%	31.0%	$0	0.0%	35.1%
	Upper	7	87.5%	$1,317	89.8%	38.2%	4	80.0%	38.2%	$1,003	87.0%	42.4%	3	100.0%	41.4%	$314	100.0%	40.8%
	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	*8*	*100.0%*	*$1,467*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$1,153*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$314*	*100.0%*	*100.0%*
REFINANCE	Low	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	5	38.5%	$615	36.1%	26.0%	3	42.9%	27.1%	$316	38.3%	25.2%	2	33.3%	25.9%	$299	34.1%	20.6%
	Middle	4	30.8%	$509	29.9%	35.8%	1	14.3%	40.4%	$100	12.1%	43.5%	3	50.0%	33.1%	$409	46.6%	34.8%
	Upper	4	30.8%	$579	34.0%	38.2%	3	42.9%	32.5%	$410	49.6%	31.3%	1	16.7%	41.0%	$169	19.3%	44.6%
	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	*13*	*100.0%*	*$1,703*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$826*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$877*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	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	3	23.1%	$310	20.2%	26.0%	3	37.5%	34.3%	$310	30.1%	25.0%	0	0.0%	24.5%	$0	0.0%	14.2%
	Middle	3	23.1%	$195	12.7%	35.8%	2	25.0%	25.7%	$125	12.1%	30.6%	1	20.0%	43.4%	$70	13.9%	55.4%
	Upper	7	53.8%	$1,028	67.1%	38.2%	3	37.5%	40.0%	$595	57.8%	44.4%	4	80.0%	32.1%	$433	86.1%	30.4%
	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	*13*	*100.0%*	*$1,533*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$1,030*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$503*	*100.0%*	*100.0%*
MULTI FAMILY						Multi-Family Units												
	Low	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%	55.1%	0	0.0%	66.7%	$0	0.0%	80.4%	0	0.0%	60.0%	$0	0.0%	62.4%
	Middle	0	0.0%	$0	0.0%	35.8%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	20.0%	$0	0.0%	2.6%
	Upper	0	0.0%	$0	0.0%	9.1%	0	0.0%	33.3%	$0	0.0%	19.6%	0	0.0%	20.0%	$0	0.0%	35.0%
	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%
	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%*
OTHER PURPOSE LOC	Low	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	1	7.1%	$300	16.4%	26.0%	0	0.0%	11.1%	$0	0.0%	4.0%	1	16.7%	15.4%	$300	26.9%	15.8%
	Middle	2	14.3%	$184	10.1%	35.8%	2	25.0%	55.6%	$184	26.0%	70.2%	0	0.0%	15.4%	$0	0.0%	22.2%
	Upper	11	78.6%	$1,342	73.5%	38.2%	6	75.0%	33.3%	$525	74.0%	25.8%	5	83.3%	69.2%	$817	73.1%	62.0%
	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%
	Total	*14*	*100.0%*	*$1,826*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$709*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$1,117*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA, Small Business, & Small Farm Loans - Table 2 of 2
Assessment Area: TX - Kerr County

