PUBLIC DISCLOSURE

March 18, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Horizon Bank
RSSD #485559

165 Madison Avenue
Memphis, Tennessee 38103

Federal Reserve Bank of St. Louis

P.O. Box 442
St. Louis, Missouri 63166-0442

NOTE: **This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of the 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.**

TABLE OF CONTENTS

I. Institution Rating 1

II. Institution
- a. Description of Institution 2
- b. Scope of Examination 4
- c. Conclusions with Respect to Performance Tests 8
- d. Fair Lending or Other Illegal Credit Practices Review 20

III. Memphis, Tennessee-Mississippi-Arkansas Multistate Metropolitan Statistical Area
- a. Multistate Metropolitan Statistical Area Rating 21
- b. Scope of Examination 22
- c. Description of Institution's Operations 22
- d. Conclusions with Respect to Performance Tests 27

IV. Chattanooga-Cleveland-Dalton, Tennessee-Georgia- Multistate Combined Statistical Area
- a. Multistate Statistical Area Rating 35
- b. Scope of Examination 36
- c. Description of Institution's Operations in the Chattanooga Assessment Area 36
- d. Conclusions with Respect to Performance Tests in the Chattanooga Assessment Area 40

V. Charlotte-Concord-Gastonia, North Carolina-South Carolina Multistate Metropolitan Statistical Area
- a. Multistate Metropolitan Statistical Area Rating 48
- b. Scope of Examination 49
- c. Description of Institution's Operations in the Charlotte Assessment Area 49
- d. Conclusions with Respect to Performance Tests in the Charlotte Assessment Area 54

VI. Tennessee
- a. Summary
  - i. State Rating 61
  - ii. Scope of Examination 61
  - iii. Description of Institution's Operations in Tennessee 62
  - iv. Conclusions with Respect to Performance Tests in Tennessee 63
- b. Nashville-Davidson-Murfreesboro, Tennessee Combined Statistical Area (Full-Scope Review)
  - i. Description of Institution's Operations in the Nashville Assessment Area 70
  - ii. Conclusions with Respect to Performance Tests in the Nashville Assessment Area 74

c. Knoxville-Morristown-Sevierville, Tennessee Combined Statistical Area (Full-Scope Review)
   i. Description of Institution's Operations in the Knoxville Assessment Area 81
   ii. Conclusions with Respect to Performance Tests in the Knoxville Assessment Area 85

d. Nonmetropolitan Tennessee Statewide Area (Full-Scope Review)
   i. Description of Institution's Operations 92
   ii. Conclusions with Respect to Performance Tests 96

e. Johnson City-Kingsport-Bristol, Tennessee-Virginia Combined Statistical Area (Limited-Scope Review)
   i. Description of Institution's Operations in the Johnson City Assessment Area 102
   ii. Conclusions with Respect to Performance Tests in the Johnson City Assessment Area 103

f. Jackson, Tennessee Metropolitan Statistical Area (Limited-Scope Review)
   i. Description of Institution's Operations in the Jackson Assessment Area 105
   ii. Conclusions with Respect to Performance Tests in the Jackson Assessment Area 106

g. Clarksville, Tennessee-Kentucky Metropolitan Statistical Area (Limited-Scope Review)
   i. Description of Institution's Operations in the Clarksville Assessment Area 107
   ii. Conclusions with Respect to Performance Tests in the Clarksville Assessment Area 108

VII. Florida
a. Summary
   i. State Rating 109
   ii. Scope of Examination 109
   iii. Description of Institution's Operations in Florida 110
   iv. Conclusions with Respect to Performance Tests in Florida 111

b. Miami-Port St. Lucie-Fort Lauderdale, Florida Combined Statistical Area (Full-Scope Review)
   i. Description of Institution's Operations in the Miami Assessment Area 118
   ii. Conclusions with Respect to Performance Tests in the Miami Assessment Area 122

c. Cape Coral-Fort Myers-Naples, Florida Combined Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Fort Myers Assessment Area....129
ii. Conclusions with Respect to Performance Tests in the Fort Myers Assessment Area....133

d. Orlando-Lakeland-Deltona, Florida Combined Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Orlando Assessment Area....140
ii. Conclusions with Respect to Performance Tests in the Orlando Assessment Area....145

e. Tampa-St. Petersburg-Clearwater, Florida Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Tampa Assessment Area....152
ii. Conclusions with Respect to Performance Tests in the Tampa Assessment Area....153

f. North Port-Bradenton-Sarasota, Florida Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Sarasota Assessment Area....155
ii. Conclusions with Respect to Performance Tests in the Sarasota Assessment Area....156

g. Jacksonville, Florida Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Jacksonville Assessment Area....158
Conclusions with Respect to Performance Tests in the Jacksonville Assessment Area....159

VIII. Louisiana
a. Summary
i. State Rating....161
ii. Scope of Examination....161
iii. Description of Institution's Operations in Louisiana....162
iv. Conclusions with Respect to Performance Tests in Louisiana....163

b. New Orleans-Metairie, Louisiana Metropolitan Statistical Area (Full-Scope Review)
   i. Description of Institution's Operations in the New Orleans Assessment Area 171
   ii. Conclusions with Respect to Performance Tests in the New Orleans Assessment Area 176

c. Lafayette-New Iberia-Opelousas, Louisiana Combined Statistical Area (Full-Scope Review)
   i. Description of Institution's Operations in the Lafayette Assessment Area 184
   ii. Conclusions with Respect to Performance Tests in the Lafayette Assessment Area 188

d. Lake Charles, Louisiana Metropolitan Statistical Area (Full-Scope Review)
   i. Description of Institution's Operations in the Lake Charles Assessment Area 195
   ii. Conclusions with Respect to Performance Tests in the Lake Charles Assessment Area 199

e. Baton Rouge, Louisiana Metropolitan Statistical Area (Limited-Scope Review)
   i. Description of Institution's Operations in the Baton Rouge Assessment Area 205
   ii. Conclusions with Respect to Performance Tests in the Baton Rouge Assessment Area 206

f. Monroe-Ruston, Louisiana Combined Statistical Area (Limited-Scope Review)
   i. Description of Institution's Operations in the Monroe Assessment Area 207
   ii. Conclusions with Respect to Performance Tests in the Monroe Assessment Area 208

g. Shreveport-Bossier City, Louisiana Metropolitan Statistical Area (Limited-Scope Review)
   i. Description of Institution's Operations in the Shreveport Assessment Area 210
   ii. Conclusions with Respect to Performance Tests in the Shreveport Assessment Area 211

h. Houma-Bayou Cane-Thibodaux, Louisiana Metropolitan Statistical Area (Limited-Scope Review)
    i. Description of Institution's Operations in the Houma Assessment Area....213
    ii. Conclusions with Respect to Performance Tests in the Houma Assessment Area....214
i. Nonmetropolitan Louisiana Statewide Area (Limited-Scope Review)
    i. Description of Institution's Operations....215
    ii. Conclusions with Respect to Performance Tests....216

IX. North Carolina
a. Summary
    i. State Rating....217
    ii. Scope of Examination....217
    iii. Description of Institution's Operations in North Carolina....218
    iv. Conclusions with Respect to Performance Tests in North Carolina....219

b. Greensboro–Winston-Salem–High Point, North Carolina Combined Statistical Area (Full-Scope Review)
    i. Description of Institution's Operations in the Greensboro Assessment Area....226
    ii. Conclusions with Respect to Performance Tests in the Greensboro Assessment Area....230

c. Raleigh-Durham–Cary, North Carolina Combined Statistical Area (Full-Scope Review)
    i. Description of Institution's Operations in the Raleigh Assessment Area....237
    ii. Conclusions with Respect to Performance Tests in the Raleigh Assessment Area....242

d. Hickory-Lenoir-Morgantown, North Carolina Metropolitan Statistical Area (Limited-Scope Review)
    i. Description of Institution's Operations in the Hickory Assessment Area....249
    ii. Conclusions with Respect to Performance Tests in the Hickory Assessment Area....250

e. Asheville, North Carolina Metropolitan Statistical Area (Limited-Scope Review)
    i. Description of Institution's Operations in the Asheville Assessment Area....252
    ii. Conclusions with Respect to Performance Tests in the Asheville Assessment Area....253

f. Fayetteville, North Carolina Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Fayetteville, North Carolina Assessment Area 255
ii. Conclusions with Respect to Performance Tests in the Fayetteville, North Carolina Assessment Area 256
g. Nonmetropolitan North Carolina Statewide Area (Limited-Scope Review)
i. Description of Institution's Operations 258
Conclusions with Respect to Performance Tests 259
X. Alabama
a. Summary
i. State Rating 260
ii. Scope of Examination 260
iii. Description of Institution's Operations in Alabama 261
iv. Conclusions with Respect to Performance Tests in Alabama 262

b. Birmingham, Alabama Metropolitan Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Birmingham Assessment Area 267
ii. Conclusions with Respect to Performance Tests in the Birmingham Assessment Area 271

c. Mobile-Daphne-Fairhope, Alabama Combined Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Mobile Assessment Area 278
ii. Conclusions with Respect to Performance Tests in the Mobile Assessment Area 279

d. Huntsville, Alabama Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Huntsville Assessment Area 281
ii. Conclusions with Respect to Performance Tests in the Huntsville Assessment Area 282

XI. Arkansas
a. Summary
i. State Rating 283
ii. Scope of Examination 283
iii. Description of Institution's Operations in Arkansas 284
iv. Conclusions with Respect to Performance Tests in Arkansas 285

b. Little Rock-North Little Rock-Conway, Arkansas Metropolitan Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Little Rock Assessment Area....291
ii. Conclusions with Respect to Performance Tests in the Little Rock Assessment Area....295

c. Fayetteville-Springdale-Rogers, Arkansas Metropolitan Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Fayetteville, Arkansas Assessment Area....301
ii. Conclusions with Respect to Performance Tests in the Fayetteville, Arkansas Assessment Area....305

d. Jonesboro, Arkansas Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Jonesboro Assessment Area....311
ii. Conclusions with Respect to Performance Tests in the Jonesboro Assessment Area....312

e. Nonmetropolitan Arkansas Statewide Area (Limited-Scope Review)
i. Description of Institution's Operations....314
ii. Conclusions with Respect to Performance Tests....315

XII. Texas
a. Summary
i. State Rating....317
ii. Scope of Examination....317
iii. Description of Institution's Operations in Texas....318
iv. Conclusions with Respect to Performance Tests in Texas....319

b. Houston-Pasadena-The Woodlands, Texas Metropolitan Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Houston Assessment Area....324
ii. Conclusions with Respect to Performance Tests in the Houston Assessment Area....328

c. Dallas-Plano-Irving, Texas Metropolitan Division (Limited-Scope Review)
i. Description of Institution's Operations in the Dallas Assessment Area....335
ii. Conclusions with Respect to Performance Tests in the Dallas Assessment Area....336

XIII. Georgia
a. Summary
i. State Rating 337
ii. Scope of Examination 337
iii. Description of Institution's Operations in Georgia 338
iv. Conclusions with Respect to Performance Tests in Georgia 339

b. Atlanta-Sandy Springs-Roswell, Georgia Metropolitan Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Atlanta Assessment Area 344
ii. Conclusions with Respect to Performance Tests in the Atlanta Assessment Area 348

c. Nonmetropolitan Georgia Statewide Area (Limited-Scope Review)
i. Description of Institution's Operations 354
ii. Conclusions with Respect to Performance Tests 355

XIV. South Carolina
a. Summary
i. State Rating 356
ii. Scope of Examination 356
iii. Description of Institution's Operations in South Carolina 357
iv. Conclusions with Respect to Performance Tests in South Carolina 358

b. Greenville-Spartanburg-Anderson, South Carolina Combined Statistical Area (Full-Scope Review)
i. Description of Institution's Operations in the Greenville Assessment Area 363
ii. Conclusions with Respect to Performance Tests in the Greenville Assessment Area 367

c. Columbia, South Carolina Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Columbia Assessment Area 373
ii. Conclusions with Respect to Performance Tests in the Columbia Assessment Area 374

d. Charleston-North Charleston, South Carolina Metropolitan Statistical Area (Limited-Scope Review)
i. Description of Institution's Operations in the Charleston Assessment Area 376
ii. Conclusions with Respect to Performance Tests in the Charleston Assessment Area 377

XV. Virginia
- a. Summary
  - i. State Rating 378
  - ii. Scope of Examination 378
  - iii. Description of Institution's Operations in Virginia 379
  - iv. Conclusions with Respect to Performance Tests in Virginia 380
- b. Nonmetropolitan Virginia Statewide Area (Full-Scope Review)
  - i. Description of Institution's Operations 385
  - ii. Conclusions with Respect to Performance Tests 389
- c. Roanoke, Virginia Metropolitan Statistical Area (Limited-Scope Review)
  - i. Description of Institution's Operations in the Roanoke Assessment Area 394
  - ii. Conclusions with Respect to Performance Tests in the Roanoke Assessment Area 395

XVI. New York
- a. State Rating 396
- b. Scope of Examination 396
- c. Description of Institution's Operations in New York 397
- d. Conclusions with Respect to Performance Tests in New York 400

XVII. Appendices
- a. Scope of Examination Tables 406
- b. Summary of State and Multistate Metropolitan Statistical Area Ratings 409
- c. Lending Performance Tables by Assessment Area 410
- d. Glossary 916

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: First Horizon Bank is rated SATISFACTORY.

The following table shows the performance level of First Horizon Bank with respect to the Lending, Investment, and Service Tests.

First Horizon Bank			
Performance Levels	**Performance Tests**		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution's rating include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.
- A high percentage of loans are made in the bank's assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the bank's assessment areas.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes an excellent level of qualified community development investments and grants and is often in a leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems.
- The bank is a leader in providing community development services throughout its assessment areas.

INSTITUTION

DESCRIPTION OF INSTITUTION

First Horizon Bank (First Horizon) is a large, multistate retail bank headquartered in Memphis, Tennessee. The bank is a wholly owned, state-chartered subsidiary of First Horizon Corporation (FHN), a one-bank holding company also headquartered in Memphis. Activities of First Horizon's subsidiaries and affiliates include wealth management services and fixed-income products and services under the FHN brand, among others, though none are engaged in credit-granting activities.

First Horizon is a full-service financial institution offering an array of commercial and consumer loan and deposit products with an extensive branch network consisting of 417 offices across 12 states in the Mid-South, Southeast, and Eastern United States, including Alabama, Arkansas, Florida, Georgia, Louisiana, Mississippi, North Carolina, New York, South Carolina, Tennessee, Texas, and Virginia. The bank's most significant presence remains in the state of Tennessee, which includes the bank's headquarters and the largest share of the bank's branches, deposits, and loan volume of any of the bank's assessment areas.

On July 2, 2020, the bank completed a merger-of-equals with IBERIABANK that resulted in the integration of approximately 190 IBERIABANK branch locations and 26 new assessment areas, primarily in the Mid-South and Southeast regions of the United States. Given the timing of this acquisition relative to the timing of the previous CRA evaluation dated November 30, 2020, performance was only evaluated in existing First Horizon assessment areas at the previous evaluation. Additionally, the bank purchased 30 bank branches divested by Branch Banking & Trust Company and SunTrust Bank on July 17, 2020, acquiring approximately $2.5 billion in deposits and $410 million in loans through the acquisition. Similarly, these acquired branch locations were not included for analysis in the previous evaluation, given the timing of the acquisition relative to the date of the evaluation. While the branch locations and associated assessment areas from these two events are evaluated under First Horizon for the first time as part of this evaluation, they are not treated as newly opened or acquired branches for the purposes of the Service Test, given that their acquisition occurred outside of the current review period.

For the purposes of this review, 51 (46 after consolidating for presentation purposes in this document) assessment areas were included for analysis across the bank's geographic footprint. Several of these assessment areas were analyzed on a combined basis, where combined statistical areas (CSAs), contiguous metropolitan statistical areas (MSAs), or nonmetropolitan statistical area (nonMSA) assessment areas shared similar economic and demographic characteristics. The composition of each assessment area, including assessment areas that were combined for analysis, is detailed in the *General Demographics* section for each separate assessment area.

In addition to the 417 branch locations previously mentioned, the bank also operates 16 loan production offices (LPOs) and 169 stand-alone automated teller machines (ATMs), 70 of which are full service, throughout its assessment areas. The bank also offers online and mobile banking services, which increase its ability to provide banking services throughout its assessment areas. Since the previous evaluation, the bank has closed 77 branches and opened 1 branch. Descriptions of the bank's various delivery channels and branch activities are detailed in the *Service Test* section for each assessment area and rated area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its assessment areas, and the bank is capable of meeting assessment area credit needs based on its available resources and financial products. As of December 31, 2023, the bank reported total assets of $81.4 billion, which represent a 1.6 percent decrease since the previous evaluation. As of the same date, loans and leases outstanding were $61.8 billion, while deposits totaled $66.7 billion.

The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of December 31, 2023		
Credit Category	**Amount $ (000s)**	**Percentage of Total Loans**
Construction and Development	$4,118,651	6.7%
Commercial Real Estate	$16,641,897	26.9%
Multifamily Residential	$1,992,004	3.2%
1–4 Family Residential	$14,070,456	22.8%
Farmland	$54,813	0.1%
Farm Loans	$3,170	< 0.1%
Commercial and Industrial	$16,569,905	26.8%
Loans to Individuals	$537,285	0.9%
Total Other Loans	$7,812,314	12.6%
TOTAL	**$61,800,495**	**100%**

As indicated by the table above, a significant portion of the bank's lending resources is directed to commercial real estate loans, commercial and industrial loans, and loans secured by 1–4 family residential properties. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity is not captured in the table. As reported on the bank's Home Mortgage Disclosure Act (HMDA) loan application registers (LARs), the bank originated and sold 12,146 loans totaling $3.5 billion and 5,268 loans totaling $1.5 billion as reported on 2021 and 2022 respective HMDA LARs.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on November 30, 2020.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) Large Institution CRA Examination Procedures, which include a Lending Test, Investment Test, and Service Test. The bank receives an overall CRA rating and individual ratings for each of the Lending, Investment, and Service Tests at the institution level, as well as for each rated area in which the bank maintains a branch presence. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. Deposit and structure information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2023.

Rated Areas	Offices		Deposits		Assessment Area Reviews		
	#	%	$ (000s)	%	Full-Scope	Limited-Scope	TOTAL
Memphis Multistate MSA	33	7.9%	$14,168,498	21.3%	1	0	1
Chattanooga Multistate MSA	17	4.1%	$3,197,768	4.8%	1	0	1
Charlotte Multistate MSA	13	3.1%	$1,005,276	1.5%	1	0	1
Tennessee	92	22.1%	$14,137,360	21.2%	3	3	6
Florida	76	18.3%	$11,632,555	17.5%	3	3	6
Louisiana	56	13.5%	$7,542,115	11.3%	3	5	8
North Carolina	67	16.1%	$6,036,913	9.1%	2	4	6
Alabama	13	3.1%	$2,299,902	3.5%	1	2	3
Arkansas	12	2.9%	$1,158,785	1.7%	2	2	4
Texas	8	1.9%	$2,209,088	3.3%	1	1	2
Georgia	11	2.6%	$1,495,006	2.2%	1	1	2
South Carolina	9	2.2%	$470,510	0.7%	1	2	3
Virginia	8	1.9%	$521,885	0.8%	1	1	2
New York	1	0.2%	$716,353	1.1%	1	0	1
OVERALL	**416**[1]	**100%**	**$66,592,014**	**100%**	**22**	**24**	**46**

Overall CRA ratings are driven by performance in the various rated areas, which are weighted according to significance based on loan and deposit activity, branch structure, and other factors such as CRA performance history. For the purposes of this evaluation, primary emphasis was placed on performance in Tennessee, Florida, Louisiana, and the Memphis multistate MSA, which account for a combined 61.8 percent of the bank's total branches and 71.3 percent of its total deposits.

To augment this evaluation, interviews with 26 community contacts were utilized throughout the bank's assessment areas. These interviews helped to ascertain certain economic and demographic conditions, as well as credit needs and opportunities, in the bank's assessment areas and provided

[1] Branch information in this table is as of June 30, 2023; since that time, the bank added one branch in the state of Georgia, bringing the current total to 417 branches as of this examination date.

context with which to evaluate the bank's responsiveness to these credit needs. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the assessment area for which they were conducted.

Lending Test

Under the Lending Test, the bank's performance is evaluated using the following criteria and time periods:

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	• Home mortgage loans reported under the HMDA • Small business and small farm loans reported under the CRA	January 1, 2021 – December 31, 2022
Assessment Area Concentration		
Loan Distribution by Borrower's Profile		
Geographic Distribution of Loans		
Community Development Lending Activities		September 30, 2020 – March 17, 2024
Product Innovation		

As shown in the preceding table, HMDA, small business, and small farm loans were used to evaluate the bank's lending performance; however, due to the overall low volume of small farm lending, primary emphasis was placed on HMDA and small business lending throughout this evaluation. While all three loan categories were included in the lending activity levels and assessment area concentration analyses, only HMDA and small business loan categories were included in the borrower's profile and geographic distribution of loans analyses. Furthermore, unless otherwise specified at the rated area or assessment area level, equal weight was given to performance based on HMDA and small business lending categories when forming overall conclusions, given loan volumes, credit needs, and the bank's business strategy. Lastly, equal emphasis is placed on performance in 2021 and 2022.

The bank's Lending Test performance is evaluated using the following criteria, as applicable:

- Level of lending activity
- Assessment areas concentration[2]
- Geographic distribution of loans
- Distribution of loans by borrower's income/revenue profile
- Community development lending activities
- Product innovation[3]

[2] This criterion is applicable at the institution level only.
[3] Unlike other large bank CRA performance criteria, a lack of innovative or flexible lending practices does not necessarily impact the bank's performance negatively, as these activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, potentially resulting in a higher rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

Under the previously noted borrower distribution and geographic distribution criteria, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation.

- Assessment area demographics are based on 2020 United States Census Bureau Decennial Census (2020 Census) data, and business demographics are based on 2021 and 2022 Dun & Bradstreet data.

- Median family incomes are based on the FFIEC's 2021 and 2022 annual estimates. The 2022 estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.

- Industry demographics are sourced from the 2023 U.S. Department of Labor, Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages data, according to the North American Industry Classification System.

- Unemployment data are sourced from the BLS and are not seasonally adjusted.

- In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses of different revenue sizes, the demographic figure refers to the percentage of families in that assessment area that are classified as low- and moderate-income (LMI) or the percentage of businesses with annual revenues of $1 million or less.

- In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to either the percentage of owner-occupied housing units in that assessment area that are in LMI census tracts or the percentage of businesses located in LMI census tracts.

When analyzing bank performance, greater emphasis is placed on aggregate lending data because it is updated annually and therefore is expected to provide more timely and relevant comparisons.

Investment Test

All community development investments, including grants and donations, made since September 30, 2020, were reviewed and evaluated. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to assessment area credit and community development needs.

Service Test

The review period for retail and community development services includes activity from September 30, 2020, to the date of the current evaluation. The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems.
- Changes in branch locations.
- Reasonableness of business hours and retail services.
- Community development services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance under the Lending Test is rated High Satisfactory. This rating reflects the performance in each rated area shown in the table below, with Tennessee, Florida, Louisiana, and the Memphis multistate MSA carrying the most weight toward the overall rating. The bank's performance under each of the criteria of the Lending Test is shown in the tables that follow.

Rated Area	Lending Test Rating
Memphis Multistate MSA	High Satisfactory
Chattanooga Multistate MSA	High Satisfactory
Charlotte Multistate MSA	High Satisfactory
Tennessee	Low Satisfactory
Florida	High Satisfactory
Louisiana	High Satisfactory
North Carolina	High Satisfactory
Alabama	High Satisfactory
Arkansas	High Satisfactory
Texas	Low Satisfactory
Georgia	High Satisfactory
South Carolina	Low Satisfactory
Virginia	Low Satisfactory
New York	Low Satisfactory
OVERALL	**HIGH SATISFACTORY**

As shown in the table above, the bank received a Lending Test rating of High Satisfactory in nine of its rated areas, including in Florida, Louisiana, and the Memphis multistate MSA, which are three of the four most heavily weighted rated areas. Thus, overall performance under the Lending Test is rated High Satisfactory.

Lending Activity

Overall, lending levels reflect good responsiveness to the credit needs of the bank's combined assessment areas, based on loan activity reviewed under the Lending Test. (See the *Lending Inside and Outside of Assessment Areas* table in the next section for a breakdown of lending activity by product type.) Additional lending activity details are discussed later for each assessment area reviewed under full-scope procedures.

Rated Area	Lending Activity
Memphis Multistate MSA	Adequate
Chattanooga Multistate MSA	Adequate
Charlotte Multistate MSA	Good
Tennessee	Adequate
Florida	Good
Louisiana	Excellent
North Carolina	Adequate
Alabama	Good
Arkansas	Excellent
Texas	Good
Georgia	Excellent
South Carolina	Adequate
Virginia	Poor
New York	Adequate
OVERALL	**GOOD**

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment areas.

Lending Inside and Outside of Assessment Areas January 1, 2021 through December 31, 2022						
Loan Type	**Inside Assessment Areas**		**Outside Assessment Areas**		**TOTAL**	
HMDA	30,544	83.2%	6,164	16.8%	36,708	100%
	$11,568,173	80.9%	$2,732,544	19.1%	$14,300,717	100%
Small Business	28,110	92.1%	2,427	7.9%	30,537	100%
	$3,987,270	89.4%	$471,410	10.6%	$4,458,680	100%
Small Farm	468	85.1%	82	14.9%	550	100%
	$17,786	73.8%	$6,324	26.2%	$24,110	100%
TOTAL LOANS	**59,122**	**87.2%**	**8,673**	**12.8%**	**67,795**	**100%**
	$15,573,229	**82.9%**	**$3,210,278**	**17.1%**	**$18,783,507**	**100%**

A high percentage of loans was made inside the bank's assessment areas. As shown above, 87.2 percent of the bank's total HMDA, small business, and small farm loans were made inside the bank's assessment areas, representing 82.9 percent of loans by dollar volume.

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following table.

Rated Area	Loan Distribution by Borrower's Profile
Memphis Multistate MSA	Good
Chattanooga Multistate MSA	Good
Charlotte Multistate MSA	Good
Tennessee	Adequate
Florida	Good
Louisiana	Good
North Carolina	Good
Alabama	Good
Arkansas	Good
Texas	Good
Georgia	Adequate
South Carolina	Good
Virginia	Good
New York	Adequate
OVERALL	**GOOD**

The overall geographic distribution of loans reflects adequate penetration throughout the assessment areas, as displayed below.

Rated Area	Geographic Distribution of Loans
Memphis Multistate MSA	Adequate
Chattanooga Multistate MSA	Good
Charlotte Multistate MSA	Good
Tennessee	Adequate
Florida	Adequate
Louisiana	Adequate
North Carolina	Good
Alabama	Good
Arkansas	Good
Texas	Adequate
Georgia	Adequate
South Carolina	Good
Virginia	Adequate
New York	Adequate
OVERALL	**ADEQUATE**

Community Development Lending Activity

Overall, the bank makes a relatively high level of community development loans, as noted in the following table.

Rated Area	Community Development Loans ($)	Community Development Lending Activity
Memphis Multistate MSA	$188.1 million	Leader
Chattanooga Multistate MSA	$22.6 million	Adequate Level
Charlotte Multistate MSA	$93.2 million	Leader
Tennessee	$203.6 million	Adequate Level
Florida	$256.5 million	Leader
Louisiana	$265.4 million	Relatively High Level
North Carolina	$85.9 million	Relatively High Level
Alabama	$60.6 million	Adequate Level
Arkansas	$26.0 million	Adequate Level
Texas	$84.1 million	Adequate Level
Georgia	$59.7 million	Leader
South Carolina	$1.7 million	Few if Any
Virginia	-	Few if Any
New York	$4.7 million	Adequate Level
OVERALL	**$1.4 billion**	**RELATIVELY HIGH LEVEL**

As shown above, the level of community development lending performance varied between the bank's rated areas. Overall, the bank made 398 community development loans within its rated areas, totaling $1.4 billion.

Included in the above totals, the bank received community development lending credit for certain loans originated under the Small Business Administration's (SBA's) Paycheck Protection Program (PPP). These loans made to small businesses impacted by the COVID-19 pandemic (pandemic) supported the retention of LMI jobs and are outlined in the *Product Innovation* section that follows. Overall, the bank made 60 community development qualified PPP loans totaling $92.3 million within its rated areas.

As the bank met the credit needs of its own assessment areas, consideration was also given to community development loans made outside of the bank's rated areas. As a result, the bank received credit for an additional nine community development loans totaling $117.7 million for this evaluation, bringing the total amount of community development lending activity to 407 loans totaling $1.5 billion.

Product Innovation

Overall, the bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas, as shown in the table below.

Rated Area	Use of Product Innovation
Memphis Multistate MSA	Makes Extensive Use
Chattanooga Multistate MSA	Makes Use
Charlotte Multistate MSA	Makes Use
Tennessee	Makes Extensive Use
Florida	Makes Extensive Use
Louisiana	Makes Extensive Use
North Carolina	Makes Extensive Use
Alabama	Makes Extensive Use
Arkansas	Makes Extensive Use
Texas	Makes Extensive Use
Georgia	Makes Extensive Use
South Carolina	Makes Extensive Use
Virginia	Makes Use
New York	Makes No Use
OVERALL	**MAKES EXTENSIVE USE**

Detailed below are descriptions for each of these practices, listed in order of impact.

Consumer Real Estate

- First Horizon Home Start Mortgage: This portfolio CRA loan product assists LMI borrowers or borrowers residing in LMI geographies in purchasing or refinancing a primary residence and is available in all of the bank's assessment areas. The product's features include 100 percent loan-to-value (LTV) limits, alternative credit references for borrowers without a credit score, no mortgage insurance required, and more flexible underwriting standards compared to other bank portfolio mortgage products. This product can be utilized in conjunction with the bank's down payment assistance grants, which further assists LMI borrowers in overcoming a common obstacle to homeownership. During the review period, the bank originated 973 loans through the Home Start program, with total balances of $189.4 million.

- CRA HomeReady: This internally developed product derives from Fannie Mae's HomeReady Mortgage program and is available to LMI borrowers residing in LMI geographies. The program features lender-paid mortgage insurance and other flexible underwriting criteria and can be utilized in conjunction with the bank's down payment assistance grants. In total, the bank originated 134 loans through this program totaling $25.1 million.

- CRA Home Possible: This internally developed product derives from Freddie Mac's Home Possible mortgage program and is available to LMI borrowers with property in LMI geographies. The program features lender-paid mortgage insurance and lower down payment requirements, among other flexible underwriting criteria, and can be utilized in conjunction with the bank's down payment assistance grants. During the review period, the bank originated 42 loans through the program totaling $6.3 million.

- Fannie Mae HomeReady and Freddie Mac Home Possible: These loan programs are the standard versions of the HomeReady and Home Possible mortgage products offered by Fannie Mae and Freddie Mac without internal First Horizon overlays. The programs feature terms that are more flexible than traditional government-insured loans, such as a lower down payment, cancelable mortgage insurance, and flexible funding sources, such as gifts and grants. During the review period, the bank made 578 of these loans totaling $111.1 million across both programs.

- Down Payment Assistance Grants: The bank offers two internal down payment assistance grant programs, the First Responder Grant and Homebuyer Grant. The former offers assistance for LMI borrowers or borrowers with property in LMI geographies with professions in law enforcement, firefighting, the military, healthcare, and education and provides up to $10,000 for assistance with down payment funds, closing costs, or interest rate buydowns. The Homebuyer Grant program is similarly designed for LMI borrowers or borrowers with property in LMI geographies and offers up to $8,000 in assistance. Notably, the bank increased the limits of these programs during the review period and expanded the use of funds to include assistance with closing costs or interest rate buydowns, offering greater flexibility to LMI borrowers to meet homeownership needs. During the review period, the bank issued a combined 1,004 grants totaling $7.8 million through both of these programs.

- Federal Home Loan Bank (FHLB) of Cincinnati Affordable Housing Program: Through this program, the FHLB provides funds to member banks to purchase, construct, or rehabilitate housing for the benefit of LMI borrowers. During the review period, the bank provided seven grants totaling $3.0 million through this program, which supported owner-occupied housing rehabilitation, construction of permanent supportive housing for homeless individuals, and rehabilitation of affordable multifamily rental housing.

Small Business Lending

- SBA Loan Programs: The bank offers SBA loan products, such as SBA 7(a) and 504 loans, that provide small businesses access to capital with more flexible terms than conventional commercial financing. In many of the bank's assessment areas, community contacts identified more flexible small business underwriting criteria, such as those offered under these loan programs, as key needs for small businesses. During the review period, the bank originated 94 loans through these programs totaling $112.7 million. Additionally, the bank made a significant number of loans through the SBA's PPP, which is described in more detail in the next section.

Activities in Response to the COVID-19 Pandemic

In response to the pandemic, additional consideration was given to the bank's retail lending activities that were responsive to the needs of LMI individuals or small businesses and farms that were impacted by the pandemic. These activities were developed and implemented swiftly and often despite resource and operational constraints that the bank faced due to disruptions caused by the pandemic.

These activities are considered particularly responsive given their impact in alleviating some of financial challenges the pandemic caused for LMI individuals and small businesses and farms, the speed and responsiveness with which they were developed, and the significant resources and planning required to implement these activities.

A summary of each of the bank's retail lending activities taken in response to the pandemic follows:

- SBA's PPP: PPP loans provided funds for payroll and other operational costs to businesses impacted by the pandemic and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. From February 2021 through June 2021, the bank originated 18,292 PPP loans totaling $1.5 billion. As previously discussed in the *Community Development Lending Activity* section, the bank also received credit for a portion of these loans as community development loans.

- Loan Forbearance and Modification Programs: Consideration was given to financial institutions offering payment accommodations, such as loan forbearance or payment modification plans, to consumer and commercial borrowers impacted by the pandemic. These activities had a significant impact in helping borrowers avoid delinquencies or negative credit bureau reporting caused by hardships from pandemic-related issues and eased cash-flow pressures on businesses impacted by the pandemic.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Outstanding. The bank made an excellent level of qualified community development investments and grants. The investments and grants exhibit good responsiveness to credit and community development needs, and the bank is often in a leadership position. The bank makes extensive use of innovative and/or complex investments to support community development initiatives. The following table displays investment and grant activity performance for each rated area.

Rated Area	Investments($)	Grants/Donations ($)	Investment Test Rating
Memphis Multistate MSA	$117.5 million	$4.1 million	Outstanding
Chattanooga Multistate MSA	$26.3 million	$1.4 million	Outstanding
Charlotte Multistate MSA	$76.1 million	$855,158	Outstanding
Tennessee	$347.5 million	$8.4 million	Outstanding
Florida	$164.6 million	$9.8 million	Outstanding
Louisiana	$77.5 million	$4.0 million	High Satisfactory
North Carolina	$155.8 million	$3.5 million	Outstanding
Alabama	$39.5 million	$962,638	Low Satisfactory
Arkansas	$29.1 million	$469,917	High Satisfactory
Texas	$56.4 million	$583,012	High Satisfactory
Georgia	$74.5 million	$578,150	High Satisfactory
South Carolina	$41.6 million	$663,938	High Satisfactory
Virginia	$240,000	$2,000	Needs to Improve
New York	$2.6 million	$57,500	Low Satisfactory
OVERALL	**$1.2 billion**	**$35.5 million**	**OUTSTANDING**

As shown above, the bank received credit for $1.2 billion in total investment activity and $35.5 million in donations made within the bank's rated areas. These figures far surpass the $619.6 million in qualified investment and $28.4 million in donations qualified at the previous evaluation and further support that the bank's Investment Test performance is Outstanding. Of the bank's total qualified investment activity, $788.9 million in investments or commitments were made during the current review period, and $420.6 million in investments or commitments were made prior to this review period but were still outstanding as of the start date of this evaluation.

Of note, the bank makes extensive use of a diverse suite of investment types in meeting the community development investment needs of its assessment areas, including the use of innovative and/or complex investments. As one example of the bank's willingness to utilize complex investment types, $619.8 million of the bank's total qualified investment activity included investments or commitments in Low-Income Housing Tax Credit (LIHTC) or New Market Tax Credit (NMTC) projects; these investment types are considered more complex than standard investments and are often highly responsive to identified community development needs in the bank's assessment areas.

Not included in the totals in the previous table are investments or donations benefiting areas outside of the bank's rated areas. These included $89.1 million in additional investment activity outside of the bank's rated areas or in geographic areas that include multiple of the bank's rated areas,[4] as well as $484,650 in additional donations. These additional investments primarily consisted of investments in mortgage-backed securities (MBS) supporting affordable multifamily or single-family housing made in a prior review period but also included several new investments in small business investment funds supporting small business development that totaled $13.0 million.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory. Service Test ratings by rated area are shown in the table below, with performance under each of the four Service Test criteria detailed in the tables that follow.

Rated Area	Service Test Rating
Memphis Multistate MSA	High Satisfactory
Chattanooga Multistate MSA	High Satisfactory
Charlotte Multistate MSA	Outstanding
Tennessee	High Satisfactory
Florida	High Satisfactory
Louisiana	High Satisfactory
North Carolina	Low Satisfactory
Alabama	High Satisfactory
Arkansas	High Satisfactory
Texas	High Satisfactory
Georgia	High Satisfactory
South Carolina	Low Satisfactory
Virginia	High Satisfactory
New York	Low Satisfactory
OVERALL	**HIGH SATISFACTORY**

[4] Investments benefiting more than one of the bank's assessment areas within a given rated area are detailed in the respective rated area section.

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels, as shown in the following tables. In addition to branch locations, consideration was given to the distribution of LPOs and stand-alone ATMs, which provide further ease of access to individuals in the bank's assessment areas. Lastly, the bank's website and mobile application offer full functionality and extend the bank's ability to offer its products and services beyond its physical branch presence.

Rated Area	Accessibility of Delivery Systems
Memphis Multistate MSA	Reasonably Accessible
Chattanooga Multistate MSA	Readily Accessible
Charlotte Multistate MSA	Readily Accessible
Tennessee	Accessible
Florida	Reasonably Accessible
Louisiana	Reasonably Accessible
North Carolina	Reasonably Accessible
Alabama	Reasonably Accessible
Arkansas	Reasonably Accessible
Texas	Reasonably Accessible
Georgia	Reasonably Accessible
South Carolina	Unreasonably Inaccessible
Virginia	Readily Accessible
New York	Reasonably Accessible
OVERALL	**REASONABLY ACCESSIBLE**

As shown above, the accessibility of the bank's service delivery systems varied somewhat by rated area but overall, they are reasonably accessible.

Changes in Branch Locations

The bank's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals. As was stated previously, the bank closed 77 branches since the last examination. The vast majority of those closures stemmed from First Horizon's efforts to absorb the operations of IBERIABANK following the acquisition, and that information was used to contextualize the bank's performance in this component of the Service Test.

Rated Area	Changes in Branch Locations
Memphis Multistate MSA	Generally Not Adversely Affected
Chattanooga Multistate MSA	Generally Not Adversely Affected
Charlotte Multistate MSA	Not Adversely Affected
Tennessee	Generally Not Adversely Affected
Florida	Not Adversely Affected
Louisiana	Generally Not Adversely Affected
North Carolina	Generally Not Adversely Affected
Alabama	Generally Not Adversely Affected
Arkansas	Generally Not Adversely Affected
Texas	Not Adversely Affected
Georgia	Not Adversely Affected
South Carolina	Not Adversely Affected
Virginia	Not Adversely Affected
New York	Not Adversely Affected
OVERALL	**GENERALLY NOT ADVERSELY AFFECTED**

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. Most branch locations operate within standard weekday hours (8:00 a.m. to 5:00 p.m.), with some branches offering extended hours until 6:00 p.m. or 7:00 p.m. In addition, 111 of the bank's 417 branches offer Saturday lobby hours, generally from 9:00 a.m. to 12:00 p.m., and drive-through facilities are operated at a vast majority of the bank's branches and often offer extended hours beyond standard lobby hours. While the bank's hours vary somewhat between branches and assessment areas, they do not vary in a way that adversely impacts LMI geographies or individuals. Moreover, the bank offers the same suite of products and services throughout its entire branch network.

Rated Area	Reasonableness of Business Hours and Services
Memphis Multistate MSA	Do Not Vary in a Way That Inconveniences
Chattanooga Multistate MSA	Do Not Vary in a Way That Inconveniences
Charlotte Multistate MSA	Do Not Vary in a Way That Inconveniences
Tennessee	Do Not Vary in a Way That Inconveniences
Florida	Do Not Vary in a Way That Inconveniences
Louisiana	Do Not Vary in a Way That Inconveniences
North Carolina	Do Not Vary in a Way That Inconveniences
Alabama	Do Not Vary in a Way That Inconveniences
Arkansas	Do Not Vary in a Way That Inconveniences
Texas	Do Not Vary in a Way That Inconveniences
Georgia	Do Not Vary in a Way That Inconveniences
South Carolina	Do Not Vary in a Way That Inconveniences
Virginia	Do Not Vary in a Way That Inconveniences
New York	Do Not Vary in a Way That Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

In addition to standard retail services and community development services, consideration was given to specialized retail services that are tailored to the needs of LMI individuals, as well as retail banking accommodations made in response to the pandemic.

These activities included the following:

- Interest on Lawyers Trust (IOLTA) Accounts: These unique accounts are operated through statewide programs in which the interest from all statewide accounts is pooled to provide civil and legal aid for LMI individuals in the state. IOLTA accounts are specifically designed to meet the needs of LMI individuals and, as such, are given consideration in the range of retail services offered by the bank. As of December 31, 2023, the bank maintained 4,483 IOLTA accounts across all 12 states in its branch footprint.

Community Development Services

The bank is a leader in providing community development services throughout its assessment areas, as displayed in the following table.

Rated Area	Community Development Services
Memphis Multistate MSA	Leader
Chattanooga Multistate MSA	Leader
Charlotte Multistate MSA	Leader
Tennessee	Relatively High Level
Florida	Leader
Louisiana	Leader
North Carolina	Relatively High Level
Alabama	Leader
Arkansas	Relatively High Level
Texas	Relatively High Level
Georgia	Leader
South Carolina	Leader
Virginia	Adequate Level
New York	Adequate Level
OVERALL	**LEADER**

As shown above, the bank is a leader in providing community development services in eight of its rated areas, including three of the four most heavily weighted. During the review period, bank employees provided 40,073 hours of community development service activities to 1,058 different organizations operating throughout its rated areas. This level of community development service activity more than doubles the 17,424 hours of service activities qualified at the previous evaluation, despite significant challenges caused by the pandemic to the provision of traditional, in-person service activities for a portion of the review period.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the most recent Fair Housing Act examination conducted, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs has been identified.

MEMPHIS, TENNESSEE-MISSISSIPPI-ARKANSAS MULTISTATE MSA[5]

CRA RATING FOR MEMPHIS MSA:	**SATISFACTORY**
The Lending Test is rated:	**High Satisfactory**
The Investment Test is rated:	**Outstanding**
The Service Test is rated	**High Satisfactory**

Factors supporting the ratings for the Memphis multistate MSA include:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the Memphis assessment area.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the Memphis assessment area.
- The bank is a leader in making community development loans throughout the Memphis assessment area.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the Memphis assessment area.
- The bank makes an excellent level of qualified community development investments and grants and is often in a leadership position in the Memphis assessment area.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Memphis assessment area. Changes in branch locations have generally not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank is a leader in providing community development services.

[5] This rating reflects performance within the multistate MSA. The statewide evaluations of Tennessee and Arkansas are adjusted and do not reflect performance in the portions of Tennessee and Arkansas contained in the Memphis assessment area.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Memphis assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section.

The Memphis assessment area was reviewed under full-scope examination procedures and included information obtained from two community contacts. These interviews were used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from these community contact interviews are included in the next section.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MEMPHIS ASSESSMENT AREA

Bank Structure

The bank operates 33 branches, including its headquarters, in the Memphis assessment area, representing 7.9 percent of total bank branches. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
1	7	6	18	1

In addition to the branch locations shown in the table above, other service delivery systems include 18 stand-alone, full-service ATMs in the assessment area and 29 stand-alone, cash-only ATMs. Moreover, bank customers have surcharge-free access to two branded stand-alone ATM locations in the assessment area. During the review period, the bank closed 10 branches in the assessment area, one of which was in a low-income census tract. The bank's branches are primarily concentrated in Shelby County, which includes the vast majority of LMI census tracts in the assessment area. The bank's branch presence is not as extensive in DeSoto or Tate counties, but bank branches are nevertheless accessible to the vast majority of residents within those counties. Therefore, based on this branch network and other delivery systems, the bank is adequately positioned to deliver financial services to substantially all of the Memphis assessment area.

General Demographics

The bank's assessment area consists of DeSoto and Tate counties in Mississippi and Shelby County in Tennessee, which represent three of the eight counties in the full Memphis TN-MS-AR MSA (Memphis MSA). None of the counties within the bank's delineated assessment area are in the Arkansas portion of the Memphis MSA. The vast majority of the assessment area's 1.1 million population is concentrated in Shelby County (929,744), which contains the city of Memphis, while DeSoto and Tate counties are significantly less populous and more rural. Population growth in the assessment area between 2015 and 2020 was stagnant at 0.7 percent, though DeSoto County experienced moderate population growth of 9.9 percent in the same time frame.

The city of Memphis serves as an important regional hub for commercial and banking activity to surrounding counties and is a vital commercial transportation junction given its location on the Mississippi River and the confluence of several key interstate roadways in the city. Several key businesses are headquartered in Memphis and maintain significant operations in the city, including FedEx and AutoZone. Additionally, Memphis is home to a number of public and private universities, the most notable of which is the University of Memphis.

The banking industry in the Memphis assessment area is competitive, with 38 financial institutions operating 268 branches throughout the assessment area. First Horizon is the market leader in terms of deposit market share, with 38.8 percent of all deposit dollars in the assessment area. Deposits held in the Memphis assessment area represent 21.3 percent of First Horizon's total deposits, by the far the most of any of the bank's assessment areas. Competition for HMDA and CRA loans is similarly high. An analysis of 2022 HMDA-reportable loans reveals that 555 financial institutions had loan activity in the assessment area, of which the bank ranked 6th in total loan activity and 4th in total originations, accounting for 3.0 percent of total HMDA originations in the assessment area that year. The bank ranked 13th out of 144 institutions with CRA loan activity in the assessment area with 1.7 percent of total CRA loan activity.

The assessment area covers a large metropolitan area with a diverse population and demographic composition. As such, there are numerous credit needs in the assessment area, in addition to the standard blend of consumer and commercial loan and deposit products. Particular credit needs noted by community contacts include microloan funds for small businesses, homeownership counseling and down payment assistance for consumers, and affordable home purchase and home improvement loans. Furthermore, the Memphis assessment area has a great need for community development activity and supports a large network of community development organizations, including government assistance entities, nonprofit organizations, and community service and economic development organizations. Consequently, financial institutions have ample opportunities for involvement in community development projects.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	51	17.2%	30,319	11.0%
Moderate	77	26.0%	66,001	24.0%
Middle	67	22.6%	70,221	25.5%
Upper	89	30.1%	107,169	39.0%
Unknown	12	4.1%	1,228	0.4%
TOTAL	**296**	**100%**	**274,938**	**100%**

As shown in the preceding table, 43.2 percent of census tracts in the assessment area are designated as LMI, while 35.0 percent of assessment area families reside within those tracts. Additionally, assessment area demographics indicate that 7.0 percent and 20.8 percent of total owner-occupied

housing units are located in LMI census tracts, respectively. The majority of LMI census tracts in the assessment area are concentrated around the city of Memphis in western Shelby County.

Based on 2020 census data, the median family income for the assessment area was $68,996. This income figure was higher than the median family income for the state of Mississippi ($58,923) and in line with the state of Tennessee as a whole ($68,793). More recently, the FFIEC estimated the median family income for the Memphis MSA to be $66,900 in 2021 and $76,200 in 2022. The following table displays the distribution of assessment area families by income level compared to the states of Tennessee and Mississippi as a whole.

Family Population by Income Level						
	Assessment Area		**Tennessee**		**Mississippi**	
Low	64,015	23.3%	364,945	21.1%	171,514	23.2%
Moderate	43,754	15.9%	304,686	17.6%	121,461	16.4%
Middle	49,399	18.0%	352,060	20.4%	137,207	18.5%
Upper	117,770	42.8%	705,248	40.8%	310,307	41.9%
TOTAL	**274,938**	**100%**	**1,726,939**	**100%**	**740,489**	**100%**

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.2 percent) than reside in LMI census tracts (35.0 percent). Overall, the distribution of families by income level in the assessment area is similar to both the statewide Tennessee and Mississippi figures. However, the percentage of families below the poverty line in the assessment area (13.1 percent) is higher than the statewide level in Tennessee (10.6 percent) but below the same figure for Mississippi as a whole (15.0 percent).

Housing Demographics

The following table displays housing demographics for the assessment area, the state of Tennessee, and the state of Mississippi.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$162,824	33.5%	$966
Tennessee	$177,600	30.9%	$897
Mississippi	$125,500	37.1%	$789

Homeownership in the assessment area is more affordable than in the state of Mississippi but less affordable than in the state of Tennessee as a whole based on the affordability ratios in the preceding table. Rental costs, however, are relatively less affordable in the assessment area than in either Tennessee or Mississippi, as a significantly higher percentage of renters in the assessment area have rental costs exceeding 30.0 percent of their total income (48.5 percent) than in either Tennessee (42.4 percent) or Mississippi (41.4 percent). Based on these figures and additional housing demographics, access to affordable housing options in the assessment area is likely a challenge for many LMI individuals, particularly for those who rent.

Of the total housing stock in LMI census tracts, only 24.3 percent of units are owner-occupied housing, while a relatively large share of the available housing stock consists of rental units (52.7 percent). Given the high rental costs relative to income in the assessment area, this means that LMI individuals throughout the assessment area likely have few affordable housing options available to them. Moreover, community contacts pointed to affordable home improvement loans as a persistent need in the assessment area to maintain existing affordable housing. The average age of housing stock in low-income (61 years) and moderate-income (57 years) census tracts in the assessment area, together with information gained from community contacts, indicates that affordable home improvement loans are a significant credit need in the assessment area.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 563,891 paid employees in the assessment area, with the three largest, nongovernmental industries by number of paid employees being healthcare and social assistance (13.7 percent), transportation and warehousing (13.7 percent), and administrative and waste services (9.0 percent). Lastly, small businesses are a vital component to the assessment area's economy, as 91.4 percent of businesses in the assessment area have annual revenues of $1.0 million or less.

The table below details unemployment data from the BLS (not seasonally adjusted) for the assessment area compared to Tennessee and Mississippi.

Unemployment Levels for the Assessment Area			
Time Period (Annual Average)	**Assessment Area**	**Tennessee**	**Mississippi**
2021	6.5%	4.5%	5.5%
2022	4.3%	3.4%	3.9%
2023 Year to Date (YTD) (September)	4.1%	3.4%	3.4%

As shown in the table above, unemployment levels in the assessment area remained higher than statewide figures for Tennessee and Mississippi during the review period, though all three datasets exhibited a declining trend in unemployment year over year. The declining trend in unemployment experienced in the assessment area during the review period is largely attributable to a national trend of economic recovery following the initial impacts of the pandemic.

Community Contact Information

Two community contact interviews were utilized with individuals knowledgeable of the assessment area's economic conditions and credit and community development needs. One of these individuals represents an affordable housing development organization, while the second represents an organization specializing in small business development.

Both community contacts characterized the local economy as facing challenges, particularly due to a steady decline in workforce population and an outflow of young professionals to other cities. One community contact went on to note that while post-pandemic economic recovery has been uneven, several new and large employers have entered the assessment area, which has helped to spur new growth and economic development opportunities. Regarding access to banking services,

both community contacts noted that banking centers in the assessment area are concentrated in higher-income areas and that access to banking services is much lower in LMI areas. Moreover, the contacts explained that Memphis lacks a robust public transportation network, making access to banking centers more challenging for LMI individuals without access to personal transportation.

When describing credit needs in the assessment area, the housing contact stated that the available affordable housing stock is insufficient to meet the demand for affordable housing. The biggest issue, according to the contact, is that a majority of the lower-cost housing units are older and need repairs to maintain, which many LMI individuals cannot afford. In recent years, there has been little new affordable housing development due to higher construction costs, which has exacerbated the issues of an aging affordable housing stock.

The second contact described the small business environment in the assessment area as healthy but pointed to a lack of qualified workforce and small business planning efforts as the largest barriers to small business growth and development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in the Memphis assessment area is rated High Satisfactory. The following table displays the bank's performance under the Lending Test in the Memphis assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Leader
Product Innovation	Makes Extensive Use
LENDING TEST RATING	**HIGH SATISFACTORY**

Lending Activity

The following table displays the bank's combined 2021 and 2022 lending volume in the Memphis assessment area by number and dollar volume.

Summary of Lending Activity				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	389	9.2%	$42,348	4.7%
Home Purchase	923	21.9%	$300,662	33.5%
Multifamily Housing	3	0.1%	$18,523	2.1%
Refinancing	798	19.0%	$199,768	22.2%
Other Purpose Line of Credit (LOC)	126	3.0%	$19,971	2.2%
Other Purpose Closed/Exempt	27	0.6%	$5,789	0.6%
Total HMDA	**2,266**	**53.8%**	**$587,061**	**65.4%**
Small Business	1,936	46.0%	$310,578	34.6%
Small Farm	7	0.2%	$517	0.1%
TOTAL LOANS	**4,209**	**100.0%**	**$898,156**	**100.0%**

Loans made in the Memphis assessment area represent 7.1 percent of total 2021 and 2022 HMDA and CRA loans made within the bank's combined assessment areas. This percentage is in line with the portion of total bank branches located in this assessment area (7.9 percent). Although a relatively higher percentage of total bank deposits are held in the assessment area (21.3 percent), this figure is somewhat inflated due to the assignment of some deposit types to the bank's headquarters. As previously mentioned, First Horizon ranks 6th out of 555 lenders in total HMDA loan activity in 2022 and 13th out of 144 lenders in total CRA loan activity; these factors demonstrate that the bank plays an important role in meeting the credit needs of the assessment area despite significant competition. Therefore, the bank's lending activity in the assessment area is considered adequate.

Loan Distribution by Borrower's Profile

The bank's overall loan distribution by borrower's profile is good based on both loan products reviewed.

HMDA Lending

In 2021, the bank originated 3.8 percent of its HMDA loans to low-income borrowers, which was in line with aggregate lending performance (3.3 percent) but well below the demographic figure (24.4 percent), reflecting adequate performance. The bank's lending to low-income borrowers increased in 2022 to 7.0 percent, which exceeded aggregate lending levels (5.2 percent) but remained below the demographic figure (23.3 percent) and is therefore considered good.

In 2021, the bank made 12.8 percent of its total HMDA loans in the assessment area to moderate-income borrowers. This level of lending was below the demographic figure (15.5 percent) but exceeded aggregate lending performance (11.3 percent) and is considered good. The bank's lending to moderate-income borrowers in 2022 (14.3 percent) is considered adequate when compared with similar performance from peer institutions in the assessment area (13.8 percent) and the demographic figure (15.9 percent). Of note, the percentage of the bank's home purchase loans made in both LMI borrower categories exceeded aggregate lending levels in both years of data reviewed. As noted by community contacts, affordable home loans are a prevalent need in the assessment area for LMI individuals. Considering this context and the bank's performance across both years of data reviewed, the overall borrower distribution of HMDA loans in the assessment area is considered good.

Small Business Lending

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 29.6 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (39.1 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.0 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 50.2 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 78.3 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (33.3 percent) is considered adequate when compared to aggregate lending levels (46.8 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile

(91.4 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's geographic distribution of loans is adequate overall based on both loan products reviewed.

HMDA Lending

The overall geographic distribution of HMDA loans is adequate. The bank originated 3.2 percent of its HMDA loans in low-income census tracts in 2021 and 5.0 percent in 2022. This performance was in line with peer institutions in the assessment area (4.1 percent in 2021 and 5.5 percent in 2022) but below the percentage of owner-occupied housing units in low-income census tracts (11.0 percent in 2021 and 7.0 percent in 2022), reflecting adequate performance for both years of data reviewed.

The distribution of the bank's HMDA loans in moderate-income geographies in 2021 is considered poor, as the bank's performance (4.8 percent) was well below aggregate lending levels (9.6 percent) and the demographic figure (16.9 percent). Performance in 2022 showed improvement both in absolute terms (12.4 percent) and relative to the aggregate lending level (17.3 percent) but remained below the demographic figure (20.8 percent), reflecting adequate performance.

Small Business Lending

The bank's record of lending to small businesses in LMI geographies is adequate overall. The bank made 10.8 percent of its 2021 small business loans in low-income geographies; this performance is considered adequate, as it is closely aligned with both peer lending levels in the assessment area (11.7 percent) and the demographic figure (13.0 percent). In 2022, the bank's lending to small businesses in low-income geographies (10.6 percent) exceeded both aggregate performance (7.9 percent) and the demographic figure (9.3 percent), reflecting excellent performance.

The bank originated 13.3 percent and 20.6 percent of its small business loans in moderate-income census tracts in 2021 and 2022, respectively. These figures are in line with aggregate lending performance in 2021 (15.9 percent) and 2022 (19.5 percent) and the demographic figure for both years, reflecting adequate performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 90.4 percent of all assessment area census tracts and 80.8 percent of all LMI geographies. In 2022, the bank had lending activity in 80.7 percent of census tracts in the assessment area and 68.0 percent of LMI geographies in the assessment area. In general, the bank's loans were most concentrated in the census tracts near branch locations, including LMI tracts. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Memphis assessment area. As detailed in the table below, the bank made 49 community development loans totaling $181.1 million and 4 PPP community development loans totaling $7.0 million. The most impactful of these loans are discussed following the table below.

Community Development (CD) Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	7	$13,101	38	$144,891	4	$23,090	0	$0	49	$181,082
PPP Loans	0	$0	0	$0	4	$7,036	0	$0	4	$7,036

- The bank made one community development loan for $10.0 million to a Community Development Financial Institution (CDFI) to help establish the Memphis Medical District Loan Fund. The fund seeks to revitalize the Memphis Medical District in the downtown Memphis area, which includes several LMI geographies, by financing community and economic development projects.

- The bank made two community development loans totaling $8.5 million to redevelop and expand a dance facility as part of an NMTC project. The facility is located in a low-income census tract of a neighborhood targeted for redevelopment and will serve over 22,000 students, the majority of whom are LMI. Additionally, the funds from these loans will help support the creation of 27 new LMI jobs.

- A significant number of community development loans were made to nonprofit organizations that provide an array of community services to LMI individuals. These loans are considered impactful considering the substantial number of LMI individuals and families that received benefits from these organizations. Of particular note, a $20.0 million line of credit was renewed three times during the review period to an organization that provides educational and support services to LMI individuals in the assessment area, and an $8.0 million line of credit was renewed three times during the review period to an organization providing behavioral and mental health services to LMI children.

Product Innovation

The bank makes extensive use of innovative and flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section.

The bank's use of flexible and/or innovative lending products in the area is described as follows:

- The bank made a considerable number of loans through its various affordable mortgage programs in the Memphis assessment area. This included 59 First Horizon Home Start loans totaling $9.5 million, 4 CRA HomeReady loans totaling $634,635, 3 CRA Home Possible loans totaling $290,555, and 35 loans totaling $6.5 million through the Fannie

Mae HomeReady and Freddie Mac Home Possible programs. These loan programs are particularly impactful in the assessment area, given the need for access to affordable financing for home loans for LMI borrowers described by community contacts.

- Through its down payment assistance programs, the bank made 72 grants totaling $615,684 to LMI borrowers or borrowers with property in LMI geographies in the assessment area. These grants are considered responsive given their role in assisting LMI borrowers in achieving homeownership.

- First Horizon partners with Habitat for Humanity of Greater Memphis (Habitat) to offer affordable housing assistance programs to LMI borrowers through Habitat's programs. Through the partnership, First Horizon purchases mortgage loans from Habitat, which frees up capital for the organization and allows it to fund additional affordable housing projects. The bank offers flexible terms through this program, including reduced interest rates and LTV of up to 100 percent. During the review period, the bank purchased 60 loans through this partnership totaling $7.7 million.

- The bank made four loans totaling $3.3 million to small businesses in the assessment area through SBA loan programs that provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's Investment Test rating in the Memphis MSA is Outstanding. The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. During the review period, the bank's qualified investments totaled $121.7 million, which included investment and grant activity made in the current review period as well as prior-period investments that are still outstanding. The bank's investment and grant activity in the assessment area is displayed in the table below, followed by a description of impactful or noteworthy investments or grants.

Summary of Investments – Memphis Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$17.5 million	$2.2 million	$19.7 million
LIHTCs	$50.1 million	$25.3 million	$75.4 million
Municipal/Private Bonds	-	$14.5 million	$14.5 million
NMTCs	$2.9 million	-	$2.9 million
Equity Equivalent	-	$5.1 million	$5.1 million
Donations	$4.1 million	-	$4.1 million
TOTAL	**$74.6 million**	**$47.1 million**	**$121.7 million**

- The bank provided four new LIHTC investments throughout the assessment area in support of affordable housing for LMI individuals and families. Three of these projects support the renovation or preservation of 497 affordable rental housing units for LMI individuals. The fourth investment provides funds for the construction of a 219-unit affordable housing development with over half of the units reserved for tenants with incomes of 60.0 percent or less of the median family income in the assessment area. This project is considered

particularly impactful, as it creates new affordable housing in the Binghampton neighborhood of Memphis, a predominantly low-income area targeted for redevelopment and revitalization efforts by municipal and nonprofit entities.

- The bank made $17.5 million in new MBS investments during the current review period. These investments support permanent financing for affordable housing loans for LMI individuals, which helps to address the substantial need for access to affordable housing in the assessment area identified by community contacts.

- First Horizon was an initial contributor to the development of a new learning facility providing financial literacy and entrepreneurship training to K-12 students. The facility hosts more than 11,000 students annually, the majority of whom are from LMI families, and supports revitalization efforts in the Binghampton neighborhood of Memphis. The bank made a $500,000 commitment to the construction of the facility, $200,000 of which was paid during this review period.

- One donation totaling $50,000 was made to an affordable housing organization providing homeownership counseling and affordable housing development and rehabilitation to LMI individuals in the assessment area. As noted by community contacts, affordable housing initiatives such as those supported by this organization are a key community development need in the assessment area.

- The bank made one donation totaling $118,750 to a nonprofit organization providing a technical job training program to incarcerated individuals prior to their release. As noted by one community contact, workforce development initiatives are a prevalent need in the assessment area.

SERVICE TEST

The bank's performance under the Service Test in the Memphis assessment area is rated High Satisfactory. The following table displays the bank's performance under the Service Test.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
SERVICE TEST RATING	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank operates 33 branches in the Memphis assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	1	7	6	18	1	**33**
	3.0%	21.2%	18.2%	54.5%	3.0%	**100%**
Census Tracts	17.2%	26.0%	22.6%	30.1%	4.1%	**100%**
Household Population	12.9%	25.3%	25.9%	35.0%	0.9%	**100%**

As shown in the table above, the bank operates eight (24.2 percent) of its assessment area branches in LMI census tracts. This percentage is below the percentage of assessment area census tracts that are LMI (43.2 percent) and the household population in LMI census tracts (38.2 percent). However, the bank operates 16 stand-alone ATMs in LMI census tracts, and a number of the bank's non-LMI branches border or are located in close proximity to LMI census tracts. These factors further increase the accessibility of the bank's service delivery systems to LMI areas. Overall, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels.

Changes in Branch Locations

During the review period, the bank closed ten branches in the assessment area and did not open any branches. Of the closed branches, one was in a low-income census tract, three were in middle-income census tracts, and six were in upper-income census tracts. Overall, the majority of branch closures had minimal impact on accessibility and therefore, changes in branch locations have generally not adversely affected the accessibility of the bank's service delivery systems, particularly to LMI individuals or geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area generally operate standard business hours from 8:30 a.m. or 9:00 a.m. to 4:00 p.m. Monday through Friday. Extended lobby hours are offered until 6:00 p.m. on Fridays at 18 branch locations, including 4 in LMI census tracts. The bank also offers Saturday lobby hours at 18 branch locations, 6 of which are in LMI census tracts. Drive-through facilities are located at 29 branches in the assessment area, including all 8 of the bank's branches in LMI census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the Memphis assessment area. During the review period, bank employees provided 3,128 hours of community development service activities to 76 different organizations. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- Bank employees provided 1,042 hours of financial literacy training to various schools and other organizations in the assessment area. This includes 487 hours of technical assistance through homebuyer education programs for LMI individuals who are seeking to obtain affordable housing, which is particularly responsive given the assessment area's need for affordable housing programs such as these.

- One employee serves on the board of directors of an economic development organization supporting women- and minority-owned small businesses through a variety of efforts, including training and technical assistance and the operation of a loan fund for small businesses. As noted by one community contact, workforce development initiatives are needed in the Memphis assessment area.

- Three different bank employees provided 278 hours of technical assistance through the Volunteer Income Tax Assistance (VITA) program, which offers tax preparation and consultation services to LMI individuals free of charge.

CHATTANOOGA-CLEVELAND-DALTON, TENNESSEE-GEORGIA MULTISTATE CSA[6]

CRA RATING FOR CHATTANOOGA CSA:	**SATISFACTORY**
The Lending Test is rated:	**High Satisfactory**
The Investment Test is rated:	**Outstanding**
The Service Test is rated:	**High Satisfactory**

Factors supporting the ratings for the Chattanooga multistate CSA include:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the Chattanooga assessment area.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good penetration throughout the Chattanooga assessment area.
- The bank makes an adequate level of community development loans throughout the Chattanooga assessment area.
- The bank makes use of innovative and/or flexible lending practices in serving the credit needs of the Chattanooga assessment area.
- The bank makes an excellent level of qualified community development investments and grants and is rarely in a leadership position in the Chattanooga assessment area.
- Delivery systems are readily accessible to geographies and individuals of different income levels in the Chattanooga assessment area. Changes in branch locations have generally not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank is a leader in providing community development services.

[6] This rating reflects performance within the multistate MSA. The statewide evaluations of Tennessee and Georgia are adjusted and do not reflect performance in the portion of Tennessee and Georgia contained in the Chattanooga assessment area.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Chattanooga assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section.

The Chattanooga assessment area was reviewed under full-scope examination procedures and included information obtained from two community contact interviews with the same agency (an initial discussion and a follow-up interview). These interviews were used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from these community contact interviews are included in the next section.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHATTANOOGA ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 17 (4.1 percent) of its total branches in the Chattanooga assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
2	3	7	5	0

In addition to the branch locations shown in the table above, the bank also operates four full-service, stand-alone ATMs in the assessment area and six cash-only, stand-alone ATMs. During the review period, the bank closed three branches in the assessment area. Based on this branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to substantially all of the Chattanooga assessment area.

General Demographics

The bank's assessment area is composed of three counties: Bradley County, Tennessee (Cleveland, TN MSA); Hamilton County, Tennessee; and Catoosa County, Georgia (Chattanooga, TN-GA MSA). These counties represent 3 of the 14 counties in the full Chattanooga-Cleveland-Dalton, TN-GA-AL CSA. The assessment area has a total population of 542,699 as of the 2020 census, with Hamilton County (366,207) accounting for the majority of the assessment area's population, followed by Bradley County (108,620) and Catoosa County (67,872). Between 2015 and 2020, the assessment area experienced population growth of 5.3 percent, which was comparable to statewide population growth in Georgia (7.0 percent) and Tennessee (6.3 percent) during the same time frame. Hamilton County contains the city of Chattanooga, the economic center of the assessment area and an important regional hub for commercial and banking activities for surrounding counties.

The banking market in the assessment area is competitive, with 24 FDIC-insured depository institutions operating 129 branches throughout the assessment area. Of these institutions, First

Horizon ranked 1st in deposit market share, with 20.9 percent of all assessment area deposit dollars. Deposits held at branches in this assessment area represent 4.1 percent of the bank's total deposit dollars held across all assessment areas.

Competition for HMDA and CRA loans in the assessment area is similarly high. An analysis of 2022 HMDA-reportable loans shows that 539 financial institutions reported HMDA loan activity in the assessment area. Of these institutions, First Horizon ranked 12th, with 1.9 percent of total reported HMDA loan activity. Of the 119 institutions with reported CRA loan activity in 2022, the bank ranked 11th, with 2.0 percent of total reported CRA loan activity.

The assessment area covers a large metropolitan area with a diverse population and demographic composition. As such, there are numerous credit needs in the assessment area in addition to the standard blend of consumer and commercial loan and deposit products. Particular credit needs noted by community contacts include microloan funds for small businesses, financial literacy training, and small business counseling services. Furthermore, the Chattanooga assessment area has a need for community development activity and supports a large network of community development organizations, including government assistance entities, nonprofit organizations, and community service and economic development organizations. Consequently, opportunities for involvement in community development projects by financial institutions are ample.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	9	7.1%	6,027	4.5%
Moderate	22	17.3%	15,627	11.6%
Middle	59	46.5%	70,764	52.3%
Upper	34	26.8%	42,268	31.2%
Unknown	3	2.4%	652	0.5%
TOTAL	**127**	**100%**	**135,338**	**100%**

As shown in the table above, 24.4 percent of census tracts in the assessment area are designated as LMI, while 16.1 percent of assessment area families reside within those tracts. The majority of these LMI geographies are concentrated around the city of Chattanooga in Hamilton County, especially in the eastern and southern portions of the city.

Based on 2020 census data, the median family income for the assessment area was $72,849. This income figure was higher than the median family income for the state of Tennessee ($68,793) and slightly lower than the statewide figure for Georgia ($74,127). More recently, the FFIEC estimates the median family income for the Chattanooga, TN-GA MSA to be $71,300 in 2021 and $75,200 in 2022; for the Cleveland, TN MSA it was $57,800 in 2021 and $70,900 in 2022. The following table displays the distribution of assessment area families by income level compared to the states of Tennessee and Georgia as a whole.

Family Population by Income Level						
	Assessment Area		Tennessee		Georgia	
Low	26,242	19.4%	364,945	21.1%	573,429	22.4%
Moderate	23,186	17.1%	304,686	17.6%	439,464	17.1%
Middle	26,764	19.8%	352,060	20.4%	494,169	19.3%
Upper	59,146	43.7%	705,248	40.8%	1,058,171	41.3%
TOTAL	**135,338**	**100%**	**1,726,939**	**100%**	**2,565,233**	**100%**

When compared with the data in the first table in this section, a much higher percentage of families in the assessment area are LMI (36.5 percent) than reside in LMI census tracts (16.0 percent). Overall, the percentage of families in the assessment area that are LMI is lower than the distribution of LMI families in Tennessee (38.7 percent) and Georgia (39.5 percent). Moreover, the assessment area has a lower percentage of families living below the federal poverty level (8.6 percent) than do the states of Tennessee and Georgia (both 10.6 percent). Therefore, considering income levels and family demographics, the assessment area is more affluent than Tennessee and Georgia as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area, the state of Tennessee, and the state of Georgia.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$178,938	31.1%	$871
Tennessee	$177,600	30.9%	$897
Georgia	$190,200	32.2%	$1,042

Housing costs in the assessment area and the state of Tennessee are closely aligned, even when accounting for income levels, as evidenced by comparable median housing value figures and affordability ratios. While median housing values in Georgia are higher than in the assessment area, housing is generally more affordable when adjusting for income levels, as evidenced by a higher affordability ratio for the state of Georgia compared to the assessment area. Despite the relative affordability of housing in the assessment area overall, additional housing demographics indicate that access to owner-occupied housing may be challenging in LMI geographies in the assessment area. Of the total housing units available in LMI census tracts, 59.2 percent of housing units in low-income census tracts and 44.1 percent of housing units in moderate-income census tracts are rental units, and only 3.0 percent and 10.5 percent of owner-occupied housing units in the assessment area are in LMI census tracts, respectively.

Moreover, the median age of housing stock in the assessment area as a whole is 44 years, though this figure is significantly higher in low- (60 years) and moderate-income (58 years) census tracts. An aging housing stock increases the need for home repairs, which may present challenges for LMI borrowers and families. Taken together, these factors indicate that opportunities for HMDA lending in LMI geographies are likely limited.

Similar to housing costs, rental costs in the assessment area are comparable to statewide figures for Tennessee but are more affordable than in Georgia based on median gross rents. When accounting for income levels, 42.2 percent of renters in the assessment area have rental costs that exceed 30.0 percent of their income. This figure is closely aligned with the statewide figure for Tennessee (42.4 percent) but is lower than in Georgia (45.3 percent).

Industry and Employment Demographics

The Chattanooga assessment area supports a diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 272,176 paid employees in the assessment area, with the three largest industries by number of paid employees being manufacturing (14.1 percent), government (12.8 percent), and retail trade (10.8 percent). Small businesses are a vital component of the assessment area's economy, with 91.7 percent of assessment area businesses having annual revenues of $1 million or less. The table below details unemployment data from the BLS (not seasonally adjusted) for the assessment area compared to Tennessee and Georgia.

Unemployment Levels for the Assessment Area			
Time Period (Annual Average)	**Assessment Area**	**Tennessee**	**Georgia**
2021	4.1%	4.5%	3.9%
2022	3.4%	3.4%	3.0%
2023 YTD (September)	3.3%	3.4%	3.4%

As shown in the table above, unemployment levels in the assessment area varied relative to statewide levels in Tennessee and Georgia during the review period. As of the most recently available unemployment data, unemployment levels in all three areas were closely aligned following a downward trend in unemployment throughout the review period. Within the assessment area, unemployment levels were highest in Bradley and Hamilton counties and lowest in Catoosa County, reaching an annual low of 2.7 percent in 2022.

Community Contact Information

For the Chattanooga assessment area, two community contact interviews were utilized with an individual representing a small business and economic development organization operating in the assessment area.

The community contact described business conditions in the assessment area as positive overall. Regarding small businesses, the assessment area has seen an increase in new businesses since the initial impacts of the pandemic, with the number of registered private-sector business organizations in the assessment area increasing by 18.7 percent between June 30, 2020, and March 31, 2023. According to the contact, the greatest community development needs facing small businesses are financial literacy training and small business counseling services as well as more flexible underwriting programs for small business loans from local financial institutions. The contact went on to explain that loan programs designed for startup businesses and small-dollar loans between $2,500 and $75,000 would be particularly impactful.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHATTANOOGA ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in the Chattanooga assessment area is rated High Satisfactory. The following table displays the bank's performance under the Lending Test in the Chattanooga assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Adequate Level
Product Innovation	Makes Use
LENDING TEST RATING	**HIGH SATISFACTORY**

Lending Activity

The following table displays the bank's combined 2021 and 2022 lending volume in the Chattanooga assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	190	11.3%	20,900	5.4%
Home Purchase	183	10.8%	76,370	19.8%
Multifamily Housing	2	0.1%	3,353	0.9%
Refinancing	300	17.8%	78,940	20.5%
Other Purpose LOC	87	5.2%	15,991	4.2%
Other Purpose Closed/Exempt	18	1.1%	7,045	1.8%
Purpose Not Applicable	4	0.2%	267	0.1
Total HMDA	**784**	**46.4%**	**202,866**	**52.7%**
Small Business	898	53.2%	181,868	47.2%
Small Farm	6	0.4%	405	0.1%
TOTAL LOANS	**1,688**	**100.0%**	**385,169**	**100.0%**

Loans made in the Chattanooga assessment area represent 2.9 percent of the bank's combined HMDA and CRA loans made in 2021 and 2022 across all assessment areas. This figure falls below the percentage of total bank branches that are operated in the Chattanooga assessment area (4.1 percent) and the percentage of the bank's total deposits held in this assessment area (4.8 percent). While the percentage of the bank's loans made in the assessment area falls slightly below comparison data, the bank ranked 12th out of 539 lenders with reported HMDA loan activity in 2022 and 11th out of 119 lenders with reported CRA loan activity. This level of lending

demonstrates the bank's willingness to meet the credit needs of the assessment area and represents adequate responsiveness to credit needs in the assessment area.

Loan Distribution by Borrower's Profile

The bank's overall loan distribution by borrower's profile is good based on the performance of both loan products reviewed.

HMDA Lending

The bank's performance in making HMDA loans to borrowers of different income levels is good overall. In 2021, the bank originated 10.2 percent of its HMDA loans in the assessment area to low-income borrowers. This figure more than doubles the aggregate percentage of reported HMDA loans made to low-income borrowers (4.9 percent) but was below the percentage of assessment area families that are low-income (20.3 percent), reflecting good performance. In 2022, the bank's level of lending to low-income borrowers (7.0 percent) exceeded aggregate lending performance in this category (5.4 percent), though by a smaller magnitude than in the previous year, reflecting good performance.

In 2021, the bank originated 14.4 percent of its HMDA loans to moderate-income borrowers, which was in line with the aggregate percentage of reported HMDA loans made to moderate-income borrowers in the assessment area (16.4 percent) and the demographic figure (16.8 percent), reflecting adequate performance. The bank's lending in this income category in 2022 (18.7 percent) exceeded the performance of peer institutions in the assessment area (16.2 percent) and was in line with the demographic figure of 17.1 percent, reflecting good performance. When considering the bank's performance overall across both years of data reviewed, the bank's borrower distribution of HMDA loans is considered good.

Small Business Lending

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 25.8 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (45.7 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.6 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 49.2 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 72.2 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (31.0 percent) is considered poor when compared to aggregate lending levels (51.1 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.7 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered adequate.

Geographic Distribution of Loans

The bank's geographic distribution of loans is good overall based on both loan products reviewed.

HMDA Lending

The bank's overall distribution of HMDA loans by geography income level is good.

In 2021, the bank originated 3.7 percent of its HMDA loans in low-income census tracts as compared with 3.1 percent by peer institutions in the assessment area; additionally, the bank's level of lending in low-income geographies was in line with the percentage of owner-occupied housing units in low-income geographies (3.8 percent). Considering the challenges present in making mortgage loans in LMI geographies outlined in the *Housing Demographics* section and the bank's performance relative to peer institutions in the assessment area, the bank's performance is considered good. The bank made an excellent level of HMDA loans in low-income census tracts in 2022, as the bank's level of lending (4.7 percent) exceeded both the aggregate lending level in low-income geographies (3.0 percent) and the demographic figure (3.0 percent).

HMDA lending in moderate-income geographies is considered adequate in both 2021 and 2022. In both years, the bank's level of lending in moderate-income geographies (8.1 percent in 2021 and 10.2 percent in 2022) was in line with both the performance of peer institutions in the assessment area (8.5 percent in 2021 and 11.1 percent in 2022) and the percentage of owner-occupied housing units located in moderate-income geographies in the assessment area (10.9 percent in 2021 and 10.5 percent in 2022).

Small Business Lending

The bank's record of lending to small businesses in LMI geographies is excellent overall.

The bank originated 11.7 percent of its small business loans in low-income geographies in 2021, exceeding both the aggregate level of reported small business loans in low-income geographies (8.3 percent) and the percentage of assessment area businesses located in low-income geographies (7.5 percent). Similarly, the bank originated 11.3 percent of its small business loans in low-income geographies in 2022, which again exceeded both the aggregate lending level (6.2 percent) and the demographic figure (6.1 percent). Considering this performance relative to comparison data, the bank's distribution of small business loans in low-income geographies is considered excellent in both 2021 and 2022.

In 2021, the bank made 13.5 percent of its small business loans in moderate-income census tracts, which was in line with the peer lending level (12.9 percent) and demographic comparator (14.0 percent). Thus, the bank's performance is considered adequate. The bank's lending to small businesses in moderate-income geographies increased significantly in 2022 to 27.8 percent, which far exceeded both the aggregate lending level (17.8 percent) and the demographic figure (18.4 percent), reflecting excellent performance.

Lastly, an analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 96.4 percent of all assessment area census tracts and 96.6 percent of all LMI geographies. In 2022, the bank had lending activity in 92.1 percent of census tracts in the assessment area and 96.8 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the Chattanooga assessment area. As detailed in the table below, the bank made seven community development loans totaling $19.6 million and two PPP community development loans totaling $3.0 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	1	$500	6	$19,072	0	$0	0	$0	**7**	**$19,572**
PPP Loans	0	$0	0	$0	2	$2,983	0	$0	**2**	**$2,983**

- The bank renewed a line of credit three times during the review period for a total commitment of $13.0 million to a nonprofit organization that provides community services to children with physical and educational disabilities or from disadvantaged backgrounds. The funds provided by the bank's line of credit support working capital needs for the organization, which predominantly serves children from LMI families.

- The bank made two community development loans totaling $6.0 million to a charter school located in a moderate-income census tract in Bradley County. The proceeds of the loans were used to acquire a commercial building allowing the charter school to expand and support a larger student population, which currently predominantly consists of students from LMI families.

Product Innovation

The bank makes use of innovative and flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section.

The bank's use of flexible and/or innovative lending products in the area is described as follows:

- The bank made a number of loans through its various affordable mortgage programs in the Chattanooga assessment area. This included seven First Horizon Home Start loans totaling $1.0 million, one CRA HomeReady loan for $218,250, and seven loans totaling $1.3 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs.

- Through its down payment assistance programs, the bank made three grants totaling $16,000 to LMI borrowers or borrowers with property in LMI geographies in the assessment area. These grants are considered responsive given their role in assisting LMI borrowers in achieving homeownership.

- The bank made two SBA loans totaling $8.9 million to a small businesses in the assessment area.

INVESTMENT TEST

The bank's Investment Test rating in the Chattanooga assessment area is Outstanding. The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $27.7 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Chattanooga Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$15.4 million	$762,421	$16.2 million
LIHTCs	-	$2.3 million	$2.3 million
Municipal/Private Bonds	-	$7.8 million	$7.8 million
Donations	$1.4 million	-	$1.4 million
TOTAL	**$16.8 million**	**$10.9 million**	**$27.7 million**

- The majority of the bank's investments in the Chattanooga assessment area consisted of new MBS investments supporting permanent financing for affordable housing loans for LMI individuals in the assessment area. While not considered innovative, these loans are nevertheless impactful given the number of individual loans financed and their benefit to supporting affordable housing for LMI residents in the assessment area.

- First Horizon has an extensive partnership with an organization that provides financial literacy training and small business counseling services to LMI youth and adults in the assessment area. The bank contributes office space at three of its branch locations in the assessment area for financial coaches of the organization to operate out of; the dollar value of these in-kind contributions of property during the review period totaled $61,612. In

addition, the bank made six donations to the organization totaling $614,000, which supported salaries and operating costs for financial coaches to operate at First Horizon's branch locations in the assessment area. The bank's partnership with the organization allows it to serve more individuals in the assessment area by operating out of a number of locations, and the bank's financial contributions allow the organization to more flexibly allocate its resources to expand the impact of its operations.

- The bank made one donation totaling $25,000 to a hospital in a moderate-income census tract in Hamilton County. The bank's donation supported the purchase of personal protective equipment and additional lab equipment in direct response to the pandemic. These activities are considered impactful given their role in helping revitalize and stabilize geographies impacted by the pandemic through the support of public health and safety.

SERVICE TEST

The bank's performance under the Service Test in the Chattanooga assessment area is rated High Satisfactory. The following table displays the bank's performance under the Service Test.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
SERVICE TEST RATING	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank operates 17 branches in the Chattanooga assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	2	3	7	5	0	**17**
	11.8%	17.6%	41.2%	29.4%	0.0%	**100%**
Census Tracts	7.1%	17.3%	46.5%	26.8%	2.4%	**100%**
Household Population	6.2%	13.9%	50.2%	29.1%	0.6%	**100%**

As shown in the table above, the bank operates five (29.4 percent) of its branches in the assessment area in LMI census tracts. This figure exceeds both the percentage of assessment area census tracts that are LMI (24.4 percent) and the household population within those tracts (20.1 percent). Moreover, two bank branches that were previously located in LMI census tracts were reclassified into non-LMI census tracts due to census changes in 2022. Both of these branches, while not

located in LMI census tracts as of the examination date, were located in LMI geographies for a portion of the review period and remain adjacent to other LMI geographies in the assessment area. Lastly, the bank's network of stand-alone ATMs, two of which are located in an LMI census tract, offers additional access to service delivery systems throughout the Chattanooga assessment area. Overall, the bank's service delivery systems are readily accessible to individuals and geographies of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank closed three branch locations and did not open any branches. The bank closed one branch location in a low-, moderate-, and upper-income census tract. Each closure was within a reasonable accessibility range of an existing branch, and consequently, changes in branch locations have generally not adversely affected the accessibility of the bank's service delivery systems in the assessment area, particularly to LMI geographies or individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area generally operate standard business hours from 8:30 a.m. or 9:00 a.m. to 4:00 p.m. or 5:00 p.m. Monday through Friday. Extended lobby hours are offered until 5:00 p.m. or 6:00 p.m. on Fridays at 16 branch locations, including all LMI branch locations. The bank also offers Saturday lobby hours from 9:00 a.m. to 1:00 p.m. at 9 branch locations, one of which is located in a moderate-income census tract. Drive-through facilities are operated at 15 of the bank's branch locations in the assessment area including 2 in moderate-income census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the Chattanooga assessment area. During the review period, bank employees provided 648 hours of community development service activities to 24 different organizations. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- One bank employee serves on the board of directors of a CDFI in the assessment area that operates a number of loan funds for small businesses in the assessment area and offers alternative financing to small businesses, particularly small-dollar loans and startup businesses. These activities are particularly impactful and responsive to the needs of small businesses identified by community contacts. In addition, four other bank employees provided 26 hours of technical assistance and small business counseling services to two different economic development organizations in the assessment area that are also considered responsive to this community development need.

- Three bank employees serve on the board of directors of separate organizations in the assessment area that develop new affordable housing for LMI residents and offer other counseling services such as homebuyer education and financial literacy training. The efforts of these organizations help to expand access to affordable housing options for LMI residents in the assessment area.

CHARLOTTE-CONCORD-GASTONIA, NORTH CAROLINA-SOUTH CAROLINA MULTISTATE MSA[7]

CRA RATING FOR CHARLOTTE MSA:	**OUTSTANDING**
The Lending Test is rated:	**High Satisfactory**
The Investment Test is rated:	**Outstanding**
The Service Test is rated	**Outstanding**

Factors supporting the ratings for the Charlotte multistate MSA include:

- The bank's lending levels reflect good responsiveness to the credit needs of the Charlotte assessment area.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good penetration throughout the Charlotte assessment area.
- The bank is a leader in making community development loans throughout the Charlotte assessment area.
- The bank makes use of innovative and/or flexible lending practices in serving the credit needs of the Charlotte assessment area.
- The bank makes an excellent level of qualified community development investments and grants and is often in a leadership position in the Charlotte assessment area.
- Delivery systems are readily accessible to geographies and individuals of different income levels in the Charlotte assessment area. Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank is a leader in providing community development services in the Charlotte assessment area.

[7] This rating reflects performance within the multistate MSA. The statewide evaluation of Missouri is adjusted and does not reflect performance in the portion of Missouri contained in the St. Louis assessment area.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Charlotte assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section.

The Charlotte assessment area was reviewed under full-scope examination procedures and included information obtained from one community contact. This interview was used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from the community contact interview are included in the next section.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLOTTE ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 13 (3.1 percent) of its total branches in the Charlotte assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
1	4	3	4	1

In addition to the branch locations shown in the table above, the bank also operates one full-service, stand-alone ATM in a moderate-income census tract in the assessment area. All but one of the bank's branches in the Charlotte assessment area are located on the North Carolina side of the assessment area, while one branch is located in York County in South Carolina. The bank did not open or close any branches during this review period, and based on this branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to substantially all of the Charlotte assessment area.

General Demographics

The bank's Charlotte assessment area consists of Gaston, Iredell, Mecklenburg, Rowan, and York counties, which represent 5 of the 11 counties in the full Charlotte-Concord-Gastonia, NC-SC MSA (Charlotte MSA). The assessment area has a total population of approximately 2.0 million residents, with most of the population concentrated in Mecklenburg County (1.1 million), which includes the city of Charlotte. Populations in the remaining counties in the assessment area range from a low of 146,875 in Rowan County to a high of 282,090 in York County. Between 2015 and 2020, the assessment area experienced population growth of 12.4 percent, which outpaced growth in North Carolina (6.0 percent) and South Carolina (7.1 percent) as a whole. The city of Charlotte serves as an important regional banking and commercial hub and hosts the headquarters of several large, national corporations including Bank of America, Lowe's, and Duke Energy.

The banking market in the assessment area is competitive, with 44 FDIC-insured depository institutions operating 396 branches in the assessment area. While a significant number of

depository institutions operate in the assessment area, deposits are highly concentrated, with two institutions holding 84.4 percent of total deposit dollars in the assessment area. Of the 44 institutions with a branch location in the assessment area, the bank ranks 9th, with 0.3 percent of the deposit market share. Deposits held in the Charlotte assessment area represent 1.5 percent of the bank's total deposits held across all assessment areas. Competition for HMDA and CRA loans is similarly high. An analysis of 2022 HMDA-reportable loans shows that 765 institutions reported loan activity in the assessment area, of which First Horizon ranked 53rd in total loan activity. A similar analysis of CRA loan activity in the assessment area shows that First Horizon ranks 26th out of 177 institutions with reported CRA loan activity in 2022.

The assessment area covers a large metropolitan area with a diverse population and demographic composition. As such, there are numerous credit needs in the assessment area, in addition to a standard blend of consumer and commercial loan and deposit products. Particular credit needs noted by community contacts include greater affordable housing development and financing, including affordable multifamily housing to address the issue of rising rental costs in the assessment area. Furthermore, the Charlotte assessment area has a need for community development activity and supports a large network of community development organizations, including government assistance entities, nonprofit organizations, and community service and economic development organizations. Consequently, there are plenty of opportunities for involvement in community development projects.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	29	5.6%	18,282	3.9%
Moderate	151	28.9%	134,375	28.5%
Middle	162	31.0%	150,965	32.0%
Upper	168	32.2%	164,436	34.9%
Unknown	12	2.3%	3,193	0.7%
TOTAL	**522**	**100%**	**471,251**	**100%**

As shown above, 34.5 percent of census tracts in the assessment area are designated as LMI, while 32.4 percent of families in the assessment area reside within those tracts. These LMI geographies are most heavily concentrated around the city of Charlotte in Mecklenburg County, though concentrations of LMI geographies are also located around the cities of Gastonia in Gaston County and Rock Hill in York County and in northern Iredell County.

Based on 2020 census data, the median family income for the assessment area was $79,325. This income figure was higher than the median family income for the states of North Carolina ($70,978) and South Carolina ($68,813) as a whole. More recently, the FFIEC estimated the median family income for the Charlotte MSA to be $77,300 in 2021 and $91,700 in 2022. The following table displays the distribution of assessment area families by income level compared to the states of North Carolina and South Carolina as a whole.

Family Population by Income Level						
	Assessment Area		**North Carolina**		**South Carolina**	
Low	102,746	21.8%	566,071	21.6%	277,164	21.6%
Moderate	84,329	17.9%	461,707	17.6%	226,941	17.7%
Middle	91,661	19.5%	526,405	20.1%	255,012	19.9%
Upper	192,515	40.9%	1,070,872	40.8%	521,506	40.7%
TOTAL	**471,251**	**100%**	**2,625,055**	**100%**	**1,280,623**	**100%**

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.7 percent) than reside in LMI census tracts (32.4 percent). The distribution of families by income level in the assessment area is closely aligned to the statewide distribution in North Carolina and South Carolina, as shown in the table above. However, the percentage of families below the poverty level in the assessment area (8.3 percent) is lower than in both North Carolina (10.0 percent) and South Carolina (10.5 percent). Considering these demographics and income levels, the assessment area is slightly more affluent than North Carolina and South Carolina as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area, the state of North Carolina, and the state of South Carolina.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$216,894	29.7%	$1,103
North Carolina	$182,100	31.1%	$932
South Carolina	$170,100	32.3%	$918

Housing in the assessment area is generally less affordable than in the states of North Carolina or South Carolina, based on the data in the preceding table. This holds true even when accounting for income levels, as evidenced by a lower affordability ratio for the assessment area than in North Carolina or South Carolina. Housing costs in the assessment area are driven primarily by Mecklenburg County, which contains 52.2 percent of all owner-occupied housing units in the assessment area and has the lowest affordability ratio (27.3 percent) of any county in the assessment area. Comparatively, the other counties in the assessment area are more closely aligned with statewide figures for North Carolina and South Carolina based on their respective affordability ratios. Given the relatively lower affordability ratio, obtaining affordable housing is likely a challenge for many residents in the assessment area, particularly in Mecklenburg County.

This issue is compounded by a lack of owner-occupied housing available in LMI geographies in the assessment area, as just 27.7 percent of available housing units in low-income census tracts and 49.2 percent in moderate-income census trats are owner-occupied units. Overall, only 2.4 percent and 25.7 percent of the assessment area's total owner-occupied housing units are located in LMI census tracts, respectively. This data indicates that opportunities for HMDA lending in LMI census tracts are likely limited, and homeownership may be out of reach for many individuals in LMI geographies.

Moreover, rental costs in the assessment area are also higher than statewide figures for North and South Carolina, although similar percentages of renters are cost burdened in the assessment area (42.3 percent) compared to North Carolina (42.7 percent) and South Carolina (43.7 percent). However, community contacts indicated that affordable rental housing is a great need in the assessment area and that rental costs have risen significantly in recent years and are no longer affordable to many LMI residents. Indeed, additional housing demographics for the assessment area show that 76.4 percent of low-income renters have rental costs exceeding 30.0 percent of their income. This figure indicates that obtaining affordable rental housing is a challenge for many low-income residents in the assessment area and can be a barrier to purchasing a home due to an inability to save for down payment funds.

Industry and Employment Demographics

The Charlotte assessment area supports a large and diverse business community that includes a strong small business sector. BLS industry demographics indicate that there are 1,077,911 paid employees in the assessment area, with the three largest industries by number of paid employees being government (10.9 percent), retail trade (9.8 percent), and healthcare and social assistance (9.0 percent). The assessment area also supports a strong small business sector, with 92.0 percent of assessment area businesses having annual revenues of $1 million or less. The table below details unemployment data from the BLS (not seasonally adjusted) for the assessment area compared to North Carolina and South Carolina.

Unemployment Levels for the Assessment Area			
Time Period (Annual Average)	**Assessment Area**	**North Carolina**	**South Carolina**
2021	4.7%	4.9%	3.9%
2022	3.5%	3.7%	3.2%
2023 YTD (September)	3.3%	3.5%	3.1%

As shown in the table above, unemployment levels in the assessment area were consistently higher than in South Carolina during the review period but below statewide levels in North Carolina. Unemployment levels within the assessment area were relatively consistent but were highest in Gaston County during the review period. The assessment area, North Carolina, and South Carolina all experienced similar declining trends in unemployment during the review period, attributable in part to a national trend of economic recovery following the effects of the pandemic.

Community Contact Information

For the Charlotte assessment area, one community contact interview with an individual representing an affordable housing nonprofit agency was utilized.