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units	2018						2019					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	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%	26.0%	0	0.0%	31.6%	$0	0.0%	38.2%	0	0.0%	14.8%	$0	0.0%	13.1%
	Middle	1	100.0%	$188	100.0%	35.8%	0	0.0%	47.4%	$0	0.0%	41.4%	1	100.0%	40.7%	$188	100.0%	47.2%
	Upper	0	0.0%	$0	0.0%	38.2%	0	0.0%	21.1%	$0	0.0%	20.5%	0	0.0%	44.4%	$0	0.0%	39.6%
	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	*1*	*100.0%*	*$188*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$188*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	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%	26.0%	0	0.0%	18.9%	$0	0.0%	19.6%	0	0.0%	32.0%	$0	0.0%	21.3%
	Middle	0	0.0%	$0	0.0%	35.8%	0	0.0%	37.8%	$0	0.0%	25.7%	0	0.0%	20.0%	$0	0.0%	34.9%
	Upper	0	0.0%	$0	0.0%	38.2%	0	0.0%	43.2%	$0	0.0%	54.7%	0	0.0%	48.0%	$0	0.0%	43.8%
	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	*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%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	10	20.4%	$1,375	20.5%	26.0%	7	25.0%	29.6%	$776	20.9%	26.0%	3	14.3%	26.8%	$599	20.0%	24.3%
	Middle	10	20.4%	$1,076	16.0%	35.8%	5	17.9%	33.8%	$409	11.0%	34.7%	5	23.8%	31.9%	$667	22.2%	34.0%
	Upper	29	59.2%	$4,266	63.5%	38.2%	16	57.1%	36.7%	$2,533	68.1%	39.3%	13	61.9%	41.3%	$1,733	57.8%	41.7%
	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	*49*	*100.0%*	*$6,717*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*$3,718*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$2,999*	*100.0%*	*100.0%*
SMALL BUSINESSES						Total Businesses												
	Low	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	16	45.7%	$2,520	58.6%	33.6%	10	47.6%	31.2%	$1,520	55.4%	31.4%	6	42.9%	28.6%	$1,000	64.1%	30.6%
	Middle	6	17.1%	$420	9.8%	37.0%	5	23.8%	35.8%	$370	13.5%	36.2%	1	7.1%	38.8%	$50	3.2%	41.9%
	Upper	13	37.1%	$1,364	31.7%	29.4%	6	28.6%	28.9%	$853	31.1%	29.9%	7	50.0%	28.4%	$511	32.7%	24.3%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	4.1%	$0	0.0%	2.5%	0	0.0%	4.2%	$0	0.0%	3.3%
	Total	*35*	*100.0%*	*$4,304*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$2,743*	*100.0%*	*100.0%*	*14*	*100.0%*	*100.0%*	*$1,561*	*100.0%*	*100.0%*
SMALL FARM						Total Farms												
	Low	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	1	33.3%	$100	40.8%	19.2%	0	0.0%	33.3%	$0	0.0%	50.1%	1	50.0%	12.8%	$100	69.0%	6.4%
	Middle	1	33.3%	$45	18.4%	36.2%	0	0.0%	47.2%	$0	0.0%	40.4%	1	50.0%	51.3%	$45	31.0%	71.2%
	Upper	1	33.3%	$100	40.8%	44.6%	1	100.0%	19.4%	$100	100.0%	9.6%	0	0.0%	28.2%	$0	0.0%	21.0%
	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%