The community contact described the assessment area's economy as growing, noting low overall unemployment levels and continued construction and development of commercial buildings as positive economic factors. In addition to the previously mentioned population growth in the assessment area, the assessment area has seen an 18.8 percent increase in the number of total private-sector business establishments operating in the assessment area between June 30, 2020, and March 31, 2023, which supports the community contact's statements regarding business development in the assessment area. When describing community development needs in the assessment area, the contact identified the most urgent as greater affordable housing development for both single-family dwellings and multifamily rental units. The community contact went on to state that rental costs in particular have increased significantly in the assessment area, which places additional strain on LMI residents and can be a barrier to homeownership if residents are unable to save enough money for a down payment on a home.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLOTTE ASSESSMENT AREA

LENDING TEST

The bank's Lending Test performance in the Charlotte assessment area is rated High Satisfactory. The following table displays the bank's performance under the Lending Test in the Charlotte assessment area.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Leader
Product Innovation	Makes Use
LENDING TEST RATING	**HIGH SATISFACTORY**

Lending Activity

The following table displays the bank's combined 2021 and 2022 lending volume in the Charlotte assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	83	5.2%	$11,331	2.9%
Home Purchase	221	13.8%	$106,419	27.6%
Multifamily Housing	2	0.1%	$58,880	15.3%
Refinancing	250	15.6%	$83,751	21.7%
Other Purpose LOC	58	3.6%	$9,210	2.4%
Other Purpose Closed/Exempt	11	0.7%	$2,459	0.6%
Purpose Not Applicable	1	0.1%	$63	0.0%
Total HMDA	**626**	**39.0%**	**$272,113**	**70.5%**
Small Business	966	60.2%	$113,675	29.4%
Small Farm	13	0.8%	$223	0.1%
TOTAL LOANS	**1,605**	**100.0%**	**$386,011**	**100.0%**

The bank made 2.7 percent of its total 2021 and 2022 HMDA and CRA loans in the Charlotte assessment area. This figure exceeds the percentage of total bank deposits held in the assessment area (1.5 percent) and is in line with the percentage of total bank branches operated in this assessment area (3.1 percent). Despite significant competition for HMDA and CRA loans in the assessment area, the bank ranks 53rd out of 765 lenders with HMDA lending activity in the

assessment area and 26th out of 177 lenders with CRA lending activity, which further demonstrates the bank's willingness to make credit available in the assessment area. Overall, the bank's lending activity levels exhibit good responsiveness to the credit needs of the Charlotte assessment area.

Loan Distribution by Borrower's Profile

The bank's overall loan distribution by borrower's profile is good, based on the performance of both loan products reviewed.

HMDA Lending

The bank's borrower distribution of HMDA loans is good overall.

The bank originated 12.0 percent of its HMDA loans to low-income borrowers in 2021, which far exceeded the performance of peer institutions in the assessment area (4.9 percent) but was below the percentage of assessment area families that are low income (23.0 percent). While the gap between the bank's performance and the demographic figure is large, a portion of borrowers in this demographic are unlikely to qualify for a home mortgage loan, given the assessment area's poverty level. Additionally, and as was described in the *Housing Demographics* section for this assessment area, homeownership is likely a challenge for many LMI borrowers in the Charlotte area, particularly borrowers who are low-income, given high housing costs and the high percentage of low-income residents who are cost burdened, based on their housing or rental costs. Considering these challenges and the degree to which the bank's performance exceeds the aggregate lending level, the bank's lending performance to low-income borrowers in 2021 is considered excellent. Similarly, the bank's performance in this category in 2022 (14.8 percent) was below the demographic figure (21.8 percent) but significantly outpaced the percentage of aggregate reported HMDA loans made to low-income borrowers (7.2 percent), reflecting excellent performance.

In 2021, the bank made 15.2 percent of its HMDA loans in the assessment area to moderate-income borrowers. This level of lending was in line with the performance of peer institutions in the assessment area (14.6 percent) and the percentage of assessment area families that are moderate-income (16.8 percent) and is therefore considered adequate. The bank's lending to moderate-income borrowers in 2022 (13.9 percent) was also in line with both the aggregate lending level (18.0 percent) and the demographic figure (17.9 percent) and is also considered adequate. When evaluating the bank's HMDA lending performance overall across both years of data reviewed, the borrower distribution of the bank's HMDA loans is good.

Small Business Lending

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 19.5 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (46.7 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.9 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 66.5 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 86.5 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (50.5 percent) is considered adequate when compared to aggregate lending levels (52.1 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (92.0 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's geographic distribution of loans is good overall, based on the performance of both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans to geographies of different income levels is adequate overall. In 2021, the bank originated 2.3 percent of its HMDA loans in low-income census tracts as compared with 3.1 percent by peer institutions in the assessment area. Additionally, the bank's level of lending in low-income census tracts was in line with demographic levels, reflecting adequate performance. Similarly, the bank's lending in low-income census tracts in 2022 (2.5 percent) was closely aligned with both the aggregate lending level (2.6 percent) and the demographic figure (2.4 percent), which also reflects adequate performance.

HMDA lending performance in moderate-income census tracts in 2021 is considered excellent, as the bank's level of lending (21.7 percent) exceeded the aggregate lending level of 17.1 percent and was in line with the percentage of owner-occupied housing units located in moderate-income census tracts (21.4 percent). The bank's lending in moderate-income census tracts in 2022 is considered adequate, as the bank's level of lending (23.7 percent) was in line with aggregate lending performance (22.9 percent) and the demographic figure (25.7 percent).

Small Business Lending

The bank's record of lending to small businesses in LMI geographies is excellent overall.

In 2021, the bank made 8.1 percent of its small business loans in low-income geographies, which exceeded the percentage of aggregate reported small business loans made in low-income

geographies (7.4 percent) and the demographic figure (7.7 percent), though by a small margin, which reflects good performance. The bank's lending in low-income census tracts in 2022 is considered excellent, as its level of lending (8.6 percent) was well above both the aggregate lending level (4.5 percent) and the demographic figure (4.9 percent).

Small business lending in moderate-income census tracts is considered excellent in both 2021 and 2022. In both years of data reviewed, the bank originated a higher share of its small business loans in moderate-income census tracts (25.4 percent in 2021 and 34.9 percent in 2022) than did peer institutions in the assessment area (19.5 percent in 2021 and 25.1 percent in 2022), and the bank's performance also exceeded the demographic estimate of small businesses located in moderate-income census tracts in both years (20.8 percent in 2021 and 26.5 percent in 2022).

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 77.3 percent of all assessment area census tracts and 74.3 percent of all LMI geographies. In 2022, the bank had lending activity in 49.6 percent of census tracts in the assessment area and 45.0 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Charlotte assessment area. As detailed in the table below, the bank made eight community development loans totaling $93.2 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	7	$59,157	0	$0	1	$34,000	0	$0	8	$93,157

- The bank made one loan totaling $34.0 million to finance the conversion of a historic industrial warehouse into commercial retail and office space. The facility is located in a low-income census tract in downtown Rock Hill, South Carolina, and supports the objectives of a municipal redevelopment plan to revitalize and stabilize the downtown area. The injection of private investment into the area and development of new retail and office space helps to attract new businesses to the assessment area.

- The bank made five loans totaling $52.7 million that helped to finance LIHTC projects supporting affordable multifamily housing throughout the assessment area. These included three loans totaling $40.0 million that financed the construction of a new 176-unit multifamily housing development in the city of Charlotte with all units reserved for residents earning 60.0 percent or less of the area median income. These loans are considered responsive to community development needs in the assessment area based on the information gleaned from community contacts, who identified affordable rental housing as a key community development priority in the assessment area.

Product Innovation

The bank makes use of innovative and flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section.

The bank's use of flexible and/or innovative lending products in the area is described as follows:

- The bank made 14 loans through its various affordable mortgage programs in the Charlotte assessment area. This included 12 First Horizon Home Start loans totaling $2.4 million and two loans totaling $297,500 through the Fannie Mae HomeReady loan program.

- Through its down payment assistance programs, the bank made seven grants totaling $43,946 to LMI borrowers or borrowers with property in LMI geographies in the assessment area. These grants are considered responsive, given their role in assisting LMI borrowers in achieving homeownership.

INVESTMENT TEST

The bank's Investment Test rating in the Charlotte assessment area is Outstanding. The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $77.0 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Charlotte Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$10.1 million	$794,641	$10.9 million
LIHTCs	$48.1 million	$17.0 million	$65.0 million
Deposits in Minority-Owned Depository Institutions	-	$242,463	$242,463
Donations	$855,158	-	$855,158
TOTAL	**$59.0 million**	**$18.0 million**	**$77.0 million**

- The bank makes significant investment in LIHTC projects in the assessment area, with total commitments of $65.0 million. This includes investments in three new LIHTC projects made during the current review period that financed the construction of 460 new affordable multifamily housing units for LMI individuals in the assessment area. In addition, the bank continues to invest in another LIHTC project supporting a 333-unit affordable multifamily housing development. These investments support a large number of affordable multifamily housing units for LMI individuals that are considered responsive to community development needs identified by community contacts.

- First Horizon has an extensive partnership with an organization that provides financial literacy training and small business counseling services to LMI youth and adults in the assessment area. The bank contributes office space at one of its branch locations in the

assessment area for financial coaches of the organization to operate out of; the dollar value of these in-kind contributions of property during the review period totaled $19,021. In addition, the bank made three donations to the organization totaling $307,000, which supported salaries and operating costs for financial coaches to operate at First Horizon's branch locations in the assessment area. The bank's partnership with the organization allows it to serve more individuals in the assessment area by operating out of a number of locations, and the bank's financial contributions allow the organization to allocate its resources more flexibly to expand the impact of its operations.

- The bank made one donation totaling $125,000 to a nonprofit agency to support the construction of 12 single-family homes for LMI families in the assessment area. This donation is considered impactful, given the assessment area's need for new affordable housing development for LMI residents, as noted by community contacts.

SERVICE TEST

The bank's performance under the Service Test in the Charlotte assessment area is rated Outstanding. The following table displays the bank's performance under the Service Test.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
INVESTMENT TEST RATING	**OUTSTANDING**

Accessibility of Delivery Systems

The bank operates 13 branches in the Charlotte assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	1	4	3	4	1	**13**
	7.7%	30.8%	23.1%	30.8%	7.7%	**100%**
Census Tracts	5.6%	28.9%	31.0%	32.2%	2.3%	**100%**
Household Population	4.7%	26.7%	31.7%	32.9%	1.0%	**100%**

The bank operates five, or 38.5 percent, of its branches in the assessment area in LMI census tracts. This distribution is above the percentage of assessment area census tracts that are designated as LMI (34.5 percent) and the household population within these census tracts (31.4 percent). In addition to these branch locations, the bank operates one full-service, stand-alone ATM in a

moderate-income census tract further extending the accessibility of its service delivery systems in LMI geographies in the assessment area. Therefore, the bank's service delivery systems are readily accessible to individuals and geographies of different income levels.

Changes in Branch Locations

The bank did not open or close any branches in the assessment area during the review period. Therefore, changes in branch locations have not adversely affected the accessibility of the bank's service delivery systems, particularly to LMI geographies or individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area all operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. Drive-through facilities are located at all but one of the bank's branches in the assessment area, including all branches in LMI geographies, and operate from 9:00 a.m. to 5:00 p.m. Monday through Friday. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 630 hours of community development service activities to 23 different organizations in the Charlotte assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- Two bank employees serve on the board of directors of two different nonprofit affordable housing organizations in the assessment area. Both of these organizations develop affordable single-family housing for LMI individuals in the assessment area and provide resources such as financial literacy training to prospective LMI homeowners. The activities of these organizations are responsive to the need for greater affordable housing development in the assessment area, particularly for LMI residents. Another bank employee serves on the board of directors of a nonprofit agency that provides counseling and technical services to LMI residents seeking to attain homeownership, including financial literacy training, homebuyer education courses, and structured credit building programs to help LMI individuals prepare for homeownership. These employees contributed a combined 97 hours of community development service activities to their respective organizations.

TENNESSEE

CRA RATING FOR TENNESSEE: **SATISFACTORY**

The Lending Test is rated: **Low Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Tennessee include the following:

- The bank's lending levels reflect adequate responsiveness to the credit needs of its Tennessee assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the Tennessee assessment areas.
- The bank makes an adequate level of community development loans throughout the Tennessee assessment areas.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its Tennessee assessment areas.
- The bank makes an excellent level of qualified community development investments and grants and is often in a leadership position.
- Service delivery systems are accessible to the bank's Tennessee assessment areas, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems. Business hours and services do not vary in a way that inconveniences certain portions of its Tennessee assessment areas, particularly in LMI geographies.
- The bank provides a relatively high level of community development services throughout the Tennessee assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Tennessee assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section.

The bank operates in seven assessment areas in Tennessee: five in CSA or MSA assessment areas and two noncontiguous nonMSA portions of the state. Performance in the nonMSA assessment areas was combined for analysis, resulting in one set of performance conclusions for nonMSA

Tennessee. The Nashville, Knoxville, and nonMSA Tennessee assessment areas were reviewed under full-scope examination procedures. When considering branch structure and loan/deposit activity, CRA performance in the Nashville assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Tennessee, five community contact interviews were utilized. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

The following table gives additional detail regarding the bank's operations within Tennessee.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Nashville CSA	42	45.7%	$5,974,869	42.3%	Full-Scope
Knoxville CSA	30	32.6%	$5,125,178	36.3%	Full-Scope
NonMSA Tennessee	6	6.5%	$1,047,927	7.4%	Full-Scope
Johnson City CSA	11	12.0%	$1,615,621	11.4%	Limited-Scope
Jackson MSA	2	2.2%	$289,976	2.1%	Limited-Scope
Clarksville MSA	1	1.1%	$83,789	0.6%	Limited-Scope
TOTAL	**92**	**100%**	**$14,137,360**	**100%**	**3 Full-Scope**

The bank operates 92 branches (22.1 percent of total branches) throughout the six CRA assessment areas in the state of Tennessee. Total deposits in the state total $14.1 billion, which represents 21.2 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank operates one LPO location in the Nashville assessment area. The bank's operations in the state are most heavily concentrated in the Nashville assessment area, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed 16 branches[8] and did not open any branches in Tennessee.

[8] Two of these branch closures resulted in the elimination of two assessment areas within Tennessee.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

The bank's performance under the Lending Test in Tennessee is rated Low Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level
Product Innovation	Makes Extensive Use
OVERALL	**LOW SATISFACTORY**

Lending Activity

Overall, lending levels reflect adequate responsiveness to the credit needs of the bank's combined assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Nashville CSA	Excellent
Knoxville CSA	Adequate
NonMSA Tennessee	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Lending Activity
Johnson City CSA	Consistent
Jackson MSA	Below
Clarksville MSA	Consistent

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is adequate, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Nashville CSA	Adequate
Knoxville CSA	Adequate
NonMSA Tennessee	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Johnson City CSA	Consistent
Jackson MSA	Consistent
Clarksville MSA	Consistent

The overall geographic distribution of loans reflects adequate penetration throughout the assessment areas, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Nashville CSA	Adequate
Knoxville CSA	Good
NonMSA Tennessee	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Johnson City CSA	Consistent
Jackson MSA	Consistent
Clarksville MSA	Consistent

Community Development Lending Activity

Overall, the bank makes an adequate level of community development loans, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Nashville CSA	Adequate Level
Knoxville CSA	Adequate Level
NonMSA Tennessee	Adequate Level
OVERALL	**ADEQUATE LEVEL**

Limited-Scope Assessment Areas	Community Development Lending
Johnson City CSA	Exceeds
Jackson MSA	Consistent
Clarksville MSA	Below

During the review period, the bank originated or renewed 36 community development loans inside Tennessee assessment areas totaling $194.4 million, which represents a decrease from the $325.5 million in community development loans at the bank's previous evaluation. These totals include six PPP community development loans totaling $9.2 million that were made in response to the pandemic. As the bank met the community development lending needs in Tennessee assessment areas, consideration was also given to community development loans made outside of the bank's

assessment areas but still in Tennessee. Such activity included five additional loans totaling $9.3 million: three loans to fund the rehabilitation of affordable housing for LMI senior citizens and two loans to a nonprofit organization providing community services to living facilities for LMI senior citizens.

Product Innovation

The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs in Tennessee. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.

The bank's use of flexible and/or innovative lending products in Tennessee includes the following:

- The bank made a considerable number of loans through its various affordable mortgage programs in Tennessee. This included 85 First Horizon Home Start loans totaling $18.1 million, 18 CRA HomeReady loans totaling $4.2 million, 5 CRA Home Possible loans totaling $930,956, and 68 loans totaling $18.7 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs.

- Through its down payment assistance programs, the bank made 79 grants totaling $624,000 to LMI borrowers or borrowers with property in LMI geographies in Tennessee. This represents a substantial increase in usage for down payment assistance grants from the six grants totaling $20,000 administered at the previous evaluation.

- The bank made 33 loans totaling $31.3 million to small businesses in Tennessee through SBA loan programs that provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Outstanding. The bank made an excellent level of qualified community development investments and grants in Tennessee. The investments and grants exhibit excellent responsiveness to credit and community development needs, and the bank is often in a leadership position. Moreover, the bank makes excellent use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Nashville CSA	Excellent Level
Knoxville CSA	Excellent Level
NonMSA Tennessee	Excellent Level
OVERALL	**EXCELLENT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Johnson City CSA	Consistent
Jackson MSA	Consistent
Clarksville MSA	Below

As shown in the table below, the bank had total investment activity of $283.9 million in its Tennessee assessment areas during the review period and $8.3 million in total qualified donations. Of the total investments made in the bank's Tennessee assessment areas, $153.6 million were new investments made in the current review period, while $130.3 million were made prior to the review period but were still outstanding. The bank made use of a diverse suite of investment types in providing community development investments in Tennessee, including LIHTC and NMTC projects, equity equivalent investments, MBS, and bonds. The bank's use of innovative or complex investment types in Tennessee further supports its overall outstanding Investment Test performance in the state.

Tennessee Assessment Areas	Investments ($)	Grants/Donations ($)
Nashville CSA	$149.7 million	$3.1 million
Knoxville CSA	$63.2 million	$2.5 million
NonMSA Tennessee	$25.9 million	$870,645
Johnson City CSA	$28.3 million	$1.1 million
Jackson MSA	$9.5 million	$414,607
Clarksville MSA	$7.4 million	$353,926
OVERALL	**$283.9 million**	**$8.3 million**

As the bank met the community development investment needs of its Tennessee assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $63.6 million in additional investment and $96,250 in additional donation activity in Tennessee, bringing the total amount of qualified investment, grant, and donation activity in the state to $355.9 million. These additional investments included LIHTCs, MBS, and equity equivalent investments, including an equity investment in a certified CDFI.

SERVICE TEST

The bank's performance under the Service Test in Tennessee is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are accessible to geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Nashville CSA	Accessible
Knoxville CSA	Readily Accessible
NonMSA Tennessee	Reasonably Accessible
OVERALL	**ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Johnson City CSA	Exceeds
Jackson MSA	Consistent
Clarksville MSA	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Nashville CSA	Generally Not Adversely Affected
Knoxville CSA	Adversely Affected
NonMSA Tennessee	Not Adversely Affected
OVERALL	**GENERALLY NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Johnson City CSA	Consistent
Jackson MSA	Consistent
Clarksville MSA	Below

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. While the bank's hours vary slightly between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas. The bank offers the same suite of products throughout its entire branch network.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Nashville CSA	Do Not Vary in a Way that Inconveniences
Knoxville CSA	Do Not Vary in a Way that Inconveniences
NonMSA Tennessee	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Johnson City CSA	Consistent
Jackson MSA	Consistent
Clarksville MSA	Consistent

Community Development Services

The bank provides a relatively high level of community development services in Tennessee, as shown below.

Full-Scope Assessment Areas	Community Development Services
Nashville CSA	Relatively High Level
Knoxville CSA	Leader
NonMSA Tennessee	Adequate Level
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Services
Johnson City CSA	Consistent
Jackson MSA	Below
Clarksville MSA	Below

During the review period, bank employees provided 5,196 hours of community development service activities to 147 different organizations throughout the Tennessee assessment areas. Details of the most impactful community development service activities are included in the *Community Development Services* section for each full-scope assessment area. As the bank met the community development service needs of its Tennessee assessment areas, consideration was also given to service activities made outside the bank's assessment areas but within the state of Tennessee and service activities that benefited a broader statewide area that includes one or more of the bank's assessment areas.

These activities included 242 additional hours of community development service activities, bringing the total number of community development service hours in the state to 5,438. This represents an increase in the level of community development service activities provided from the 2,646 hours qualified at the previous evaluation despite constraints on the bank's ability to provide some service activities due to the impact of the pandemic during 2020 and 2021.

NASHVILLE-DAVIDSON-MURFREESBORO, TENNESSEE CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NASHVILLE ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 42 (10.1 percent) of its total branches in the Nashville assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
1	9	13	17	2

In addition to the branch locations shown in the table above, other service delivery systems include one LPO location and seven stand-alone, full-service ATMs in the assessment area, two of which are located in a moderate-income census tract. The bank also operates nine stand-alone, cash-only ATMs, of which two are located in LMI census tracts. Lastly, bank customers have surcharge-free access to 40 branded stand-alone ATM locations in the assessment area. During the review period, the bank closed three branches in the assessment area, one of which was in a moderate-income census tract. Based on this branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to substantially all of this assessment area.

General Demographics

The bank takes a portion of the Nashville-Davidson-Murfreesboro, TN CSA, which combines the Nashville-Davidson-Murfreesboro-Franklin, TN MSA (Nashville MSA) and six surrounding nonMSA counties, as its assessment area. The bank's Nashville assessment area consists of 9 of the 20 counties in the full CSA: Davidson, Lawrence, Macon, Marshall, Maury, Rutherford, Sumner, Williamson, and Wilson counties. The assessment area has a total population of 1.9 million, with the largest population concentrated in Davidson County (715,884), which includes the city of Nashville. Nashville serves as an important regional hub for commercial and banking activity to the surrounding counties and serves as the headquarters location for a number of key businesses and public and private universities.

The assessment area hosts a competitive banking market, with 64 FDIC-insured depository institutions operating 543 branches in the assessment area. Of these institutions, First Horizon ranks 5th in deposit market share with 6.6 percent of all assessment area deposit dollars and 2nd in total branches in the assessment area. Of the bank's total deposits, 9.0 percent are held in the Nashville assessment area. Competition for HMDA and CRA loans is similarly high. An analysis of 2022 HMDA-reportable loans reveals that 856 financial institutions had loan activity in the assessment area, of which First Horizon ranked 9th in total loan activity but 6th in total originations, accounting for 2.7 percent of total HMDA originations in the assessment area that year. The bank

ranked 20th out of 196 institutions with CRA loan activity in the assessment area with 0.6 percent of total CRA loan activity.

The Nashville assessment area covers a wide metropolitan area with a diverse demographic composition. The population of the assessment area has continued to expand and has benefited from a robust tourism industry and several large corporations establishing operations in the assessment area. Consequently, demand for mortgage and small business loans has remained high in addition to the need for a standard blend of other consumer and commercial credit and deposit products. Additionally, community contacts pointed to newer affordable housing development and access to affordable financing for home loans as pressing needs in the assessment area. The assessment area has great need for community development, and community contacts noted that opportunities for community development involvement are numerous through partnerships with various government assistance, nonprofit, and community service and development organizations operating in the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	22	5.5%	19,225	4.4%
Moderate	93	23.4%	88,623	20.1%
Middle	153	38.4%	178,117	40.3%
Upper	120	30.2%	152,750	34.6%
Unknown	10	2.5%	2,933	0.7%
TOTAL	**398**	**100%**	**441,648**	**100%**

As shown above, 28.9 percent of the census tracts in the assessment area are LMI geographies, while 24.5 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the city of Nashville in Davidson County.

Based on 2020 census data, the median family income for the assessment area was $82,579. At the same time, the median family income for the state of Tennessee was $68,793. More recently, the FFIEC estimates the 2021 and 2022 median family income for the Nashville MSA to be $79,200 and $95,600, respectively. The following table displays population percentages of assessment area families by income level compared to the Tennessee family populations.

Family Population by Income Level				
	Assessment Area		**Tennessee**	
Low	88,861	20.1%	364,945	21.1%
Moderate	75,820	17.2%	304,686	17.6%
Middle	93,674	21.2%	352,060	20.4%
Upper	183,293	41.5%	705,248	40.8%
TOTAL	**441,648**	**100%**	**1,726,939**	**100%**

When compared with the data in the first table in this section, a much higher percentage of families in the assessment area are LMI (37.3 percent) than reside in LMI geographies (24.5 percent). Overall, the population of families in the assessment area that are LMI is slightly lower than in Tennessee as a whole (38.7 percent). Similarly, the percentage of families below the poverty line in the assessment area (8.0 percent) is lower than statewide levels in Tennessee (10.6 percent). Considering these income levels and family demographics, the assessment area is more affluent than Tennessee as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Tennessee.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$267,751	25.4%	$1,145
Tennessee	$177,600	30.9%	$897

Based on the data in the table above, housing is considerably less affordable in the assessment area than in Tennessee as a whole. This holds true even when accounting for higher income levels in the assessment area, as evidenced by a lower affordability ratio in the assessment area. Within the assessment area, housing is least affordable in Davidson County based on an affordability ratio of 23.4 percent and housing cost burden (the percentage of renters with rental costs exceeding 30.0 percent of total income) of 46.8 percent.

The median age for housing stock in Davidson County (38 years) is also generally higher than the rest of the assessment area, which creates a need for affordable home improvement loans in order to maintain the existing affordable housing stock. Indeed, community contacts described that existing aging affordable housing stock is often replaced with new, less affordable housing developments that decrease the availability of affordable housing options for LMI individuals in the assessment area, particularly around the city of Nashville. Of the total owner-occupied housing units in the assessment area, only 19.4 percent are located in LMI census tracts, while 48.8 percent of total available housing units in LMI census tracts are rental units. In light of these demographic figures and the information gleaned from community contact interviews, homeownership is likely out of reach for many LMI individuals in the assessment area, and opportunities for HMDA lending in LMI geographies may be limited.

Industry and Employment Demographics

The assessment area supports a large and diverse business community buoyed by the tourism industry, major medical research facilities, universities, and several large national corporations. BLS industry demographics indicate that there are 1.0 million paid employees in the assessment area, the highest concentration of whom are employed in healthcare and social assistance (12.6 percent), government (10.9 percent), and accommodation and food services (10.0 percent). The assessment area also supports a strong small business sector, with assessment area demographics indicating that 91.6 percent of businesses reported annual revenues of $1 million or less. The table

below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to Tennessee as a whole.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Tennessee**
2021	3.9%	4.5%
2022	2.8%	3.4%
2023 YTD (September)	2.7%	3.4%

As shown in the table above, unemployment rates in the assessment area were consistently lower than statewide figures over the review period. Unemployment levels varied somewhat by county in the assessment area but were lower than statewide figures for each county in the assessment area. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial impacts of the pandemic.

Community Contact Information

For the Nashville assessment area, one community contact interview was utilized with an individual representing an organization providing community service benefits to LMI individuals and small businesses across the assessment area. According to the contact, economic conditions in the assessment have improved post-pandemic, with lowering unemployment levels and new major employers entering the assessment area. The benefits of these trends are varied, however, as consumer and housing prices have increased, which more negatively impacts LMI borrowers. Additionally, the contact noted labor shortages in key industries such as hospitality and construction. Regarding banking conditions in the assessment area, the contact described that access to banking services is widespread in the more commercialized areas surrounding Nashville but that there are far fewer bank branch locations in the more rural counties surrounding Nashville. When describing housing conditions in the assessment area, the contact characterized homeownership as extremely challenging for many individuals, especially LMI. The contact noted that the demand for affordable housing far exceeds the supply and that a trend of replacing existing affordable housing stock with newer, less affordable development has exacerbated this issue. As a result, many residents are unable to attain homeownership and are forced to rent. Assessment area demographics support this claim, as nearly half of all renters in the assessment area have rental costs exceeding 30.0 percent of their total income. In addition to these factors, the contact pointed to further investment in transportation infrastructure and access to small-dollar consumer loans as additional credit needs in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NASHVILLE ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Nashville assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	808	12.6%	$140,903	8.0%
Home Purchase	1,499	23.4%	$727,190	41.4%
Multifamily Housing	0	0.0%	$0	0.0%
Refinancing	1,645	25.7%	$564,384	32.1%
Other Purpose LOC	320	5.0%	$69,603	4.0%
Other Purpose Closed/Exempt	42	0.7%	$22,774	1.3%
Total HMDA	**4,314**	**67.4%**	**$1,524,854**	**86.8%**
Small Business	2,057	32.2%	$232,160	13.2%
Small Farm	27	0.4%	$464	0.0%
TOTAL LOANS	**6,398**	**100.0%**	**$1,757,478**	**100.0%**

The bank's lending in the Nashville assessment area represents 10.8 percent of total 2021 and 2022 HMDA and CRA loans made inside the bank's combined assessment areas. By comparison, the bank operates 10.1 percent of its total branches and holds 9.0 percent of total bank deposits in the assessment area. As previously discussed, the bank ranks 6th out of 856 lenders in HMDA originations in the assessment area, which demonstrates the bank's importance in helping to meet the credit needs of the assessment area. Given this context and the bank's lending activity levels relative to comparison data, the bank's lending levels reflect excellent responsiveness to credit needs in the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is adequate in the Nashville assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is adequate overall.

The bank originated 6.4 percent of its HMDA loans to low-income borrowers in 2021, which was higher than the performance of peer institutions in the assessment area (4.7 percent) but below the percentage of assessment area families who are low income (20.2 percent). Therefore, the bank's performance is considered adequate. In 2022, the bank made 7.3 percent of its HMDA loans to low-income borrowers, which was in line with aggregate lending levels (6.5 percent) and below the demographic figure, reflecting adequate performance.

In 2021, the bank's level of lending to moderate-income borrowers (17.3 percent) is considered good in comparison to aggregate lending levels (15.6 percent) and the demographic figure (17.2 percent). The bank's performance declined slightly in 2022 (16.2 percent) but is considered adequate when compared with the performance of peer institutions in the assessment area (17.6 percent) and the demographic figure (17.2 percent).

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 30.5 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (48.5 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.5 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 54.9 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 86.0 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (45.8 percent) is considered adequate when compared to aggregate lending levels (51.2 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.6 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of

the bank's performance. When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate based on performance from both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is adequate overall. The bank made 2.8 percent of its total 2021 HMDA loans in low-income census tracts, which was in line with aggregate lending levels (4.4 percent) and the percentage of owner-occupied housing units in low-income census tracts (3.5 percent), and is considered adequate. In 2022, the bank's level of lending in low-income census tracts decreased (1.3 percent) and was below the performance of peer institutions in the assessment area (2.9 percent) and the demographic figure (2.4 percent), reflecting poor performance.

In both years of data reviewed, the bank's lending in moderate-income census tracts (11.9 percent in 2021 and 12.1 percent in 2022) was in line with aggregate lending levels (13.6 percent in 2021 and 16.0 percent in 2022) but below the demographic figure for both years. Therefore, performance in both years is considered adequate.

Small Business Lending

The overall geographic distribution of small business loans is good when considering performance from both years of data reviewed. The bank made 7.4 percent of its small business loans in low-income census tracts in 2021, which was closely aligned with both the aggregate lending level (7.7 percent) and the demographic figure (7.9 percent), reflecting adequate performance. In 2022, the bank's lending to small businesses in low-income census tracts (4.6 percent) exceeded the performance of peer institutions in the assessment area (3.6 percent) and was in line with the demographic figure (4.5 percent), reflecting good performance.

In 2021, the bank originated 17.4 percent of small business loans in moderate-income geographies, which was in line with aggregate lending levels (18.4 percent) and the percentage of assessment area small businesses located in moderate-income geographies (20.1 percent), reflecting adequate performance. The bank's performance in 2022 (25.2 percent) exceeded both the aggregate lending level (19.7 percent) and the demographic figure (21.2 percent) and is considered excellent.

No conspicuous lending gaps were identified based on an analysis of the dispersion of both loan products reviewed. The bank had loan activity in 96.3 percent of all assessment area census tracts in 2021 and 92.8 percent of all LMI census tracts. Similarly, the bank originated loans in 91.2 percent of all census tracts in the assessment area in 2022 and 86.1 percent of all LMI census tracts.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the Nashville assessment area. As detailed in the table below, the bank made 14 community development loans totaling $43.2 million and 5 PPP loans totaling $8 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	2	$8,049	10	$32,155	0	$0	2	$3,029	**14**	**$43,233**
PPP Loans	0	$0	0	$0	5	$8,027	0	$0	**5**	**$8,027**

- The bank renewed a $10.0 million line of credit twice during the review period to a medical college providing free or reduced-cost services to individuals in the assessment area, the majority of whom are LMI. Each year, the college provides $30 million in free medical and dental care to residents in the assessment area.

- The bank made two loans totaling $8.0 million to acquire and renovate an affordable housing development located in a low-income census tract in Madison, Tennessee. The development includes 117 housing units designated for LMI seniors with incomes at or below 60.0 percent of the median family income level. These loans are considered responsive to the need for new or maintained affordable housing stock for LMI individuals in the assessment area described by a community contact.

One loan for $6.3 million was made to a nonprofit agency that funded the expansion of a mental health facility serving LMI individuals in the assessment area. The organization provides reduced-cost mental health services to LMI individuals on a sliding scale based on the income level of the individual.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $152.8 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Nashville Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$39.5 million	$958,689	$40.4 million
LIHTCs	$10.1 million	$78.9 million	$89.1 million
Municipal/Private Bonds	-	$19.9 million	$19.9 million
Deposits in Minority-Owned Financial Institution	-	$254,621	$254,621
Donations	$3.1 million	-	$3.1 million
TOTAL	**$52.7 million**	**$100.1 million**	**$152.8 million**

- The bank made one new investment totaling $10.1 million in a LIHTC project that funds the acquisition and renovation of a 117-unit affordable housing development for LMI seniors located in a low-income census tract. The project caps rental costs at 30.0 percent of a renter's income, ensuring that rents remain affordable for all tenants. This project is responsive to affordable housing needs identified by a community contact, especially considering the high housing cost burden in the assessment area discussed in the *Housing Demographics* section.

- The bank continues to invest in 12 LIHTC projects from a prior review period, with total outstanding balances of $78.9 million. While these investments were initially made in a prior review period, the bank's commitments continue to support the developments, which created or maintained 2,400 total housing units that are affordable to LMI individuals in the assessment area. Given the great need for affordable housing development such as these in the assessment area, these investments continue to have significant impact and are considered responsive to assessment area community development needs.

- First Horizon has an extensive partnership with an organization that provides financial literacy training and small business counseling services to LMI youth and adults in the assessment area. The bank contributes office space at five of its branch locations in the assessment area for financial coaches of the organization to operate out of; the dollar value of these in-kind contributions of property during the review period totaled $133,239. In addition, the bank made 15 donations to the organization totaling $1.5 million, which supported salaries and operating costs for financial coaches to operate at First Horizon's branch locations. The bank's partnership with the organization allows it to serve more individuals in the assessment area by operating out of a number of locations, and the bank's financial contributions allow the organization to more flexibly allocate its resources to expand the impact of its operations.

- One donation totaling $50,000 benefited an affordable housing organization that provides assistance to prospective LMI homebuyers, including down payment assistance programs. This organization helps increase homeownership for LMI individuals, a key community development need in the assessment area, and the bank's donation is considered responsive to that need.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Nashville assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

The bank operates 42 branches in the assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	1	9	13	17	2	**42**
	2.4%	21.4%	31.0%	40.5%	4.8%	**100%**
Census Tracts	5.5%	23.4%	38.4%	30.2%	2.5%	**100%**
Household Population	5.1%	22.1%	40.4%	31.9%	0.9%	**100%**

As shown in the table above, the bank operates ten branches, representing 23.8 percent of its total assessment area branches, in LMI census tracts. This distribution is in line with the percentage of assessment area census tracts that are LMI (28.9 percent) and the household population in LMI census tracts (27.2 percent). Furthermore, the bank operates five stand-alone ATMs in LMI census tracts in the assessment area, two of which are deposit accepting and all of which are located in LMI census tracts that the bank does not operate a branch location in. These factors further increase the accessibility of the bank's service delivery systems, which are accessible to individuals and geographies of different income levels in the assessment area.

Changes in Branch Locations

The bank closed three branches and did not open any branches during the review period. Of the closed branch locations, one was located in a moderate-income census tract, one in a middle-income tract, and one in an upper-income tract. Therefore, changes in branch locations have generally not affected the accessibility of the bank's service delivery systems, particularly to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area generally operate standard business hours from 8:30 a.m. or 9:00 a.m. to 4:00 p.m. Monday through Friday. Extended lobby hours are offered until 6:00 p.m. on Fridays at 25 branch locations, including 3 in LMI census tracts. The bank also offers Saturday lobby hours at 26 branch locations, 5 of which are in LMI census tracts. Drive-through facilities are located at 40 branches in the assessment area, including all 10 of the bank's branches in LMI census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, bank employees provided 1,493 hours of community development service activities to 45 different organizations in the Nashville assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- Bank employees provided 541 total hours of services related to financial literacy or homebuyer education training events. This consisted of financial literacy events at various schools in LMI areas or through community service organizations primarily serving LMI individuals in the assessment area.

- One bank employee serves on the board of directors of an affordable housing organization offering assistance to prospective LMI homebuyers, including down payment assistance. In total, bank employees provided 100 hours of community service activities to six different organizations supporting affordable housing initiatives in the assessment area through leadership roles in the organizations or in the capacity of a financial literacy/homebuyer education instructor. These activities are considered responsive to the need for greater access to affordable housing for LMI individuals in the assessment area.

KNOXVILLE-MORRISTOWN-SEVIERVILLE, TENNESSEE CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KNOXVILLE ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 30 (7.2 percent) of its total branches in the Knoxville assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
2	5	11	11	1

In addition to the branch locations in the table above, other service delivery systems offered in the assessment area include 11 stand-alone, deposit-accepting ATMs and 15 stand-alone, cash-only ATMs. During the review period, the bank closed six branches and did not open any branches in this assessment area. The bank's branch network in the assessment area is mostly concentrated in Knox and Blount counties, which contain the majority of the assessment area's population and LMI census tracts. Furthermore, following the branch closures during this review period, the bank no longer operates a branch location in Loudon or Roane counties and may have difficulty fully serving this portion of the assessment area. Nevertheless, the bank is adequately positioned to deliver financial services throughout the Knoxville assessment area.

General Demographics

The Knoxville assessment area consists of Blount, Cocke, Hamblen, Jefferson, Knox, Loudon, Roane, and Sevier counties, which represent 8 of the 13 counties in the Knoxville-Morristown-Sevierville, TN CSA, which combines the Knoxville, TN MSA, Morristown, TN MSA, and two adjacent nonMSA counties. The assessment area has a total population of 976,102, the majority of which is concentrated in Knox (478,971) and Blount (135,280) counties. Knox County includes the city of Knoxville, the main population center in the assessment area and an important regional hub for commercial and banking activity. Knoxville is also home to the University of Tennessee, a large public university with a total enrollment of more than 36,000 students.

The assessment area hosts a relatively competitive banking market, with 37 FDIC-insured depository institutions operating 252 branches throughout the assessment area. First Horizon is the deposit market share leader in the assessment area, with 18.1 percent of all assessment area deposit dollars, representing 7.7 percent of the bank's total deposit dollars. While only 37 financial institutions operate a branch location in the assessment area, a much higher number of institutions reported loan activity in the assessment area, indicative of a competitive banking market for loan activity. An analysis of 2022 HMDA-reportable loans shows that 732 institutions had loan activity in the assessment area, of which First Horizon ranked 12th, with 2.0 percent of total HMDA loans.

Of the 144 institutions that reported CRA loan activity in the assessment area, the bank ranked 11th, with 1.7 percent of total CRA loans.

This assessment area covers a metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. Community contacts noted specific credit-related needs in the assessment area, including small-dollar loans to small businesses and financing for the development of single-family affordable housing stock. Contacts also indicated that there are ample opportunities to collaborate with local organizations on community development projects.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	14	5.8%	9,053	3.6%
Moderate	34	14.0%	31,275	12.6%
Middle	122	50.4%	135,340	54.5%
Upper	63	26.0%	72,651	29.2%
Unknown	9	3.7%	150	0.1%
TOTAL	**242**	**100%**	**248,469**	**100%**

As shown above, 19.8 percent of the census tracts in the assessment area are LMI geographies, and 16.2 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the city of Knoxville.

Based on 2020 Census data, the median family income for the assessment area was $70,495. At the same time, the median family income for the state of Tennessee was $68,793. More recently, the FFIEC estimates the 2021 and 2022 median family income for the Knoxville, TN MSA to be $69,100 and $82,000, respectively. At the same time, the estimated median family incomes for the Morristown MSA were $56,300 in 2021 and $70,700 in 2022. The following table displays population percentages of assessment area families by income level compared to the Tennessee family populations.

Family Population by Income Level				
	Assessment Area		**Tennessee**	
Low	48,018	19.3%	364,945	21.1%
Moderate	43,206	17.4%	304,686	17.6%
Middle	51,131	20.6%	352,060	20.4%
Upper	106,114	42.7%	705,248	40.8%
TOTAL	**248,469**	**100%**	**1,726,939**	**100%**

As shown in the preceding table, a much higher percentage of families in the assessment area are LMI (36.7 percent) than reside in LMI geographies (16.2 percent). Overall, the distribution of

families in the assessment area by income level is slightly lower in the assessment area than Tennessee as a whole (38.7 percent). Similarly, the percentage of families below the poverty level in the assessment area (9.1 percent) is slightly lower than the statewide level (10.6 percent). Considering these factors and the previously discussed income figures, the assessment area appears slightly more affluent than the state of Tennessee as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Tennessee.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$181,511	30.9%	$854
Tennessee	$177,600	30.9%	$897

Based on the data in the table above, housing costs are similarly affordable in the assessment area compared to statewide levels. While the median housing value in the assessment area is slightly higher than the statewide figure, affordability ratios for the two areas are equal when accounting for income levels. Additionally, median gross rental figures are comparable in the assessment area and state of Tennessee.

While housing costs in the assessment area are generally comparable to statewide levels, homeownership in LMI geographies may still be a challenge for many LMI individuals based on additional housing demographics, particularly in low-income census tracts. Only 2.1 percent of total owner-occupied housing units in the assessment area are located in low-income census tracts. Further, 58.8 percent of housing units in low-income census tracts are rental units; many of these low-income census tracts are near the University of Tennessee and have a high share of rental units targeted to student housing. These factors indicate that opportunities for making home loans in low-income census tracts are likely limited.

Industry and Employment Demographics

The assessment area economy is large and diverse, supporting 27,281 business establishments. Small businesses play a key role in the assessment area economy, as evidenced by the fact that 91.3 percent of businesses in the assessment area reported annual revenue figures of $1 million or less in 2022. According to BLS industry demographics, there are 448,871 paid employees in the assessment area; by number of paid employees, the largest economic sectors are government (13.1 percent), accommodation and food services (12.8 percent), and healthcare and social assistance (11.4 percent).

Displayed in the following table is unemployment data from the BLS (not seasonally adjusted) for the assessment area and the state of Tennessee.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Tennessee**
2021	3.8%	4.5%
2022	3.1%	3.4%
2023 YTD (September)	3.1%	3.4%

As shown in the table above, unemployment rates in the assessment area were slightly lower than statewide figures over the review period. Unemployment rates were highest in Cocke County (5.8 percent in 2021 and 5.1 percent in 2022) but were relatively consistent across the remaining counties in the assessment area during the review period. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial impacts of the pandemic.

Community Contact Information

For the Knoxville assessment area, two community contact interviews were utilized as part of this evaluation. One interview was with an individual specializing in small business development, and one was with an individual working for an affordable housing development organization.

The community contact interviewees characterized the local economy as growing rapidly due to population growth and new business development. While this growth has generally benefited the assessment area as a whole, one contact identified the Western Heights area of Knoxville and portions east of downtown Knoxville as areas specifically designated for and in need of further economic development initiatives. Both contacts described access to affordable housing as an issue in the assessment area, as continued population growth in the assessment area has increased the demand for affordable housing beyond the existing supply and pace of new affordable housing development. One contact further identified microloans for small businesses, particularly new business ventures, as a credit need in the assessment area to continue to support new business development. Overall, the community contacts noted that there are ample opportunities for local financial institutions to participate in economic development initiatives through loan funds and other partnerships with local community development organizations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KNOXVILLE ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Knoxville assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Adequate
Geographic Distribution	Good
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	373	11.6%	$47,988	6.8%
Home Purchase	468	14.6%	$220,639	31.2%
Multifamily Housing	4	0.1%	$8,875	1.3%
Refinancing	592	18.4%	$172,889	24.4%
Other Purpose LOC	209	6.5%	$38,529	5.4%
Other Purpose Closed/Exempt	29	0.9%	$8,262	1.2%
Total HMDA	**1,675**	**52.1%**	**$497,182**	**70.2%**
Small Business	1,521	47.3%	$210,757	29.8%
Small Farm	18	0.6%	$288	0.0%
TOTAL LOANS	**3,214**	**100.0%**	**$708,227**	**100.0%**

The bank's lending activity in the assessment area represents 5.4 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, the bank operates 7.2 percent of its total branches and holds 7.7 percent of total bank deposits in the assessment area. While the bank's lending levels were slightly below comparison data in the assessment area, the bank ranked 12th of 732 lenders with HMDA activity in the assessment area in 2022 and 11th out of 144 lenders with CRA loan activity. This demonstrates the bank's willingness to meet the credit needs of the assessment area and reflects adequate overall lending activity levels.

Loan Distribution by Borrower's Profile

The borrower distribution of the bank's loans to borrowers of different income levels and business with different revenue profiles is adequate overall based on the performance of both loan products reviewed.

HMDA Lending

The bank's borrower distribution of HMDA loans is adequate overall.

In both 2021 and 2022, the percentage of the bank's HMDA loans to low-income borrowers (8.1 percent in 2021 and 9.5 percent in 2022) exceeded the aggregate lending level (4.6 percent in 2021 and 6.7 percent in 2022) but was below the demographic figure. Given the bank's performance relative to peer institutions in the assessment area, this performance is considered good for both years of data reviewed.

In 2021, the bank made 13.5 percent of its HMDA loans to moderate-income borrowers, which was in line with peer institutions in the assessment area (14.9 percent) and the percentage of assessment area families that are moderate income (16.6 percent). Similarly, the bank's performance in 2022 (15.4 percent) was in line with aggregate performance (17.0 percent) and the demographic figure (17.4 percent). Performance in both years is considered adequate in relation to peer lending levels and the moderate-income demographic figure. When considering low- and moderate-income borrowers combined, the distribution of HMDA loans by borrower's income level is adequate overall.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 29.0 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (47.3 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.2 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 53.2 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 82.5 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (34.4 percent) is considered poor when compared to aggregate lending levels (49.4 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.3

percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered adequate.

Geographic Distribution of Loans

Overall, the bank's geographic distribution of HMDA and small business loans is good.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is adequate overall.

The percentage of the bank's HMDA loans originated in low-income census tracts in 2021 (1.3 percent) and 2022 (2.0 percent) was in line with aggregate lending levels (1.8 percent in 2021 and 2.6 percent in 2022) and the percentage of owner-occupied housing in low-income census tracts (2.3 percent and 2.1 percent, respectively). This reflects adequate performance in low-income geographies for both years.

Similarly, the bank's HMDA lending performance in moderate-income census tracts is considered adequate in both 2021 and 2022. In 2021, the bank made 8.6 percent of its HMDA loans in moderate-income census tracts as compared to aggregate lending performance of 9.1 percent and a demographic figure of 12.0 percent. The bank's performance in 2022 (9.2 percent) was also closely aligned with aggregate performance (10.8 percent) and the demographic figure (11.8 percent).

Small Business Lending

The distribution of the bank's small business loans in LMI geographies is considered excellent.

The percentage of small business loans originated in low-income census tracts in 2021 (6.4 percent) exceeded aggregate lending levels (3.3 percent) and the demographic figure for low-income geographies (4.4 percent). Similarly, the bank's lending in low-income geographies in 2022 (5.7 percent) exceeded that of peer institutions in the assessment area (3.3 percent) and the demographic figure (4.3 percent). This reflects excellent performance across both years of data reviewed.

In 2021, the bank made 16.1 percent of its small business loans in moderate-income census tracts, which is considered excellent in comparison to the aggregate lending level (12.3 percent) and the percentage of assessment area businesses located in these geographies (14.4 percent). The bank's performance in 2022 (16.3 percent) is also considered excellent, as the bank's performance exceeded the aggregate lending level (13.2 percent) and the demographic figure for moderate-income geographies (14.1 percent).

No conspicuous lending gaps were identified based on an analysis of the dispersion of both loan products reviewed. The bank had loan activity in 96.7 percent of all assessment area census tracts in 2021 and 97.9 percent of all LMI census tracts. Similarly, the bank originated loans in 91.3 percent of all census tracts in the assessment area in 2022 and 87.5 percent of all LMI census tracts.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the Knoxville assessment area. As detailed in the table below, the bank made ten community development loans totaling $32.1 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	5	$23,114	4	$6,800	0	$0	1	$2,165	9	$32,079

- The bank made one loan for $15.3 million in support of a LIHTC project for the construction of a 184-unit affordable housing development for LMI individuals. Units are reserved only for LMI individuals in the assessment area, with 67.0 percent of the units restricted to tenants with incomes at 60.0 percent or less of the assessment area median family income. The proceeds of this loan will increase affordable housing availability in the assessment area, which is responsive to credit and community development needs identified by community contacts. The bank also made four community development loans totaling $7.8 million that supported either the preservation or addition of affordable housing for LMI individuals in the assessment area, all of which are considered responsive to community development needs in the assessment area.

- One loan totaling $5.0 million was made to the local chapter of a national community service organization. The funds support the organization's grant through the Tennessee Opportunity Pilot Initiative Implementation Grant program, which provides funds to the organization to facilitate the delivery of key community services to LMI individuals in the assessment area.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $65.6 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed after the table.

Summary of Investments – Knoxville Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$19.7 million	$2.4 million	$22.1 million
LIHTCs	$25.7 million	$14.4 million	$40.0 million
Equity Equivalent	$1.0 million	-	$1.0 million
Donations	$2.5 million	-	$2.5 million
TOTAL	**$48.8 million**	**$16.8 million**	**$65.6 million**

- The bank invested in two new LIHTC projects during the review period totaling $25.7 million. These projects provided 216 total new housing units designated for LMI individuals in the assessment area, which is responsive to the need for additional affordable housing development in the assessment area identified by community contacts. Additionally, the bank continues to invest in five different LIHTC projects from a previous review period with balances totaling $14.4 million. While these investments were initially made in a prior review period, the bank's commitments continue to support the developments, which created or maintained 803 total housing units that are affordable to LMI individuals in the assessment area. Given the great need for affordable housing developments such as these in the assessment area, these investments continue to have significant impact and are considered responsive to assessment area community development needs.

- The bank made one equity equivalent investment totaling $1.0 million in a CDFI to support small business lending activities. The proceeds of the investment will provide capital to the Knox County Technology and Jobs Fund, a revolving loan fund for small businesses in the assessment area.

- First Horizon has an extensive partnership with an organization that provides financial literacy training and small business counseling services to LMI youth and adults in the assessment area. The bank contributes office space at four of its branch locations in the assessment area for financial coaches of the organization to operate out of; the dollar value of these in-kind contributions of property during the review period totaled $128,115. In addition, the bank made 12 donations to the organization totaling $1.2 million, which supported salaries and operating costs for financial coaches to operate at First Horizon's branch locations. The bank's partnership with the organization allows it to serve more individuals in the assessment area by operating out of a number of locations, and the bank's financial contributions allow the organization to more flexibly allocate its resources to expand the impact of its operations.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Knoxville assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates 30 branches in the Knoxville assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	2	5	11	11	1	**30**
	6.7%	16.7%	36.7%	36.7%	3.3%	**100%**
Census Tracts	5.8%	14.0%	50.4%	26.0%	3.7%	**100%**
Household Population	4.9%	14.3%	52.7%	27.6%	0.5%	**100%**

The bank operates seven branches in LMI census tracts, representing 23.3 percent of its total branches in the assessment area. This compares favorably to the percentage of census tracts that are LMI (19.8 percent) and the household population in LMI census tracts (19.2 percent). Moreover, four bank branches that were previously located in LMI census tracts were reclassified into non-LMI census tracts due to census changes in 2022. These branches, while not located in LMI census tracts as of the examination date, were located in LMI geographies for a portion of the review period and are adjacent to other LMI geographies in the assessment area. Therefore, the bank's service delivery systems are readily accessible to individuals and geographies of different income levels.

Changes in Branch Locations

During the review period, the bank closed six branch locations: three in moderate-income census tracts, two in middle-income census tracts, and one in an upper-income census tract. While two of the closed branch locations in moderate-income census tracts were in relatively close proximity to other First Horizon branch locations in the assessment area, the third closed branch location in a moderate-income census tract was the bank's only branch in Blount County. Given the distribution of closed branch locations by geography income level and the impact of these closures on portions of the assessment area, the bank's record of opening and closing branches has adversely affected the accessibility of the bank's service delivery systems, particularly to LMI individuals or geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area generally operate standard business hours from 8:30 a.m. or 9:00 a.m. to 4:00 p.m. or 5:00 p.m. Monday through Friday. Extended lobby hours are offered until 6:00 p.m. on Fridays at 19 branch locations, including 5 in LMI census tracts. The bank also offers Saturday lobby hours at 15 branch locations, 4 of which are in LMI census tracts. Drive-through facilities are located at 28 branches in the assessment area, including all 7 of the bank's branches in LMI census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 2,977 hours of community development service activities to 64 different organizations in the Knoxville assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- One bank employee serves on the board of directors of an affordable housing agency developing affordable rental and owner-occupied housing for LMI individuals in the assessment area. The efforts of the organization are considered responsive to needs identified by community contacts related to affordable housing in the assessment area.

- Twenty-nine bank employees provided 1,005 total community development service hours to four different local affiliates of a national community service organization. The organization supports a number of initiatives that primarily benefit LMI individuals throughout the assessment area, including housing assistance, affordable health and mental wellness services, financial literacy, and economic development grants. These activities are considered impactful given the number of LMI individuals benefited and significant number of service hours provided by bank employees.

- Bank employees provided 528 hours of financial literacy or homebuyer education training to numerous schools, housing organizations, and community organizations in the assessment area.

NONMETROPOLITAN TENNESSEE STATEWIDE AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS

Bank Structure

As shown in the table below, the bank operates six (1.4 percent) of its total branches in nonMSA Tennessee.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	0	5	1

In addition to the branch locations displayed in the table above, the bank also operates two stand-alone, deposit-accepting ATMs in the assessment areas, one of which is in a moderate-income census tract, and six stand-alone, cash-only ATMs, five of which are in moderate-income census tracts. During the review period, the bank closed one branch in a middle-income census tract and did not open any new branches in the assessment areas. Based on this branch network and other service delivery systems, the bank is adequately positioned to deliver financial services throughout both nonMSA Tennessee assessment areas.

General Demographics

The bank's combined nonMSA Tennessee review area is composed of two noncontiguous assessment areas. One is composed of Putnam and White counites in central-eastern Tennessee, while the second consists of Greene County in eastern Tennessee. Given their similar demographic characteristics, economic conditions, and credit needs, these two assessment areas are combined for analysis purposes. The combined area has a total population of 177,357; Putnam and Greene counties are the most populous counties in the assessment area, with populations of 79,854 and 70,152, respectively. The assessment areas are predominantly rural, though certain cities such as Cookeville in Putnam County and Greeneville in Greene County serve as important commercial and banking hubs for the surrounding areas.

While rural, the assessment areas still host many financial institutions. In total, 20 FDIC-insured depository institutions operate 54 branches throughout the combined area. First Horizon is the market leader, with 21.6 percent of total combined area deposit dollars, representing 1.6 percent of the bank's total deposits. In line with its high deposit market share, the bank also plays an important role in meeting the credit needs of the assessment areas. An analysis of 2022 HMDA-reportable loans shows that there were 301 entities with lending activity in the combined area, of which First Horizon ranked 8th, with 2.5 percent of all HMDA lending activity. The bank ranked 14th out of 70 lenders with CRA lending activity in the combined area but ranked 2nd out of lenders with a branch presence in the markets.

The combined area credit needs include a blend of consumer, commercial, and agricultural loan products. Additionally, community contacts familiar with the assessment areas pointed to a need for affordable housing development, credit counseling and homebuyer education, and workforce development and financial literacy training initiatives. While the availability of community development intermediaries, such as nonprofit agencies and government assistance entities, is somewhat limited relative to more urban portions of the state, community contacts noted that community development opportunities are available for financial institutions.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	0	0.0%	0	0.0%
Moderate	6	14.6%	6,020	13.3%
Middle	28	68.3%	32,810	72.4%
Upper	7	17.1%	6,476	14.3%
Unknown	0	0.0%	0	0.0%
TOTAL	**41**	**100%**	**45,306**	**100%**

As shown above, the assessment areas include no low-income and six moderate-income census tracts, representing 14.6 percent of the total census tracts in the combined area. Meanwhile, 13.3 percent of families in the assessment areas reside in moderate-income census tracts. The moderate-income geographies are primarily located around the cities of Cookeville in Putman County and Greeneville in Greene County. Most of the combined area census tracts and families are middle income.

Based on 2020 census data, the median family income for the combined area was $56,479. At the same time, the median family income for nonMSA Tennessee as a whole was $56,418. More recently, the FFIEC estimates the 2021 and 2022 median family income for nonMSA Tennessee as a whole to be $53,700 and $64,700, respectively. The following table displays population percentages of assessment area families by income level compared to statewide nonMSA family populations.

Family Population by Income Level				
	Assessment Area		**NonMSA Tennessee**	
Low	8,985	19.8%	78,772	20.3%
Moderate	8,568	18.9%	73,505	18.9%
Middle	8,841	19.5%	79,147	20.4%
Upper	18,912	41.7%	157,361	40.5%
TOTAL	**45,306**	**100%**	**388,785**	**100%**

As shown above, 38.7 percent of families in the assessment areas are LMI, significantly higher than the percentage of families who live in moderate-income census tracts (13.3 percent). This

figure is comparable to nonMSA Tennessee as a whole, though the poverty level in the combined area (11.6 percent) is slightly lower than the statewide nonMSA level (12.6 percent). When considering all of these factors, the assessment area is similarly affluent to nonMSA Tennessee as a whole.

Housing Demographics

The following table displays housing demographics for the combined area and nonMSA Tennessee as a whole.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent**
Assessment Area	$147,903	29.8%	$708
NonMSA Tennessee	$131,942	33.0%	$679

Homeownership in the combined area is less affordable than in nonMSA Tennessee as a whole, as evidenced by a lower affordability ratio. Additionally, median rental costs for the combined area are slightly higher than statewide nonMSA levels, and the assessment areas have a higher share of renters with rental costs exceeding 30.0 percent of their income (39.5 percent) than does nonMSA Tennessee as a whole (36.7 percent). Together, these figures indicate that attaining affordable housing is likely a challenge for many LMI residents. This was echoed by community contacts who noted that new affordable housing development in the assessment areas is a pressing community development and credit need. Moreover, the average age of housing stock in the combined area (40 years) is significantly higher than in nonMSA Tennessee as a whole (31 years). As the average age of available housing stock increases, home improvements are often needed to maintain the condition of the home; this increases the associated costs of homeownership outside of what is reflected by the median housing value and adds further barriers to homeownership, particularly for LMI individuals.

Industry and Employment Demographics

The assessment area economy is largely supported by its small business sector, with 91.5 percent of combined area businesses reporting annual revenues of $1 million or less. Of the 71,198 paid employees in the assessment areas, 18.6 percent work in manufacturing, 18.2 percent in government, and 13.3 percent in retail trade. The table below details unemployment data from the BLS (not seasonally adjusted) for the assessment area and the state of Tennessee.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Tennessee**
2021	4.2%	4.5%
2022	3.6%	3.4%
2023 YTD (September)	3.8%	3.4%

As shown in the table above, unemployment rates in the combined area were generally comparable to statewide levels during the review period. Unemployment levels were highest in Greene County throughout the review period, while Putnam and White counties were more closely aligned with statewide levels. Both the assessment areas and state of Tennessee experienced a decline in overall

unemployment levels from 2021 to 2022, which is largely attributable to a nationwide trend of economic recovery following the initial effects of the pandemic in 2020.

Community Contact Information

For the nonMSA Tennessee assessment areas, two community contact interviews were utilized as part of this evaluation, one from each assessment area. One interview was with an individual representing a government lending agency operating in the region including White County, and the second was with an individual representing an affordable housing agency in Greene County.

The community contact interviewees characterized the local economy as expanding due to population growth and noted that unemployment levels remain low overall, particularly in Greene County. According to assessment area demographic data, the assessment area has experienced population growth of 5.2 percent from 2015 American Community Survey (ACS) data, which outpaces population growth in nonMSA Tennessee as a whole during the same period (2.7 percent). Despite the population growth, one contact noted that there are shortages of skilled or qualified labor in certain sectors, which can hinder further economic development. The same contact also noted that inflation has had an impact on the area's economy, most notably resulting in higher housing costs, which have increased at a faster rate than wage growth. Both community contacts pointed to a need for more affordable housing development, with one contact going on to explain that the current public housing occupancy rate is nearly 100 percent, which indicates that the demand for affordable housing exceeds the available supply. One contact also noted the need for homebuyer education and credit counseling services for LMI individuals in order to better prepare applicants for homeownership.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The following table displays the bank's performance under the Lending Test in nonMSA Tennessee.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	42	9.7%	$4,744	7.4%
Home Purchase	43	9.9%	$14,386	22.5%
Multifamily Housing	0	0.0%	$0	0.0%
Refinancing	112	25.9%	$18,243	28.6%
Other Purpose LOC	41	9.5%	$5,839	9.1%
Total HMDA	**238**	**55.0%**	**$43,212**	**67.7%**
Small Business	182	42.0%	$20,406	32.0%
Small Farm	13	3.0%	$229	0.4%
TOTAL LOANS	**433**	**100.0%**	**$63,847**	**100.0%**

Loans made in the assessment area represent 0.7 percent of total 2021 and 2022 HMDA and CRA loans made within the bank's combined assessment areas. This percentage is in line with the portion of total bank branches located in the combined areas (1.4 percent) and the portion of total bank deposits held in the combined areas (1.6 percent). Therefore, the bank's lending activity in the assessment areas is considered adequate.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is adequate in nonMSA Tennessee based on the performance from both loan products reviewed.

HMDA Lending

The distribution of HMDA loans to low-income borrowers is considered adequate in 2021 (5.0 percent) and 2022 (6.5 percent), as the bank's performance is in line with the performance of peer institutions in the assessment area (3.5 percent in 2021 and 5.6 percent in 2022) but below the demographic figure in both years (21.8 percent in 2021 and 19.8 percent in 2022).

The bank originated 17.0 percent of its HMDA loans to moderate-income borrowers in 2021, which compares favorably to aggregate lending levels (13.7 percent) and was in line with the percentage of families who were moderate income (18.5 percent), reflecting good performance. In 2022, the percentage of the bank's HMDA loans originated to moderate-income borrowers (13.8 percent) approached aggregate lending levels (17.0 percent) but was below the demographic figure (18.9 percent), representing adequate performance.

When considering low- and moderate-income borrowers combined, the distribution of HMDA loans by borrower's income level is adequate overall.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 23.4 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (51.7 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.6 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 60.6 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 85.5 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (33.3 percent) is considered poor when compared to aggregate lending levels (57.6 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.5 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data

reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered adequate.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the combined area is adequate. As the assessment areas do not include any low-income census tracts, performance conclusions are based on the bank's lending in moderate-income census tracts.

HMDA Lending

The bank's distribution of HMDA loans in moderate-income geographies is poor overall. In 2021, the bank originated 9.0 percent of its HMDA loans in moderate-income census tracts, which was in line with aggregate lending levels (10.6 percent) and the percentage of owner-occupied housing units located in moderate-income census tracts (11.8 percent), reflecting adequate performance. The bank's performance in 2022 (4.3 percent) declined from 2021 and was below the lending level of peer institutions in the assessment area (9.7 percent) and the demographic figure (11.2 percent) and is considered poor.

Small Business Lending

The percentage of small business loans originated in moderate-income census tracts in 2021 (20.4 percent) was slightly higher than the aggregate lending level (17.5 percent) and in line with the demographic figure (20.7 percent), reflecting good performance. The bank's performance in 2022 is considered excellent, as the percentage of the bank's small business loans made in moderate-income census tracts (35.6 percent) was considerably higher than aggregate lending levels (11.8 percent) and the percentage of assessment area small businesses located in moderate-income census tracts (14.7 percent). Considering performance across both years of data reviewed, the bank's geographic distribution of small business loans is good overall.

Lastly, no conspicuous lending gaps were identified based on an analysis of both loan products. In 2021, the bank had loan activity in all assessment area census tracts. In 2022, the bank had loan activity in 95.1 percent of all assessment area census tracts and 83.3 percent of moderate-income census tracts. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank makes an adequate level of community development lending in the nonMSA Tennessee combined area. The bank made one community development loan totaling $9.9 million, which supported affordable housing development for LMI residents and improved housing in a moderate-income geography. This project supports 48 affordable multifamily housing units, all of which are reserved for residents with incomes below 60.0 percent of the assessment area median family income. As noted by community contacts, affordable housing development is a pressing need in the assessment area, and both of the bank's community development loans are considered responsive to that need.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the combined area and is often in a leadership position. In total, the bank made $26.7 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – NonMSA Tennessee Assessment Areas			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$5.1 million	-	$5.1 million
LIHTCs	$17.9 million	$2.9 million	$20.8 million
Donations	$870,645	-	$870,645
TOTAL	**$23.8 million**	**$2.9 million**	**$26.7 million**

- The bank made two new investments in LIHTC projects in the combined area supporting the development and rehabilitation of affordable housing stock for LMI individuals. Additionally, the bank continues to invest in a LIHTC project that was initially made in a previous review period but is still outstanding. Together, these projects have helped to create or maintain 170 affordable multifamily housing units, all of which benefit LMI individuals and families. These investments are considered responsive to community development needs in the assessment areas identified by community contacts.

- The bank donated a former bank branch to an economic development organization supporting small business development. Valued at $800,000, the facility donated by the bank will offer workspace for startup businesses and entrepreneurs and offer small business counseling services.

SERVICE TEST

The following table displays the bank's performance under the Service Test in nonMSA Tennessee.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level

Accessibility of Delivery Systems

The bank operates six branches in the combined area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	5	1	0	**6**
	0.0%	0.0%	83.3%	16.7%	0.0%	**100%**
Census Tracts	0.0%	14.6%	68.3%	17.1%	0.0%	**100%**
Household Population	0.0%	14.6%	70.9%	14.5%	0.0%	**100%**

As shown in the previous table, none of the bank's offices are in LMI geographies. However, three of the bank's offices are located less than one mile from a moderate-income census tract. Moreover, two bank branches that were previously located in LMI census tracts were reclassified into non-LMI census tracts due to census changes in 2022. Both of these branches, while not located in LMI census tracts as of the examination date, were located in LMI geographies for a portion of the review period and are adjacent to other LMI geographies. Furthermore, the bank operates six stand-alone ATMs in LMI census tracts in the combined area, two of which are deposit-accepting and all of which are located in LMI census tracts that the bank does not operate a branch location in. These factors further increase the accessibility of the bank's service delivery systems, which are reasonably accessible to individuals and geographies of different income levels in the combined area.

Changes in Branch Locations

The bank did not open any branches and closed one branch in the assessment area during the review period. The bank closed one branch location in Greeneville, Tennessee, in a middle-income census tract. However, the bank still operates three branch locations in Greeneville, which minimizes the impact of the branch closure. As a result, the bank's record of opening and closing offices in the combined area has not adversely affected the accessibility of service delivery systems, particularly to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area generally operate standard business hours from 8:30 a.m. or 9:00 a.m. to 4:00 p.m. or 5:00 p.m. Monday through Friday. Extended lobby hours are offered until 6:00 p.m. on Fridays at two branch locations, including two of the bank's branches that border moderate-income census tracts. The bank also offers Saturday lobby hours at two branch locations, both of which border LMI geographies. Drive-through facilities are located at two branches in the assessment area. Lastly, lenders are available at four branches in the assessment area, all of which border LMI geographies.

Community Development Services

The bank provides an adequate level of community development services in the nonMSA Tennessee areas. During the review period, four bank employees provided 105 hours of community development services to four different organizations in nonMSA Tennessee. Bank employees provided financial literacy training to organizations primarily serving LMI children, provided homebuyer education courses, and served on the board of directors of an organization offering community services to LMI children.

JOHNSON CITY-KINGSPORT-BRISTOL, TENNESSEE-VIRGINIA CSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JOHNSON CITY ASSESSMENT AREA

The bank operates 11 branches in the Johnson City assessment area, which includes Carter, Hawkins, Sullivan, and Washington counties; these counties represent four of the eight counties in the full Johnson City-Kingsport-Bristol, TN-VA CSA, which combines the Johnson City, TN MSA; Kingsport-Bristol, TN-VA MSA; and the Greenville, TN micropolitan statistical area. During the review period, the bank closed one branch and did not open any branches in the assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	3	27	48	24	1	**103**
	2.9%	26.2%	46.6%	23.3%	1.0%	**100%**
Family Population	2,087	20,894	55,996	29,083	0	**108,060**
	1.9%	19.3%	51.8%	26.9%	0.0%	**100%**
Household Population	3,764	36,796	84,416	43,448	0	**168,424**
	2.2%	21.9%	50.1%	25.8%	0.0%	**100%**
Business Institutions	607	2,969	5,776	3,783	26	**13,161**
	4.6%	22.6%	43.9%	28.7%	0.2%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	23,494	18,624	22,662	43,280	**108,060**
	21.7%	17.2%	21.0%	40.1%	**100%**
Household Population	40,381	27,283	29,325	71,435	**168,424**
	24.0%	16.2%	17.4%	42.4%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JOHNSON CITY ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank's Lending Test performance in this assessment area is consistent with overall Tennessee statewide performance (which is based on the full-scope review areas). For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Exceeds
OVERALL	**CONSISTENT**

During the review period, the bank made four community development loans totaling $92.4 million. In addition to these loans, the bank received credit for one PPP community development loan for $1.1 million. Most notably, two of these loans totaling $80.0 million were made to finance the construction of a major new manufacturing plant in a moderate-income census tract in the city of Kingsport, Tennessee. When finished, the plant is estimated to support 60 permanent jobs, many of which be LMI.

INVESTMENT TEST

The bank's investment performance in the Johnson City assessment area is consistent with the overall excellent level of investment and grant activity made by the bank in Tennessee (as based on the full-scope review areas). The bank's qualified investment activity in the assessment area totaled $28.3 million, $24.3 million of which were new investments made during this review period. Additionally, the bank made 65 donations to organizations serving this assessment area totaling $1.1 million.

SERVICE TEST

As displayed in the table below, First Horizon's Service Test performance in this assessment area is consistent with overall Tennessee statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 24 organizations totaling 472 services hours, which is consistent with the bank's performance in Tennessee.

JACKSON, TENNESSEE MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSON ASSESSMENT AREA

The bank operates two branches in the Jackson assessment area, which includes the entirety of Madison County, one of four counties in the Jackson, TN MSA. The bank did not open or close any branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	4	4	9	10	1	**28**
	14.3%	14.3%	32.1%	35.7%	3.6%	**100%**
Family Population	2,007	3,306	9,891	9,388	70	**24,662**
	8.1%	13.4%	40.1%	38.1%	0.3%	**100%**
Household Population	3,795	5,539	15,816	12,533	583	**38,266**
	9.9%	14.5%	41.3%	32.8%	1.5%	**100%**
Business Institutions	185	386	1,757	1,150	291	**3,769**
	4.9%	10.2%	46.6%	30.5%	7.7%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	5,794	3,606	4,840	10,422	**24,662**
	23.5%	14.6%	19.6%	42.3%	**100%**
Household Population	9,946	5,227	7,090	16,003	**38,266**
	26.0%	13.7%	18.5%	41.8%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSON ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank's Lending Test performance in this assessment area is consistent with overall Tennessee statewide performance (which is based on the full-scope review areas). For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Consistent
OVERALL	**CONSISTENT**

During the review period, the bank made one community development loan totaling $7.6 million to finance the acquisition and renovation of a low-income housing community in the Jackson assessment area.

INVESTMENT TEST

The bank's investment performance in the Jackson assessment area is consistent with the overall excellent level of investment and grant activity made by the bank in Tennessee (as based on the full-scope review areas). During the review period, the bank made new investments totaling $9.5 million and made 21 donations to organizations serving this assessment area totaling $414,607.

SERVICE TEST

As displayed in the table below, First Horizon's Service Test performance in this assessment area is consistent with overall Tennessee statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to five organizations totaling 96 service hours, which is below the bank's performance in Tennessee.

CLARKSVILLE, TENNESSEE-KENTUCKY MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CLARKSVILLE ASSESSMENT AREA

First Horizon operates one branch in this assessment area, which includes the entirety of Montgomery County, one of four counties in the Clarksville, TN-KY MSA. The bank closed two branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	1	11	18	15	1	**46**
	2.2%	23.9%	39.1%	32.6%	2.2%	**100%**
Family Population	615	9,726	23,181	19,613	0	**53,135**
	1.2%	18.3%	43.6%	36.9%	0.0%	**100%**
Household Population	1,221	15,400	32,437	25,548	0	**74,606**
	1.6%	20.6%	43.5%	34.2%	0.0%	**100%**
Business Institutions	88	1,893	1,890	2,119	2	**5,992**
	1.5%	31.6%	31.5%	35.4%	0.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	9,369	9,329	11,143	23,294	**53,135**
	17.6%	17.6%	21.0%	43.8%	**100%**
Household Population	14,039	11,831	14,082	34,654	**74,606**
	18.8%	15.9%	18.9%	46.6%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CLARKSVILLE ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank's Lending Test performance in this assessment area is consistent with overall Tennessee statewide performance (which is based on the full-scope review areas). For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

During the review period, the bank did not make any community development loans in the Clarksville assessment area.

INVESTMENT TEST

While the bank made a satisfactory level of community development investments in this assessment area, this performance was below statewide levels, as the bank made an excellent level of community development investments in the Tennessee full-scope review assessment areas. The bank's qualified investment activity in the assessment area included a $7.4 million investment that was made in a prior review period but is still outstanding. Additionally, the bank made eight donations to organizations serving this assessment area totaling $353,926.

SERVICE TEST

As displayed in the table below, First Horizon's Service Test performance in this assessment area is below the overall Tennessee statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Below
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**BELOW**

During the review period, bank employees provided community development service activities to five organizations totaling 53 service hours, which is below the bank's performance in Tennessee.

FLORIDA

CRA RATING FOR FLORIDA: **SATISFACTORY**

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Florida include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of the Florida assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the Florida assessment areas.
- The bank is a leader in making community development loans in the Florida assessment areas.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its Florida assessment areas.
- The bank makes an excellent level of qualified community development investments and grants and is often in the leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the Florida assessment areas, particularly in LMI geographies.
- The bank is a leader in providing community development services throughout the Florida assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Florida assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section.

The bank operates in six assessment areas in Florida: three in CSAs and three in MSA assessment areas. The Miami, Fort Myers, and Orlando assessment areas were reviewed under full-scope examination procedures. When considering branch structure and loan/deposit activity, CRA performance in the Miami assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Florida, four community contact interviews were utilized. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

The following table gives additional detail regarding the bank's operations within Florida.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Miami CSA	37	48.7%	$6,711,123	57.7%	Full-Scope
Fort Myers CSA	16	21.1%	$2,674,933	23.0%	Full-Scope
Orlando CSA	9	11.8%	$1,020,630	8.8%	Full-Scope
Tampa MSA	5	6.6%	$575,337	4.9%	Limited-Scope
Sarasota MSA	7	9.2%	$509,982	4.4%	Limited-Scope
Jacksonville MSA	2	2.6%	$140,460	1.2%	Limited-Scope
TOTAL	**76**	**100%**	**$11,632,555**	**100%**	**3 Full-Scope**

The bank operates 76 branches (18.3 percent of total branches) throughout the six CRA assessment areas in the state of Florida. Total deposits in the state total $11.6 billion, which represents 17.5 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates six LPO locations in Florida: two in the Orlando assessment area, two in the Fort Myers assessment area, and two in the Tampa assessment area. Other service delivery systems available in Florida include two stand-alone, deposit-accepting ATMs (one in the Miami assessment area and one in the Fort Myers assessment area). The bank's operations in the state are most heavily concentrated in the Miami assessment area, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed 21 branches and did not open any branches in Florida.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in Florida is rated High Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Leader
Product Innovation	Makes Extensive Use
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect good responsiveness to the credit needs of the bank's Florida assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Miami CSA	Excellent
Fort Myers CSA	Adequate
Orlando CSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Lending Activity
Tampa MSA	Consistent
Sarasota MSA	Consistent
Jacksonville MSA	Consistent

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is adequate, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Miami CSA	Adequate
Fort Myers CSA	Excellent
Orlando CSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Tampa MSA	Consistent
Sarasota MSA	Consistent
Jacksonville MSA	Below

The overall geographic distribution of loans reflects adequate penetration throughout the assessment areas, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Miami CSA	Poor
Fort Myers CSA	Good
Orlando CSA	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Tampa MSA	Consistent
Sarasota MSA	Consistent
Jacksonville MSA	Below

Community Development Lending Activity

First Horizon is a leader in making community development loans in the Florida assessment areas, as displayed in the tables below.

Full-Scope Assessment Areas	Community Development Lending
Miami CSA	Leader
Fort Myers CSA	Leader
Orlando CSA	Adequate Level
OVERALL	**LEADER**

Limited-Scope Assessment Areas	Community Development Lending
Tampa MSA	Below
Sarasota MSA	Below
Jacksonville MSA	Below

During the review period, the bank originated or renewed 99 community development loans inside its Florida assessment areas totaling $244.7 million. These totals include 17 PPP community development loans totaling $24.5 million that were made in response to the pandemic. As the bank met the community development lending needs of the assessment areas, additional consideration was given to community development loans made in Florida but outside of the bank's assessment areas, which added 9 loans at $11.9 million to statewide totals; consequently, community development loans made in the state of Florida totaled 108 at $256.5 million. Six of these loans totaling $2.7 million were loan participations to help finance the construction of new affordable housing developments for LMI individuals and families, 1 loan for $5.7 million helped finance the construction of a private school with a majority of students coming from LMI families, and 2 PPP loans totaling $3.4 million were made that supported businesses impacted by the pandemic.

Product Innovation

The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the Florida assessment areas and broader statewide area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.

The bank's use of flexible and/or innovative lending products in Florida includes the following:

- The bank made a considerable number of loans through its various affordable mortgage programs in Florida. This included 163 First Horizon Home Start loans totaling $31.5 million, 29 CRA HomeReady loans totaling $5.6 million, 2 CRA Home Possible loans totaling $346,300, and 45 loans totaling $8.3 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs.

- Through its down payment assistance programs, the bank made 141 grants totaling $900,131 to LMI borrowers or borrowers with property in LMI geographies in Florida.

- The bank made 32 loans totaling $44.0 million to small businesses in Florida through SBA loan programs, which provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Outstanding. Overall, the bank made an excellent level of qualified community development investments and grants. The investments and grants exhibit excellent responsiveness to credit and community development needs, and the bank is often in a leadership position. The bank makes significant use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Miami CSA	Excellent Level
Fort Myers CSA	Excellent Level
Orlando CSA	Significant Level
OVERALL	**EXCELLENT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Tampa MSA	Below
Sarasota MSA	Below
Jacksonville MSA	Below

As shown in the table below, the bank had total investment activity of $152.0 million in its Florida assessment areas during the review period and $9.6 million in total donations. Of the total investments made in the bank's Florida assessment areas, $117.2 million were new investments made in the current review period, while $34.8 million were made prior to the review period but were still outstanding. The bank made use of a diverse suite of investment types in providing community development investments in Florida, including LIHTC projects, equity equivalent investments, MBS, and bonds. The bank's use of innovative or complex investment types in Florida further supports its overall outstanding Investment Test performance in the state.

Florida Assessment Areas	Investments ($)	Grants/Donations ($)
Miami CSA	$84.5 million	$5.9 million
Fort Myers CSA	$22.1 million	$1.7 million
Orlando CSA	$13.1 million	$1.5 million
Tampa MSA	$12.8 million	$234,500
Sarasota MSA	$11.1 million	$130,163
Jacksonville MSA	$8.3 million	$166,037
OVERALL	**$152.0 million**	**$9.6 million**

As the bank met the community development investment needs of its Florida assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $12.7 million in additional investment and $184,550 in additional donation activity in Florida, bringing the total amount of qualified investment, grant, and donation activity in the state to $174.4 million. Most of these additional investments were bond purchases that support affordable housing development for LMI individuals in Florida.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Miami CSA	Reasonably Accessible
Fort Myers CSA	Reasonably Accessible
Orlando CSA	Reasonably Accessible
OVERALL	**REASONABLY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Tampa MSA	Consistent
Sarasota MSA	Consistent
Jacksonville MSA	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches in Florida has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Miami CSA	Not Adversely Affected
Fort Myers CSA	Not Adversely Affected
Orlando CSA	Not Adversely Affected
OVERALL	**NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Tampa MSA	Consistent
Sarasota MSA	Consistent
Jacksonville MSA	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its Florida assessment areas, particularly LMI geographies or individuals. While the bank's hours vary slightly between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas. The bank offers the same suite of products throughout its entire branch network.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Miami CSA	Do Not Vary in a Way that Inconveniences
Fort Myers-Naples CSA	Do Not Vary in a Way that Inconveniences
Orlando CSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Tampa MSA	Consistent
Sarasota MSA	Consistent
Jacksonville MSA	Consistent

Community Development Services

The bank is a leader in providing community development services in the Florida assessment areas, as shown below.

Full-Scope Assessment Areas	Community Development Services
Miami CSA	Leader
Fort Myers-Naples CSA	Relatively High
Orlando CSA	Relatively High
OVERALL	**LEADER**

Limited-Scope Assessment Areas	Community Development Services
Tampa MSA	Consistent
Sarasota MSA	Below
Jacksonville MSA	Below

During the review period, bank employees provided 10,709 hours of community development service activities to 276 different organizations throughout the Florida assessment areas. Details of the most impactful community development service activities are included in the *Community Development Services* section for each full-scope assessment area. As the bank met the community development service needs of its Florida assessment areas, consideration was also given to service activities made outside the bank's assessment areas but within the state of Florida and to service activities that benefited a broader statewide area that includes one or more of the bank's assessment areas. These activities included 214 additional hours of community development service activities, bringing the total number of community development service hours in the state to 10,923. This represents an increase in the level of community development service activities provided from the 7,960 hours qualified at the previous evaluation, despite constraints on the bank's ability to provide some service activities due to the impact of the pandemic during 2020 and 2021.

MIAMI-PORT ST. LUCIE-FORT LAUDERDALE, FLORIDA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MIAMI ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 37 (8.9 percent) of its total branches in the Miami assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
1	5	9	20	2

In addition to the branch locations shown in the table above, other service delivery systems include one stand-alone, full-service ATM in the assessment area. During the review period, the bank closed nine branches in the assessment area, three of which were in middle-income census tracts and six of which were located in an upper-income census tract. Based on this branch network and other delivery systems, the bank is adequately positioned to deliver financial services to the entire Miami assessment area.

General Demographics

The bank's Miami assessment area consists of Broward, Miami-Dade, Monroe, and Palm Beach counties, four of the seven counties in the full Miami-Port St. Lucie-Fort Lauderdale, FL CSA, which combines the Miami-Fort Lauderdale-West Palm Beach, FL MSA; Port St. Lucie, FL MSA; and Sebastian-Vero Beach-West Vero Corridor, FL MSA; as well as two nonMSA counties, Monroe County (encompassing the Florida Keys) and Okeechobee County. The assessment area is densely populated with a total population of 6,221,207. Miami-Dade is the most populous county in the assessment area with a total population of 2,701,767, though Broward (1,944,375) and Palm Beach (1,492,191) counties have significant population concentrations as well.

The assessment area has experienced modest population growth of 4.8 percent from 2015 through 2020, with Monroe County (9.2 percent) experiencing the most growth of the counties in the assessment area. The city of Miami in Miami-Dade County serves as a key commercial and banking hub within the state of Florida. Among other notable economic features, the city hosts the Port of Miami, one of the largest shipping ports in the United States, and several large public and private universities.

The banking market in the assessment area is extremely competitive, with 86 FDIC-insured financial institutions operating 1,388 branches in the assessment area. Of these institutions, First Horizon ranks 11th, with 2.0 percent of assessment area deposit dollars. Of the bank's total deposits, 10.0 percent are held in the assessment area. Competition for loan activity in the assessment area is also extremely high based on an analysis of reported loan activity. In 2022,

1,128 institutions reported HMDA loan activity in the assessment area, of which the bank ranked 34th, with less than 1.0 percent of total loan activity. An analysis of 2022 CRA loan data shows that there were 289 institutions with loan activity in the assessment area, with First Horizon ranking 31st out of these institutions in terms of total loan activity.

As this assessment area covers a large and diverse metropolitan area with some smaller nonmetropolitan areas, credit needs are varied and include a standard blend of consumer and commercial loan products. As previously mentioned, the assessment area has experienced continued population growth during the review period, which increases the need for further housing development; community contacts echoed this observation, noting that greater affordable housing development as a particular community development and credit need in the assessment area. Other credit and community development needs identified by community contacts include financial literacy training, credit coaching, and credit repair programs. The assessment area has great need for community development, and community contacts noted that opportunities for community development involvement are numerous through partnerships with various government assistance, nonprofit, and community service and development organizations operating in the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	79	5.2%	62,841	4.4%
Moderate	394	25.8%	379,017	26.4%
Middle	461	30.2%	454,882	31.6%
Upper	533	34.9%	524,695	36.5%
Unknown	59	3.9%	16,893	1.2%
TOTAL	**1,526**	**100%**	**1,438,328**	**100%**

As shown above, 31.0 percent of the census tracts in the assessment area are LMI geographies, while 30.8 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in the coastal portions of Miami-Dade, Broward, and Palm Beach counties, with the highest concentration of LMI census tracts located in Miami-Dade County.

Based on 2020 census data, the median family income for the assessment area was $68,938. At the same time, the median family income for the state of Florida was $69,670. More recently, the FFIEC estimates the 2021 and 2022 median family income for the Miami-Miami Beach-Kendall, FL metropolitan division (MD) to be $61,000 and $68,300, respectively. The estimated median family income for the Fort Lauderdale-Pompano Beach-Sunrise, FL MD was $73,400 in 2021 and $82,100 in 2022. The following table displays population percentages of assessment area families by income level compared to the Florida family populations.

Family Population by Income Level				
	Assessment Area		Florida	
Low	320,518	22.3%	1,071,283	20.9%
Moderate	252,704	17.6%	937,203	18.3%
Middle	258,512	18.0%	998,399	19.5%
Upper	606,594	42.2%	2,111,174	41.3%
TOTAL	**1,438,328**	**100%**	**5,118,059**	**100%**

When compared with the data in the first table in this section, a significantly higher percentage of families in the assessment area are LMI (39.9 percent) than reside in LMI geographies (30.9 percent). Compared to statewide figures (39.2 percent), the distribution of families by income level in the assessment area skews slightly more toward LMI, and a higher percentage of families in the assessment area are below the poverty level (10.5 percent) than in Florida as a whole (9.5 percent). Considering these factors and income figures, the assessment area appears slightly less affluent than the state of Florida.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Florida.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$300,494	19.7%	$1,411
Florida	$232,000	24.9%	$1,218

Based on housing values, income levels, and rental costs, housing in the assessment area is considerably less affordable than in the state of Florida as a whole. Within the assessment area, housing is least affordable in Monroe County based on an affordability ratio of 12.9 percent, though each county in the assessment area has a lower affordability ratio than the statewide figure. These figures indicate that homeownership is likely out of reach for many LMI individuals across the assessment area, and financial institutions may struggle to make home loans to LMI borrowers.

Moreover, affordable rental options also appear limited based on additional housing demographics. As a whole, 58.9 percent of renters in the assessment area have rental costs exceeding 30.0 percent of their income. This figure is even higher for low-income renters (82.8 percent) and moderate-income renters (66.7 percent), which further limits opportunities for these individuals to obtain affordable housing and compounds the challenges that many LMI individuals face in attaining homeownership due to an inability to save for a down payment. Furthermore, 48.0 percent of total available housing units in LMI census tracts are rental units, indicating that opportunities for making home loans in LMI census tracts may be somewhat limited.

Industry and Employment Demographics

The assessment area supports a large and diverse business community that is driven heavily by the tourism industry in addition to being a significant shipping and transportation hub. By number of paid employees, the largest job categories in the assessment area are healthcare and social

assistance (12.8 percent), retail trade (11.8 percent), and government (11.1 percent). Small businesses are also a vital part of the area's economy, with assessment area demographics indicating that 93.5 percent of businesses in the assessment area reported annual revenues of $1 million or less. The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to the state of Florida.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Florida**
2021	5.0%	4.6%
2022	2.8%	2.9%
2023 YTD (September)	2.4%	2.8%

As shown in the table above, unemployment rates in the assessment area were higher in the assessment area than statewide levels in 2021 but have since decreased to lower than the statewide figure. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial impacts of the COVID-19 pandemic. However, community contacts noted that many jobs in the assessment area were lost due to businesses that permanently closed during the pandemic and that unemployment remains an issue for many LMI individuals in the assessment area despite low unemployment levels on aggregate.

Community Contact Information

Two community contact interviews were utilized with individuals knowledgeable of the assessment area's economic conditions and credit and community development needs. One of these individuals represents an organization providing community services to homeless and LMI individuals in the assessment area, while the second represents an affordable housing organization.

When describing economic conditions in the assessment area, one contact noted that many LMI individuals and families struggle due to a high cost of living and limited employment opportunities. The contact also described that the assessment area lost a large number of businesses during the pandemic, which has increased the amount of available commercial real estate space but further negatively impacted employment opportunities for many LMI individuals. Both community contacts identified food insecurity as a key challenge for many LMI families in the assessment area and noted efforts to address food shortages and areas with food deserts as a community development need. One community contact went on to explain that many LMI individuals and families in the assessment area are underbanked due to poor financial literacy or mistrust of the banking system, instead utilizing alternative financial services such as non-bank check cashing services. The contact went on to note that some pockets of the assessment area, particularly in Miami-Dade and Broward counties, are banking deserts with few banking options.

Regarding credit and community development needs in the assessment area, both community contacts identified financial literacy and credit counseling services as key needs to bring more individuals into the banking system and increase access to banking services. One contact went on to describe that affordable housing is an urgent need in the assessment area and that credit counseling services would further increase the likelihood of LMI individuals being able to attain homeownership.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MIAMI ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Miami assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Poor
Community Development Lending Activity	Leader

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	397	6.4%	$136,620	5.2%
Home Purchase	1,327	21.4%	$1,069,618	40.8%
Multifamily Housing	14	0.2%	$24,206	0.9%
Refinancing	1,003	16.2%	$722,936	27.6%
Other Purpose LOC	109	1.8%	$44,012	1.7%
Other Purpose Closed/Exempt	86	1.4%	$67,721	2.6%
Purpose Not Applicable	2	0.0%	$390	0.0%
Total HMDA	**2,938**	**47.4%**	**$2,065,503**	**78.9%**
Small Business	3,213	51.8%	$551,805	21.1%
Small Farm	46	0.7%	$1,576	0.1%
TOTAL LOANS	**6,197**	**100.0%**	**$2,618,884**	**100.0%**

The bank's lending activity in the assessment area represents 10.5 percent of total 2021 and 2022 HMDA and CRA loans. This figure compares favorably to the percentage of total bank branches in this assessment area (8.9 percent) and is in line with the share of total bank deposits held in the assessment area (10.1 percent). By total volume, the bank's lending activity during this review period (6,197 loans) is significantly higher than the 789 total HMDA and CRA loans originated during the previous review period, further demonstrating the bank's willingness to make credit available in and meet the credit needs of the assessment area. While competition for loan activity in the assessment area is high, the bank ranked 34th of 1,128 institutions by volume of 2022 HMDA loans, which demonstrates the bank's importance to meeting HMDA credit needs in the assessment area. Considering these factors and additional context, the bank's lending activity levels reflect excellent responsiveness to credit needs in the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is adequate in the Miami assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is adequate overall.

The bank originated 2.2 percent of its HMDA loans to low-income borrowers in 2021, which mirrored the performance of peer institutions in the assessment area but was below the percentage of assessment area families who are low income (23.0 percent). Similarly, in 2022, the bank's level of lending to low-income borrowers (2.1 percent) was in line with aggregate lending performance (3.0 percent) but below the demographic figure (22.3 percent). Therefore, the bank's lending to low-income borrowers is considered adequate in both years.

The bank's lending to moderate-income borrowers also reflects adequate performance in both years of data reviewed. In 2021 (6.6 percent) and 2022 (8.2 percent), the bank's performance was in line with the aggregate lending level (9.3 percent in 2021 and 9.0 percent in 2022) but below the demographic figure (16.9 percent in 2021 and 17.6 percent in 2022).

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is considered good. In 2021, the bank made 26.5 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (42.9 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (93.6 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 50.3 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 78.8 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (43.3 percent) is considered adequate when compared to aggregate lending levels (52.0 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (93.5 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of

the bank's performance. When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is poor based on the performance from both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is poor overall.

The bank originated 1.8 percent of its HMDA loans in low-income census tracts in 2021, which is considered adequate when compared to the aggregate lending level (2.1 percent) and the percentage of owner-occupied housing units located in low-income census tracts (2.6 percent). In 2022, the bank's performance (1.4 percent) was below aggregate performance (2.4 percent) and the demographic figure (2.9 percent), reflecting poor performance.

The percentage of HMDA loans originated in moderate-income census tracts in 2021 (10.6 percent) and 2022 (11.6 percent) was below aggregate lending levels (18.7 percent in 2021 and 20.1 percent in 2022) and the demographic figure (22.9 percent in 2021 and 21.5 percent in 2022). This reflects poor performance in moderate-income geographies for both years.

Small Business Lending

The bank's geographic distribution of small business loans is adequate overall. The bank originated 5.3 percent of its small business loans in low-income census tracts in 2021. This level of lending compared favorably to the performance of peer institutions in the assessment area (4.4 percent) and the percentage of assessment area businesses located in low-income census tracts (4.5 percent) and is considered good. In 2022, the bank also made a higher share of its small business loans in low-income census tracts (4.0 percent) than did peer institutions in the assessment area (2.8 percent) and exceeded the demographic figure of 3.0 percent, reflecting excellent performance.

The bank's level of lending to small businesses in moderate-income census tracts in 2021 (15.7 percent) lagged the aggregate lending level of 23.3 percent and the demographic figure of 22.6 percent, reflecting poor performance. In 2022, the bank's performance (16.3 percent) was in line with peer performance (21.8 percent) and the percentage of assessment area businesses located in moderate-income census tracts (22.4 percent), which is considered adequate performance.

An analysis of the dispersion of both products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 68.2 percent of all assessment area census tracts and 60.8 percent of all LMI geographies. In 2022, the bank had lending activity in 45.4 percent of census tracts in the assessment area and 37.2 percent of LMI geographies in the assessment area. The disparity in the bank's overall assessment area penetration between 2021 and 2022 is largely explained by higher overall lending activity levels in 2021 due to macro and regional economic factors. Together, these factors resulted in

higher overall lending activity levels and a higher dispersion of loans across the bank's assessment areas than in 2022. In general, the bank's loans were most concentrated in the census tracts near branch locations, including LMI tracts, in both 2021 and 2022. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Miami assessment area. As detailed in the table below, the bank made 48 community development loans totaling $136.4 million and 10 PPP loans totaling $14.1 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	19	$83,945	19	$11,580	4	$30,435	6	$10,489	48	$136,448

- The bank made one loan totaling $30.4 million to finance the construction of a mixed-use commercial building including parking, retail space, and office space, in the Wynwood neighborhood of Miami. The area was designated as Miami's first Neighborhood Revitalization District, and the development of this facility supports the city's initiative to attract and retain businesses and residents.

- The bank financed seven community development loans totaling $69.4 million that supported LIHTC projects throughout the assessment area. These loans included primary financing for the construction of new affordable housing facilities, refinancing of existing debt, and financing for the rehabilitation of existing affordable housing developments. Together, these loans contributed to the construction, rehabilitation, or preservation of 947 affordable multifamily housing units in the assessment area. As previously described, the assessment area has great need of affordable rental units, particularly for LMI individuals, given high rental costs in the assessment area, and these loans are all responsive to that need.