	Tr Unknown	0	0.0%	$0	0.0%		0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	7.7%	$0	0.0%	1.4%
	Total	*3*	*100.0%*	*$245*	*100.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$100*	*100.0%*	*100.0%*	*2*	*100.0%*	*100.0%*	*$145*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data, 2019 D&B Info and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 1 of 2
Assessment Area: TX - Kerr County

Product Type	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank Count		Bank Dollar		Families by Family Income	2018 Count			2018 Dollar			2019 Count			2019 Dollar		
		#	%	$ (000s)	$ %	%	Bank #	Bank %	Agg %	Bank $(000s)	Bank $ %	Agg $ %	Bank #	Bank %	Agg %	Bank $(000s)	Bank $ %	Agg $ %
HOME PURCHASE	Low	0	0.0%	$0	0.0%	19.7%	0	0.0%	1.9%	$0	0.0%	0.7%	0	0.0%	0.7%	$0	0.0%	0.3%
	Moderate	3	37.5%	$340	23.2%	18.0%	1	20.0%	13.1%	$150	13.0%	8.0%	2	66.7%	10.6%	$190	60.5%	6.1%
	Middle	2	25.0%	$312	21.3%	17.8%	1	20.0%	18.9%	$188	16.3%	15.4%	1	33.3%	22.4%	$124	39.5%	16.6%
	Upper	2	25.0%	$615	41.9%	44.4%	2	40.0%	55.5%	$615	53.3%	66.1%	0	0.0%	56.7%	$0	0.0%	67.6%
	Unknown	1	12.5%	$200	13.6%	0.0%	1	20.0%	10.6%	$200	17.3%	9.9%	0	0.0%	9.6%	$0	0.0%	9.5%
	Total	*8*	*100.0%*	*$1,467*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$1,153*	*100.0%*	*100.0%*	*3*	*100.0%*	*100.0%*	*$314*	*100.0%*	*100.0%*
REFINANCE	Low	0	0.0%	$0	0.0%	19.7%	0	0.0%	5.1%	$0	0.0%	3.5%	0	0.0%	3.9%	$0	0.0%	2.0%
	Moderate	1	7.7%	$169	9.9%	18.0%	0	0.0%	13.3%	$0	0.0%	8.6%	1	16.7%	9.9%	$169	19.3%	5.5%
	Middle	6	46.2%	$720	42.3%	17.8%	3	42.9%	20.4%	$342	41.4%	16.1%	3	50.0%	17.4%	$378	43.1%	11.3%
	Upper	5	38.5%	$690	40.5%	44.4%	3	42.9%	47.5%	$360	43.6%	57.4%	2	33.3%	49.0%	$330	37.6%	54.0%
	Unknown	1	7.7%	$124	7.3%	0.0%	1	14.3%	13.7%	$124	15.0%	14.4%	0	0.0%	19.8%	$0	0.0%	27.2%
	Total	*13*	*100.0%*	*$1,703*	*100.0%*	*100.0%*	*7*	*100.0%*	*100.0%*	*$826*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$877*	*100.0%*	*100.0%*
HOME IMPROVEMENT	Low	0	0.0%	$0	0.0%	19.7%	0	0.0%	5.7%	$0	0.0%	4.8%	0	0.0%	1.9%	$0	0.0%	0.6%
	Moderate	2	15.4%	$120	7.8%	18.0%	0	0.0%	14.3%	$0	0.0%	9.2%	2	40.0%	13.2%	$120	23.9%	7.3%
	Middle	4	30.8%	$430	28.0%	17.8%	3	37.5%	20.0%	$310	30.1%	19.0%	1	20.0%	22.6%	$120	23.9%	16.6%
	Upper	7	53.8%	$983	64.1%	44.4%	5	62.5%	54.3%	$720	69.9%	59.6%	2	40.0%	60.4%	$263	52.3%	74.6%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	5.7%	$0	0.0%	7.4%	0	0.0%	1.9%	$0	0.0%	0.9%
	Total	*13*	*100.0%*	*$1,533*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$1,030*	*100.0%*	*100.0%*	*5*	*100.0%*	*100.0%*	*$503*	*100.0%*	*100.0%*