- The bank renewed or extended multiple lines of credit totaling $6.3 million to an affordable housing development organization in the assessment area. These lines of credit provide the organization with working capital with which to purchase and develop additional owner-occupied affordable housing units in the assessment area. The organization also requires homebuyer education training as part of its affordable housing program, which, together with the development of new affordable housing, addresses two key community development needs identified by community contacts.

- A $300,000 line of credit to a nonprofit food bank was renewed three times during the review period. The organization operates in Palm Beach County and distributes food to over 200,000 LMI individuals per month. As noted by community contacts, food insecurity is a challenge faced by many LMI individuals and families in the assessment area, and these funds help support an organization that is working to address those challenges.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $90.4 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Miami Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$27.3 million	-	$27.3 million
LIHTCs	$36.6 million	$15.1 million	$51.7 million
Municipal/Private Bonds	-	$5.5 million	$5.5 million
Donations	$5.9 million	-	$5.9 million
TOTAL	**$69.8 million**	**$20.6 million**	**$90.4 million**

- The bank made two new investments in LIHTC projects in the assessment area with commitments totaling $36.6 million. These projects finance the construction of a combined 350 affordable rental units for LMI individuals. These investments are considered responsive to the need for affordable rental housing for LMI residents previously discussed in the *Housing Demographics* section for this assessment area.

- The bank made $4.0 million in donations to an organization awarding scholarships to children in the assessment area from families at or below 200.0 percent of the federal poverty level. This program supports the Florida Tax Credit Scholarship Program administered by the Florida Department of Education and is considered impactful given the size of the bank's contributions and the number of LMI individuals impacted.

- First Horizon has an extensive partnership with an organization that provides financial literacy training and small business counseling services to LMI youth and adults in the assessment area. The bank contributed office space at one of its branch locations in the assessment area for financial coaches of the organization to operate out of; the dollar value of these in-kind contributions of property during the review period totaled $57,437. In addition, the bank made three donations to the organization totaling $307,000, which supported salaries and operating costs for financial coaches to operate at First Horizon's branch locations. The bank's partnership with the organization allows it to serve more individuals in the assessment area by operating out of a number of locations, and the bank's financial contributions allow the organization to more flexibly allocate its resources to expand the impact of its operations.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Miami assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates 37 branches in the Miami assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	1	5	9	20	2	**37**
	2.7%	13.5%	24.3%	54.1%	5.4%	**100%**
Census Tracts	5.2%	25.8%	30.2%	34.9%	3.9%	**100%**
Household Population	4.8%	27.7%	31.5%	34.7%	1.3%	**100%**

As shown in the previous table, the bank operates six branches in LMI census tracts in the assessment area, representing 16.2 percent of total bank branches in the assessment area. This distribution is below the percentage of census tracts that are LMI (31.0 percent) and the household population within those tracts (32.5 percent). However, the bank operates ten branch locations that border or are located within close proximity of LMI census tracts in the assessment area, which provides further accessibility to the bank's service delivery systems for residents in LMI geographies. Additionally, three bank branches that were previously located in LMI census tracts were reclassified into non-LMI census tracts due to census changes in 2022. Both of these branches, while not located in LMI census tracts as of the examination date, were located in LMI geographies for a portion of the review period and are adjacent to other LMI geographies in the assessment area. These factors further increase the accessibility of the bank's service delivery systems, which are reasonably accessible to individuals and geographies of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank closed nine branch locations, none of which were located in LMI geographies. Therefore, the bank's record of opening and closing branch locations has not adversely affected the accessibility of its service delivery systems in the assessment area, particularly for LMI individuals and geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area all operate standard business hours from 9:00 a.m. to 4:00 p.m. or 5:00 p.m. Monday through Friday. Extended lobby hours are offered on Fridays at 33 branch locations, including 6 in LMI census tracts. Drive-through facilities are located at 20 branches in the assessment area, including 3 of the bank's branches in LMI census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches and are available at 32 of the bank's branches in the assessment area.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 6,422 community development service hours to 158 different organizations in the Miami assessment area.

These community development services included the following noteworthy activities:

- Bank employees provided 1,812 hours of financial literacy training or homebuyer education courses that primarily benefited LMI individuals in the assessment area. These services were delivered at a number of schools and community organizations throughout the assessment area and are considered responsive to the need for financial literacy efforts identified by community contacts.

- Three bank employees served organizations that work to connect underbanked LMI residents in the assessment area to mainstream financial services, including through coaching and credit counseling activities. As noted by community contacts, many LMI residents in the assessment area are underbanked, and efforts to increase financial literacy are needed to address this issue.

- Bank employees provided 4,432 hours of community development service hours through leadership roles, such as board of directors membership, in numerous organizations operating throughout the assessment area. Organizations with board membership include affordable housing and development agencies, economic development organizations, neighborhood revitalization groups, homeless shelters and food banks, and many other community service organizations providing services to LMI individuals and families throughout the assessment area.

CAPE CORAL-FORT MYERS-NAPLES, FLORIDA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FORT MYERS ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 16 (3.8 percent) of its total branches in the Fort Myers assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	2	8	6

In addition to the branch locations shown in the table above, other service delivery systems include two LPO locations and one stand-alone, full-service ATM. During the review period, the bank closed seven branches in the assessment area: one in a moderate-income census tract, four in middle-income census tracts, and two in upper-income census tracts. The bank is adequately positioned to deliver financial services to substantially all of the Fort Myers assessment area but may have difficulty in fully serving the inland and northern portions of Collier County, where the bank does not have a branch presence.

General Demographics

The Cape Coral-Fort Myers-Naples, FL CSA combines the Cape Coral-Fort Myers, FL MSA (Fort Myers MSA); Naples-Marco Island, FL MSA (Naples MSA); and two adjacent nonMSA counties (Glades and Hendry counties). The bank's assessment area includes Lee and Collier counties, which are two of the four counties in the full CSA. The assessment area has a total population of 1,136,574, which is most heavily concentrated in Lee County (760,822). Key cities in the assessment area include Cape Coral and Fort Myers, located in Lee County, and Naples, located in Collier County. The assessment area also hosts Florida Gulf Coast University, a large university in Fort Myers with a total enrollment of approximately 15,000.

The assessment area hosts a competitive banking market, with 43 FDIC-insured depository institutions operating 294 branches in the assessment area. First Horizon ranks 6th out of these institutions in deposit market share, encompassing 6.3 percent of total deposit dollars in the assessment area. Deposits held in this assessment area represent 4.0 percent of the bank's total deposits held across all assessment areas. While only 43 depository institutions operate a branch in the assessment area, a substantially higher number of institutions reported loan activity in the assessment area, indicating a competitive lending market. An analysis of 2022 HMDA-reportable loans shows that 1,153 institutions had loan activity in the assessment area, of which First Horizon ranked 45th, with less than 1.0 percent of total HMDA loans. The bank ranked 18th out of 203 institutions with CRA loan activity in the assessment area, accounting for less than 1.0 percent of total CRA loan activity.

This assessment area covers a metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. Community contacts noted specific credit-related needs in the assessment area, including affordable housing development and down payment assistance programs. Additionally, in September 2022, the assessment area received a Major Disaster Declaration from the Federal Emergency Management Agency (FEMA) following the effects of Hurricane Ian. During this period, the assessment area had need for a wide range of community development and disaster recovery efforts beyond traditional community development initiatives. Given this information, there are ample opportunities for community development involvement from financial institutions in the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	13	3.9%	8,800	3.1%
Moderate	69	20.8%	60,190	21.1%
Middle	143	43.1%	126,931	44.4%
Upper	99	29.8%	88,288	30.9%
Unknown	8	2.4%	1,789	0.6%
TOTAL	**332**	**100%**	**285,998**	**100%**

As shown above, 24.7 percent of the census tracts in the assessment area are LMI geographies 24.2 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the city of Fort Myers in the central and eastern portions of Lee County, and in the central/eastern portion of the city of Naples.

Based on 2020 census data, the median family income for the assessment area was $75,105. At the same time, the median family income for the state of Florida was $69,670. More recently, the FFIEC estimates the 2021 median family income for the Fort Myers MSA to be $71,900 and the Naples MSA to be $84,300. In 2022, the estimated median family incomes for these areas increased to $83,200 in the Fort Myers MSA and $98,600 in the Naples MSA.

The following table displays the population percentages of assessment area families by income level compared to the Florida family populations.

Family Population by Income Level				
	Assessment Area		**Florida**	
Low	57,736	20.2%	1,071,283	20.9%
Moderate	53,301	18.6%	937,203	18.3%
Middle	58,347	20.4%	998,399	19.5%
Upper	116,614	40.8%	2,111,174	41.3%
TOTAL	**285,998**	**100%**	**5,118,059**	**100%**

When compared with the data in the first table in this section, a significantly higher percentage of families in the assessment area are LMI (38.8 percent) than reside in LMI census tracts (24.2 percent). The distribution of families by income level in the assessment area is slightly lower than the percentage of families that are LMI in the state as a whole (39.2 percent). Additionally, the percentage of assessment area families below the poverty level (7.6 percent) is lower than the statewide level (9.5 percent). Considering these factors and income levels in the assessment area and state as a whole, the assessment area appears more affluent than the state of Florida.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Florida.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$271,108	23.0%	$1,272
Florida	$232,000	24.9%	$1,218

Based on the data in the table above, housing is less affordable in the assessment area than in Florida as a whole. This holds true even when accounting for higher income levels in the assessment area based on the lower affordability ratio in the assessment area relative to the statewide figure. Within the assessment area, housing is generally more affordable in Lee County, based on an affordability ratio of 25.3 percent, than in Collier County (19.2 percent). These figures indicate that attaining affordable housing may be a challenge for LMI individuals in Collier County in particular. Additional housing demographics indicate that there may be challenges in making home loans to LMI borrowers or in LMI geographies. For example, opportunities for home lending in low-income census tracts may be somewhat limited, as only 29.6 percent of all available housing units in low-income tracts are owner-occupied. Furthermore, a high percentage of the total housing units in the assessment area (29.5 percent) are vacant, likely due to a high number of unoccupied vacation homes in the assessment area.

Rental costs are comparable in the assessment area and state of Florida. The housing cost burden, which measures the percentage of renters with rental costs exceeding 30.0 percent of their income, is slightly lower in the assessment area (51.2 percent) than the statewide figure (52.6 percent), though rental costs are slightly higher in the assessment area. Nevertheless, attaining affordable rental housing is likely still a challenge for many LMI residents in the assessment area, as 81.7 percent of low- and 61.6 percent of moderate-income renters have a housing cost burden exceeding 30.0 percent. Based on these figures, many LMI individuals may struggle to attain homeownership, as a high housing cost burden can be a barrier to saving money for a down payment on a home. As noted by community contacts, down payment assistance programs are in need in the assessment area to help more LMI individuals qualify for a home loan.

Industry and Employment Demographics

The assessment area supports a diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 458,719 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment

area are retail trade (14.2 percent), government (12.7 percent), and construction (12.7 percent). Small businesses play a vital role in the assessment area economy, as 94.5 percent of businesses in the assessment area report annual revenues of $1 million or less. The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to the state of Florida.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Florida**
2021	4.1%	4.6%
2022	3.0%	2.9%
2023 YTD (September)	2.9%	2.8%

As shown in the table above, unemployment rates in the assessment area were slightly lower than statewide figures in 2021 but were closely aligned for the rest of the review period. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial impacts of the pandemic.

Community Contact Information

One community contact interview was conducted as part of this evaluation with an individual with knowledge of the economic conditions and credit needs of the assessment area. The individual represents an affordable housing agency developing affordable housing for LMI residents in the assessment area. The contact noted that the assessment area is still in recovery after the impacts of Hurricane Ian in September 2022. While unemployment is relatively low, the contact noted that many workers left the area after the hurricane, and thus labor shortages have negatively impacted certain sectors of the assessment area's economy.

According to the community contact, affordable housing is one of the most pressing community development needs in the assessment area, along with down payment assistance programs. The contact explained that most of the available affordable housing stock is located more inland, outside of the cores of the major cities in the assessment area, which forces many LMI individuals to commute long distances for work. Moreover, the effects of the hurricane have exacerbated the issue, as the recovery of affordable housing stock in the assessment area has been slow. Overall, the assessment area has experienced high population growth of 13.1 percent since 2015 ACS data, which further contributes to the need for housing development and can further drive prices up for existing housing stock.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT MYERS ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Fort Myers assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Excellent
Geographic Distribution	Good
Community Development Lending Activity	Leader

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	115	5.6%	$22,950	4.8%
Home Purchase	276	13.5%	$122,960	25.4%
Multifamily Housing	3	0.1%	$54,486	11.3%
Refinancing	221	10.8%	$92,775	19.2%
Other Purpose LOC	37	1.8%	$10,873	2.3%
Other Purpose Closed/Exempt	17	0.8%	$13,128	2.7%
Purpose Not Applicable	1	0.0%	$74	0.0%
Total HMDA	**670**	**32.8%**	**$317,246**	**65.7%**
Small Business	1,367	67.0%	$165,788	34.3%
Small Farm	3	0.1%	$119	0.0%
TOTAL LOANS	**2,040**	**100.0%**	**$483,153**	**100.0%**

The bank's lending activity in the assessment area represents 3.5 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, the bank operates 3.8 percent of its total branches and holds 4.0 percent of total bank deposits in the assessment area. While competition from other financial institutions for loan activity is high in the assessment area, the bank ranked 45th out of 1,153 institutions with HMDA lending activity and 18th out of 203 institutions with CRA lending activity. Therefore, the bank's level of lending represents adequate responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is excellent in the Fort Myers assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is excellent overall.

The bank originated 9.9 percent of its HMDA loans to low-income borrowers in 2021, which more than doubled the performance of peer institutions in the assessment area (3.5 percent) but was below the percentage of assessment area families who are low income (20.8 percent). While the gap between the bank's performance and the demographic figure is large, the bank's performance is nevertheless considered excellent when compared to that of other lenders in the assessment area. In particular, the bank exceeded aggregate lending performance in making home purchase loans to low-income borrowers, which represented 15.0 percent of the bank's total home purchase originations in 2021 as compared to 2.8 percent of aggregate home purchase loans. These loans are considered exceptionally impactful given needs identified by community contacts for affordable housing in the assessment area, coupled with the increased challenges that low-income borrowers face, given the high costs of home loan down payments. This context further demonstrates the bank's willingness to meet credit needs of LMI individuals in the assessment area and supports that the bank's performance in this category is excellent.

Similarly, in 2022, the bank originated 8.0 percent of its HMDA loans to low-income borrowers, which was below the demographic figure (20.2 percent) but far exceeded peer lending performance (4.5 percent), reflecting excellent performance. Once again, the bank made a substantially higher percentage of home purchase loans to low-income borrowers (13.5 percent) than did peer institutions in the assessment area (2.5 percent), further supporting excellent lending performance.

In 2021, the bank originated 19.5 percent of its HMDA loans to moderate-income borrowers, which exceeded both the aggregate lending level (14.4 percent) and the demographic figure (18.2 percent) and is considered excellent. The bank's lending to moderate-income borrowers in 2022 is considered good, as the bank's level of lending (16.7 percent) compared favorably to peer institutions in the assessment area (14.8 percent) and was in line with the demographic figure (18.6 percent).

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is considered good. In 2021, the bank made 22.6 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (46.3 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (94.6 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 58.7 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 85.2 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (45.6 percent) is considered adequate when compared to aggregate lending levels (51.8 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (94.5 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good based on the performance of both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans reflects good penetration among geographies of different income levels, particularly LMI geographies.

In 2021, the bank made 2.5 percent of its HMDA loans in low-income census tracts, which exceeded the aggregate lending level (1.4 percent) and the percentage of owner-occupied housing units located in low-income census tracts (2.1 percent). This level of lending reflects excellent performance, especially when considering the limited opportunities available for lending in these geographies reflected by the low demographic and aggregate figures. In 2022, the bank's level of HMDA lending in low-income census tracts (0.8 percent) was in line with aggregate performance (1.0 percent) and the demographic figure (1.4 percent), reflecting adequate performance.

In 2021, the bank's geographic distribution of HMDA loans in moderate-income census tracts is considered excellent, as the bank's performance (21.9 percent) exceeded both the aggregate lending level (17.9 percent) and the demographic figure (17.8 percent). The bank's level of lending in moderate-income census tracts in 2022 (18.2 percent) was in line with the aggregate lending level (18.3 percent) and the demographic figure (17.2 percent), reflecting adequate performance.

Small Business Lending

Overall, the bank's distribution of small business loans by geography income level is adequate.

The bank originated 2.6 percent of its small business loans in low-income census tracts in 2021 and 1.5 percent in 2022. These figures were closely aligned with aggregate lending levels in low-income census tracts in 2021 (2.7 percent) and 2022 (2.0 percent) and the demographic figures (2.9 percent in 2021 and 2.4 percent in 2022). Therefore, the geographic distribution of the bank's small business loans in low-income geographies is considered adequate for both years of data reviewed.

The bank's level of small business lending in moderate-income geographies is also adequate for both years of data in the review period. In 2021, the bank originated 14.7 percent of its small business loans in the assessment area in moderate-income census tracts, as compared with 19.4 percent of loans made in these geographies by other lenders reporting lending activity in the assessment area and the demographic figure of 19.2 percent. Similarly, the bank's performance in these geographic areas in 2022 (18.0 percent) was in line with the aggregate lending level (19.7 percent) and the demographic figure (18.9 percent), also reflecting adequate performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 83.0 percent of all assessment area census tracts and 74.3 percent of all LMI geographies. In 2022, the bank had lending activity in 63.0 percent of census tracts in the assessment area and 61.0 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Fort Myers assessment area. As detailed in the table below, the bank made 19 community development loans totaling $35.4 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	5	$9,121	9	$11,453	1	$5,474	4	$9,387	**19**	**$35,435**

- Four loans totaling $9.4 million were made or renewed during the review period to a nonprofit organization that provides food, shelter, counseling, and rehabilitation services to homeless and LMI individuals free of charge. These loans are considered impactful given the substantial number of LMI individuals served by the organization.

- The bank renewed a $1.0 million line of credit to an affordable housing organization in the assessment area three times during the review period. These funds contribute to the organization's ability to buy and rehabilitate additional housing stock for LMI individuals in the assessment area, which is responsive to the need for new affordable housing development identified by community contacts.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. During the review period, the bank made $22.0 million in newly qualified investments, all of which were MBS supporting affordable housing loans for LMI individuals in the assessment area. In addition to these investments, the bank made 76 donations totaling $1.7 million to various organizations throughout the assessment area.

A number of these donations were considered impactful and are described below:

- The bank made donations totaling $889,783 to an organization awarding scholarships to children in the assessment area from families at or below 200.0 percent of the federal poverty level. This program supports the Florida Tax Credit Scholarship Program administered by the Florida Department of Education and is considered impactful given the size of the bank's contributions and the number of LMI individuals impacted.

- The bank made at least ten donations totaling $230,000 in direct support of disaster relief efforts following the effects of Hurricane Ian in September 2022. These donations provided funds to pay for immediate and urgent needs, including rent and utility assistance for displaced individuals and families, emergency food supplies, education support, and transportation services.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Fort Myers assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

The bank operates 16 branches in the Fort Myers assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	2	8	6	0	**16**
	0.0%	12.5%	50.0%	37.5%	0.0%	**100%**
Census Tracts	3.9%	20.8%	43.1%	29.8%	2.4%	**100%**
Household Population	2.9%	21.3%	45.0%	30.2%	0.6%	**100%**

The bank operates two, or 12.5 percent, of its branches in the assessment area in LMI geographies, while 24.7 percent of census tracts in the assessment area are LMI and 24.2 percent of the household population resides in those tracts. While this distribution is below comparison data, the bank operates nine branches in the assessment area that are located in census tracts that border LMI geographies and are accessible to residents of those geographies. One of these branches was previously located in a moderate-income census tract but was reclassified into a middle-income census tract due to census changes in 2022. While not located in an LMI census tract as of the examination date, this branch location was in an LMI geography for a portion of the review period and remains adjacent to other LMI geographies, to which it is accessible. Therefore, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels.

Changes in Branch Locations

As previously noted, the bank closed seven branches in the assessment area during the review period: one in a moderate-income census tract, four in middle-income census tracts, and two in upper-income census tracts. While one branch was closed in a moderate-income census tract in North Fort Myers, the bank operates a nearby branch location in downtown Fort Myers, mitigating the overall impact to accessibility of the branch closure. The other closed branch locations were in non-LMI geographies and did not negatively impact the accessibility of the bank's service delivery systems to LMI geographies. Therefore, the bank's record of opening and closing branch locations has not adversely affected the accessibility of its service delivery systems in the assessment area, particularly for LMI individuals and geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area all operate standard business hours from 9:00 a.m. to 4:00 p.m. Monday through Thursday and offer extended lobby hours until 5:00 p.m. on Friday. Drive-through facilities are located at 14 branches in the assessment area, including both of the bank's branches in LMI census tracts. Many of these locations, including both in LMI geographies, offer extended hours beyond the bank's lobby hours. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, bank employees provided 1,371 hours of community development services to 24 different organizations in the Fort Myers assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- The bank's employees provided 220 hours of community development services consisting of financial literacy training to various organizations in the assessment area. These efforts primarily consisted of financial literacy events at schools in the assessment area with a majority of students from LMI families.

- One employee serves on the board of directors of an affordable housing agency operating in Collier County. As previously noted, housing affordability is low in Collier County given the low affordability ratio and the information gained from community contacts, and the efforts of this organization are responsive to the need for greater affordable housing development in the assessment area.

ORLANDO-LAKELAND-DELTONA, FLORIDA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ORLANDO ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates nine (2.2 percent) of its total branches in the Orlando assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	0	5	4

In addition to the branches shown in the table above, the bank operates two LPOs in the assessment area, one in a moderate-income census tract and one in an upper-income census tract. During the review period, the bank closed two branches in the assessment area, both in upper-income census tracts. The bank operates branch locations in Orange and Seminole counties in the assessment area but does not operate any branches in Volusia County. While the bank does operate one LPO location in Volusia County, the bank may have difficulty fully serving the county without a branch presence. Overall, the bank is adequately positioned to deliver financial services to most of the assessment area.

General Demographics

The bank's Orlando assessment area consists of Orange, Seminole, and Volusia counties—three of the eight counties in the full Orlando-Lakeland-Deltona, FL CSA, which combines the Deltona-Daytona Beach-Ormond Beach, FL MSA; Lakeland-Winter Haven, FL MSA; Orlando-Kissimmee-Sanford, FL MSA; and Wildwood-The Villages, FL MSA. The assessment area has a total population of 2,454,307, most of which is concentrated in Orange County (1,429,908), which includes the city of Orlando. Among other notable institutions and organizations, the assessment area hosts the University of Central Florida, a large public university with a total enrollment of almost 68,500 students.

The assessment area hosts a competitive banking market, with 46 FDIC-insured depository institutions operating 452 branches throughout the assessment area. Of these institutions, First Horizon ranks 13th in deposit market share, holding 1.4 percent of total deposit dollars in the assessment area. Deposits held in this assessment area represent 1.5 percent of the bank's total deposit dollars held in all assessment areas. An analysis of reportable loan activity shows that the competition for loans is also extremely high in the assessment area. In 2022, there were 955 institutions with reported HMDA loan activity and 193 institutions with reported CRA loan activity. First Horizon ranked 52nd of the institutions with reported HMDA loan activity and 38th of the institutions with reported CRA loan activity.

As this assessment area covers a large and diverse metropolitan area, credit needs are varied and include a standard blend of consumer and commercial loan products. In addition to these needs, community contacts with knowledge of the economic and financial conditions of the assessment area also pointed to affordable housing development and lower-cost financial products as specific needs in the assessment area, particularly for LMI individuals. Community contacts also noted that opportunities for community development involvement are numerous through partnerships with various government assistance, nonprofit, and community service and development organizations operating in the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	20	4.1%	14,968	2.6%
Moderate	117	24.1%	123,759	21.9%
Middle	184	37.9%	208,292	36.8%
Upper	158	32.5%	215,031	38.0%
Unknown	7	1.4%	3,853	0.7%
TOTAL	**486**	**100%**	**565,903**	**100%**

As shown above, 28.2 percent of the census tracts in the assessment area are LMI geographies, while 24.5 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the city of Orlando in Orange County.

Based on 2020 census data, the median family income for the assessment area was $71,643 which compares favorably to the median family income for the state of Florida ($69,670). More recently, the FFIEC estimates the 2021 and 2022 median family income for the Deltona-Daytona Beach-Ormond Beach, FL MSA to be $66,400 and $73,500, respectively. At the same time, the estimated median family income for the Orlando-Kissimmee-Sanford, FL MSA was $70,800 in 2021 and $80,100 in 2022. The following table displays population percentages of assessment area families by income level compared to the Florida family populations.

Family Population by Income Level				
	Assessment Area		Florida	
Low	113,967	20.1%	1,071,283	20.9%
Moderate	99,163	17.5%	937,203	18.3%
Middle	109,029	19.3%	998,399	19.5%
Upper	243,744	43.1%	2,111,174	41.3%
TOTAL	**565,903**	**100%**	**5,118,059**	**100%**

When compared with the data in the first table in this section, a much higher percentage of families in the assessment area are LMI (37.6 percent) than reside in LMI census tracts (24.5 percent). Compared to statewide levels (39.2 percent), a slightly smaller percentage of families in the

assessment area are LMI. Considering these factors and income levels, the assessment area appears slightly more affluent than the state of Florida as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Florida.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$239,799	25.3%	$1,252
Florida	$232,000	24.9%	$1,218

Based on housing values and income levels, housing costs in the assessment area are closely aligned with statewide levels, as evidenced by similar affordability ratios. Within the assessment area, housing is least affordable in Orange County based on an affordability ratio of 23.8 percent, while Seminole and Volusia counties are comparatively more affordable. Based on additional housing demographics, home lending in low-income census tracts in the assessment area may be a challenge. Of the total owner-occupied housing units in the assessment area, only 1.5 percent are located in low-income census tracts, while 54.5 percent of the housing units in these geographies are rental units. Many of these census tracts are located around the University of Central Florida and are predominantly composed of rental housing targeted to students, which further limits the opportunities for making home loans in these areas.

Rental costs in the assessment area are slightly higher than statewide levels based on the median gross rent figures displayed in the table above. Moreover, the assessment area has a higher percentage of LMI renters with a housing cost burden (the percentage of renters with rental costs exceeding 30.0 percent of total income) than does the state of Florida as a whole. In the assessment area, 82.7 percent of low-income renters and 69.2 percent of moderate-income renters have a housing cost burden greater than 30.0 percent, while the same figures for Florida as a whole are 80.9 percent and 61.8 percent, respectively. These data points indicate that obtaining affordable rental housing is likely a challenge for most LMI residents in the assessment area.

Industry and Employment Demographics

The assessment area supports a diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 1,322,873 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are accommodation and food services (13.3 percent), healthcare and social assistance (11.1 percent), and retail trade (10.5 percent). Small businesses play a vital role in the assessment area economy, as 94.2 percent of businesses in the assessment area report annual revenues of $1 million or less. The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to the state of Florida.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Florida**
2021	4.8%	4.6%
2022	2.9%	2.9%
2023 YTD (September)	2.8%	2.8%

As shown in the preceding table, unemployment rates in the assessment area were slightly higher than statewide figures in 2021 but were closely aligned for the rest of the review period. As described by community contacts, the assessment area economy is heavily reliant on tourism, which was an industry especially impacted by the effects of the pandemic. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial effects of the pandemic.

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank's activities in the assessment area were evaluated. The interview was conducted with an individual working for a community development organization that specializes in providing community services. When describing economic conditions in the assessment area, the contact stated that the local economy has largely returned to pre-pandemic levels. They also explained that many businesses and tourist attractions were forced to close due to the economic shutdown that occurred during the pandemic. The contact explained that the assessment area's reliance on tourism intensified the impacts of the pandemic in the assessment area relative to other areas in the state, particularly as it related to job loss due to layoffs. While most businesses have recovered, and tourism levels have returned to normal, many employees were never rehired and remain jobless.

Furthermore, the contact stated the cost of housing the area has increased dramatically, which has placed pressure on many individuals and families, particularly those who are LMI, as wage growth has not kept pace with the increase in housing costs. The contact explained the disparity between wages and housing costs has continued to make affordable housing harder to find for many residents. Regarding other economic factors in previous years, the contact pointed to the effects of Hurricanes Ian and Irma as having continued negative impacts on the assessment area due to residents who lost their homes, which has further increased the demand for affordable housing and new housing development.

The community contact noted several opportunities for financial institutions to help meet the community development needs of the assessment area and the needs of LMI residents in particular. The contact cited a need for better access to traditional banking products and services for LMI individuals. Many residents avoid traditional financial institutions in favor of alternative finance sources such as check cashing, prepaid debit cards, and payday loan services, which typically charge higher fees and rates for services than traditional financial institutions do. In addition, the contact cited other lower-cost products, such as bank accounts with no minimum balance, free debit cards, and access to checking with no fees, as means to better meet the financial needs of the LMI population in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ORLANDO ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Orlando assessment area.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	126	8.1%	$27,413	8.4%
Home Purchase	333	21.5%	$109,717	33.6%
Multifamily Housing	0	0.0%	$0	0.0%
Refinancing	227	14.7%	$66,948	20.5%
Other Purpose LOC	44	2.8%	$12,865	3.9%
Other Purpose Closed/Exempt	10	0.6%	$4,680	1.4%
Purpose Not Applicable	5	0.3%	$362	0.1%
Total HMDA	**745**	**48.1%**	**$221,985**	**68.0%**
Small Business	799	51.6%	$104,624	32.0%
Small Farm	4	0.3%	$58	0.0%
TOTAL LOANS	**1,548**	**100.0%**	**$326,667**	**100.0%**

By number of loans, the bank's level of lending activity in this assessment area represents 2.6 percent of total 2021 and 2022 HMDA and CRA loans made inside the bank's combined assessment areas. This level of lending activity compares favorably to the percentage of total bank branches operated in this assessment area (2.2 percent) and the percentage of total bank deposits held in this assessment area (1.5 percent). Therefore, the bank's lending activity levels reflect good responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

The bank's overall loan distribution by borrower's profile is good, based on the performance of both loan products reviewed.

HMDA Lending

The distribution of HMDA loans to low-income borrowers is considered good in 2021 (5.9 percent) and 2022 (5.9 percent), as the bank's performance exceeded the performance of peer institutions in the assessment area in both years (3.9 percent in 2021 and 4.3 percent in 2022) but was below the demographic figure (20.8 percent in 2021 and 20.1 percent in 2022). While the bank's performance was well below the demographic figure, performance is nevertheless considered good relative to the aggregate lending level.

In 2021, the bank originated 19.6 percent of its HMDA loans to moderate-income borrowers, which exceeded the aggregate lending level (13.6 percent) by a wide margin and was also higher than the percentage of assessment area families that are LMI (17.5 percent), reflecting excellent performance. The bank's lending to moderate-income borrowers in 2022 is considered good, as the bank's performance (16.2 percent) exceeded aggregate lending performance (13.9 percent), though by a smaller margin than in 2021, and was in line with the demographic figure (17.5 percent).

Overall, when considering lending to LMI borrowers combined, the distribution of HMDA loans by borrower's income level is good overall.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is considered good. In 2021, the bank made 32.2 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (45.8 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (94.3 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 49.3 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 83.1 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (41.3 percent) is considered adequate when compared to aggregate lending levels (51.9 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile

(94.2 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance.

When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate based on the performance from both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans reflects adequate penetration among geographies of different income levels, particularly LMI geographies.

In 2021, the bank originated 0.7 percent of its HMDA loans in low-income census tracts, which is in line with aggregate lending levels (0.6 percent) and the percentage of owner-occupied housing units in low-income census tracts (1.0 percent), reflecting adequate performance. The bank's lending in low-income census tracts in 2022 (0.9 percent) was below the demographic figure (1.5 percent) and aggregate lending levels (1.3 percent), which reflects poor performance.

In 2021, the bank originated 14.2 percent of its HMDA loans in moderate-income census tracts, in line with the 13.4 percent of aggregate HMDA loans originated in moderate-income census tracts in the assessment area and the percentage of owner-occupied housing units located in these census tracts (17.1 percent). The percentage of the bank's HMDA loans originated in moderate-income census tracts in 2022 (11.8 percent) was below the demographic figure (17.0 percent) but in line with aggregate lending levels (14.1 percent). The bank's level of lending in moderate-income census tracts reflects adequate performance for both years of data reviewed.

Small Business Lending

The bank's record of lending to small businesses in geographies of different income levels is adequate overall.

The bank made 1.7 percent of its small business loans in low-income census tracts in 2021, which was closely aligned with the performance of peer institutions (1.7 percent) and the percentage of assessment area businesses located in low-income census tracts (1.7 percent). Similarly, the bank's performance in 2022 (2.2 percent) was also closely aligned with aggregate lending levels (1.9 percent) and the demographic figure (2.3 percent), reflecting adequate performance in low-income census tracts in both years reviewed.

In 2021, the bank originated 20.9 percent of its small business loans in moderate-income census tracts, which is considered adequate in comparison to aggregate lending levels (22.0 percent) and the percentage of assessment area businesses located in moderate-income census tracts (23.0 percent). In 2022, the percentage of the bank's small business loans originated in moderate-income

census tracts (15.9 percent) was in line with aggregate lending levels (22.3 percent) and the demographic figure (22.5 percent), reflecting adequate performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 70.5 percent of all assessment area census tracts and 63.0 percent of all LMI geographies. In 2022, the bank had lending activity in 43.8 percent of census tracts in the assessment area and 27.7 percent of LMI geographies in the assessment area. The disparity in the bank's overall assessment area penetration between 2021 and 2022 is largely explained by higher overall lending activity levels in 2021 due to certain economic factors. In 2021, a favorable interest rate environment spurred higher volumes of HMDA originations, while the bank's PPP lending resulted in higher volumes of small business originations. Together, these factors resulted in higher overall lending activity levels and a higher dispersion of loans across the bank's assessment areas than in 2022. In general, the bank's loans were most concentrated in the census tracts near branch locations, including LMI tracts, in both 2021 and 2022. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the Orlando assessment area. As detailed in the table below, the bank made eight community development loans totaling $10.5 million and three PPP community development loans totaling $3.5 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	4	$1,158	3	$700	1	$8,665	0	$0	**8**	**$10,523**
PPP Loans	0	$0	0	$0	3	$3,492	0	$0	**3**	**$3,492**

- One loan for $8.7 million provided financing for the construction of a supermarket in a moderate-income census tract in the city of Apopka, Florida. The development of this facility directly supports the Community Redevelopment Area designated by the municipality to facilitate investment and revitalize the downtown Apopka area and thus is considered responsive to community development needs identified for the assessment area. In addition, the opening of the supermarket will support permanent LMI job creation.

- The bank committed a total of $1.2 million through four separate loan participations that supported LIHTC developments in the assessment area. Together, these facilities support 350 affordable multifamily housing units designated for LMI individuals and helps to address the need for affordable housing identified by community contacts with knowledge of the assessment area's community development needs.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is rarely in a leadership position. In total, the bank made $14.6 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed after the table.

Summary of Investments – Orlando Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$9.8 million	-	$9.8 million
LIHTCs	-	$1.9 million	$1.9 million
Municipal/Private Bonds	-	$1.4 million	$1.4 million
Donations	$1.5 million	-	$1.5 million
TOTAL	**$11.3 million**	**$3.3 million**	**$14.6 million**

- The bank's CRA investments in the assessment area primarily support affordable housing initiatives, which were identified by community contacts as a key community development need for the assessment area. These investments include a continuing investment from a prior review period in a LIHTC development that includes 108 affordable multifamily housing units, all of which are designated for individuals or families at or below 60.0 percent of the median family income figure for the assessment area. Additionally, the bank invested $9.8 million in MBS supporting affordable multifamily and owner-occupied housing in the assessment area. While not considered to be as responsive or innovative as investments in LIHTC projects, these investments nevertheless provide financing for affordable housing in the assessment area and are therefore considered responsive.

- The bank made three separate donations totaling $1.2 million to an organization awarding scholarships to children in the assessment area from families at or below 200.0 percent of the federal poverty level. This program supports the Florida Tax Credit Scholarship Program administered by the Florida Department of Education and is considered impactful given the size of the bank's contributions and the number of LMI individuals impacted.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Orlando assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

The bank operates nine branches in the Orlando assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	5	4	0	**9**
	0.0%	0.0%	55.6%	44.4%	0.0%	**100%**
Census Tracts	4.1%	24.1%	37.9%	32.5%	1.4%	100%
Household Population	3.1%	22.8%	38.2%	35.0%	0.9%	100%

The bank does not operate any branches in LMI geographies in the assessment area, while 28.2 percent of census tracts in the assessment area are LMI and 25.9 percent of the household population reside in those tracts. While this distribution is below comparison data, seven of the bank's branches in the assessment area are located in census tracts that border one or more LMI geographies and are accessible to residents of those geographies. Moreover, four of these branches were previously located in moderate-income census tracts but were reclassified into middle-income census tracts due to census changes in 2022. While not located in an LMI census tract as of the date of this evaluation, these locations were located in LMI geographies for a portion of the review period and remain adjacent to other LMI geographies to which they are accessible. In addition to the branch locations shown in the previous table, the bank operates two LPO locations in the assessment area, one of which is located in a moderate-income census tract. Considering these factors, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels, particularly LMI geographies.

Changes in Branch Locations

During the review period, the bank closed two branch locations, both of which were located in upper-income census tracts. Thes bank still operates branches that are accessible to residents near the two closed branch locations, and neither of these locations were in census tracts that border LMI geographies. Therefore, the bank's record of opening and closing branch locations has not adversely affected the accessibility of its service delivery systems in the assessment area, particularly for LMI individuals and geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area all operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. While extended lobby hours or weekend lobby hours are not offered in this assessment area, drive-through facilities are located at eight branches in the assessment area. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, bank employees provided 1,048 hours of community development services to 25 different organizations in the Orlando assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- Two bank employees serve on the board of directors of the local chapter of a national affordable housing development nonprofit agency. Both employees provide financial expertise to the organization through service on board committees that help finance the organization and review loan applications and affordable housing development opportunities. During the review period, these employees contributed 106 total hours of community development service activities to the organization.

- One employee serves as the chair of the board of directors of a nonprofit agency that assists patients with high medical costs by providing financial assistance and guidance for copayments, coinsurance, deductibles, and other health-related expenses. The bank employee contributed 472 hours of service activities to the organization during the review period. These activities are considered responsive given the number of LMI individuals and families served by the organization and the impact of the organization's activities.

TAMPA-ST. PETERSBURG-CLEARWATER, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TAMPA ASSESSMENT AREA

The bank operates five branches and two LPOs in the Tampa assessment area, which includes the entirety of Hillsborough and Pinellas counties, two of four counties in the Tampa-St. Petersburg-Clearwater, FL MSA. The bank closed one branch in this assessment area during the review period and did not open any branches. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	31	138	232	186	23	**610**
	5.1%	22.6%	38.0%	30.5%	3.8%	**100%**
Family Population	16,760	120,778	220,311	209,323	4,395	**571,567**
	2.9%	21.1%	38.5%	36.6%	0.8%	**100%**
Household Population	37,241	207,900	381,021	314,021	12,975	**953,158**
	3.9%	21.8%	40.0%	33.0%	1.4%	**100%**
Business Institutions	5,807	33,693	60,517	66,250	3,640	**169,907**
	3.4%	19.8%	35.6%	39.0%	2.1%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	116,242	99,513	107,878	247,934	**571,567**
	20.3%	17.4%	18.9%	43.4%	**100%**
Household Population	217,554	156,083	164,048	415,473	**953,158**
	22.8%	16.4%	17.2%	43.6%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TAMPA ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank's Lending Test performance in this assessment area is consistent with overall Florida statewide performance (which is based on the full-scope review areas). For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

While the bank made a satisfactory level of community development loans in this assessment area, this performance was below statewide levels, as the bank was a leader in making community development loans in the Florida full-scope review assessment areas. During the review period, the bank made four community development loans totaling $18.3 million and one PPP community development loan totaling $1.4 million.

INVESTMENT TEST

While the bank made a satisfactory level of community development investments in this assessment area, this performance was below statewide levels, as the bank made an excellent level of community development investments in the Florida full-scope review assessment areas. The bank had qualified investment activity totaling $12.8 million, $5.2 million of which was made in the current review period. Furthermore, 46 donations were made to organizations serving this assessment area totaling $234,500.

SERVICE TEST

As displayed in the table below, the bank's Service Test performance in this assessment area is consistent with overall Florida statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 41 organizations totaling 900 service hours.

NORTH PORT-BRADENTON-SARASOTA, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SARASOTA ASSESSMENT AREA

The bank operates seven branches in the Sarasota assessment area, which includes the entirety of the North Port-Bradenton-Sarasota, FL MSA. The bank closed two branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	5	48	99	62	3	**217**
	2.3%	22.1%	45.6%	28.6%	1.4%	**100%**
Family Population	3,742	44,489	96,391	71,645	422	**216,689**
	1.7%	20.5%	44.5%	33.1%	0.2%	**100%**
Household Population	6,411	72,868	155,302	104,496	496	**339,573**
	1.9%	21.5%	45.7%	30.8%	0.2%	**100%**
Business Institutions	771	9,818	30,643	22,279	166	**63,677**
	1.2%	15.4%	48.1%	35.0%	0.3%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	40,741	42,538	44,220	89,190	**216,689**
	18.8%	19.6%	20.4%	41.2%	**100%**
Household Population	74,817	60,183	62,802	141,771	**339,573**
	22.0%	17.7%	18.5%	41.8%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SARASOTA ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank's Lending Test performance in this assessment area is consistent with overall Florida statewide performance (which is based on the full-scope review areas). For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

While the bank made a satisfactory level of community development loans in this assessment area, this performance was below statewide levels, as the bank was a leader in making community development loans in the Florida full-scope review assessment areas. During the review period, the bank made two community development loans totaling $22.0 million in the Sarasota assessment area.

INVESTMENT TEST

The bank made a satisfactory level of community development investments in this assessment area; however, this performance was below statewide levels, as the bank made an excellent level of community development investments in the Florida full-scope review assessment areas. The bank had total qualified investment activity of $11.1 million, of which $6.9 million was made in the current period. Furthermore, 48 donations were made to organizations serving this assessment area totaling $130,163.

SERVICE TEST

As displayed in the table below, the bank's Service Test performance in this assessment area is consistent with overall Florida statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the Florida full-scope review assessment areas. During the review period, bank employees provided community development service activities to 17 organizations totaling 692 service hours.

JACKSONVILLE, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSONVILLE ASSESSMENT AREA

The bank operates two branches in the Jacksonville assessment area, which includes the entirety of Duval and St. Johns counties, two of five counties in the Jacksonville, FL MSA. The bank did not open or close any branches in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	22	75	90	77	6	**270**
	8.2%	27.8%	33.3%	28.5%	2.2%	**100%**
Family Population	16,637	73,763	103,772	96,437	1,999	**292,608**
	5.7%	25.2%	35.5%	33.0%	0.7%	**100%**
Household Population	29,843	128,219	160,854	138,636	3,405	**460,957**
	6.5%	27.8%	34.9%	30.1%	0.7%	**100%**
Business Institutions	4,908	20,984	32,482	28,554	1,894	**88,822**
	5.5%	23.6%	36.6%	32.1%	2.1%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	64,006	54,106	56,252	118,244	**292,608**
	21.9%	18.5%	19.2%	40.4%	**100%**
Household Population	109,748	78,582	85,872	186,755	**460,957**
	23.8%	17.1%	18.6%	40.5%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSONVILLE ASSESSMENT AREA

LENDING TEST

As displayed in the following table, the bank's Lending Test performance in this assessment area is below overall Florida statewide performance (which is based on the full-scope review areas). For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Below
Geographic Distribution	Below
Community Development Lending Activity	Below
OVERALL	**BELOW**

While the bank made a satisfactory level of community development loans in this assessment area, this performance was below statewide levels, as the bank was a leader in making community development loans in the Florida full-scope review assessment areas. During the review period, the bank made three community development loans totaling $964,789 in the Jacksonville assessment area. In addition to these loans, the bank received credit for one PPP community development loan totaling $2.0 million.

INVESTMENT TEST

The bank made a satisfactory level of community development investments in this assessment area; however, this performance was below statewide levels, as the bank made an excellent level of community development investments in the Florida full-scope review assessment areas. The bank made total investments of $8.3 million, $7.8 million of which were new investments made during the current review period. Additionally, the bank made 23 donations totaling $166,037 to organizations serving this assessment area.

SERVICE TEST

As displayed in the table below, the bank's Service Test performance in this assessment area is consistent with overall Florida statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the Florida full-scope review assessment areas. During the review period, bank employees provided community development service activities to 11 organizations totaling 275 service hours.

LOUISIANA

CRA RATING FOR LOUISIANA: **SATISFACTORY**

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Louisiana include the following:

- The bank's lending levels reflect excellent responsiveness to the credit needs of the Louisiana assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the Louisiana assessment areas.
- The bank makes a relatively high level of community development loans in the Louisiana assessment areas.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of the Louisiana assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in the leadership position in Louisiana.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the Louisiana assessment areas, particularly LMI geographies.
- The bank is a leader in providing community development services throughout the Louisiana assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Louisiana assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in eight assessment areas in Louisiana: five MSA assessment areas, two CSA assessment areas, and one nonMSA assessment area. The New Orleans, Lafayette, and Lake Charles assessment areas were reviewed under full-scope examination procedures. When considering branch structure and loan/deposit activity, CRA performance in the New Orleans and Lafayette assessment areas carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Louisiana, four community contact interviews were utilized. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN LOUISIANA

The following table gives additional detail regarding the bank's operations within Louisiana.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
New Orleans MSA	19	33.9%	$2,063,595	27.4%	Full-Scope
Lafayette CSA	16	28.6%	$2,411,400	32.0%	Full-Scope
Lake Charles MSA	6	10.7%	$981,090	13.0%	Full-Scope
Baton Rouge MSA	6	10.7%	$1,348,731	17.9%	Limited-Scope
Monroe CSA	5	8.9%	$366,939	4.9%	Limited-Scope
Shreveport MSA	2	3.6%	$229,705	3.0%	Limited-Scope
Houma MSA	1	1.8%	$55,841	0.7%	Limited-Scope
NonMSA Louisiana	1	1.8%	$84,814	1.1%	Limited-Scope
TOTAL	**56**	**100%**	**$7,542,115**	**100%**	**3 Full-Scope**

The bank operates 56 branches (13.5 percent of total branches) throughout the eight CRA assessment areas in the state of Louisiana. Total deposits in the state total $7.5 billion, which represents 11.3 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank operates two LPO locations, both located in the Lafayette assessment area, and six stand-alone ATMs, all of which are deposit accepting. The bank's operations in the state are heavily concentrated in the New Orleans and Lafayette assessment areas, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed seven branches and did not open any branches in Louisiana.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

LENDING TEST

The bank's performance under the Lending Test in Louisiana is rated High Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Relatively High Level
Product Innovation	Makes Extensive Use
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect excellent responsiveness to the credit needs of the bank's Louisiana assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
New Orleans MSA	Excellent
Lafayette CSA	Excellent
Lake Charles MSA	Good
OVERALL	**EXCELLENT**

Limited-Scope Assessment Areas	Lending Activity
Baton Rouge MSA	Below
Monroe CSA	Below
Shreveport MSA	Below
Houma MSA	Below
NonMSA Louisiana	Below

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
New Orleans MSA	Adequate
Lafayette CSA	Good
Lake Charles MSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Baton Rouge MSA	Consistent
Monroe CSA	Consistent
Shreveport MSA	Consistent
Houma MSA	Consistent
NonMSA Louisiana	Consistent

The overall geographic distribution of loans reflects adequate penetration throughout the assessment areas, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
New Orleans MSA	Adequate
Lafayette CSA	Adequate
Lake Charles MSA	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Baton Rouge MSA	Consistent
Monroe CSA	Consistent
Shreveport MSA	Consistent
Houma MSA	Below
NonMSA Louisiana	Below

Community Development Lending Activity

Overall, the bank makes a relatively high level of community development loan in the Louisiana assessment areas, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
New Orleans MSA	Adequate
Lafayette CSA	Relatively High Level
Lake Charles MSA	Leader
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Lending
Baton Rouge MSA	Consistent
Monroe CSA	Below
Shreveport MSA	Exceeds
Houma MSA	Below
NonMSA Louisiana	Below

During the review period, the bank originated or renewed 73 community development loans inside its Louisiana assessment areas totaling $250.4 million. These totals include six PPP community development loans totaling $10.0 million that were made in response to the pandemic. As the bank met the community development lending needs of its own assessment areas, additional consideration was given to community development loans made in Louisiana outside of the bank's assessment areas.

In addition, the bank also made six loans totaling $15.0 million outside of the bank's Louisiana assessment areas but within the state of Louisiana. Two of these loans totaling $13.0 million financed an NMTC project for the construction of a new skilled nursing facility in Natchitoches, Louisiana, for which a majority of patients are LMI. Another loan for $1.6 million covered operating expenses for an organization contracted with the Louisiana Department of Health to provide testing and sampling services related to the pandemic for schools in Louisiana, while the remaining three loans totaling $300,000 were made to a nonprofit food bank operating throughout southeastern Louisiana.

Product Innovation

The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the Louisiana assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.

The bank's use of flexible and/or innovative lending products in Louisiana includes the following:

- The bank made a considerable number of loans through its various affordable mortgage programs in Florida. This included 104 First Horizon Home Start loans totaling $19.7 million, 32 CRA HomeReady loans totaling $4.9 million, 8 CRA Home Possible loans totaling $1.4 million, and 105 loans totaling $17.3 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs.

- Through its down payment assistance programs, the bank made 172 grants totaling $1.2 million to LMI borrowers or borrowers with property in LMI geographies in Louisiana.

- The bank made seven loans totaling $6.6 million to small businesses in the Louisiana assessment areas through SBA loan programs, which provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test in Louisiana is rated High Satisfactory. Overall, the bank made a significant level of qualified community development investments and grants. The investments and grants exhibit good responsiveness to credit and community development needs, and the bank is occasionally in a leadership position. The bank makes significant use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
New Orleans MSA	Significant Level
Lafayette CSA	Excellent Level
Lake Charles MSA	Poor Level
OVERALL	**SIGNIFICANT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Baton Rouge MSA	Consistent
Monroe CSA	Consistent
Shreveport MSA	Below
Houma MSA	Below
NonMSA Louisiana	Below

As shown in the table below, the bank had total investments of $75.7 million in its Louisiana assessment areas during the review period and $3.8 million in total donations. Of the total investments made in the bank's Louisiana assessment areas, $54.5 million were new investments made in the current review period, while $21.2 million were made prior to the review period but were still outstanding. The bank made use of a diverse suite of investment types in providing community development investments in Louisiana, including LIHTC projects, equity equivalent investments, MBS, and bonds. The bank's use of innovative or complex investment types in Louisiana further supports the bank's overall Investment Test performance in the state.

Louisiana Assessment Areas	Investments($)	Grants/Donations ($)
New Orleans MSA	$21.6 million	$2.8 million
Lafayette CSA	$39.8 million	$586,283
Lake Charles MSA	$827,087	$90,500
Baton Rouge MSA	$3.4 million	$101,795
Monroe CSA	$10.0 million	$110,510
Shreveport MSA	-	$27,900
Houma MSA	-	$104,450
NonMSA Louisiana	-	$2,500
OVERALL	**$75.7 million**	**$3.8 million**

As the bank met the community development investment needs of its Louisiana assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $1.8 million in additional investment and $235,100 in additional donation activity in Louisiana, bringing the total amount of qualified investment, grant, and donation activity in the state to $81.5 million. These additional investments included a continuing investment in a LIHTC project from a prior review period, MBS purchases, and a municipal bond supporting affordable housing loans.

SERVICE TEST

The bank's performance under the Service Test in Louisiana is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
New Orleans MSA	Reasonably Accessible
Lafayette CSA	Readily Accessible
Lake Charles MSA	Reasonably Accessible
OVERALL	**REASONABLY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Baton Rouge MSA	Consistent
Monroe CSA	Consistent
Shreveport MSA	Consistent
Houma MSA	Consistent
NonMSA Louisiana	Below

Changes in Branch Locations

The bank's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
New Orleans MSA	Generally Not Adversely Affected
Lafayette CSA	Generally Not Adversely Affected
Lake Charles MSA	Generally Not Adversely Affected
OVERALL	**GENERALLY NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Baton Rouge MSA	Consistent
Monroe CSA	Consistent
Shreveport MSA	Consistent
Houma MSA	Consistent
NonMSA Louisiana	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. While the bank's hours vary slightly between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas. The bank offers the same suite of products throughout its entire branch network.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
New Orleans MSA	Do Not Vary in a Way that Inconveniences
Lafayette CSA	Do Not Vary in a Way that Inconveniences
Lake Charles MSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Baton Rouge MSA	Consistent
Monroe CSA	Consistent
Shreveport MSA	Consistent
Houma MSA	Consistent
NonMSA Louisiana	Consistent

Community Development Services

The bank is a leader in providing community development services in Louisiana, as shown below.

Full-Scope Assessment Areas	Community Development Services
New Orleans MSA	Leader
Lafayette CSA	Leader
Lake Charles MSA	Adequate Level
OVERALL	**LEADER**

Limited-Scope Assessment Areas	Community Development Services
Baton Rouge MSA	Consistent
Monroe CSA	Below
Shreveport MSA	Below
Houma MSA	Below
NonMSA Louisiana	Below

During the review period, bank employees provided 5,600 hours of community development service activities to 135 different organizations throughout the Louisiana assessment areas. Details of the most impactful community development service activities are included in the *Community Development Services* section for each full-scope assessment area. As the bank met the community development service needs of its Louisiana assessment areas, consideration was also given to service activities made outside the bank's assessment areas but within the state of Louisiana and to service activities that benefited a broader statewide area that includes one or more of the bank's assessment areas. These activities included 442 additional hours of community development service activities, bringing the total number of community development service hours in the state to 6,042.

NEW ORLEANS-METAIRIE, LOUISIANA MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NEW ORLEANS ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 19 (4.6 percent) of its total branches in the New Orleans assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
1	3	5	10

In addition to the branch locations shown in the table above, the bank operates one stand-alone, deposit-accepting ATM located in a middle-income census tract. Moreover, bank customers have surcharge-free access to seven branded, stand-alone ATM locations in the assessment area. During the review period, the bank closed three branches in the assessment area: one in a low-income census tract, one in a middle-income census tract, and one in an upper-income census tract. The bank is adequately positioned to deliver financial services to substantially all of the New Orleans assessment area but may have difficulty in fully serving the far southern portions of Jefferson Parish, which extends substantially south from the city of New Orleans away from the nearest First Horizon branch location.

General Demographics

The bank's New Orleans assessment area consists of Orleans, Jefferson, and St. Tammany parishes, three of the seven parishes in the full New Orleans-Metairie, LA MSA (New Orleans MSA). The assessment area has a total population of 1,089,348, with Jefferson Parish being the most populous parish in the assessment area (440,781), followed by Orleans Parish (383,997) and St. Tammany Parish (264,570). Overall, the assessment area has experienced limited population growth of 3.3 percent between 2015 ACS data and 2020 census data, though population growth in St. Tammany Parish (8.9 percent) has been more pronounced. The city of New Orleans serves as a key commercial and banking hub within the state of Louisiana. Among other notable economic features, the city hosts the Port of New Orleans, a key commercial transportation hub near the confluence of the Mississippi River and Gulf of Mexico.

The assessment area hosts a competitive banking market, with 31 FDIC-insured depository institutions operating 262 branches throughout the assessment area. Of these institutions, the bank ranks 5th in deposit market share, with 4.8 percent of all assessment area deposit dollars. Deposits held in the New Orleans assessment area represent 3.1 percent of the bank's total deposit dollars held across all assessment areas.

While only 31 depository institutions operate a branch location in the assessment area, a significantly higher number of institutions reported HMDA and CRA loan activity in the assessment area, indicative of a competitive lending market. An analysis of 2022 HMDA-

reportable loans shows that 459 institutions had loan activity in the assessment area, of which the bank ranked 8th, with 3.0 percent of total HMDA loans. A similar analysis of CRA-reportable loans shows that the bank ranked 11th out of 129 institutions with reported CRA loan activity in the assessment area in 2022 but 4th out of institutions with a branch presence in the assessment area.

The New Orleans assessment area covers a wide metropolitan area with a diverse demographic composition. Consequently, demand for mortgage and small business loans has remained high in addition to the need for a standard blend of other consumer and commercial credit and deposit products. Community contacts also pointed to newer affordable housing development and access to affordable financing for home loans as pressing needs in the assessment area. The assessment area has great need for community development, and community contacts noted that opportunities for community development involvement are numerous through partnerships with various government assistance, nonprofit, and community service and development organizations operating in the assessment area.

Additionally, in August 2021, the assessment area received a Major Disaster Declaration from FEMA following the effects of Hurricane Ida. During this period, the assessment area had need for a wide range of community development and disaster recovery efforts beyond traditional community development initiatives. Given this information, there are ample opportunities for community development involvement from financial institutions in the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	45	12.1%	19,245	7.9%
Moderate	98	26.4%	57,359	23.6%
Middle	90	24.3%	78,540	32.3%
Upper	119	32.1%	85,228	35.1%
Unknown	19	5.1%	2,738	1.1%
TOTAL	**371**	**100%**	**243,110**	**100%**

As shown above, 38.5 percent of the census tracts in the assessment area are LMI geographies, but only 31.5 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the city of New Orleans in Orleans and northern Jefferson parishes.

Based on 2020 census data, the median family income for the assessment area was $72,277. At the same time, the median family income for the state of Louisiana was $65,427. More recently, the FFIEC estimates the 2021 and 2022 median family income for the New Orleans MSA to be $70,100 and $81,800, respectively. The following table displays population percentages of assessment area families by income level compared to the Louisiana family populations.

Family Population by Income Level				
	Assessment Area		Louisiana	
Low	60,353	24.8%	274,718	24.6%
Moderate	36,724	15.1%	176,730	15.8%
Middle	44,265	18.2%	198,261	17.8%
Upper	101,768	41.9%	467,043	41.8%
TOTAL	**243,110**	**100%**	**1,116,752**	**100%**

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.9 percent) than reside in LMI geographies (31.5 percent). This figure is closely aligned to the statewide LMI family distribution (40.2 percent); however, the percentage of families living below the poverty level in the assessment area (12.1 percent) falls slightly below the level for the state of Louisiana as a whole (14.2 percent). Considering these factors and income levels, the assessment area appears slightly more affluent than the state of Louisiana.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Louisiana.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent**
Assessment Area	$213,933	25.3%	$1,023
Louisiana	$168,100	30.2%	$876

Based on housing values, income levels, and rental costs, housing in the assessment area is considerably less affordable than in the state of Louisiana as a whole. Within the assessment area, housing is least affordable in Orleans Parish based on an affordability ratio of 17.3 percent, while St. Tammany Parish has a higher affordability ratio (31.7 percent) than the statewide figure. These figures indicate that homeownership is likely out of reach for many LMI individuals across the assessment area, particularly in Orleans Parish, and that financial institutions may struggle to make home loans to LMI borrowers.

Additionally, LMI borrowers face challenges stemming from an aging housing stock, which increases the cost to maintain existing affordable housing stock and points to a need for affordable home improvement loans in the assessment area. Across the assessment area as a whole, the median age of housing stock is 54 years, while the statewide figure is 40 years; within LMI census tracts, the median age of housing stock is even higher (58 years and 57 years, respectively), further exacerbating this issue. Lastly, a disproportionate share of housing stock in LMI tracts is made of rental and vacant units (61.0 percent), which may limit the ability of financial institutions to make home loans in these geographies. These figures indicate that homeownership is likely out of reach for many LMI individuals across the assessment area, particularly in Orleans Parish, and that financial institutions may struggle to make home loans to LMI borrowers.

Lastly, affordable rental options appear limited based on additional housing demographics. As a whole, 51.4 percent of renters in the assessment area have rental costs exceeding 30.0 percent of their income, which exceeds the statewide level of 46.7 percent. This figure is even higher for low- (78.4 percent) and moderate-income renters (53.2 percent), which further limits opportunities for attaining affordable housing for these individuals and compounds the challenges that many LMI individuals face in attaining homeownership due to an inability to save for a down payment.

Industry and Employment Demographics

The assessment area supports a large and diverse business community that is driven heavily by the tourism industry in addition to being a significant shipping and transportation hub. By number of paid employees, the largest job categories in the assessment area are healthcare and social assistance (15.2 percent), accommodation and food services (14.1 percent), and government (12.0 percent). Small businesses are also a vital part of the area's economy, with assessment area demographics indicating that 92.6 percent of businesses in the assessment area reported annual revenues of $1 million or less. The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to the state of Louisiana.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Louisiana**
2021	6.3%	5.6%
2022	3.7%	3.7%
2023 YTD (September)	3.7%	3.6%

As shown in the table above, unemployment rates in the assessment area were higher than statewide figures in 2021 but were closely aligned for the rest of the review period. As noted by a community contact, the assessment area economy was hit especially hard by the pandemic given the impact to the tourism industry, which is vital to the assessment area's economy. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial effects of the pandemic.

Community Contact Information

One community contact interview was utilized as part of this evaluation with an individual with knowledge of the economic conditions and credit needs of the assessment area. The individual represents a community development agency funding housing initiatives for LMI residents.

The community contact described that the assessment area's economy is still recovering from the impacts of Hurricane Katrina, which devastated the area in 2005, and the impacts of the pandemic. The contact noted that after Hurricane Katrina, many residents relocated or moved out of the assessment area; however, the population of the area has been increasing more recently, despite lingering effects from the pandemic that hit the area with higher unemployment levels compared to statewide and national figures. The contact explained that many LMI individuals faced evictions or lost their homes during the pandemic due to unemployment and other economic challenges. Regarding community development needs in the assessment area, the contact noted that the more recent population inflow has increased demand for new housing development, including affordable housing stock and affordable multifamily developments for LMI individuals.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NEW ORLEANS ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the New Orleans assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	318	7.0%	$50,442	4.5%
Home Purchase	1,214	26.6%	$487,959	43.9%
Multifamily Housing	6	0.1%	$24,978	2.2%
Refinancing	692	15.2%	$250,702	22.5%
Other Purpose LOC	94	2.1%	$16,002	1.4%
Other Purpose Closed/Exempt	46	1.0%	$16,947	1.5%
Total HMDA	**2,370**	**51.9%**	**$847,030**	**76.2%**
Small Business	2,183	47.8%	$264,695	23.8%
Small Farm	10	0.2%	$174	0.0%
TOTAL LOANS	**4,563**	**100.0%**	**$1,111,899**	**100.0%**

The bank's lending activity in this assessment area represents 7.7 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, this exceeds both the percentage of total bank branches that are operated in this assessment area (4.6 percent) and the share of total bank deposits held in this assessment area (3.1 percent). Moreover, despite significant competition for lending activity in the assessment area, First Horizon ranked 8th out of 459 lenders with reported HMDA loan activity and 11th out of 129 lenders with reported CRA loan activity in 2022, which further demonstrates the bank's importance in meeting the credit needs of the New Orleans assessment area. Therefore, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's distribution of loans by borrower's income profile and small business revenue size is adequate based on the performance of both loan products reviewed.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is adequate overall.

The bank originated 4.1 percent of its HMDA loans to low-income borrowers in 2021, which was closely aligned with the performance of peer institutions in the assessment area (3.9 percent) but was below the percentage of assessment area families who are low income (25.1 percent). Similarly, in 2022, the bank's level of lending to low-income borrowers (6.6 percent) was in line with aggregate lending performance (5.3 percent) but below the demographic figure (24.8 percent). Therefore, the bank's lending to low-income borrowers is considered adequate in both years.

The bank's lending to moderate-income borrowers also reflects adequate performance in both years of data reviewed. In 2021 (10.8 percent) and 2022 (13.0 percent), the bank's performance was in line with the aggregate lending level (13.5 percent in 2021 and 16.2 percent in 2022). Similarly, the bank's 2022 lending level was in line with the 2022 demographic figure (15.1 percent), while the 2021 lending level was further below the 2021 demographic figure (15.5 percent).

Small Business

In 2021, the bank made 33.0 percent of its small business loans to businesses with annual revenues of $1 million or less, which was in line with the aggregate lending level (37.2 percent) but below the demographic estimate of businesses in the assessment area with this revenue profile (92.6 percent). While the bank's performance initially appears comparable to peer lending levels in the assessment area, additional analysis indicates that a significant portion of the bank's small business lending during the review period consisted of PPP loans made in direct response to the pandemic. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 50.4 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 84.4 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (47.8 percent) is considered adequate when compared to aggregate lending levels (50.8 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (92.6 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance.

When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate based on an analysis of the bank's HMDA and small business lending.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is adequate overall.

The percentage of HMDA loans originated in low-income census tracts in 2021 (5.2 percent) and 2022 (4.5 percent) was in line with aggregate lending levels (6.0 percent in 2021 and 5.4 percent in 2022) and in line with the percentage of owner-occupied housing in low-income census tracts (6.4 percent in 2021 and 5.9 percent in 2022); this reflects adequate performance in low-income geographies for both years.

In 2021, the bank originated 12.0 percent of HMDA loans in moderate-income geographies in the assessment area, which was in line with the aggregate lending level (15.0 percent) but below the demographic figure (18.6 percent), reflecting adequate performance. In 2022 the percentage of the bank's HMDA loans in moderate-income geographies increased to 16.5 percent, which was in line with the performance of peer institutions in the assessment area (17.9 percent) and the percentage of owner-occupied housing units located in moderate-income census tracts (20.9 percent), also reflective of adequate performance.

Small Business Lending

The bank's lending to small businesses in LMI geographies is adequate overall.

In 2021, the bank originated 8.4 percent of its small business loans in the assessment area in low-income census tracts, while peer lenders originated a comparable 10.0 percent of aggregate small business loans in low-income census tracts; the bank's level of lending is considered adequate in comparison to the performance of peer institutions and the percentage of assessment area small businesses located in low-income census tracts (9.0 percent). In 2022, the bank originated a slightly lower share of its small business loans in low-income census tracts (5.5 percent), though this performance was closely aligned with both the aggregate lending level (6.1 percent) and the demographic figure (6.4 percent), reflecting adequate performance.

The percentage of the bank's small business loans originated in moderate-income census tracts in 2021 (13.8 percent) was in line with aggregate lending levels (18.9 percent) and the demographic figure (18.5 percent), reflecting adequate performance. Similarly, the bank's performance in 2022 (17.6 percent) was in line with both the performance of peer institutions in the assessment area (21.2 percent) and the percentage of small businesses located in moderate-income census tracts (21.0 percent) and is considered adequate.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 92.2 percent of all assessment area census tracts and 91.0 percent of all LMI geographies. In 2022, the bank had lending activity in 82.2 percent of census tracts in the assessment area and 72.0 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the New Orleans assessment area. As detailed in the table below, the bank made 34 community development loans totaling $41.3 million and 2 PPP loans totaling $2.7 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	7	$5,850	20	$25,728	2	$5,296	5	$4,398	**34**	**$41,272**
PPP Loans	0	$0	0	$0	2	$2,685	0	$0	**2**	**$2,685**

- The bank originated six community development loans totaling $5.1 million to two different affordable housing organizations that develop specialized affordable housing for LMI residents in the assessment area. In addition to constructing new affordable housing for LMI residents, one of these organizations further assists LMI individuals in securing government-provided down payments or other closing cost assistance, which helps to reduce one of the most common barriers that LMI individuals face in attaining homeownership. These loans are considered responsive to the need for affordable housing development identified by community contacts in the assessment area.

- The bank renewed a $1.0 million line of credit to a CDFI supporting small businesses in the assessment area. The CDFI provides technical assistance and alternative financing options to many businesses that would not otherwise qualify for conventional small business underwriting criteria.

- Two loans totaling $4.9 million were made in connection with an NMTC project to renovate a high school in the assessment area that is both located in a low-income census tract and has a majority of students coming from LMI families.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the New Orleans assessment area and is occasionally in a leadership position. In total, the bank made $24.4 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed after the table.

Summary of Investments – New Orleans Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$5.6 million	-	$5.6 million
LIHTCs	$11.9 million	$1.1 million	$13.0 million
Equity Investment	$3.0 million	-	$3.0 million
Donations	$2.8 million	-	$2.8 million
TOTAL	**$23.3 million**	**$1.1 million**	**$24.4 million**

- The bank made two new LIHTC investments with commitments totaling $11.9 million for the acquisition and renovation of a multifamily housing development that includes 148 units restricted for residents who earn 60.0 percent or less of the assessment area median family income. These investments are considered responsive to the need for affordable housing for LMI residents noted by community contacts. In addition, the bank continues to invest in another LIHTC project that was initially made in a prior review period but continues to support an affordable housing development with 64 units available to LMI residents.

- The bank made a $3.0 million investment in a minority-owned depository intuition (MDI) in the assessment area. The investment provides capital for the MDI, which strengthens its ability to meet credit and community development needs in the communities served by the institution.

- As previously noted, the assessment area was heavily impacted by the effects of Hurricane Ida in August 2021. In the period immediately following this event, the assessment area had great need of disaster recovery efforts to help revitalize and stabilize the assessment area. Between August and October 2021, First Horizon made at least eight donations totaling $215,000 to eight different organizations that were directly involved with disaster recovery efforts. These efforts included the deployment of food, medicine, shelter, and other necessities to LMI individuals, as well as the establishment of longer-term recovery funds to assist impacted residents with revitalization and stabilization efforts in the wake of the hurricane.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the New Orleans assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates 19 branches in the New Orleans assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	1	3	5	10	0	**19**
	5.3%	15.8%	26.3%	52.6%	0.0%	**100%**
Census Tracts	12.1%	26.4%	24.3%	32.1%	5.1%	**100%**
Household Population	9.4%	26.7%	29.6%	32.8%	1.5%	**100%**

As shown in the previous table, the bank operates four branches in LMI census tracts in the assessment area, representing 21.1 percent of total bank branches in the assessment area. This distribution is below the percentage of census tracts that are LMI (38.5 percent) and the household population within those tracts (36.1 percent). However, the bank operates seven branch locations that border or are located within close proximity of LMI census tracts in the assessment area, which provides further accessibility to the bank's service delivery systems for residents in LMI geographies. Based on these factors, service delivery systems are reasonably accessible to individuals and geographies of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank closed one branch in each a low-, middle-, and upper-income census tract and did not open any branches. The bank closed one branch location in a low-income census tract in the core of the city of New Orleans, an area with a high concentration of LMI geographies. Though this closure negatively impacts the accessibility of the bank's service delivery systems in the area, the effect is mitigated by the fact that the bank operates two other nearby branches in this portion of the assessment area. Therefore, changes in branch locations generally have not adversely affected the accessibility of the bank's delivery systems, particularly to LMI individuals and geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. The bank's branches in the assessment area all operate standard business hours from 9:00 a.m. to 4:00 p.m. or 5:00 p.m. Monday through Friday. Extended lobby hours are offered on Fridays at 15 branch locations, including all 4 branches in LMI census tracts. The bank also offers Saturday lobby hours from 9:00 a.m. to 12:00 p.m. at 9 branch locations, 2 of which are in LMI census tracts. Drive-through facilities are available at 15 branches in the assessment area, including 2 in LMI geographies, and offer extended hours Monday through Friday from 8:30 a.m. to 5:00 p.m. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 2,109 hours of community development service activities to 46 different organizations in the New Orleans assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- One employee serves on the board of directors of an affordable housing organization that helps revitalize and stabilize LMI areas by providing minor home repairs for LMI residents in the assessment area. The activities of this organization are considered particularly impactful given the challenges of maintaining existing affordable housing stock discussed in the *Housing Demographics* section for this assessment area, as well as the need for home repairs following the effects of Hurricane Ida on the assessment area in August 2021.

- Five bank employees serve in leadership roles for economic development organizations that provide technical services and support to small businesses in the assessment area, including assistance to businesses impacted by the pandemic during the review period. These activities primarily benefit small businesses in the assessment area and workforce development initiatives benefitting LMI individuals. Bank employees contributed 115 hours of community development service to four such organizations during the review period.

- Three bank employees serve in leadership roles, ranging from board chairman to treasurer, for three different affordable housing organizations in the assessment area, contributing a total of 118 hours of community development service activities during the review period. Each of these organizations supports affordable housing development in the assessment area or assists LMI residents in attaining homeownership through counseling and technical assistance services. Given the prescient need for affordable housing development and the challenges that many LMI residents in the assessment area face in attaining homeownership, these activities are considered impactful.

- Additionally, a significant number of bank employees provided financial literacy training and technical assistance to a number of organizations in the assessment area, totaling 666 hours of community service activities. Many of these events include homebuyer education or technical assistance for prospective homebuyers.

LAFAYETTE-NEW IBERIA-OPELOUSAS, LOUISIANA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAFAYETTE ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 16 (3.8 percent) of its total branches in the Lafayette assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
1	5	6	4

In addition to the branch locations shown in the table above, other service delivery systems include three stand-alone, full-service ATMs in the assessment area, one of which is located in a middle-income census tract and two of which are in upper-income census tracts. Additionally, bank customers have surcharge-free access to five branded stand-alone ATM locations in the assessment area. During the review period, the bank closed three branches in the assessment area, two of which were in moderate-income census tracts. One of these closed branch locations was the bank's only branch in Vermillion Parish, the southernmost portion of the bank's Lafayette assessment area. As the bank no longer operates a branch in Vermillion Parish, it may have some difficulty in fully serving the area, given the distance to the nearest First Horizon branch. Nevertheless, the bank's branch network is concentrated around the main population centers and the majority of LMI geographies in the assessment area, and, overall, the bank is adequately positioned to deliver financial services throughout the Lafayette assessment area.

General Demographics

The bank's Lafayette assessment area includes the entirety of the Lafayette-New Iberia-Opelousas, LA CSA, which combines the Lafayette, LA MSA (four parishes: Acadia, Lafayette, St. Martin, and Vermilion) and two adjacent nonMSA parishes (Iberia and St. Landry). In addition to the CSA, the assessment area includes the adjacent, nonMSA parish, St. Mary, which was a part of the CSA prior to 2023 Office of Management and Budget revised delineations. According to 2020 census data, the assessment area has a total population of 610,330, which is most heavily concentrated in Lafayette Parish (241,753), which includes the city of Lafayette, while the remaining six parishes in the assessment area are relatively less populous, ranging from 49,406 (St. Mary Parish) to 82,540 (St. Landry Parish). The assessment area is large and extends from the Gulf of Mexico approximately 120 miles inland, including both urban and rural areas. Most notably, the assessment area hosts the city of Lafayette, which serves as a regional hub for commercial and banking activity and includes the University of Louisiana at Lafayette, a large public university with a total enrollment of approximately 16,000 students.

The banking market in the assessment area is competitive, with 40 FDIC-insured depository institutions operating 210 branches in the assessment area. Of these institutions, First Horizon ranked 1st in both deposit market share (15.1 percent) and total branches in the assessment area (16). Deposits held in this assessment area represent 3.6 percent of the bank's total deposit dollars held across all assessment areas. While only 40 institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity. An analysis of 2022 HMDA-reportable loans shows that 335 institutions reported loan activity in the assessment area, with First Horizon ranking 5th in total lending volume and 1st out of institutions with a branch presence in the market. A similar analysis reveals that 115 institutions reported CRA lending activity in the assessment area in 2022, of which First Horizon ranked 12th.

As this assessment area covers a large and diverse metropolitan area with some smaller nonmetropolitan areas, credit needs are varied and include a standard blend of consumer and commercial loan products. Other credit and community development needs identified by community contacts include housing development across all income levels. Additionally, in August 2021, the assessment area received a Major Disaster Declaration from FEMA following the effects of Hurricane Ida. During this period, the assessment area had a need for a wide range of community development and disaster recovery efforts beyond traditional community development initiatives. Given this information, there are ample opportunities for community development involvement from financial institutions in the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	13	7.2%	8,452	5.4%
Moderate	46	25.4%	37,391	24.1%
Middle	66	36.5%	56,631	36.5%
Upper	51	28.2%	51,900	33.5%
Unknown	5	2.8%	767	0.5%
TOTAL	**181**	**100%**	**155,141**	**100%**

As shown above, 32.6 percent of the census tracts in the assessment area are LMI geographies, while 29.5 percent of the family population resides in these tracts. These LMI geographies are dispersed throughout the assessment area but are most heavily concentrated around the city of Lafayette in Lafayette Parish and in St. Martin Parish. The assessment area also includes a number of middle-income census tracts that were designated as distressed during the review period, as detailed below.

- Nine census tracts were designated as distressed due to poverty in St. Landry Parish in both 2021 and 2022.

- Nine census tracts were designated as distressed due to poverty in St. Mary Parish in 2021.

Based on 2020 census data, the median family income for the assessment area was $61,580. At the same time, the median family income for the state of Louisiana was $65,427. More recently, the FFIEC estimates the 2021 and 2022 median family income for the Lafayette, LA MSA to be $66,400 and $74,900, respectively; for nonMSA Louisiana, the figures are $50,100 and $56,600. The following table displays population percentages of assessment area families by income level compared to the Louisiana family populations.

Family Population by Income Level				
	Assessment Area		**Louisiana**	
Low	39,561	25.5%	274,718	24.6%
Moderate	23,674	15.3%	176,730	15.8%
Middle	27,930	18.0%	198,261	17.8%
Upper	63,976	41.2%	467,043	41.8%
TOTAL	**155,141**	**100%**	**1,116,752**	**100%**

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (40.8 percent) than reside in LMI geographies (29.5 percent). As shown in the table above, the family population by income level in the assessment area is closely aligned with the statewide distribution. However, the percentage of families living below the poverty level in the assessment area (15.5 percent) exceeds the statewide poverty level (14.2 percent). Considering these factors and income levels, the assessment area appears less affluent than the state of Louisiana as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Louisiana.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (monthly)**
Assessment Area	$154,582	32.2%	$797
Louisiana	$168,100	30.2%	$876

Based on the data in the table above, homeownership is more affordable in the assessment area than in the state of Louisiana as a whole, based on the affordability ratios for each. This holds true for each parish in the assessment area, all of which displayed higher affordability ratios than the statewide figure. While still at a relatively affordable level, housing within the assessment area was least affordable in Lafayette Parish (31.0 percent), which may result in challenges attaining affordable housing for some LMI residents given the high concentration of LMI geographies and individuals in Lafayette Parish. Similar to homeownership costs, rental costs in the assessment area are also lower than statewide levels, and a lower percentage of renters are cost burdened in the assessment area (41.4 percent) than at the statewide level (46.7 percent), indicating that affordable rental housing is more easily attainable in the assessment area.

Industry and Employment Demographics

The assessment area supports a diverse business community buoyed by a strong small business sector. BLS industry demographics indicate that there are 238,803 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (16.0 percent), government (13.7 percent), and retail trade (13.5 percent). The table below details unemployment data from the BLS (not seasonally adjusted) the assessment area as a whole, and the state of Louisiana.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Louisiana**
2021	5.4%	5.6%
2022	3.6%	3.7%
2023 YTD (September)	3.6%	3.6%

As shown in the table above, unemployment rates in the assessment area were slightly lower than statewide figures over the review period. Unemployment rates were highest in Iberia, St. Landry, and St. Mary parishes during the review period, with the most recent 2023 YTD (September) unemployment figure exceeding 4.0 percent in each of these areas. Conversely, unemployment was consistently lower than statewide levels in Lafayette Parish during the review period. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial impacts of the pandemic.

Community Contact Information

One community contact interview was utilized with an individual knowledgeable of the assessment area's economic conditions and credit and community development needs. The community contact represents an economic development organization supporting small businesses in the assessment area. The community contact characterized the assessment area's economy as generally strong, pointing to a low unemployment rate and an increase in new businesses opening after the pandemic. The contact also noted that despite these favorable economic conditions, the assessment area still has a significant population that resides at or below the poverty level. Demographic data supports this claim, as poverty levels in St. Landry (20.9 percent) and Iberia (18.8 percent) parishes far exceed statewide poverty levels (14.2 percent). The contact went on to note that financial institutions are active in support of community development initiatives and small businesses in the assessment area. Regarding specific community development needs, the contact pointed to opportunities for financial institutions to partner/mentor with small businesses, as well as a strong need for housing development to suit potential buyers from all income levels.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAFAYETTE ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Lafayette assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Relatively High Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	268	9.0%	$22,060	5.5%
Home Purchase	585	19.7%	$134,277	33.7%
Multifamily Housing	2	0.1%	$904	0.2%
Refinancing	459	15.5%	$79,290	19.9%
Other Purpose LOC	92	3.1%	$8,581	2.2%
Other Purpose Closed/Exempt	15	0.5%	$2,830	0.7%
Total HMDA	**1,421**	**47.9%**	**$247,942**	**62.1%**
Small Business	1,518	51.2%	$150,303	37.7%
Small Farm	28	0.9%	$751	0.2%
TOTAL LOANS	**2,967**	**100.0%**	**$398,996**	**100.0%**

The bank's lending activity in this assessment area represents 5.0 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, this exceeds both the percentage of total bank branches that are operated in this assessment area (3.8 percent) and the share of total bank deposits held in this assessment area (3.6 percent). Moreover, despite significant competition for lending activity in the assessment area, First Horizon ranked 5th out of 335 lenders with reported HMDA loan activity and 12th out of 115 lenders with reported CRA loan activity in 2022, which further demonstrates the bank's importance in meeting the credit needs of the Lafayette assessment area. Therefore, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

The bank's overall borrower distribution in the Lafayette assessment area is considered good based on the performance of both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans by borrower's income level is good overall.

In 2021, the bank made 9.3 percent of its HMDA loans to low-income borrowers. That performance exceeded aggregate lenders (5.9 percent) but trailed the local demographic figure (25.2 percent), reflecting good performance. Similarly, the bank originated 8.4 percent of its HMDA loans to low-income borrowers in 2022, which fell below the demographic figure (25.5 percent) but exceeded the performance of peer institutions in the assessment area (6.3 percent), reflecting good performance.

Of the bank's total HMDA loans originated in the assessment area, 17.4 percent were made to moderate-income borrowers in 2021, and 18.8 percent were made in 2022. For both years of data reviewed, this performance was in line with aggregate lending levels (15.5 percent in 2021 and 17.6 percent in 2022) but above the percentage of assessment area families who are moderate income. Therefore, the bank's lending to moderate-income borrowers is considered good in both years of data reviewed.

Small Business

In 2021, the bank made 36.1 percent of its small business loans to businesses with annual revenues of $1 million or less, which was in line with the aggregate lending level (33.1 percent) but below the demographic estimate of businesses in the assessment area with this revenue profile (90.8 percent). While the bank's performance initially appears comparable to peer lending levels in the assessment area, additional analysis indicates that a significant portion of the bank's small business lending during the review period consisted of PPP loans made in direct response to the pandemic. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 50.8 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 87.3 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (55.0 percent) is considered adequate when compared to aggregate lending levels (49.1 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (90.6 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate based on the performance of both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is adequate overall.

The percentage of HMDA loans originated in low-income census tracts in 2021 (1.6 percent) and 2022 (2.1 percent) was in line with aggregate lending levels (1.7 percent in 2021 and 2.6 percent in 2022) but below the percentage of owner-occupied housing in low-income census tracts (3.5 percent in 2021 and 4.2 percent in 2022). This reflects adequate performance in low-income geographies for both years.

In 2021, the bank originated 12.5 percent of HMDA loans in moderate-income geographies in the assessment area, which was in line with the aggregate lending level (12.8 percent) but below the demographic figure, reflecting adequate performance. Similarly, the bank's lending in moderate-income geographies in 2022 (15.8 percent) was in line with the performance of peer institutions in the assessment area (19.2 percent) but below the demographic figure, also indicative of adequate performance.

Small Business Lending

The bank's geographic distribution of small business loans in LMI geographies is good overall.

In 2021, the bank made 6.3 percent of its small business loans in low-income census tracts. This level of lending was in line with the percentage of assessment area businesses located in low-income census tracts (6.0 percent) and above the aggregate percentage of reported small business loans made in low-income census tracts in the assessment area (5.5 percent), reflecting good performance. In 2022, the bank's performance improved to 7.8 percent of small business loans made in low-income census tracts, exceeding both the aggregate lending level (5.0 percent) and the demographic figure (6.4 percent). Therefore, performance in 2022 is considered excellent.

In 2021 the bank originated 15.4 percent of its small business loans in moderate-income census tracts, in line with the 18.2 percent of aggregate small business loans reported in moderate-income census tracts in the assessment area but below the demographic figure (20.5 percent). Performance in 2022 is similarly considered adequate, as the bank's level of lending (19.9 percent) was in line with the performance of peer institutions in the assessment area (18.6 percent) and the percentage of assessment area businesses located in moderate-income census tracts (21.5 percent). Considering performance in both income categories across both years of data, the overall geographic distribution of small business loans is considered good.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 92.4 percent of all assessment area census tracts and 92.9 percent of all LMI geographies. In 2022, the bank had lending activity in 81.8 percent of census tracts in the assessment area and 72.9 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank makes a relatively high level of community development loans in the Lafayette assessment area. As detailed in the table below, the bank made 16 community development loans totaling $33.3 million and 1 PPP loan totaling $2.0 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	4	$8,075	7	$16,625	4	$7,348	1	$1,250	**16**	**$33,298**
PPP Loans	0	$0	0	$0	1	$2,000	0	$0	**1**	**$2,000**

- The bank originated four community development loans totaling $7.3 million that helped to revitalize and stabilize an area of Lafayette targeted for redevelopment by municipal officials. Three of these loans totaling $4.7 million were made to a local government entity for the purpose of acquiring and improving a vacant commercial building in a low-income census tract in Lafayette to be used for government offices. A fourth loan for $2.6 million financed the acquisition and improvement of another vacant commercial building in the same area of Lafayette, which will serve as the main facility for an economic development organization. All of these loans support the Downtown Lafayette Action Plan and Plan Lafayette, municipal plans for redeveloping areas of Lafayette focused on the repurposing of vacant or dilapidated buildings.

- One loan for $8.0 million was made to finance the renovation of an existing 65-unit affordable multifamily housing development for LMI senior citizens in New Iberia, Louisiana. This loan is considered impactful given that it helps to preserve existing affordable housing, a need identified by community contacts.

- The bank made one loan for $10.0 million to a local school district with a majority LMI population to fund renovations and improvements to school facilities in response to the pandemic. The proceeds of the loan help revitalize and stabilize LMI geographies impacted by the national pandemic public health emergency in St. Landry Parish.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the Lafayette assessment area and is often in a leadership position. In total, the bank had $40.4 million in qualified investment, grant, and donation activity through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Lafayette Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$6.5 million	$2.6 million	$9.1 million
LIHTCs	$17.4 million	$12.3 million	$29.7 million
Municipal/Private Bonds	-	$255,621	$255,621
Donations	$586,283	-	$586,283
TOTAL	**$24.5 million**	**$15.9 million**	**$40.4 million**

- The majority of the bank's investments in the assessment area were in LIHTC projects supporting affordable multifamily housing developments. These included investments in two new projects totaling $17.4 million and continued investment in two other LIHTC projects that were originally made in a prior review period but remain outstanding. Together, these projects support the development or preservation of 362 affordable housing units for LMI residents in the assessment area.

- The bank made two donations totaling $200,000 to an economic development and community services nonprofit organization operating in the assessment area. Among other initiatives, the organization focuses on economic development opportunities in rural and underserved communities and disaster recovery efforts. These donations are considered impactful considering their support of disaster recovery efforts, a key community development need in the wake of Hurricane Ida. Additionally, the organization is active in supporting economic development efforts in St. Landry and St. Mary parishes, which contain a number of distressed middle-income census tracts, and the bank's contributions to the organization support these efforts.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Lafayette assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates 16 branches in the Lafayette assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	1	5	6	4	0	**16**
	6.3%	31.3%	37.5%	25.0%	0.0%	**100%**
Census Tracts	7.2%	25.4%	36.5%	28.2%	2.8%	**100%**
Household Population	6.1%	24.5%	36.5%	32.2%	0.7%	**100%**

As shown in the table above, the bank operates six branches in LMI geographies in the assessment area, representing 37.6 percent of its total branches in the assessment area. This figure compares favorably to the percentage of census tracts that are LMI (32.6 percent) and the household population in LMI census tracts in the assessment area (30.6 percent). In addition to these branch locations, the bank operates two LPO locations and three full-service, stand-alone ATMs in the assessment area, which offer additional accessibility to the bank's products and services. Overall, the bank's service delivery systems are readily accessible in the assessment area, particularly to LMI geographies and individuals.

Changes in Branch Locations

During the review period, the bank closed three branch locations in the assessment area, two in moderate-income census tracts and one in a middle-income census tract. As previously described, one of these closed locations was in a moderate-income census tract in Vermilion Parish, the bank's only branch in the parish. Therefore, the bank's record of opening and closing branch locations in the assessment area has generally not adversely affected the accessibility of its service delivery systems, particularly for LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. The bank's branches in the assessment area all operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. The bank also offers Saturday lobby hours from 9:00 a.m. to 12:00 p.m. at six branch locations, two of which are in LMI census tracts. Drive-through facilities are available at all branches in the assessment area and mirror lobby hours, and Saturday drive-through hours at ten branches, three of which are in LMI census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 1,548 hours of community development service activities to 27 different organizations in the Lafayette assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- One employee serves on the board of directors of an affordable housing organization that develops and sells affordable housing to LMI individuals through a structured homeowner program. The activities of this organization are responsive to the assessment area's need for greater affordable housing development noted by community contacts.

- Additionally, eight bank employees provided homebuyer education or credit counseling courses to four different organizations in the assessment area totaling 76 hours of service activities.

- Three bank employees provided 69 hours of technical assistance through the VITA program, which offers tax preparation and consultation services to LMI individuals free of charge.

LAKE CHARLES, LOUISIANA MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAKE CHARLES ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates six (1.4 percent) of its total branches in the Lake Charles assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	1	3	2

In addition to the branch locations in the table above, the bank operates one full-service, stand-alone ATM in a middle-income census tract in the assessment area. Additionally, bank customers have surcharge-free access to two branded stand-alone ATM locations in the assessment area. During the review period, the bank closed one branch in a moderate-income census tract and did not open any branch locations. Based on the bank's branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to the entire assessment area.

General Demographics

The bank's assessment area includes Calcasieu and Cameron parishes, two of the three parishes making up the Lake Charles, LA MSA. The assessment area has a total population of 222,402, which is almost entirely concentrated in Calcasieu Parish (216,785). While Cameron Parish is more rural and sparsely populated, Calcasieu Parish includes the city of Lake Charles, an important hub for commercial activity in southwestern Louisiana.

Of the 18 FDIC-insured depository institutions with a branch presence in the assessment area, First Horizon ranks 1st in deposit market share, encompassing 16.9 percent of total deposit dollars held in the assessment area. As a percentage of the bank's total deposit dollars held across all assessment areas, deposits held in the Lark Charles assessment area represent 1.5 percent of the bank's total deposits. While only 18 depository institutions operate a branch in the assessment area, an analysis of HMDA- and CRA-reportable loan activity shows that 238 financial institutions reported HMDA loan activity and 77 reported CRA loan activity in the assessment area. Of these institutions, First Horizon ranked 11th out of the 238 institutions with reported HMDA activity and 6th out of the 77 institutions with reported CRA loan activity.

This assessment area includes both metropolitan and nonmetropolitan areas and thus has diverse credit needs that include a blend of credit products for individuals and businesses of various income/revenue levels. While community contacts did not point to any specific community development need above others in the assessment area, community development intermediaries such as nonprofit agencies and government assistance entities are available in the assessment area and offer opportunities for participation from financial institutions.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	8	13.1%	4,708	8.7%
Moderate	9	14.8%	8,127	15.0%
Middle	23	37.7%	22,646	41.8%
Upper	17	27.9%	18,473	34.1%
Unknown	4	6.6%	172	0.3%
TOTAL	**61**	**100%**	**54,126**	**100%**

Based on the data in the table above, 27.9 percent of the census tracts in the assessment area are LMI geographies, but only 23.7 percent of the family population resides in these tracts. All LMI geographies in the assessment area are located in Calcasieu Parish, while Cameron Parish has no LMI geographies.

Based on 2020 census data, the median family income for the assessment area was $65,228. At the same time, the median family income for the state of Louisiana was $65,427. More recently, the FFIEC estimates the 2021 and 2022 median family income for the Lake Charles, LA MSA to be $68,400 and $75,000, respectively. The following table displays population percentages of assessment area families by income level compared to the Louisiana family populations.

Family Population by Income Level				
	Assessment Area		**Louisiana**	
Low	12,594	23.3%	274,718	24.6%
Moderate	9,250	17.1%	176,730	15.8%
Middle	9,677	17.9%	198,261	17.8%
Upper	22,605	41.8%	467,043	41.8%
TOTAL	**54,126**	**100%**	**1,116,752**	**100%**

When compared with the data in the first table in this section, a much higher percentage of families in the assessment area are LMI (40.4 percent), than reside in LMI geographies (23.7 percent). The LMI family distribution in the assessment area is closely aligned with the statewide figure, although the percentage of families living below the poverty level is slightly lower in the assessment area (12.7 percent) than at the statewide level (14.2 percent). Considering these factors and income levels, the assessment area appears similarly affluent to the state of Louisiana overall.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Louisiana.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (monthly)**
Assessment Area	$159,593	33.4%	$851
Louisiana	$168,100	30.2%	$876

Based on the data in the table above, homeownership is more affordable in the assessment area than in the state of Louisiana as a whole based on the affordability ratios for each. Within the assessment area, housing is more affordable in Cameron Parish (based on an affordability ratio of 45.8 percent) than in Calcasieu Parish (32.9 percent), though housing is more affordable in each than in the state of Louisiana as a whole. Of note, assessment area demographics indicate that low-income census tracts contained only 2.8 percent of the total owner-occupied housing units in the assessment area in 2021 and 6.0 percent in 2022. Given the limited availability of owner-occupied housing units, opportunities for home lending in these geographies may be limited.

Like home costs, rental costs in the assessment area are also lower than statewide levels, and a lower percentage of renters are cost burdened in the assessment area (43.9 percent) than at the statewide level (46.7 percent), indicating that affordable rental housing is generally more easily attainable in the assessment area.

Industry and Employment Demographics

BLS industry demographics indicate that there are 91,880 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are government (14.5 percent), accommodation and food services (12.5 percent), and manufacturing (12.1 percent). The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to the state of Louisiana.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Louisiana**
2021	5.6%	5.6%
2022	3.5%	3.7%
2023 YTD (September)	3.3%	3.6%

As shown in the table above, unemployment rates in the assessment area were in close alignment with statewide figures in 2021 and 2022 and slightly lower in 2023. The declining trend in unemployment experienced during the review period is largely attributable to a national trend of economic recovery following the initial impacts of the pandemic.