MULTI FAMILY	Low	0	0.0%	$0	0.0%	19.7%	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%	18.0%	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%	17.8%	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%	44.4%	0	0.0%	0.0%	$0	0.0%	0.0%	0	0.0%	20.0%	$0	0.0%	1.4%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	100.0%	$0	0.0%	100.0%	0	0.0%	80.0%	$0	0.0%	98.6%
	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%*
OTHER PURPOSE LOC	Low	0	0.0%	$0	0.0%	19.7%	0	0.0%	11.1%	$0	0.0%	8.1%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	3	21.4%	$396	21.7%	18.0%	1	12.5%	11.1%	$141	19.9%	11.9%	2	33.3%	30.8%	$255	22.8%	20.0%
	Middle	2	14.3%	$240	13.1%	17.8%	1	12.5%	5.6%	$90	12.7%	4.4%	1	16.7%	7.7%	$150	13.4%	7.2%
	Upper	9	64.3%	$1,190	65.2%	44.4%	6	75.0%	72.2%	$478	67.4%	75.6%	3	50.0%	61.5%	$712	63.7%	72.8%
	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	*14*	*100.0%*	*$1,826*	*100.0%*	*100.0%*	*8*	*100.0%*	*100.0%*	*$709*	*100.0%*	*100.0%*	*6*	*100.0%*	*100.0%*	*$1,117*	*100.0%*	*100.0%*

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans & Small Business/Small Farm Loans by Revenue & Loan Size - Table 2 of 2
Assessment Area: TX - Kerr County

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$(000s)	$ %	$ %	#	%	%	$(000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	$0	0.0%	19.7%	0	0.0%	5.3%	$0	0.0%	2.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	18.0%	0	0.0%	26.3%	$0	0.0%	14.0%	0	0.0%	18.5%	$0	0.0%	13.9%
	Middle	0	0.0%	$0	0.0%	17.8%	0	0.0%	5.3%	$0	0.0%	6.3%	0	0.0%	11.1%	$0	0.0%	6.5%
	Upper	0	0.0%	$0	0.0%	44.4%	0	0.0%	52.6%	$0	0.0%	60.5%	0	0.0%	44.4%	$0	0.0%	54.0%
	Unknown	1	100.0%	$188	100.0%	0.0%	0	0.0%	10.5%	$0	0.0%	17.3%	1	100.0%	25.9%	$188	100.0%	25.6%
	Total	*1*	*100.0%*	*$188*	*100.0%*	*100.0%*	*0*	*0.0%*	*100.0%*	*$0*	*0.0%*	*100.0%*	*1*	*100.0%*	*100.0%*	*$188*	*100.0%*	*100.0%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	$0	0.0%	19.7%	0	0.0%	2.7%	$0	0.0%	1.0%	0	0.0%	0.0%	$0	0.0%	0.0%
	Moderate	0	0.0%	$0	0.0%	18.0%	0	0.0%	8.1%	$0	0.0%	2.8%	0	0.0%	4.0%	$0	0.0%	2.3%
	Middle	0	0.0%	$0	0.0%	17.8%	0	0.0%	2.7%	$0	0.0%	3.7%	0	0.0%	8.0%	$0	0.0%	3.5%
	Upper	0	0.0%	$0	0.0%	44.4%	0	0.0%	21.6%	$0	0.0%	18.2%	0	0.0%	20.0%	$0	0.0%	26.1%
	Unknown	0	0.0%	$0	0.0%	0.0%	0	0.0%	64.9%	$0	0.0%	74.2%	0	0.0%	68.0%	$0	0.0%	68.0%
	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%	19.7%	0	0.0%	3.1%	$0	0.0%	1.5%	0	0.0%	1.6%	$0	0.0%	0.8%
	Moderate	9	18.4%	$1,025	15.3%	18.0%	2	7.1%	13.2%	$291	7.8%	7.9%	7	33.3%	10.7%	$734	24.5%	5.8%
	Middle	14	28.6%	$1,702	25.3%	17.8%	8	28.6%	18.2%	$930	25.0%	14.7%	6	28.6%	20.1%	$772	25.7%	13.8%
	Upper	23	46.9%	$3,478	51.8%	44.4%	16	57.1%	52.3%	$2,173	58.4%	61.2%	7	33.3%	53.5%	$1,305	43.5%	59.8%