Community Contact Information

For the Lake Charles assessment area, one community contact interview was utilized with an individual representing a small business development organization supporting small businesses in the assessment area. The community contact described the local economy as showing improvement in recent years following the impacts of the pandemic and several significant hurricanes. In support of this claim, the contact pointed to falling unemployment levels, increases in average wages in the Lake Charles MSA, and new business development in Cameron Parish. Data from the BLS confirms the trend of new business development in the assessment area, as the total number of private sector business establishments has risen from 5,485 as of June 30, 2020, to 5,885 as of March 31, 2023. Overall, the assessment area has experienced population growth of 9.8 percent between 2015 and 2020, though this growth has been limited to Calcasieu Parish (10.7 percent population growth), while Cameron Parish has experienced a 16.2 percent decline in population during the same period. The contact further described that housing costs in the assessment area have risen precipitously in recent years but have declined somewhat over the past 12 months, outpacing the national trend for decreases in housing costs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAKE CHARLES ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Lake Charles assessment area.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Leader

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	59	6.1%	$5,517	4.4%
Home Purchase	103	10.7%	$24,838	19.7%
Multifamily Housing	1	0.1%	$276	0.2%
Refinancing	120	12.5%	$25,699	20.4%
Other Purpose LOC	14	1.5%	$1,641	1.3%
Other Purpose Closed/Exempt	3	0.3%	$373	0.3%
Total HMDA	**300**	**31.2%**	**$58,344**	**46.2%**
Small Business	597	62.1%	$65,900	52.2%
Small Farm	65	6.8%	$2,006	1.6%
TOTAL LOANS	**962**	**100.0%**	**$126,250**	**100.0%**

The bank's lending activity in the assessment area represents 1.6 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, the bank operates 1.4 percent of its total branches and holds 1.5 percent of total bank deposits in the assessment area. In 2022, the bank ranked 11th out of 238 lenders in HMDA originations and 6th out of 77 lenders in CRA originations in the assessment area, which demonstrates the bank's willingness to meet the credit needs of the assessment area Therefore, the bank's lending activity levels reflect good responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Lake Charles assessment area based on both loan products reviewed.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is adequate overall.

In 2021, the bank originated 6.7 percent of its HMDA loans to low-income borrowers in the assessment area. This performance exceeded the aggregate lending level of peer institutions in the assessment area (4.7 percent) and was below the percentage of assessment area families who are low income (23.4 percent) and is, therefore, considered good. In 2022, the bank made 2.9 percent of its HMDA loans to low-income borrowers, which lagged both the aggregate lending level (5.2 percent) and the demographic figure (23.3 percent), reflecting poor performance.

In 2021, the bank originated 15.9 percent of its HMDA loans to moderate-income borrowers. This performance exceeded the aggregate lending level of reported HMDA loans in the assessment area (14.1 percent) and was in line with the demographic figure (16.7 percent), reflecting good performance. Conversely, the bank's lending to moderate-income borrowers in 2022 (10.3 percent) was below the performance of peer institutions in the assessment area (15.2 percent) and the demographic figure (17.1 percent) and is considered poor. When considering overall performance across both years of data and in both income categories, the overall borrower distribution of HMDA loans is considered adequate.

Small Business

In 2021, the bank made 49.1 percent of its small business loans to businesses with annual revenues of $1 million or less, which exceeds the aggregate lending level (32.0 percent) but was below the demographic estimate of businesses in the assessment area with this revenue profile (92.2 percent). Additional analysis indicates that a significant portion of the bank's small business lending during the review period consisted of PPP loans made in direct response to the pandemic. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 38.8 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 79.1 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (56.8 percent) is considered adequate when compared to aggregate lending levels (52.2 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (92.1 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of

the bank's performance. When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate based on both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is poor overall.

In 2021, the bank originated 1.2 percent of its HMDA loans in low-income census tracts and 14.0 percent in moderate-income census tracts. This performance was in line with the aggregate lending level of reported HMDA loans in the assessment area (1.4 percent in low-income census tracts in 2021 and 14.7 percent in moderate-income census tracts) but below the percentage of owner-occupied housing units in low-income (2.8 percent) and moderate-income (17.9 percent) census tracts. Therefore, the bank's lending in LMI census tracts in 2021 is considered adequate.

Conversely, the bank's level of HMDA lending in LMI geographies in 2022 is considered poor. The bank originated 2.2 percent of its HMDA loans in low-income census tracts in 2022, which is considered poor in comparison to the performance of peer institutions in the assessment area (3.5 percent) and the demographic figure (6.0 percent). Similarly, the bank's lending in moderate-income census tracts in 2022 (5.1 percent) was below both the aggregate lending level (13.3 percent) and the demographic figure (15.4 percent) and is also considered poor. When evaluating the bank's performance across both years of data reviewed and in both income categories, the bank's overall geographic distribution of HMDA loans is considered poor.

Small Business Lending

The bank's record of lending to small businesses in LMI geographies is considered adequate overall.

In 2021, the bank originated 6.1 percent of its small business loans in low-income census tracts, which exceeded both aggregate lending levels (5.5 percent) and the percentage of businesses in the assessment area located in these geographies (4.9 percent), reflecting excellent performance. In 2022, the bank's performance (7.4 percent) was in line with both the aggregate lending level for reported small business loans in low-income census tracts (8.1 percent) and the demographic figure (7.8 percent), which reflects adequate performance.

The bank's level of lending to small businesses in moderate-income census tracts is considered adequate in both 2021 and 2022. In 2021, the bank's lending level (21.1 percent) was consistent with the performance of peer institutions in the assessment area (24.8 percent) but below the demographic figure (25.9 percent). Given the greater emphasis placed on comparisons to aggregate lending performance, this level of lending from the bank is considered adequate. In 2022, the bank originated 16.3 percent of its small business loans in moderate-income census tracts, which is also

considered adequate in comparison to the aggregate lending level (16.8 percent) and the demographic figure (16.4 percent).

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 91.5 percent of all assessment area census tracts and 93.8 percent of all LMI geographies. In 2022, the bank had lending activity in 85.3 percent of census tracts in the assessment area and 82.4 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Lake Charles assessment area. During the review period, the bank made four community development loans totaling $24.6 million. The bank made one loan totaling $22.4 million to fund the construction of a 120-bed skilled nursing facility in a low-income census tract in the city of Lake Charles. The facility will offer specialized health services primarily to LMI individuals in the assessment area. The bank also renewed a line of credit to a nonprofit healthcare organization three times during the review period, totaling $2.3 million in total credit. The funds from these loans provide working capital to the organization, which is a federally qualified health center offering a variety of healthcare services primarily to LMI individuals in the assessment area.

INVESTMENT TEST

The bank makes a poor level of qualified community development investments and grants within the Lake Charles assessment area. During the review period, the bank made one investment for $251,867 in MBS supporting affordable housing and received credit for one investment made in a prior review period but still outstanding totaling $575,500. In addition to these investments, the bank made ten donations totaling $90,500 to various organizations throughout the assessment area. These included three donations totaling $30,000 to a community service organization offering youth counseling and educational services and a $27,000 donation to an economic development organization focusing on workforce development in southwest Louisiana.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Lake Charles assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level

Accessibility of Delivery Systems

The bank operates six branches in the Lake Charles assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	1	3	2	0	**6**
	0.0%	16.7%	50.0%	33.3%	0.0%	**100%**
Census Tracts	13.1%	14.8%	37.7%	27.9%	6.6%	**100%**
Household Population	9.6%	16.2%	41.5%	32.4%	0.3%	**100%**

In addition to the branch locations shown in the table above, the bank operates one full-service, stand-alone ATM in a middle-income census tract in the assessment area and offers surcharge-free access to two branded ATMs in the assessment area. As shown in the table above, the bank operates one branch in a moderate-income census tract, which represents 16.7 percent of its total branches in the assessment area. This figure falls below the percentage of assessment area census tracts that are LMI (27.9 percent) and the household population in LMI geographies (25.8 percent). However, two of the bank's branches are located in census tracts that border LMI geographies and are accessible to residents of those areas. Overall, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels in the assessment area, particularly those that are LMI.

Changes in Branch Locations

During the review period, the bank closed one branch in a moderate-income census tract and did not open any branches. The closed branch location was in the city of Lake Charles, where the bank still operates four branch locations, one of which is located in a nearby census tract minimizing the overall impact to accessibility in the assessment area. Therefore, changes in branch locations have generally not adversely affected the accessibility of the bank's service delivery systems, particularly to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. The bank's branches in the assessment area all operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. Drive-through facilities are available five of the bank's branches in the assessment area, including the branch in a moderate-income census tract, and offer extended weekday hours from 8:30 a.m. to 6:00 p.m. at four locations. Additionally, three locations offer drive-through banking hours on Saturdays from 9:00 a.m. to 12:00 p.m., including the branch in a moderate-income census tract. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. During the review period, bank employees provided 347 hours of community development service activities to eight different organizations in the Lake Charles assessment area. Of note, 277 of these hours (79.8 percent) were for service activities in which the bank employee serves in a leadership role in the organization, such as a member of the board of directors or a key officer position. Two bank employees serve in leadership roles for the only nonprofit organization focused on economic development in southwest Louisiana, offering services such as technical support, financial literacy, and workforce development. Other organizations served by bank employees in the assessment area include a number of community service organizations that offer financial literacy services, youth counseling and education, and crisis intervention services.

BATON ROUGE, LOUISIANA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BATON ROUGE ASSESSMENT AREA

The bank operates six branches in the Baton Rouge assessment, area which includes East Baton Rouge Parish, one of ten parishes making up the full Baton Rouge, LA MSA. The bank did not open or close any branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	20	21	30	32	5	**108**
	18.5%	19.4%	27.8%	29.6%	4.6%	**100%**
Family Population	12,959	15,948	32,109	36,632	1,139	**98,787**
	13.1%	16.1%	32.5%	37.1%	1.2%	**100%**
Household Population	24,476	27,500	51,024	57,627	4,014	**164,641**
	14.9%	16.7%	31.0%	35.0%	2.4%	**100%**
Business Institutions	2,984	4,609	8,626	10,126	327	**26,672**
	11.2%	17.3%	32.3%	38.0%	1.2%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	24,365	16,186	16,964	41,272	**98,787**
	24.7%	16.4%	17.2%	41.8%	**100%**
Household Population	45,790	25,174	27,115	66,562	**164,641**
	27.8%	15.3%	16.5%	40.4%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BATON ROUGE ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Louisiana (which is based on the full-scope review areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Consistent
OVERALL	**CONSISTENT**

While the bank had a satisfactory level of lending activity in this assessment area, that performance was below the excellent level for the state of Louisiana based on the full-scope review assessment areas. During the review period, the bank made 11 community development loans totaling $26.4 million. These totals include 3 PPP community development loans totaling $5.4 million made in support of small businesses impacted by the pandemic.

INVESTMENT TEST

The bank's investment performance in the Baton Rouge assessment area is consistent with the performance level in the state of Louisiana. The bank had qualified investment activity totaling $3.4 million, $701,006 of which was made in the current review period. Furthermore, 18 donations were made to organizations serving this assessment area totaling $101,795.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the performance in the state of Louisiana (which is based on the full-scope review areas), as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 26 organizations totaling 1,003 service hours, which is consistent with the bank's performance in Louisiana.

MONROE-RUSTON, LOUISIANA CSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MONROE ASSESSMENT AREA

The bank's Monroe assessment area includes Ouachita and Lincoln parishes, two of the five parishes in the full Monroe-Ruston, LA CSA, which combines the four parishes in the Monroe MSA and one adjacent nonMSA parish. The bank operates five branches in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	12	10	14	21	2	**59**
	20.3%	16.9%	23.7%	35.6%	3.4%	**100%**
Family Population	6,463	5,716	12,379	20,273	238	**45,069**
	14.3%	12.7%	27.5%	45.0%	0.5%	**100%**
Household Population	11,845	10,520	20,284	31,228	940	**74,817**
	15.8%	14.1%	27.1%	41.7%	1.3%	**100%**
Business Institutions	892	1,786	2,459	4,111	287	**9,535**
	9.4%	18.7%	25.8%	43.1%	3.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	10,953	6,900	7,289	19,927	**45,069**
	24.3%	15.3%	16.2%	44.2%	**100%**
Household Population	19,580	11,208	12,000	32,029	**74,817**
	26.2%	15.0%	16.0%	42.8%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MONROE ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in state of Louisiana (which is based on the full-scope review assessment areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

While the bank had a satisfactory level of lending activity in this assessment area, that performance was below the excellent level of lending activity for the state of Louisiana based on the full-scope review assessment areas. During the review period, the bank made two community development loans totaling $100,000, both of which provided working capital to a nonprofit workforce development organization in the assessment area.

INVESTMENT TEST

The bank's investment performance in the Monroe assessment area is consistent with the performance level in the state of Louisiana (which is based on the full-scope review areas). The bank had qualified investment activity totaling $10.0 million, $9.1 million of which was made in the current review period. Furthermore, 38 donations were made to organizations serving this assessment area totaling $110,510.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Monroe assessment area, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the Louisiana full-scope review assessment areas. During the review period, bank employees provided community development service activities to 14 organizations totaling 314 service hours, which is below the bank's performance in Louisiana overall.

SHREVEPORT-BOSSIER CITY, LOUISIANA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SHREVEPORT ASSESSMENT AREA

The bank's Shreveport assessment area includes Bossier and Caddo parishes, two of the three parishes in the full Shreveport-Bossier City, LA MSA. The bank operates two branches in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	9	29	32	31	6	**107**
	8.4%	27.1%	29.9%	29.0%	5.6%	**100%**
Family Population	5,031	21,151	27,419	34,041	2,146	**89,788**
	5.6%	23.6%	30.5%	37.9%	2.4%	**100%**
Household Population	9,525	37,745	42,814	52,006	3,553	**145,643**
	6.5%	25.9%	29.4%	35.7%	2.4%	**100%**
Business Institutions	1,160	4,635	4,545	6,466	1,252	**18,058**
	6.4%	25.7%	25.2%	35.8%	6.9%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	22,128	13,224	15,898	38,538	**89,788**
	24.6%	14.7%	17.7%	42.9%	**100%**
Household Population	38,035	22,478	23,092	62,038	**145,643**
	26.1%	15.4%	15.9%	42.6%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SHREVEPORT ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Louisiana (which is based on the full-scope review assessment areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Exceeds
OVERALL	**CONSISTENT**

While the bank had a satisfactory level of lending activity in this assessment area, that performance was below the excellent level of lending activity for the state of Louisiana based on the full-scope review assessment areas. During the review period, the bank renewed a line of credit three times to a nonprofit medical center providing medical services to uninsured and underinsured patients in the assessment area, the majority of whom are LMI. Combined, these loans provided $120.0 million in credit to the medical center. These loans are considered impactful given the dollar amount of credit extended and the impact of the medical center in providing essential services to LMI residents in the assessment area.

INVESTMENT TEST

The bank's investment performance in the Shreveport assessment area is below the performance level in the state of Louisiana (which is based on the full-scope review areas). The bank made no investments in the assessment area during the review period but did receive credit for 14 donations totaling $27,900.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the state of Louisiana, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the Louisiana full-scope review assessment areas. During the review period, bank employees provided community development service activities to nine organizations totaling 164 service hours, which is below the bank's performance in Louisiana overall.

HOUMA-BAYOU CANE-THIBODAUX, LOUISIANA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOUMA ASSESSMENT AREA

The bank's Houma assessment area consists of Terrebonne and Lafourche parishes, which make up the entire Houma-Bayou Cane-Thibodaux, LA MSA. The bank operates one branch in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	3	11	28	16	4	**62**
	4.8%	17.7%	45.2%	25.8%	6.5%	**100%**
Family Population	1,789	8,062	24,163	17,171	1,514	**52,699**
	3.4%	15.3%	45.9%	32.6%	2.9%	**100%**
Household Population	2,738	12,314	36,090	23,771	2,106	**77,019**
	3.6%	16.0%	46.9%	30.9%	2.7%	**100%**
Business Institutions	254	1,371	3,637	2,921	168	**8,351**
	3.0%	16.4%	43.6%	35.0%	2.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	12,573	8,994	9,374	21,758	**52,699**
	23.9%	17.1%	17.8%	41.3%	**100%**
Household Population	20,727	11,606	11,348	33,338	**77,019**
	26.9%	15.1%	14.7%	43.3%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOUMA ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is below the Lending Test performance in the state of Louisiana (which is based on the full-scope review assessment areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Below
Community Development Lending Activity	Below
OVERALL	**BELOW**

While the bank had a satisfactory level of lending activity in this assessment area, that performance was below the excellent level of lending activity for the state of Louisiana based on the full-scope review assessment areas. Conversely, the bank did not make any community development loans in this assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in the Houma assessment area is below the performance level in the state of Louisiana. The bank did not make any investments in the assessment area during the review period but did receive credit for eight donations totaling $104,450.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the state of Louisiana, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the Louisiana full-scope review assessment areas. During the review period, bank employees provided community development service activities to four organizations totaling 62 service hours, which is below the bank's performance in Louisiana overall.

NONMETROPOLITAN LOUISIANA STATEWIDE AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's nonMSA Louisiana assessment area includes Allen Parish in the central-western portion of the state. The bank operates one branch in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	0	1	2	3	1	**7**
	0.0%	14.3%	28.6%	42.9%	14.3%	**100%**
Family Population	0	644	1,901	3,285	41	**5,871**
	0.0%	11.0%	32.4%	56.0%	0.7%	**100%**
Household Population	0	1,113	2,530	4,441	53	**8,137**
	0.0%	13.7%	31.1%	54.6%	0.7%	**100%**
Business Institutions	0	107	210	216	12	**545**
	0.0%	19.6%	38.5%	39.6%	2.2%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	1,169	638	1,071	2,993	**5,871**
	19.9%	10.9%	18.2%	51.0%	**100%**
Household Population	1,634	1,420	894	4,189	**8,137**
	20.1%	17.5%	11.0%	51.5%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's overall lending performance in this assessment area is below the Lending Test performance in the state of Louisiana (which is based on the full-scope review assessment areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Below
Community Development Lending Activity	Below
OVERALL	**BELOW**

While the bank had a satisfactory level of lending activity in this assessment area, that performance was below the excellent level for the state of Louisiana based on the full-scope review assessment areas. Conversely, the bank did not make any community development loans in this assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in the nonMSA Louisiana assessment area is below the performance level in the state of Louisiana. The bank did not make any investments in the assessment area during the review period but did receive credit for two donations totaling $2,500.

SERVICE TEST

The bank's Service Test performance in this assessment area is below the service performance in the state of Louisiana (which is based on the full-scope review areas), as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**BELOW**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the Louisiana full-scope review assessment areas. During the review period, bank employees provided community development service activities to one organization totaling 53 service hours, which is below the bank's performance in Louisiana overall.

NORTH CAROLINA

CRA RATING FOR NORTH CAROLINA: **SATISFACTORY**

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **Low Satisfactory**

The major factors supporting the rating for the state of North Carolina include the following:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the North Carolina assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good penetration throughout the North Carolina assessment areas.
- The bank makes a relatively high level of community development loans in North Carolina.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of the North Carolina assessment areas.
- The bank makes an excellent level of qualified community development investments and grants in the North Carolina assessment areas and is often in a leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the North Carolina assessment areas, particularly LMI geographies or individuals.
- The bank provides a relatively high level of community development services throughout the North Carolina assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the North Carolina assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in six assessment areas in North Carolina: two CSA assessment areas, three MSA assessment areas, and one nonMSA assessment area. Performance in the Raleigh and Greensboro assessment areas was reviewed under full-scope examination procedures. When considering branch structure and loan/deposit activity, CRA performance in the Greensboro assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in North Carolina, two community contact interviews were utilized. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH CAROLINA

The following table gives additional detail regarding the bank's operations within North Carolina.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Greensboro CSA	27	40.3%	$2,024,420	33.5%	Full-Scope
Raleigh CSA	24	35.8%	$2,503,806	41.5%	Full-Scope
Hickory MSA	7	10.4%	$869,832	14.4%	Limited-Scope
Asheville MSA	3	4.5%	$244,364	4.0%	Limited-Scope
Fayetteville MSA	2	3.0%	$100,217	1.7%	Limited-Scope
NonMSA North Carolina	4	6.0%	$294,274	4.9%	Limited-Scope
TOTAL	**67**	**100%**	**$6,036,913**	**100%**	**2 Full-Scope**

The bank operates 67 branches (16.1 percent of total branches) throughout the six CRA assessment areas in the state of North Carolina. Deposits held across the state total $6.0 billion, which represents 9.1 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank operates one LPO location in the Hickory assessment area and 13 stand-alone ATMs. The bank's operations in the state are heavily concentrated in the Greensboro and Raleigh assessment areas, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed ten branches and did not open any branches in North Carolina.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in North Carolina is rated High Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Relatively High Level
Product Innovation	Makes Extensive Use
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect adequate responsiveness to the credit needs of the bank's North Carolina assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Greensboro CSA	Adequate
Raleigh CSA	Poor
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Lending Activity
Hickory MSA	Below
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

As shown in the tables above, lending activity performance varied between the two assessment areas reviewed under full-scope procedures. While performance was considered poor in the Raleigh assessment area, performance in the Greensboro assessment area was adequate and carried more weight toward forming statewide conclusions. Thus, statewide performance is considered adequate.

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Greensboro CSA	Good
Raleigh CSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Hickory MSA	Consistent
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

The overall geographic distribution of loans reflects good penetration throughout the North Carolina assessment areas, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Greensboro CSA	Good
Raleigh CSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Hickory MSA	Above
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

Community Development Lending Activity

Overall, the bank makes a relatively high level of community development loans in North Carolina, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Greensboro CSA	Adequate Level
Raleigh CSA	Leader
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Lending
Hickory MSA	Consistent
Asheville MSA	Below
Fayetteville MSA	Below
NonMSA North Carolina	Below

During the review period, the bank originated or renewed 22 community development loans inside its North Carolina assessment areas totaling $83.8 million. These totals include five PPP community development loans totaling $7.9 million that were made in response to the pandemic. As the bank met the community development lending needs of its own assessment areas, additional consideration was given to community development loans made in North Carolina outside of the bank's assessment areas. As a result, these figures also include one loan totaling $2.1 million made outside of the bank's North Carolina assessment areas but within the state of North Carolina. This loan qualified as economic development by financing the acquisition and renovation of a commercial property that will support the creation of 41 new LMI jobs in a moderate-income census tract.

Product Innovation

The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the North Carolina assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.

The bank's use of flexible and/or innovative lending products in North Carolina includes the following:

- The bank made a considerable number of loans through its various affordable mortgage programs in North Carolina. This included 46 First Horizon Home Start loans totaling $7.5 million, 3 CRA HomeReady loans totaling $743,069, 2 CRA Home Possible loan totaling $407,691, and 10 loans totaling $1.8 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs.

- Through its down payment assistance programs, the bank made 14 grants totaling $86,000 to LMI borrowers or borrowers with property in LMI geographies in its North Carolina assessment areas.

- The bank made five loans totaling $10.2 million to small businesses in North Carolina through SBA loan programs that provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Outstanding. Overall, the bank made an excellent level of qualified community development investments and grants. The investments and grants exhibit good responsiveness to credit and community development needs, and the bank is often in a leadership position. The bank makes significant use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Greensboro CSA	Excellent Level
Raleigh CSA	Excellent Level
OVERALL	**EXCELLENT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Hickory MSA	Below
Asheville MSA	Below
Fayetteville MSA	Below
NonMSA North Carolina	Below

As shown in the table below, the bank had total investment activity of $131.6 million in its North Carolina assessment areas during the review period and $3.5 million in total qualified donations. This represents a significant increase in total qualified investment activity from the $52.9 million qualified at the previous evaluation. Of the total investments made in the bank's North Carolina assessment areas, $106.5 million were new investments made in the current review period, while $25.1 million were made prior to the review period but were still outstanding. The bank made use of a diverse suite of investment types in providing community development investments in North Carolina, including LIHTC projects, equity equivalent investments, MBS, and bonds. The bank's use of innovative or complex investment types in North Carolina further supports the bank's overall Investment Test performance in the state.

North Carolina Assessment Areas	Investments($)	Grants/Donations ($)
Greensboro CSA	$36.0 million	$999,653
Raleigh CSA	$93.2 million	$1.1 million
Hickory MSA	$848,961	$512,544
Asheville MSA	$1.3 million	$167,250
Fayetteville MSA	$245,623	$332,613
NonMSA North Carolina	-	$387,501
OVERALL	**$131.6 million**	**$3.5 million**

As the bank met the community development investment needs of its North Carolina assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $24.2 million in additional investments and donation activity in North Carolina, bringing the total amount of qualified investment activity in the state to $159.7 million. These

investments included a number of municipal bonds supporting affordable housing loans, a continuing investment in a LIHTC project, MBS loans supporting affordable housing for LMI individuals and families, and ongoing equity investment that supports small business and economic development loan funds and affordable housing development funds.

SERVICE TEST

The bank's performance under the Service Test is rated Low Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level
OVERALL	**LOW SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Greensboro CSA	Reasonably Accessible
Raleigh CSA	Accessible
OVERALL	**REASONABLY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Hickory MSA	Exceeds
Asheville MSA	Consistent
Fayetteville MSA	Below
NonMSA North Carolina	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches in North Carolina has generally not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Greensboro CSA	Generally Not Adversely Affected
Raleigh CSA	Not Adversely Affected
OVERALL	**GENERALLY NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Hickory MSA	Consistent
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. While the bank's hours vary slightly between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas. The bank offers the same suite of products throughout its entire branch network.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Greensboro CSA	Do Not Vary in a Way that Inconveniences
Raleigh CSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Hickory MSA	Consistent
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

Community Development Services

The bank provides a relatively high level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Greensboro CSA	Relatively High Level
Raleigh CSA	Relatively High Level
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Services
Hickory MSA	Consistent
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

During the review period, bank employees provided 2,194 hours of community development service activities to 80 different organizations in North Carolina. These figures include 12 hours of community development service activities that benefited a broader statewide area that included the bank's assessment areas or that were made outside of the bank's assessment areas but within North Carolina. Details of the most impactful community development service activities are included in the *Community Development Services* section for each full-scope assessment area.

GREENSBORO–WINSTON-SALEM–HIGH POINT, NORTH CAROLINA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREENSBORO ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 27 (6.5 percent) of its total branches in the Greensboro–Winston-Salem assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
1	4	15	7

In addition to the branch locations shown in the table above, other service delivery systems include four stand-alone, full-service ATMs in the assessment area and two stand-alone, cash-only ATMs. During the review period, the bank closed seven branches in the assessment area, three of which were in moderate-income census tracts. Based on this branch network and other delivery systems, the bank is adequately positioned to deliver financial services to substantially all of the Greensboro assessment area.

General Demographics

The bank's Greensboro assessment area includes the counties listed in the table below. These counties represent eight of the ten counties in the full Greensboro–Winston-Salem–High Point, NC CSA, which combines the three MSAs shown in the table below along with one adjacent nonMSA county.

Composition of the Greensboro Assessment Area		
MSA/NonMSA	**County**	**Population**
Greensboro–High Point MSA	Guilford County	541,299
	Randolph County	144,171
Winston Salem MSA	Davie County	42,712
	Forsyth County	382,590
	Stokes County	44,520
	Yadkin County	37,214
Burlington MSA	Alamance County	171,415
NonMSA	Surry County	71,359

The assessment area has a total population of 1,435,280, most of which is concentrated in Guilford and Forsyth counties, which contain the cities of Greensboro and Winston-Salem, respectively. By comparison, the other counties in the assessment area are less densely populated and range in population size as shown in the table above. From 2015 to 2020, the assessment area experienced overall population growth of 5.1 percent, in line with statewide population growth of 6.0 percent during the same time frame. Within the assessment area, Alamance County experienced the highest

levels of population growth (10.4 percent), while Stokes, Surry, and Yadkin counties experienced slight population loss.

The banking market in the assessment area is relatively competitive, with 29 FDIC-insured depository institutions operating 275 branches in the assessment area. Of these institutions, First Horizon ranks 5th in deposit market share, holding 6.4 percent of total deposit dollars in the assessment area. Deposits held in this assessment area represent 3.0 percent of the bank's total deposits held across all assessment areas. An analysis of reported HMDA and CRA loans reveals high levels of competition for loan activity in the assessment area. In 2022, there were 626 institutions with reported HMDA loan activity in the assessment area and 141 with reported CRA loan activity. First Horizon ranked 35th out of all institutions reporting HMDA loan activity in the assessment area and 20th out of institutions with reported CRA loan activity.

The assessment area is diverse and includes metropolitan and nonmetropolitan areas. Thus, the assessment area has a need for a blend of credit products for individuals and businesses of various income/revenue levels. Community contacts with knowledge of the credit and community development needs of the assessment area also noted the restoration or preservation of existing affordable housing stock, financing for infrastructure improvements such as water and sewer lines, and enhanced credit offerings for small businesses as specific needs in the assessment area. Contacts also indicated that there are opportunities to collaborate with local entities such as economic development organizations, nonprofit agencies, and government intermediaries on community development projects.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	31	8.9%	21,279	5.9%
Moderate	72	20.7%	66,895	18.6%
Middle	144	41.5%	159,001	44.3%
Upper	97	28.0%	110,603	30.8%
Unknown	3	0.9%	988	0.3%
TOTAL	**347**	**100%**	**358,766**	**100%**

As shown above, 29.6 percent of the census tracts in the assessment area are LMI geographies but only 24.5 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the cities of Greensboro, Winston-Salem, and High Point.

Based on 2020 census data, the median family income for the assessment area was $66,552. At the same time, the median family income for the state of North Carolina was $70,978. More recently, the FFIEC estimates the 2021 median family income for the Greensboro–High Point, NC MSA to be $65,200 in 2021 and $70,300 in 2022, while the same figures for the Winston-Salem, NC MSA were $65,400 in 2021 and $74,800 in 2022. The following table displays population percentages of assessment area families by income level compared to the North Carolina family populations.

Family Population by Income Level				
	Assessment Area		North Carolina	
Low	76,919	21.4%	566,071	21.6%
Moderate	61,602	17.2%	461,707	17.6%
Middle	68,774	19.2%	526,405	20.1%
Upper	151,471	42.2%	1,070,872	40.8%
TOTAL	**358,766**	**100%**	**2,625,055**	**100%**

When compared with the data in the first table in this section, a much higher percentage of families in the assessment area are LMI (38.6 percent) than reside in LMI census tracts (24.5 percent). Overall, the distribution of families by income level in the assessment area is closely aligned with the statewide distribution. However, a higher percentage of families in the assessment area are below the poverty level (11.2 percent) than in the state of North Carolina (10.0 percent). Considering these factors and income levels, the assessment area is slightly less affluent than the state of North Carolina overall.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of North Carolina.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$159,078	33.2%	$835
North Carolina	$182,100	31.1%	$932

Based on the data in the preceding table, housing in the assessment area is more affordable than in the state of North Carolina overall, including rental housing. This holds true even when accounting for income levels, as evidenced by a higher affordability ratio for the assessment area compared to the statewide figure. Housing affordability in the assessment area is relatively consistent, as each county in the assessment area has a higher affordability ratio than the statewide figure. While housing costs in the assessment area are generally more affordable than statewide levels, LMI residents may nevertheless face challenges in attaining homeownership.

For example, the median age of housing stock in the assessment area is 43 years, which is significantly older than the statewide median age of housing stock, 32 years. As older homes are often more costly to maintain, such circumstances in the assessment area may render otherwise affordable housing options unaffordable to many LMI residents. This issue is even more pronounced in LMI census tracts, as the median age of housing stock increases to 56 years in low-income census tracts and 48 years in moderate-income census tracts. Community contacts also identified that the aging affordable housing stock in the assessment area may present challenges to LMI borrowers in particular, pointing to affordable home improvement loans and newer affordable housing development as particular credit and community development needs in the assessment area.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 644,301 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (15.6 percent), manufacturing (12.5 percent), and retail trade (11.8 percent). Additionally, small businesses are a vital component to the assessment area's economy, as evidenced by the fact that 91.8 percent of businesses in the assessment area reported annual revenues of $1.0 million or less in 2022. The table below details unemployment data from the BLS (not seasonally adjusted) for the assessment area and North Carolina overall.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**North Carolina**
2021	5.1%	4.9%
2022	3.8%	3.7%
2023 YTD (September)	3.6%	3.5%

As shown in the table above, unemployment rates in the assessment area were in close alignment with statewide figures during the review period, with both experiencing a decreasing trend. Unemployment levels within the assessment area varied somewhat with Guilford County consistently having the highest levels of unemployment, reaching an annual high of 5.7 percent in 2021.

Community Contact Information

For the Greensboro assessment area, one community contact interview was utilized with an individual representing an economic development organization operating in the nonMSA portion of the assessment area. The community contact described the assessment area economy as growing, though not to the same degree as other nearby urban areas. Demographically, the contact noted that the assessment area has an aging population with many younger residents relocating to nearby urban areas. Regarding housing in the assessment area, the community contact stated that affordable housing is available in the assessment area, but much of the housing stock is aging and in poor condition. The contact further explained that many organizations in the assessment area have been active in trying to address this issue by attempting to develop new affordable housing, including affordable rental housing, and by improving existing affordable housing stock. Given the need for maintaining or improving existing housing stock, affordable home improvement loans are a notable credit need in the assessment area. Other community development needs identified by the community contact include financing infrastructure projects, such as sewer and water line enhancements, and enhanced credit offerings to small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREENSBORO ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Greensboro–Winston-Salem assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	86	4.7%	$8,581	3.6%
Home Purchase	180	9.8%	$52,212	21.7%
Multifamily Housing	4	0.2%	$6,473	2.7%
Refinancing	275	15.0%	$55,416	23.0%
Other Purpose LOC	66	3.6%	$7,657	3.2%
Other Purpose Closed/Exempt	8	0.4%	$1,456	0.6%
Purpose Not Applicable	1	0.1%	$54	0.0%
Total HMDA	**620**	**33.8%**	**$131,849**	**54.7%**
Small Business	1,177	64.2%	$107,889	44.7%
Small Farm	35	1.9%	$1,391	0.6%
TOTAL LOANS	**1,832**	**100.0%**	**$241,129**	**100.0%**

The bank's lending activity in the assessment area represents 3.1 percent of the bank's combined 2021 and 2022 HMDA and CRA loans made across all assessment areas. This percentage is closely aligned with the percentage of total bank deposits that are held in the assessment area (3.0 percent) but is below the percentage of total bank branches operated in this assessment area (6.5 percent). As previously noted, the bank ranks 35th out of 626 institutions with HMDA lending activity and 20th out of 141 institutions with CRA lending activity in the assessment area. Overall, the bank's lending activity levels reflect adequate responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Greensboro assessment area, based on the performance from both loan products reviewed.

HMDA Lending

The bank originated 12.1 percent of its HMDA loans to low-income borrowers in 2021, which more than doubled the percentage of aggregate reported HMDA loans made to low-income borrowers by other lenders in the assessment area but was below the demographic figure (21.7 percent). While the gap between the bank's performance and the demographic figure is large, a significant portion of borrowers in this demographic are unlikely to qualify for a home mortgage loan given the overall poverty level of 11.2 percent in the assessment area. Given this context and the bank's performance relative to other lenders in the assessment area, the bank's distribution of HMDA loans to low-income borrowers is considered excellent in 2021. Likewise, the bank's performance in 2022 is considered excellent given that it substantially outperformed peer institutions in the assessment area (13.1 percent versus 6.9 percent of HMDA loans originated to low-income borrowers).

In 2021, the bank originated 19.4 percent of its HMDA loans to moderate-income borrowers. This performance exceeded that of peer institutions in the assessment area (16.8 percent) and was in line with the percentage of assessment area families who were moderate-income (17.6 percent), reflecting good performance. In 2022, the bank's lending to moderate-income borrowers (19.0 percent) was in line with the aggregate lending level (18.4 percent) but exceeded the demographic figure (17.2 percent), reflecting good performance.

Overall, when considering the bank's performance in both income categories across both years of data reviewed, the bank's distribution of HMDA loans by borrower's income level is considered good.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the distribution of small business loans by borrower's profile is good. In 2021, the bank made 33.2 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (48.5 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.7 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 57.0 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 88.0 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level

of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (55.9 percent) is considered adequate when compared to aggregate lending levels (53.4 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.8 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance. When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good based on the performance of both loan products reviewed.

HMDA Lending

The bank's distribution of HMDA loans reflects adequate penetration among geographies of different income levels, particularly LMI geographies.

In 2021, the bank originated 1.8 percent of its HMDA loans in low-income census tracts, which is in line with aggregate lending levels (1.4 percent) and the percentage of owner-occupied housing units in low-income geographies (2.3 percent). Therefore, the bank's performance is considered adequate. The bank's performance is also considered adequate in 2022, as the percentage of HMDA loans the bank made in low-income census tracts (2.4 percent) was in line with the performance of peer institutions in the assessment area (3.4 percent) and the demographic figure (3.3 percent).

In 2021, the bank originated 12.7 percent of its HMDA loans in moderate-income census tracts, which compared closely to the performance of peer institutions in the assessment area (13.4 percent) but was below the demographic figure of 17.9 percent. Considering the bank's performance relative to other lenders in the assessment area, this performance is considered adequate. Lending in moderate-income tracts in 2022 is also considered adequate, as the bank's performance (15.9 percent) was in line with both the aggregate lending level (14.9 percent) and the percentage of owner-occupied housing units located in moderate-income census tracts (15.3 percent).

Small Business Lending

The distribution of the bank's small business loans by geography income level is good overall.

The bank's lending to business located in low-income census tracts in 2021 (4.3 percent) exceeded that of peer institutions in the assessment area (3.7 percent) and was in line with the percentage of assessment area businesses located in these geographies, reflecting good performance. In 2022, the bank made a higher percentage of its small business loans in low-income census tracts (6.2

percent) than in 2021, though the bank's performance was more closely aligned with aggregate lending levels (6.7 percent) and the demographic figure (6.9 percent). Therefore, the bank's performance in 2021 is considered adequate.

In 2021, the bank originated 23.6 percent of its small business loans in moderate-income census tracts. This level of lending is considered excellent when compared to the aggregate percentage of small business loans made in these geographies (20.4 percent) and the demographic figure (20.9 percent). Similarly, the bank's lending to businesses in moderate-income census tracts in 2022 (21.0 percent) compared favorably to the performance of other lenders in the assessment area (17.5 percent) and was in line with the percentage of assessment area businesses located in these geographies (18.1 percent), which is also considered excellent.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 88.2 percent of all assessment area census tracts and 82.5 percent of all LMI geographies. In 2022, the bank had lending activity in 62.5 percent of census tracts in the assessment area and 56.3 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the Greensboro assessment area. As detailed in the table below, the bank made three community development loans totaling $8.9 million and three PPP community development loans totaling $3.9 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	1	$1,425	2	$7,500	0	$0	0	$0	**3**	**$8,925**
PPP Loans	0	$0	0	$0	3	$3,873	0	$0	**3**	**$3,873**

- Two loans totaling $7.5 million were made as part of the financing for an NMTC project to fund the construction of a new distribution center for a food bank in Winston-Salem. These loans are considered impactful given the significant number of LMI individuals who are served by the organization.

- Three PPP community development loans totaling $3.9 million were made to businesses to provide emergency relief during the pandemic, aiding them in sustaining 394 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents in relation to the global pandemic.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $37.0 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Greensboro Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$8.2 million	$145,380	$8.3 million
LIHTCs	$9.5 million	$6.3 million	$15.8 million
NMTCs	$5.8 million	-	$5.8 million
Municipal/Private Bonds	-	$6.0 million	$6.0 million
Donations	$999,653	-	$999,953
TOTAL	**$24.5 million**	**$12.5 million**	**$37.0 million**

- The bank invested in one new LIHTC project with a total commitment of $9.5 million and continues to invest in another project with an outstanding value of $6.3 million. The new LIHTC development will include 84 units of affordable multifamily rental housing, all of which are designated for low-income individuals at or below 60.0 percent of the area median family income. This investment is considered responsive to the need for new affordable housing development identified by community contacts and is impactful in increasing affordable housing availability for low-income renters in the assessment area.

- The bank invested $5.8 million in NMTC funds in a project to build a distribution center for a food bank that offers a variety of community services to LMI individuals across an 18-county area in North Carolina, including the counties in this assessment area. The facility, which will be located in a moderate-income census tract in Winston-Salem, will facilitate food distribution across the organization's network and supports the organization's other initiatives, such as workforce development training and health and nutrition education and outreach.

- First Horizon has an extensive partnership with an organization that provides financial literacy training and small business counseling services to LMI youth and adults in the assessment area. The bank contributes office space at two of its branch locations in the assessment area for financial coaches of the organization to operate out of; the dollar value of these in-kind contributions of property during the review period totaled $63,553. In addition, the bank made seven donations to the organization totaling $721,000, which supported salaries and operating costs for financial coaches to operate at First Horizon's branch locations. The bank's partnership with the organization allows it to serve more individuals in the assessment area by operating out of a number of locations, and the bank's financial contributions allow the organization to more flexibly allocate its resources to expand the impact of its operations.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Greensboro assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

The bank operates 27 branches in the Greensboro assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate**	**Middle-**	**Upper-**	**Unknown-**	
Branches	1	4	15	7	0	**27**
	3.7%	14.8%	55.6%	25.9%	0.0%	**100%**
Census Tracts	8.9%	20.7%	41.5%	28.0%	0.9%	**100%**
Household Population	6.9%	19.4%	43.8%	29.5%	0.4%	**100%**

As shown above, the bank operates five, or 18.5 percent, of its branches in LMI geographies. This percentage is below the portion of census tracts in the assessment area that are LMI (29.6 percent) and the household population in those census tracts (26.3 percent). While not captured as LMI branches in the table above, two bank branches that were previously located in LMI census tracts were reclassified into non-LMI census tracts due to census changes in 2022. Both of these branches, while not located in LMI census tracts as of the examination date, were located in LMI geographies for a portion of the review period and are adjacent to other LMI geographies in the assessment area. In addition to these branches, six other bank branches border or are located in close proximity to LMI census tracts in the assessment area and are accessible to residents of those areas. Considering these factors, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank closed seven branches and did not open any branch locations. Of the closed branch locations, three were in moderate-income census tracts, three were in middle-income census tracts, and one was in an upper-income census tract. The three closed branches in moderate-income census tracts were located in less densely populated areas surrounding the urban cores of the assessment area, and ultimately, the bank's branch network remains accessible to the vast majority of LMI geographies and residents in the assessment area. Thus, changes in branch

locations have generally not adversely affected the accessibility of the bank's service delivery systems, particularly to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. The bank also offers Saturday lobby hours from 9:00 a.m. to 1:00 p.m. at one branch located in a moderate-income census tract. Drive-through facilities are located at all but one branch in the assessment area, including all five of the bank's branches in LMI census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, bank employees provided 597 hours of community development service activities to 23 different organizations in the Greensboro assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service and economic development organizations in the assessment area.

These community development services included the following noteworthy activities:

- The majority of the bank's community development service hours in the assessment area were focused on financial literacy training delivered to various schools and nonprofit community service organizations in the assessment area. The bank's financial literacy efforts in the assessment area consisted of 363 hours of service activities provided to 15 different organizations.

RALEIGH-DURHAM–CARY, NORTH CAROLINA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RALEIGH ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 24 (5.8 percent) of its total branches in the Raleigh assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	6	6	12

During the review period, the bank closed one branch in a middle-income census tract and did not open any branches. Based on the bank's branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to the entire assessment area.

General Demographics

The bank's Raleigh assessment area consists of six counties. Chatham, Durham, Orange, Person, and Wake counties represent five of the ten counties in the full Raleigh-Durham–Cary, NC CSA, which combines the Durham-Chapel Hill, NC MSA and Raleigh-Cary, NC MSA, along with three nonMSA counties. The sixth county in the assessment area, Granville County, is contiguous to the CSA, and it was a part of the CSA prior to the 2023 Office of Management and Budget revised delineations. The assessment area has a total population of 1,779,313, most of which is concentrated in Wake County (1,129,410), which includes the cities of Raleigh and Cary. Between 2015 and 2020, the assessment area experienced population growth of 13.5 percent, which outpaced statewide population growth in North Carolina (6.0 percent) during the same time frame. As the state capital and most populous city, Raleigh functions as a key commercial and banking hub for surrounding counties. The assessment area also hosts several large universities, including North Carolina State University (38,442 students), the University of North Carolina at Chapel Hill (32,234 students), and Duke University (16,840 students), located in the cities of Raleigh, Chapel Hill, and Durham, respectively. The geographic area between these institutions, commonly referred to as "the Research Triangle," contains Research Triangle Park, a prominent technology research and development site that is home to numerous research facilities, laboratories, and technology companies.

The banking market in the assessment area is highly competitive, with 39 FDIC-insured depository institutions operating 343 branches throughout the assessment area. While a significant number of depository institutions operate in the assessment area, deposits are highly concentrated, with three institutions holding 69.4 percent of total deposit dollars in the assessment area. Of these institutions, First Horizon ranks 7th in deposit market share, with 2.6 percent of total deposit dollars held in the assessment area. Deposits held in the Raleigh assessment area represent 3.8 percent of the bank's total deposits held across all assessment areas.

While only 39 depository institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity in the assessment area, indicative of a competitive lending market. An analysis of 2022 HMDA-reportable loans shows that 733 institutions reported loan activity in the assessment area, of which First Horizon ranked 46th in total loan activity. Of the 162 institutions with reported CRA loan activity in the assessment area, First Horizon ranked 26th in total loan activity.

This assessment area covers a metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. Community contacts noted specific credit-related needs in the assessment area, including small-dollar loans for businesses and continued affordable housing development. Contacts also indicated that there are ample opportunities to collaborate with local organizations on community development projects such as participation in affordable housing funds and public transit infrastructure projects.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	29	7.6%	23,862	5.6%
Moderate	76	19.9%	81,856	19.2%
Middle	122	32.0%	148,328	34.9%
Upper	141	37.0%	167,171	39.3%
Unknown	13	3.4%	4,265	1.0%
TOTAL	**381**	**100%**	**425,482**	**100%**

As shown above, 27.5 percent of census tracts in the assessment area are designated as LMI, while 24.8 percent of the family population in the assessment area resides in those tracts. These LMI geographies are concentrated around the cities of Raleigh and Durham. Additionally, the immediate areas surrounding the previously noted universities in the assessment area contain a number of LMI census tracts due to high concentrations of student housing. Opportunities for HMDA lending in these areas are generally limited due to a low availability of owner-occupied housing units.

Based on 2020 census data, the median family income for the assessment area was $97,058. At the same time, the median family income for the state of North Carolina was $70,978. More recently, the FFIEC estimates the 2021 median family income for the Raleigh-Cary, NC MSA to be $95,700 in 2021 and $110,100 in 2022, while the same figures for the Durham-Chapel Hill, NC MSA were $81,500 in 2021 and $92,900 in 2022. The following table displays population percentages of assessment area families by income level compared to the North Carolina family populations.

Family Population by Income Level				
	Assessment Area		North Carolina	
Low	88,671	20.8%	566,071	21.6%
Moderate	67,835	15.9%	461,707	17.6%
Middle	84,758	19.9%	526,405	20.1%
Upper	184,218	43.3%	1,070,872	40.8%
TOTAL	**425,482**	**100%**	**2,625,055**	**100%**

When compared with the data in the first table in this section, a much higher percentage of families in the assessment area are LMI (36.7 percent) than reside in LMI census tracts (24.8 percent). When compared to North Carolina as a whole (39.2 percent), a lower percentage of families in the assessment area are classified as LMI. Furthermore, a lower percentage of families in the assessment area are below the poverty level (6.7 percent) than in North Carolina as a whole (10.0 percent). Considering these factors and income levels, the assessment area is more affluent than the state of North Carolina.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of North Carolina.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent**
Assessment Area	$281,003	27.1%	$1,155
North Carolina	$182,100	31.1%	$932

Based on the data in the table above, homeownership is less affordable in the assessment area than in the state of North Carolina as a whole. This holds true even when accounting for income levels in the assessment area, given the lower affordability ratio for the assessment area compared to the statewide figure. Within the assessment area, homeownership is least affordable in Chatham and Orange counties based on their respective affordability ratios of 22.5 percent, while housing is most affordable in Person County (42.8 percent).

As noted by community contacts, affordable housing development is a great need in the assessment area, and access to affordable housing may be challenging for many LMI residents. The community contact described that housing costs have increased significantly in the assessment area and have become increasingly unaffordable to many residents, particularly LMI residents. Additional housing data shows that the median housing value in the assessment area increased by 26.8 percent from 2015 through 2020, which significantly outpaced the growth in median housing value for the entire state of North Carolina (17.6 percent). While this trend impacts the assessment area as a whole, the need for greater affordable housing development is further heightened in LMI geographies in particular, based on a relatively low availability of owner-occupied housing in these geographies. Of the total available housing units in LMI geographies, only 26.4 percent of housing units in low-income census tracts and 51.6 percent of units in moderate-income census tracts are owner occupied, which further limits opportunities for homeownership in these areas.