	Unknown	3	6.1%	$512	7.6%	0.0%	2	7.1%	13.2%	$324	8.7%	14.6%	1	4.8%	14.0%	$188	6.3%	19.8%
	Total	*49*	*100.0%*	*$6,717*	*100.0%*	*100.0%*	*28*	*100.0%*	*100.0%*	*$3,718*	*100.0%*	*100.0%*	*21*	*100.0%*	*100.0%*	*$2,999*	*100.0%*	*100.0%*
Small Business — Revenue						Total Businesses												
	$1 Million or Less	8	22.9%	$857	19.9%	93.2%	3	14.3%	51.1%	$215	7.8%	52.1%	5	35.7%	49.4%	$642	41.1%	45.0%
	Over $1 Million	6	17.1%	$1,700	39.5%	5.9%	5	23.8%					1	7.1%				
	Total Rev. available	*14*	*40.0%*	*$2,557*	*59.4%*	*99.1%*	*8*	*38.1%*					*6*	*42.8%*				
	Rev. Not Known	21	60.0%	$1,747	40.6%	0.8%	13	61.9%					8	57.1%				
	Total	35	100.0%	$4,304	100.0%	100.0%	21	100.0%					14	100.0%				
Small Business — Loan Size	$100,000 or Less	24	68.6%	$1,407	32.7%		15	71.4%	94.1%	$831	30.3%	45.3%	9	64.3%	94.6%	$576	36.9%	48.4%
	$100,001 - $250,000	8	22.9%	$1,097	25.5%		4	19.0%	2.9%	$512	18.7%	13.2%	4	28.6%	3.0%	$585	37.5%	15.3%
	$250,001 - $1 Million	3	8.6%	$1,800	41.8%		2	9.5%	3.0%	$1,400	51.0%	41.5%	1	7.1%	2.3%	$400	25.6%	36.3%
	Total	35	100.0%	$4,304	100.0%		21	100.0%	100.0%	$2,743	100.0%	100.0%	14	100.0%	100.0%	$1,561	100.0%	100.0%
Small Farm — Revenue						Total Farms												
	$1 Million or Less	0	0.0%	$0	0.0%	99.2%	0	0.0%	75.0%	$0	0.0%	92.8%	0	0.0%	66.7%	$0	0.0%	64.9%
	Over $1 Million	0	0.0%	$0	0.0%	0.8%	0	0.0%					0	0.0%				
	Not Known	3	100.0%	$245	100.0%	0.0%	1	100.0%					2	100.0%				
	Total	*3*	*100.0%*	*$245*	*100.0%*	*100.0%*	*1*	*100.0%*					*2*	*100.0%*				
Small Farm — Loan Size	$100,000 or Less	3	100.0%	$245	100.0%		1	100.0%	88.9%	$100	100.0%	40.4%	2	100.0%	84.6%	$145	100.0%	29.4%
	$100,001 - $250,000	0	0.0%	$0	0.0%		0	0.0%	5.6%	$0	0.0%	22.1%	0	0.0%	5.1%	$0	0.0%	12.6%
	$250,001 - $500,000	0	0.0%	$0	0.0%		0	0.0%	5.6%	$0	0.0%	37.5%	0	0.0%	10.3%	$0	0.0%	58.0%
	Total	3	100.0%	$245	100.0%		1	100.0%	100.0%	$100	100.0%	100.0%	2	100.0%	100.0%	$145	100.0%	100.0%

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over $1 million or revenue unknown, and for loan size by revenue.
2019 FFIEC Census Data, 2019 D&B Info, and 2015 ACS Data

Appendix I – Distribution of Branch Delivery System, Branch Openings and Closings

As of: December 31, 2020

Assessment Areas				% of Branches by Income Level of Geography				Branch Openings and Closings		Net Change in Branch Locations				Demographics % of Population				
Name	% of Deposits	# of Branches	% of Branches	Low	Mod	Mid	Upp	# Opened	# of Closed	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	Unk
Arizona																		
Phoenix	0.7	17	3.9	0.0	0.0	52.9	47.1	0	0	0	0	0	0	11.3	23.0	31.4	34.2	0.2
All Arizona AAs	0.7	17	3.9	0.0	0.0	52.9	47.1	0	0	0	0	0	0	11.3	23.0	31.4	34.2	0.2
California																		
Greater Los Angeles	12.7	38	8.8	2.6	15.8	10.5	63.2	1	1	0	0	0	0	8.8	29.2	27.0	34.5	0.5
Inland Empire	0.1	3	0.7	0.0	33.3	33.3	33.3	0	0	0	0	0	0	4.9	24.7	32.3	38.2	0.0
Salinas	0.5	4	0.9	25.0	0.0	0.0	75.0	0	0	0	0	0	0	3.9	21.5	35.7	38.3	0.5
San Diego	1.2	14	3.2	14.3	7.1	35.7	42.9	0	0	0	0	0	0	9.7	23.3	31.3	35.2	0.4
San Francisco	4.4	17	3.9	11.8	17.6	29.4	41.2	0	0	0	0	0	0	12.0	22.0	31.5	34.1	0.5
San Jose	11.7	13	3.0	0.0	15.4	23.1	61.5	0	0	0	0	0	0	9.3	21.3	36.4	33.0	0.2
Santa Cruz	1.1	6	1.4	16.7	0.0	66.7	16.7	1	1	0	0	0	0	5.6	25.4	40.3	28.7	0.0
Ventura	0.1	1	0.2	0.0	0.0	0.0	100.0	0	0	0	0	0	0	5.1	29.3	32.8	32.8	0.0
All California AAs	31.8	96	22.2	7.3	13.5	22.9	53.1	2	2	0	0	0	0	8.8	26.2	29.9	34.8	0.4
Florida																		
Fort Lauderdale – West Palm Beach	0.4	6	1.4	0.0	16.7	33.3	50.0	0	0	0	0	0	0	5.6	28.7	32.4	33.1	0.2
Naples	0.0	1	0.2	0.0	0.0	0.0	100.0	0	0	0	0	0	0	7.2	23.5	38.0	31.3	0.0
All Florida AAs	0.4	7	1.6	0.0	14.3	28.6	57.1	0	0	0	0	0	0	5.8	28.2	33.0	32.9	0.2
Michigan																		
Ann Arbor	1.4	9	2.1	0.0	22.2	44.4	22.2	0	0	0	0	0	0	14.9	12.9	40.2	27.6	4.4
Battle Creek	0.3	4	0.9	0.0	50.0	0.0	50.0	0	0	0	0	0	0	7.4	26.5	39.2	26.9	0.0
Fenton	0.1	1	0.2	0.0	0.0	100.0	0.0	0	0	0	0	0	0	11.9	18.3	36.4	33.5	0.0
Grand Rapids – Wyoming	0.9	11	2.6	0.0	0.0	63.6	36.4	0	0	0	0	0	0	5.3	16.7	50.1	28.0	0.0
Jackson	0.7	8	1.9	0.0	50.0	37.5	12.5	0	0	0	0	0	0	9.9	19.4	47.4	20.1	3.2
Kalamazoo	0.4	6	1.4	16.7	50.0	33.3	0.0	0	0	0	0	0	0	10.3	14.8	45.9	26.9	2.1
Lansing – East Lansing	0.9	7	1.6	0.0	57.1	28.6	14.3	0	0	0	0	0	0	5.5	19.6	39.7	31.1	4.1
Lenawee County	0.1	1	0.2	0.0	0.0	100.0	0.0	0	0	0	0	0	0	0.0	0.0	54.4	45.6	0.0
Midland	0.2	2	0.5	0.0	50.0	0.0	50.0	0	0	0	0	0	0	3.3	19.2	42.2	35.3	0.0
Muskegon	0.3	4	0.9	0.0	50.0	0.0	50.0	0	0	0	0	0	0	11.1	23.1	37.6	28.2	0.0
Southeast Michigan	46.6	136	31.5	7.4	21.3	29.4	41.2	2	6	0	0	-2	-2	10.4	22.8	33.1	33.5	0.2
All Michigan AAs	51.8	189	43.8	5.8	24.9	31.7	36.5	2	6	0	0	-2	-2	9.5	20.6	37.5	31.6	0.8
Texas																		
Austin	1.6	10	2.3	10.0	0.0	20.0	70.0	1	1	0	0	0	0	11.9	19.7	33.3	33.7	1.4
Bank of the Hills	0.3	4	0.9	0.0	50.0	25.0	25.0	0	0	0	0	0	0	0.0	35.0	34.4	30.7	0.0
Dallas – Fort Worth	8.1	55	12.7	10.9	21.8	29.1	38.2	1	0	0	0	0	1	11.9	26.0	27.2	34.8	0.1
Houston	5.0	48	11.1	12.5	18.8	18.8	50.0	1	1	0	0	-1	1	12.2	26.0	25.9	35.6	0.3
San Antonio	0.3	6	1.4	16.7	16.7	33.3	33.3	0	0	0	0	0	0	7.2	33.4	27.8	31.6	0.0
All Texas AAs	15.3	123	28.5	11.4	19.5	24.4	44.7	3	2	0	0	-1	2	11.4	26.3	27.4	34.6	0.3
All Assessment Areas	100.0	432	100.0	7.4	19.7	28.5	43.3	7	10	0	0	-3	0	9.6	25.4	30.5	34.2	0.4