Similar to housing costs, rental costs in the assessment area exceed statewide levels based on median gross rental figures. When factoring in income levels, 43.5 percent of renters in the assessment area are considered cost burdened, with rental costs exceeding 30.0 percent of their total income, which also exceeds the statewide figure of 42.7 percent. Specific to LMI renters, 79.0 percent of low-income and 37.0 percent of moderate-income renters have rental costs exceeding 30.0 percent of their income. These percentages suggest that significant portions of the LMI population in the assessment area may have difficulty saving for a down payment for a home given high rental costs relative to income levels, which presents further challenges to attaining homeownership for many LMI residents.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 982,180 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are government (15.3 percent), healthcare and social assistance (12.4 percent), and professional and technical services (12.0 percent). As previously noted, the assessment area contains several large universities and a prominent technology and scientific research industry. Businesses related to professional and technical services represent 21.9 percent of total business establishments in the assessment area, demonstrating the importance of this sector to the assessment area's overall economy. The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to the state of North Carolina as a whole.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**North Carolina**
2021	4.1%	4.9%
2022	3.1%	3.7%
2023 YTD (September)	3.0%	3.5%

As shown in the table above, unemployment rates in the assessment area remained lower than statewide figures throughout the review period. Unemployment levels were fairly consistent within the assessment area but were consistently highest in Person County, reaching an annual high of 5.2 percent in 2021. Both the assessment area and state of North Carolina experienced a decreasing trend of unemployment during the review period that is attributable in part to a nationwide trend of economic recovery following the initial impacts of the pandemic.

Community Contact Information

For the Raleigh assessment area, one community contact was conducted with an individual representing an economic development and community services nonprofit organization operating in the assessment area. The community contact noted that the assessment area as a whole has experienced continued growth both in terms of population and business development. The contact went on to explain, however, that despite relatively high income levels in the assessment area, many residents struggle with the cost of living, due in part to increasing housing costs (described in more detail in the *Housing Demographics* section for this assessment area). As housing costs in the assessment area have risen, many smaller housing developers and construction companies that were more likely to build affordable housing have been bought out or merged with other

developers, which has slowed the development of new affordable housing, according to the contact. Thus, the need for new affordable housing development has increased in the assessment area and is a key community development need. The contact noted that opportunities for financial institutions to help address this need are available, including through participation in an affordable housing preservation and gap fund for Wake County. The contact also pointed to early capital investment in small businesses and small-dollar loans for small businesses as specific business credit needs in the assessment area, noting that the assessment area has a high volume of new startup businesses and small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RALEIGH ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Raleigh assessment area.

Lending Test Summary	
Lending Activity	Poor
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Leader

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	133	8.5%	$21,272	6.0%
Home Purchase	171	11.0%	$74,431	21.1%
Multifamily Housing	3	0.2%	$50,601	14.3%
Refinancing	287	18.4%	$76,057	21.6%
Other Purpose LOC	52	3.3%	$9,817	2.8%
Other Purpose Closed/Exempt	10	0.6%	$3,936	1.1%
Total HMDA	**656**	**42.1%**	**$236,114**	**66.9%**
Small Business	890	57.1%	$115,788	32.8%
Small Farm	14	0.9%	$776	0.2%
TOTAL LOANS	**1,560**	**100.0%**	**$352,678**	**100.0%**

The bank's lending activity in the assessment area represents 2.6 percent of the bank's combined 2021 and 2022 HMDA and CRA loans made across all assessment areas. This level of lending activity falls below the percentage of total bank branches operated in the assessment area (5.8 percent) and the percentage of total bank deposits held in the assessment area (3.8 percent). Overall, the bank's lending activity levels reflect poor responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Raleigh assessment area based on the performance of both loan products reviewed.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is excellent overall.

The bank originated 13.4 percent of its HMDA loans to low-income borrowers in 2021, which more than doubled the aggregate percentage of reported HMDA loans made to low-income borrowers in the assessment area (5.2 percent). While the bank's performance was below the percentage of assessment area families who are low income (21.1 percent), a significant portion of this demographic is unlikely to qualify for a home mortgage loan given the overall poverty level of 7.7 percent in the assessment area and the challenges that high housing costs present to low-income borrowers in the assessment area, as discussed in the *Housing Demographics* section. Considering these factors and the bank's strong performance relative to peer institutions in the assessment area, the bank's performance is considered excellent in 2021. Similarly, the bank's performance in this income category in 2022 is considered excellent, as the bank's level of lending (12.6 percent) was below the demographic figure (20.8 percent) but far exceeded the performance of peer institutions in the assessment area (6.6 percent).

In 2021, the bank originated 16.9 percent of its HMDA loans to moderate-income borrowers. This performance exceeded that of peer institutions in the assessment area (14.9 percent) and was in line with the percentage of assessment area families who are moderate income (16.3 percent), reflecting good performance. The bank's performance in 2022 (18.1 percent) is considered excellent, as it exceeded both aggregate lending performance (16.4 percent) and the demographic figure (15.9 percent).

Small Business

In 2021, the bank made 33.6 percent of its small business loans to businesses with annual revenues of $1 million or less, which was in line with the aggregate lending level (47.4 percent) but below the demographic estimate of businesses in the assessment area with this revenue profile (93.0 percent). While the bank's performance initially appears comparable to peer lending levels in the assessment area, additional analysis indicates that a significant portion of the bank's small business lending during the review period consisted of PPP loans made in direct response to the pandemic. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue.

Further analysis indicated that 49.5 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 76.9 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (45.0 percent) is considered adequate when compared to aggregate lending levels (52.1 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (93.0 percent). Compared to 2021, a significantly smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance.

When considering the bank's performance across both years of data reviewed, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good based on the performance of both loan products reviewed.

HMDA Lending

The bank's geographic distribution of HMDA loans is good overall.

In 2021, the bank originated 3.9 percent of its HMDA loans in low-income census tracts in the assessment area. This performance exceeded that of peer institutions in the assessment area (2.4 percent) and the percentage of owner-occupied housing units located in these geographies (2.4 percent), reflecting excellent performance. Of the bank's total HMDA loans in low-income geographies, 66.7 percent were home purchase loans, which are considered particularly impactful given the low availability of owner-occupied housing units in these geographies. The bank's lending in low-income census tracts in 2022 is considered adequate, as the percentage of the bank's HMDA loans made in these geographies (2.9 percent) was closely aligned with the aggregate lending level (3.4 percent) and the demographic figure (3.2 percent).

The bank originated 18.6 percent of its HMDA loans in moderate-income census tracts in 2021, which exceeded the performance of peer institutions in the assessment area (15.5 percent) and was in line with the percentage of owner-occupied housing units located in these census tracts (19.3 percent). Therefore, the bank's performance is considered good. In 2022, the bank made 17.5 percent of its HMDA loans in moderate-income census tracts, which is considered adequate when compared with the similar performance of peer lenders in the assessment area (17.2 percent) and the demographic figure (17.8 percent).

Small Business Lending

The percentage of small business loans originated in low-income census tracts in 2021 (3.2 percent) was in line with the percentage of aggregate reported small business loans in these geographies (4.4 percent) and the percentage of assessment area businesses operating in these geographies (4.9 percent), reflecting adequate performance. In 2022, the bank made a higher percentage of its small business loans in low-income census tracts (6.1 percent), which exceeded both the aggregate lending level (4.8 percent) and the demographic figure (5.2 percent), reflecting excellent performance.

The bank originated 18.3 percent and 19.1 percent of its small business loans in moderate-income census tracts in 2021 and 2022, respectively. The bank's performance in 2021 was in line with the performance of peer institutions in the assessment area (18.9 percent) and the demographic figure (19.9 percent) and is therefore considered adequate. In 2022, the bank's level of lending in moderate-income census tracts exceeded the aggregate lending figure (17.4 percent) and the demographic figure (17.3 percent), reflecting good performance.

When considering the bank's performance across both years of data reviewed, the bank's geographic distribution of small business loans is good overall.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 84.4 percent of all assessment area census tracts and 82.6 percent of all LMI geographies. In 2022, the bank had lending activity in 58.8 percent of census tracts in the assessment area and 48.6 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Raleigh assessment area. As detailed in the table below, the bank made 11 community development loans totaling $64.6 million and one PPP community development loan totaling $2.0 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	9	$61,049	2	$3,550	0	$0	0	$0	**11**	**$64,599**
PPP Loans	0	$0	0	$0	1	$2,000	0	$0	**1**	**$2,000**

- The bank made one loan for $15.0 million to a CDFI administering the Wake County Affordable Housing Preservation Fund, a municipally sponsored affordable housing fund providing grants and funds for the preservation of existing affordable housing stock and the construction of new affordable housing developments in Wake County. This housing fund was specifically identified by a community contact as an opportunity for financial institutions in the assessment area to address affordable housing needs. The bank's loan is considered responsive to these community development needs and is considered particularly impactful given the overall impact that the housing fund will have on affordable housing availability in Wake County.

- In addition to the aforementioned loan, most of the bank's remaining community development loans made in the assessment area supported affordable housing. The bank made eight additional affordable housing loans, which totaled $46.0 million and included five affordable multifamily housing (LIHTC) developments. Together, these projects supported the development or preservation of 773 affordable multifamily housing units designated for LMI residents. Given the assessment area's need for affordable housing

development, including affordable rental housing, these loans are considered responsive to community development needs in the assessment area and are impactful given the total number of affordable housing units supported.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area and is often in a leadership position. In total, the bank made $94.3 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Raleigh Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$17.6 million	$901,944	$18.5 million
LIHTCs	$64.0 million	-	$64.0 million
Municipal/Private Bonds	-	$10.8 million	$10.8 million
Donations	$1.1 million	-	$1.1 million
TOTAL	**$82.7 million**	**$11.7 million**	**$94.3 million**

- The bank made investments in four new LIHTC projects in the assessment area with commitments totaling $64.0 million. Together, these developments will provide 674 new affordable multifamily housing units for rent in the assessment area. As noted by community contacts and in the *Housing Demographics* section for this assessment area, new affordable housing development is a pressing need in the assessment area, and these investments are considered responsive to that need.

- First Horizon has an extensive partnership with an organization that provides financial literacy training and small business counseling services to LMI youth and adults in the assessment area. The bank contributes office space at two of its branch locations in the assessment area for financial coaches of the organization to operate out of; the dollar value of these in-kind contributions of property during the review period totaled $77,531. In addition, the bank made six donations to the organization totaling $614,000, which supported salaries and operating costs for financial coaches to operate at First Horizon's branch locations. The bank's partnership with the organization allows it to serve more individuals in the assessment area by operating out of a number of locations, and the bank's financial contributions allow the organization to allocate its resources more flexibly to expand the impact of its operations.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Raleigh assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

The bank operates 24 branches in the Raleigh assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	6	6	12	0	**24**
	0.0%	25.0%	25.0%	50.0%	0.0%	**100%**
Census Tracts	7.6%	19.9%	32.0%	37.0%	3.4%	**100%**
Household Population	6.8%	20.0%	35.0%	37.0%	1.2%	**100%**

As shown in the table above, the bank operates six branches, or 25.0 percent of its total branches, in LMI census tracts in the assessment area. This percentage is closely aligned with the distribution of LMI census tracts (27.5 percent) and the household population within LMI census tracts in the assessment area (26.8 percent). While not captured as LMI branches in the table above, three bank branches that were previously located in LMI census tracts were reclassified into non-LMI census tracts due to census changes in 2022. Both of these branches, while not located in LMI census tracts as of the examination date, were located in LMI geographies for a portion of the review period and are adjacent to other LMI geographies in the assessment area. Overall, the bank's service delivery systems are accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank closed one branch and did not open any branch locations. The closed branch location was in a middle-income census tract in the city of Hillsborough, where the bank still operates a branch location less than 2.0 miles from the closed location. Therefore, changes in branch locations have not adversely affected the accessibility of the bank's service delivery systems, particularly to LMI geographies or individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. Saturday lobby hours are offered from 9:00 a.m. to 1:00 p.m. at 1 branch location in a moderate-income census tract. The bank also operates drive-through facilities at 21 branches in the assessment area, including 5 in LMI census tracts. Lastly, lenders are equally dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, bank employees provided 565 hours of community development service activities to 18 different organizations in the Raleigh assessment area. Bank employees provided financial literacy and technical training to LMI individuals and businesses and served in leadership positions for a variety of community service, economic development, and affordable housing organizations in the assessment area.

These community development services included the following noteworthy activities:

- The majority of the bank's community development service hours in the assessment area were focused on financial literacy training delivered to various schools and nonprofit community service organizations in the assessment area. The bank's financial literacy efforts in the assessment area consisted of 237 hours of service activities provided to nine different organizations.

- Bank employees contributed 162 hours of community development service activities in leadership roles, such as board of directors membership or committee leadership, for three affordable housing organizations operating in the assessment area. These organizations all facilitate affordable housing development or preservation for LMI residents in the assessment area, an area identified by community contacts as a community development need in the Raliegh assessment area.

HICKORY-LENOIR-MORGANTOWN, NORTH CAROLINA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HICKORY ASSESSMENT AREA

The bank's Hickory assessment area consists of Catawba, Burke, and Caldwell counties, three of the four counties in the full Hickory-Lenoir-Morgantown, NC MSA. The bank operates seven branches in this assessment area and closed one branch in a middle-income census tract during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	1	13	44	16	0	**74**
	1.4%	17.6%	59.5%	21.6%	0.0%	**100%**
Family Population	644	14,637	54,130	19,509	0	**88,920**
	0.7%	16.5%	60.9%	21.9%	0.0%	**100%**
Household Population	885	22,757	79,766	27,994	0	**131,402**
	0.7%	17.3%	60.7%	21.3%	0.0%	**100%**
Business Institutions	105	2,683	6,319	3,089	0	**12,196**
	0.9%	22.0%	51.8%	25.3%	0.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	17,409	17,309	18,239	35,963	**88,920**
	19.6%	19.5%	20.5%	40.4%	**100%**
Household Population	30,915	22,074	24,084	54,329	**131,402**
	23.5%	16.8%	18.3%	41.4%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HICKORY ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of North Carolina (which is based on the full-scope review areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Exceeds
Community Development Lending Activity	Consistent
OVERALL	**CONSISTENT**

During the review period, the bank made four community development loans totaling $4.4 million in the Hickory assessment area. These included one loan totaling $2.3 million that financed the purchase of a 60-unit affordable multifamily housing development and a PPP community development loan totaling $2.0 million, which supported a small business impacted by the pandemic in the assessment area.

INVESTMENT TEST

The bank made a satisfactory level of community development investments in this assessment area; however, this performance was below statewide levels, as the bank made an excellent level of community development investments in the North Carolina full-scope review assessment areas. The bank had qualified investments totaling $848,961, which consisted of an outstanding investment in a LIHTC project that was initially made in a previous review period. Furthermore, 24 donations were made to organizations serving this assessment area totaling $512,544.

SERVICE TEST

As displayed in the table below, the bank's Service Test performance in this assessment area is consistent with overall North Carolina statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 11 organizations totaling 306 service hours, which is consistent with the bank's performance in North Carolina.

ASHEVILLE, NORTH CAROLINA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ASHEVILLE ASSESSMENT AREA

The bank's Asheville assessment area includes Buncombe and Madison counties, two of the three counties in the full Asheville, NC MSA. The bank operates three branches in this assessment area and did not open or close any branches in the assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	1	13	37	21	0	**72**
	1.4%	18.1%	51.4%	29.2%	0.0%	**100%**
Family Population	1,190	10,752	34,070	19,918	0	**65,930**
	1.8%	16.3%	51.7%	30.2%	0.0%	**100%**
Household Population	1,805	18,525	60,678	32,542	0	**113,550**
	1.6%	16.3%	53.4%	28.7%	0.0%	**100%**
Business Institutions	196	3,512	8,928	5,098	0	**17,734**
	1.1%	19.8%	50.3%	28.7%	0.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	12,783	12,069	13,725	27,353	**65,930**
	19.4%	18.3%	20.8%	41.5%	**100%**
Household Population	26,797	19,237	19,884	47,632	**113,550**
	23.6%	16.9%	17.5%	42.0%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ASHEVILLE AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of North Carolina (which is based on the full-scope review areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

The bank did not make any community development loans in this assessment area during the review period.

INVESTMENT TEST

The bank made a satisfactory level of community development investments in this assessment area; however, this performance was below statewide levels, as the bank made an excellent level of community development investments in the North Carolina full-scope review assessment areas. The bank had qualified investment activity totaling $1.3 million, of which $1.2 million was made in the current review period. Furthermore, 25 donations were made to organizations serving this assessment area totaling $167,250.

SERVICE TEST

As displayed in the table below, the bank's Service Test performance in this assessment area is consistent with overall North Carolina statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to seven organizations totaling 455 service hours, which is consistent with the bank's performance in North Carolina.

FAYETTEVILLE, NORTH CAROLINA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FAYETTEVILLE, NORTH CAROLINA ASSESSMENT AREA

The bank has designated Cumberland County as its Fayetteville, North Carolina assessment area, which is one of the two counties in the full Fayetteville, NC MSA. The bank operates two branches in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	2	26	36	14	3	**81**
	2.5%	32.1%	44.4%	17.3%	3.7%	**100%**
Family Population	759	19,668	38,437	20,146	0	**79,010**
	1.0%	24.9%	48.6%	25.5%	0.0%	**100%**
Household Population	1,663	34,139	64,412	27,318	0	**127,532**
	1.3%	26.8%	50.5%	21.4%	0.0%	**100%**
Business Institutions	264	3,119	6,430	3,091	12	**12,916**
	2.0%	24.1%	49.8%	23.9%	0.1%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	18,485	14,408	15,783	30,334	**79,010**
	23.4%	18.2%	20.0%	38.4%	**100%**
Household Population	31,949	21,312	24,073	50,198	**127,532**
	25.1%	16.7%	18.9%	39.4%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE, NORTH CAROLINA ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of North Carolina (which is based on the full-scope review areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

The bank did not make any community development loans in this assessment area during the review period.

INVESTMENT TEST

The bank made a satisfactory level of community development investments in this assessment area; however, this performance was below statewide levels, as the bank made an excellent level of community development investments in the North Carolina full-scope review assessment areas. The bank's qualified investment activity totaled 245,624. Furthermore, three donations were made to organizations serving this assessment area totaling $332,613.

SERVICE TEST

As displayed in the table below, the bank's Service Test performance in this assessment area is consistent with overall North Carolina statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to six organizations totaling 79 service hours, which is consistent with the bank's performance in North Carolina.

NONMETROPOLITAN NORTH CAROLINA STATEWIDE AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's combined nonMSA North Carolina review area consists of two noncontiguous assessment areas. Lee, Moore, and Richmond counties are contiguous and comprise one assessment area in the south-central part of the state, while Watauga and Wilkes counties comprise a second assessment area in the northwestern portion of the state. Given similar economic and demographic characteristics between these two areas, demographics and performance conclusions are presented here on a combined basis. The bank operates four branches in the combined assessment areas and closed one branch in a moderate-income census tract (Richmond County) during the review period. The tables below detail key demographics relating to the combined assessment areas.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	1	8	36	40	2	**87**
	1.1%	9.2%	41.4%	46.0%	2.3%	**100%**
Family Population	637	6,996	39,162	35,992	1,618	**84,405**
	0.8%	8.3%	46.4%	42.6%	1.9%	**100%**
Household Population	1,018	10,562	58,559	57,617	3,665	**131,421**
	0.8%	8.0%	44.6%	43.8%	2.8%	**100%**
Business Institutions	123	1,141	5,006	6,727	615	**13,612**
	0.9%	8.4%	36.8%	49.4%	4.5%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	15,096	13,329	16,244	39,736	**84,405**
	17.9%	15.8%	19.2%	47.1%	**100%**
Household Population	29,056	18,994	20,738	62,633	**131,421**
	22.1%	14.5%	15.8%	47.7%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's overall lending performance in the combined assessment areas is consistent with Lending Test performance in the state of North Carolina (which is based on the full-scope review areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

The bank did not make any community development loans in the nonMSA assessment areas during the review period.

INVESTMENT TEST

The bank's investment performance in the nonMSA North Carolina assessment areas is below the performance level in the state of North Carolina overall (based on the full-scope review assessment areas). The bank did not make any investments in the assessment area during the review period but did receive credit for 23 donations totaling $387,501.

SERVICE TEST

As displayed in the table below, the bank's Service Test performance in the combined assessment areas is consistent with overall North Carolina statewide performance (which is based on the full-scope review areas).

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 14 organizations totaling 180 service hours, which is consistent with the bank's performance in the North Carolina full-scope review assessment areas.

ALABAMA

CRA RATING FOR ALABAMA:	**SATISFACTORY**
The Lending Test is rated:	**High Satisfactory**
The Investment Test is rated:	**Low Satisfactory**
The Service Test is rated:	**High Satisfactory**

The major factors supporting the rating for the state of Alabama include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its Alabama assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good penetration throughout the Alabama assessment areas.
- The bank makes an adequate level of community development loans in Alabama.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its Alabama assessment areas.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in a leadership position in Alabama.
- Service delivery systems are reasonably accessible to the bank's Alabama assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the Alabama assessment areas, particularly LMI geographies or individuals.
- The bank is a leader in providing community development services throughout the Alabama assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Alabama assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in three assessment areas throughout Alabama, located entirely in MSA portions of the state. Only one of the bank's Alabama assessment areas was reviewed under full-scope procedures, and therefore, when considering branch structure and loan/deposit activity, CRA performance in the Birmingham MSA assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Alabama, one community contact interview was utilized. This interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

The following table gives additional detail regarding the bank's operations within Alabama.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Birmingham MSA	7	53.8%	$1,094,029	47.6%	Full-Scope
Mobile-Daphne-Fairhope CSA	3	23.1%	$973,505	42.3%	Limited-Scope
Huntsville MSA	3	23.1%	$232,368	10.1%	Limited-Scope
TOTAL	**13**	**100%**	**$2,299,902**	**100%**	**1 Full-Scope**

The bank operates 13 branches (3.1 percent of total branches) throughout the three CRA assessment areas in the state of Alabama. Total deposits in the state total $2.3 billion, which represents 3.5 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank operates four stand-alone ATMs, two of which are deposit accepting. The bank's branches in the state are concentrated in the Birmingham assessment area, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed one branch in the Birmingham assessment area and did not open any branches throughout Alabama.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The bank's performance under the Lending Test in Alabama is rated High Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Adequate Level
Product Innovation	Makes Extensive Use
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect good responsiveness to the credit needs of the bank's full-scope review assessment area, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Birmingham MSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Lending Activity
Mobile CSA	Consistent
Huntsville MSA	Consistent

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as driven by performance in the full-scope review assessment area.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Birmingham MSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Mobile CSA	Below
Huntsville MSA	Consistent

The overall geographic distribution of loans reflects good penetration throughout the full-scope review assessment area, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Birmingham MSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Mobile CSA	Below
Huntsville MSA	Consistent

Community Development Lending Activity

Overall, the bank makes an adequate level of community development loans, as driven by performance in the full-scope review assessment area..

Full-Scope Assessment Areas	Community Development Lending
Birmingham MSA	Adequate Level
OVERALL	**ADEQUATE LEVEL**

Limited-Scope Assessment Areas	Community Development Lending
Mobile CSA	Consistent
Huntsville MSA	Exceeds

During the review period, the bank originated or renewed 26 community development loans in Alabama assessment areas totaling $59.6 million; furthermore, the bank makes an adequate level of community development loans in the Birmingham assessment area, which carries the most weight and, therefore, supports that the bank's overall level of community development lending is at an adequate level. The bank's community development lending activity included four PPP community development loans totaling $6.7 million that were deemed responsive to area community development needs and positively affected the bank's overall rating. In addition to meeting the community development lending needs of its own assessment areas, the bank made one PPP community development loan totaling $1.0 million outside its assessment areas but within Alabama.

Product Innovation

The bank makes extensive use of innovative and flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section.

The bank's use of flexible and/or innovative lending products in the state of Alabama is described as follows:

- The bank made a considerable number of loans through its various affordable mortgage programs in the Alabama assessment areas or the broader statewide region. This included 120 First Horizon Home Start loans totaling $21.2 million, 8 CRA HomeReady loans totaling $1.3 million, 12 CRA Home Possible loans totaling $1.5 million, and 38 loans totaling $6.8 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs. These loan programs are particularly impactful in the assessment area given the need for affordable housing for LMI borrowers described by the community contact.

- Through its down payment assistance programs, the bank made 126 grants totaling $1.0 million to LMI borrowers or borrowers with property in LMI geographies in the assessment areas or the broader statewide area. These grants are considered responsive given their role in assisting LMI borrowers in achieving homeownership.

- The bank made two loans totaling $924,300 to small businesses in the Alabama assessment areas through SBA loan programs, which provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Low Satisfactory, driven primarily by the performance in the Birmingham assessment area. Overall, the bank made an adequate level of qualified community development investments and grants. The investments and grants exhibit adequate responsiveness to credit and community development needs, and the bank is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Birmingham MSA	Adequate Level
OVERALL	**ADEQUATE LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Mobile CSA	Consistent
Huntsville MSA	Consistent

As shown in the table below, the bank's total investment and grant activity in its Alabama assessment areas included $26.0 million in qualified investments and $830,0638 in donations. These activities consisted primarily of investments in MBS and LIHTCs supporting affordable housing throughout the Alabama assessment areas. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

Alabama Assessment Areas	Investments ($)	Grants/Donations ($)
Birmingham MSA	$8.4 million	$651,500
Mobile CSA	$16.9 million	$89,218
Huntsville MSA	$729,784	$89,920
OVERALL	**$26.0 million**	**$830,638**

As the bank met the community development investment needs of its Alabama assessment areas, additional consideration was given to investment activity that benefited a broader statewide area. This included an additional investment totaling $13.5 million in a commercial MBS fund and an additional $132,000 in donation activity in Alabama, bringing the total amount of qualified investment, grant, and donation activity in the state to $40.5 million.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Birmingham MSA	Reasonably Accessible
OVERALL	**REASONABLY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Mobile CSA	Consistent
Huntsville MSA	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Birmingham MSA	Generally Not Adversely Affected
OVERALL	**GENERALLY NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Mobile CSA	Consistent
Huntsville MSA	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Birmingham MSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Mobile CSA	Consistent
Huntsville MSA	Consistent

Community Development Services

The bank is a leader in providing community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Birmingham MSA	Leader
OVERALL	**LEADER**

Limited-Scope Assessment Areas	Community Development Services
Mobile CSA	Consistent
Huntsville MSA	Consistent

In total, bank employees provided community development service activities to 81 different organizations totaling 4,711 hours in Alabama. The majority of these services were provided in the bank's Birmingham assessment area, where 2,416 service hours were qualified for community development. In addition to meeting the needs of its assessment areas, bank employees provided 236 hours of community development services to nine different organizations in Alabama outside of the bank's assessment areas in the state.

BIRMINGHAM, ALABAMA MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BIRMINGHAM ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates seven (1.7 percent) of its total branches in the Birmingham assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	0	0	7

In addition to the branch locations shown in the table above, the bank operates two full-service, stand-alone ATMs in the assessment area. During the review period, the bank closed one branch in this assessment area located in a middle-income census tract. Based on the bank's branch network and other service delivery systems, the bank is positioned to deliver financial services to the entire assessment area.

General Demographics

This assessment area is composed of the entirety of Jefferson and Shelby counties, two of the six counties that make up the full Birmingham-Hoover, AL MSA (Birmingham MSA). The city of Birmingham, Alabama, is located in Jefferson County. According to 2020 census data, the assessment area population was 897,745, which is most heavily concentrated in Jefferson County (674,721). Of the 42 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 8th in deposit market share, encompassing 2.5 percent of total deposit dollars.

While 42 depository institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity in the assessment area. An analysis of 2022 HMDA-reportable loans shows that 494 institutions had loan activity in the assessment area, of which the bank ranked 28th in total HMDA loans. Similarly, the bank ranked 24th out of 129 institutions with CRA loan activity in the assessment area in 2022.

This assessment area covers a metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. The community contact noted specific credit-related needs in the assessment area, including down payment assistance for aspiring LMI homeowners. Contacts also indicated that there are sufficient opportunities to cooperate with local organizations on varying community development projects.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	26	10.7%	14,586	6.6%
Moderate	58	23.8%	44,737	20.3%
Middle	76	31.1%	72,092	32.7%
Upper	77	31.6%	87,153	39.5%
Unknown	7	2.9%	2,028	0.9%
TOTAL	**244**	**100%**	**220,596**	**100%**

As shown above, 34.5 percent of the census tracts in the assessment area are LMI geographies, but only 26.9 percent of the family population resides in these tracts. The 26 low-income census tracts are located exclusively in Jefferson County, and only three of the 58 moderate-income census tracts are located in Shelby County.

Based on 2020 census data, the median family income for the assessment area was $78,199. At the same time, the median family income for the state of Alabama was $66,772. More recently, the FFIEC estimates the 2021 and 2022 median family income for the entirety of the Birmingham MSA to be $73,300 and $83,300, respectively. The following table displays population percentages of assessment area families by income level compared to the Alabama family populations.

Family Population by Income Level				
	Assessment Area		**Alabama**	
Low	47,297	21.4%	275,821	22.3%
Moderate	36,180	16.4%	212,313	17.2%
Middle	40,287	18.3%	240,271	19.5%
Upper	96,832	43.9%	506,147	41.0%
TOTAL	**220,596**	**100%**	**1,234,552**	**100%**

As shown in the table above, 37.8 percent of families within the assessment area were considered LMI, which is below the LMI family percentages of 39.5 percent in the state of Alabama. Additionally, the percentage of families living below the poverty level in the assessment area (9.4 percent) falls below the level in the state of Alabama (11.6 percent). Considering these factors, the assessment area appears slightly more affluent than the state of Alabama.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Alabama.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$182,170	33.2%	$956
Alabama	$149,600	34.8%	$811

Based on the data in the table above, homeownership is slightly less affordable in the assessment area than in the state of Alabama as a whole, even when accounting for higher income levels in the assessment area. Within the assessment area, there is a significant divergence between the median housing values, with Shelby County having a median housing value of $220,700 compared to Jefferson County's median housing value of $165,000. This disparity is also reflected in the assessment area's median gross rents, with Shelby County having a median monthly rent amount more than $100 greater than Jefferson County. Therefore, although the affordability ratio of the assessment area as a whole is similar to the statewide figures, there may be larger challenges in affordability across the two-county assessment area than the combined demographics suggest.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 443,641 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are government (15.4 percent), healthcare and social assistance (13.2 percent), and retail trade (10.5 percent). The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area as a whole and the state of Alabama.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Alabama**
2021	3.2%	3.4%
2022	2.4%	2.6%
2023 YTD (September)	2.1%	2.3%

As shown in the table above, unemployment rates in the assessment area were slightly lower than statewide figures over the entire review period. Unemployment rates dropped by the same amount across the time periods in the assessment area and the state. Unemployment was consistently lower in Shelby County throughout the review period, reaching a low of 1.7 percent as of 2023 YTD (September).

Community Contact Information

For the Birmingham assessment area, one community contact interview was referenced as part of this evaluation. This interview was with an individual specializing in economic development serving the entire Birmingham MSA. The community contact characterized the local economy as steadily improving. The area experienced some setbacks during the pandemic, but the area has experienced a bounce back. No major employers have left the area, nor have any remaining companies had major layoffs. There has been an influx of new small businesses in the area that have occupied commercial real estate left vacant by companies that moved to remote work. The contact noted that certain areas in the MSA have not experienced the same levels of growth as the MSA overall, but the economic struggles in these communities have not been severe. Affordable housing in the area is lacking, with new construction focusing on condominiums and luxury apartments in downtown Birmingham. The contact cited a number of barriers, in addition to the lack of affordable housing stock, that prevent LMI homeownership. These include the recent rise in interest rates, which has negatively impacted the ability of residents to purchase homes, and difficulties affording the down payments in an environment with rising home values and inflation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BIRMINGHAM ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Birmingham assessment area.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	111	8.1%	$19,714	6.8%
Home Purchase	289	21.1%	$85,021	29.5%
Multifamily Housing	9	0.7%	$28,585	9.9%
Refinancing	180	13.1%	$59,146	20.5%
Other Purpose LOC	16	1.2%	$2,764	1.0%
Other Purpose Closed/Exempt	8	0.6%	$4,477	1.6%
Purpose Not Applicable	1	0.1%	$34	0.0%
Total HMDA	**614**	**44.8%**	**$199,741**	**69.3%**
Small Business	757	55.2%	$88,336	30.7%
Small Farm	4	0.3%	$240	0.1%
TOTAL LOANS	**1,375**	**100.00%**	**288,317**	**100.0%**

The bank's lending activity in the assessment area represents 2.3 percent of total 2021 and 2022 HMDA and CRA loans by number and 1.7 percent by dollar amount. By comparison, the bank operates 1.7 percent of its total branches and holds 1.6 percent of total bank deposits in the assessment area. Therefore, the bank's lending activity levels reflect good responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Birmingham assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is excellent overall.

The bank originated 9.4 percent of its HMDA loans to low-income borrowers in 2021, which was below the percentage of assessment area families who are low income (23.5 percent) but was well above the performance of peer institutions in the assessment area (5.5 percent). Given the bank's performance relative to other lenders in the assessment area, this performance is considered excellent. In 2022, the bank improved on its performance and originated 17.5 percent of its HMDA loans to low-income borrowers, which significantly outperformed aggregate lending levels (8.0 percent). Again, this was below the demographic figure (21.4 percent), but given the more than doubling of aggregate lending, this represents excellent performance.

In 2021, the bank originated 15.7 percent of its HMDA loans to moderate-income borrowers, which was closely aligned with the aggregate lending level (15.8 percent) and the demographic figure (15.2 percent) and is considered adequate. In 2022, the bank made 21.0 percent of its HMDA loans to moderate-income borrowers, greater than the 19.1 percent for other lenders in the assessment area and the demographic figure (16.4 percent), reflecting excellent performance.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 33.5 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (41.4 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (90.4 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 44.3 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 87.6 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (43.0 percent) is considered adequate when compared to aggregate lending levels (43.3 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (90.7 percent). There were limited loans that were originated with unknown revenue figures in 2022, and thus the impact on the evaluation of the bank's performance was negligible. When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good. As previously mentioned, the assessment area has 26 low-income census tracts and 58 moderate-income census tracts.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is excellent overall.

The percentage of HMDA loans originated in low-income census tracts in 2021 (1.7 percent) was in line with aggregate lending levels (1.9 percent) but below the percentage of owner-occupied housing in low-income census tracts (6.4 percent); this reflects adequate performance. The bank's performance in low-income geographies improved in 2022 to 3.6 percent of HMDA originations. This was greater than the aggregate lending levels (2.5 percent) and nearer the demographic levels (4.8 percent), reflecting good performance.

In 2021, the bank originated 13.8 percent of HMDA loans in moderate-income geographies in the assessment area, which was well above aggregate performance (9.4 percent) but below demographic levels (18.0 percent). Of these loans originated in moderate-income geographies, 72.0 percent of the bank's HMDA loans were for home purchases, which significantly outstrips the aggregate home purchase performance (52.6 percent). In 2022, similarly, the percentage of HMDA loans in moderate-income geographies was 17.1 percent, which was well above aggregate lending levels (12.5 percent) and near the demographic figure (18.3 percent). As was the case in 2021, a significantly higher percentage of the bank's HMDA loans in moderate-income geographies were for home purchases (81.3 percent) compared to peer performance (56.7 percent). Given the bank's outperformance of aggregate lending levels in moderate-income census tracts both in terms of overall HMDA loans and home purchase loans made in these geographies, the bank's performance is considered excellent in both 2021 and 2022.

Small Business Lending

When considering low- and moderate-income geographies combined, the bank's distribution of small business loans in LMI geographies is adequate overall.

The percentage of small business loans originated in low-income census tracts in 2021 (6.8 percent) was in line with both aggregate lending levels (7.6 percent) and the demographic figure (8.1 percent); this reflects adequate performance in low-income geographies. In 2022, this percentage fell to 4.7 percent, which was below both aggregate performance (7.2 percent) and demographic figures (8.7 percent). This reflects poor performance.

In 2021, the bank originated 14.5 percent of small business loans in moderate-income geographies, which is in line with aggregate performance (17.2 percent) but below demographic levels (19.7 percent), reflecting adequate performance. The bank's lending levels in 2022, however, significantly improved, as 18.0 percent of its small business loans were made in moderate-income geographies, which is above aggregate performance (13.5 percent) and demographic levels (15.6 percent), reflecting excellent performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 77.3 percent of all assessment area census tracts and 66.3 percent of all LMI geographies. In 2022, the bank had lending activity in 60.7 percent of census tracts in the assessment area and 50.0 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the Birmingham assessment area. As detailed in the table below, the bank made 14 community development loans totaling $11.2 million and 1 PPP community development loan totaling $2.0 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	5	$8,725	5	$1,800	-	-	4	$650	**14**	**$11,175**
PPP Loans	-	-	-	-	1	$2,000	-	-	**1**	**$2,000**

- The bank originated its two largest community development loans with a purpose of affordable housing, with a combined total of $4.9 million. These two loans provided financing for separate large multifamily apartment complexes that offer affordable rental units to area LMI residents, a noted need in the area, according to the community contact.

- The bank originated and subsequently renewed a line of credit for a nonprofit economic development organization that specializes in providing technical assistance and capital loans to women- and minority-owned businesses.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants in the Birmingham assessment area and is rarely in a leadership position. In total, the bank made $9.1 million in qualified investments and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Birmingham Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
Municipal/Private Bonds	-	$3.4 million	$3.4 million
LIHTC	-	$3.3 million	$3.3 million
MBS	$1.6 million	-	$1.6 million
Donations	$651,500	-	$651,500
TOTAL	**$2.3 million**	**$6.7 million**	**$9.1 million**

- The bank made $1.6 million in new MBS investments during the current period. These investments support permanent financing for affordable housing loans for LMI individuals in the assessment area. The bank's current period investment is responsive to the needs of the community as identified by the community contact.

- Additionally, the bank provided three donations during the review period totaling $337,500 to the same organization that provides community services to local LMI residents. Specifically, the organization is committed to meeting its constituents' immediate needs, such as food resources, shelter, and assistance during a crisis or natural disaster.

- Lastly, the bank made 11 donations totaling $147,000 to organizations operating in the assessment area that specialize in economic development. These organizations provide benefits predominantly to small businesses in the area through technical assistance or various grant programs.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Birmingham assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates seven branches in the Birmingham assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	0	7	0	**7**
	0.0%	0.0%	0.0%	100%	0.0%	**100%**
Census Tracts	10.7%	23.8%	31.2%	31.6%	2.9%	**100%**
Household Population	8.4%	22.0%	32.1%	36.1%	1.4%	**100%**

As shown in the previous table, none of the bank's offices are in LMI geographies. Three of the bank's offices, however, are located near multiple LMI census tracts. Additionally, the bank has one ATM located in a low-income census tract. Lastly, during the review period, due to the changing census tract designations following updated census data, a bank branch that was located in a moderate-income census tract became located in a newly designated upper-income census tract. Therefore, when considering these mitigating factors, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices in LMI geographies in this assessment area during the review period, although it did close one branch that was located in a middle-income census tract. While not located in an LMI census tract, this branch was the bank's only branch location in Shelby County. As a result, the bank's record of opening and closing offices in this assessment area has generally not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area all operate standard business hours from 8:30 a.m. or 9:00 a.m. to 4:00 p.m. Monday through Thursday. Extended lobby hours are offered until 5:00 p.m. on Fridays at all branch locations. Drive-through facilities are located at six of the seven branches in the assessment area and operate during similar hours as the lobby. Additionally, all the branches have a full-service ATM. Lastly, lenders are dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 2,416 hours of community development service activities to 41 different organizations in the Birmingham assessment area.

These community development services included the following noteworthy activities:

- One bank employee served in a leadership role for a local community development organization and provided 786 community development service hours over the entirety of the review period. This organization provided food relief for area LMI residents.

- Another bank employee provided 156 hours of their technical expertise serving on the board of a local organization providing affordable housing for area LMI residents, a noted need according to the community contact.

- Two bank employees provided 117 hours of community development services leading homebuyer education courses for eligible LMI residents in the Birmingham assessment area.

MOBILE-DAPHNE-FAIRHOPE, ALABAMA CSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MOBILE ASSESSMENT AREA

The bank's Mobile assessment area includes the entire Mobile-Daphne-Fairhope, AL CSA, which is further subdivided into two MSAs that consist of one county each—the Mobile, AL MSA (Mobile County) and the Daphne-Fairhope-Foley, AL MSA (Baldwin County). The bank operates three branches in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	9	51	72	42	5	**179**
	5.0%	28.5%	40.2%	23.5%	2.8%	**100%**
Family Population	3,189	34,886	76,333	43,646	805	**158,859**
	2.0%	22.0%	48.1%	27.5%	0.5%	**100%**
Household Population	5,623	58,162	114,437	62,194	1,188	**241,604**
	2.3%	24.1%	47.4%	25.7%	0.5%	**100%**
Business Institutions	641	6,009	12,072	8,458	246	**27,426**
	2.3%	21.9%	44.0%	30.8%	0.9%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	33.464	28,746	32,220	64,429	**158,859**
	21.1%	18.1%	20.3%	40.6%	**100%**
Household Population	60,005	38,994	40,837	101,768	**241,604**
	24.8%	16.1%	16.9%	42.1%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MOBILE ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is below the Lending Test performance in the state of Alabama (which is based on the full-scope review assessment area), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Below
Geographic Distribution	Below
Community Development Lending Activity	Consistent
OVERALL	**BELOW**

During the review period, the bank made five community development loans in the Mobile assessment area totaling $28.1 million. Of note, one loan for $23.8 million financed the construction of a retail establishment in an LMI area of Orange Beach, Alabama, which is expected to add more than 300 jobs for LMI individuals. The development is undertaken in conjunction with city of Orange Beach and helps to revitalize and stabilize an LMI geography in the assessment area.

INVESTMENT TEST

The bank's investment performance in the Mobile assessment area is consistent with the performance level in the state of Alabama (based on the full-scope review assessment area). The bank had qualified investment activity totaling $16.9 million, $13.6 million of which was made in the current review period. Furthermore, 26 donations were made to organizations serving this assessment area totaling $89,218.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the state of Alabama (which is based on the full-scope review assessment area), as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 12 organizations totaling 912 service hours, which is consistent with the bank's performance in Alabama.

HUNTSVILLE, ALABAMA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HUNTSVILLE ASSESSMENT AREA

The bank's Huntsville assessment area consists of Madison and Limestone counties, which together make up the entire Huntsville, AL MSA. The bank operates three branches in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics related to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	15	27	35	40	1	**118**
	12.7%	22.9%	29.7%	33.9%	0.8%	**100%**
Family Population	11,287	21,738	41,474	44,421	337	**119,257**
	9.5%	18.2%	34.8%	37.2%	0.3%	**100%**
Household Population	22,504	35,936	60,143	64,531	1,239	**184,353**
	12.2%	19.5%	32.6%	35.0%	0.7%	**100%**
Business Institutions	2,791	3,434	5,361	7,589	529	**19,704**
	14.2%	17.4%	27.2%	38.5%	2.7%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	27,496	19,391	23,297	49,073	**119,257**
	23.1%	16.3%	19.5%	41.1%	**100%**
Household Population	47,295	28,568	29,619	78,871	**184,353**
	25.7%	15.5%	16.1%	42.8%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HUNTSVILLE ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Alabama (which is based on the full-scope review assessment area), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Exceeds
OVERALL	**CONSISTENT**

During the review period, the bank made six community development loans totaling $18.3 million. Two of these loans totaling $15.5 million helped finance the construction of a retail center in Athens, Alabama, which is expected to add more than 125 new—primarily LMI—jobs in the assessment area and help to revitalize and stabilize LMI geographies in the assessment area.

INVESTMENT TEST

The bank's investment performance in the Huntsville assessment area is consistent with the performance level in the state of Alabama (based on the full-scope review assessment area). The bank had qualified investment activity totaling $729,784 million, $489,218 of which was made in the current review period. Furthermore, 25 donations were made to organizations serving this assessment area totaling $89,920.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the performance in the state of Alabama (which is based on the full-scope review area), as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 19 organizations totaling 1,148 service hours, which is consistent with the bank's performance in Alabama.

ARKANSAS

CRA RATING FOR ARKANSAS: **SATISFACTORY**

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Arkansas include the following:

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in the leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the Arkansas assessment areas, particularly LMI geographies or individuals.
- The bank provides a relatively high level of community development services throughout the Arkansas assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Arkansas assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in four assessment areas throughout Arkansas, located in three MSAs and one contiguous nonMSA portion of the state. Two of the bank's Arkansas assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the Little Rock assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Arkansas, two community contact interviews were conducted. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ARKANSAS

The following table gives additional detail regarding the bank's operations within Arkansas.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Little Rock MSA	5	41.7%	$487,120	42.0%	Full-Scope
Fayetteville MSA	2	16.7%	$167,964	14.5%	Full-Scope
Jonesboro MSA	2	16.7%	$299,256	25.8%	Limited-Scope
NonMSA Arkansas	3	25.0%	$204,445	17.6%	Limited-Scope
TOTAL	**12**	**100%**	**$1,158,785**	**100%**	**2 Full-Scope**

The bank operates 12 branches (2.9 percent of total branches) throughout the four CRA assessment areas in the state of Arkansas. Total deposits in the state total $1.2 billion, which represents 1.7 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank operates one LPO location in the Fayetteville assessment area and two stand-alone ATMs, both of which are located in the Little Rock assessment area. The bank's operations in the state are concentrated in the Little Rock assessment area, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed four branches throughout Arkansas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

The bank's performance under the Lending Test in Arkansas is rated High Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Adequate Level
Product Innovation	Makes Extensive Use
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect excellent responsiveness to the credit needs of the bank's combined assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Little Rock MSA	Excellent
Fayetteville MSA	Excellent
OVERALL	**EXCELLENT**

Limited-Scope Assessment Areas	Lending Activity
Jonesboro MSA	Below
NonMSA Arkansas	Below

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Little Rock MSA	Good
Fayetteville MSA	Adequate
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Jonesboro MSA	Consistent
NonMSA Arkansas	Consistent

The overall geographic distribution of loans reflects good penetration throughout the assessment areas, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Little Rock MSA	Good
Fayetteville MSA	Adequate
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Jonesboro MSA	Consistent
NonMSA Arkansas	Consistent

Community Development Lending Activity

Overall, the bank makes an adequate level of community development loans, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Little Rock MSA	Relatively High Level
Fayetteville MSA	Few if Any
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Community Development Lending
Jonesboro MSA	Below
NonMSA Arkansas	Consistent

During the review period, the bank originated 13 community development loans inside its Arkansas assessment areas totaling $21.0 million. The vast majority of these community development loans, 12 of the 13 total, were originated in the bank's Little Rock assessment area, for a total of $10.7 million. This assessment area was the primary driver of the overall adequate community development lending rating. In addition to meeting the community development lending needs of its own assessment areas, the bank made one loan totaling $5.0 million outside its assessment areas that benefited the broader statewide area, bringing the total amount of community development loans in the state to $26.0 million.

Product Innovation

The bank makes extensive use of innovative and flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section.

The bank's use of flexible and/or innovative lending products in the state is described as follows:

- The bank made a considerable number of loans through its various affordable mortgage programs in the Arkansas assessment areas and the broader state. This included 184 First Horizon Home Start loans totaling $31.3 million, 14 CRA HomeReady loans totaling $2.0 million, 8 CRA Home Possible loans totaling $1.2 million, and 157 loans totaling $26.7 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs. These loan programs are particularly impactful in the assessment area given the need for access to affordable financing for home loans for LMI borrowers described by community contacts.

- Through its down payment assistance programs, the bank made 261 grants totaling $2.0 million to LMI borrowers or borrowers with property in LMI geographies in the assessment areas or the broader state. These grants are considered responsive given their role in assisting LMI borrowers in achieving homeownership.

- The bank made one loan totaling $2.1 million to a small business in the Fayetteville assessment area through SBA loan programs, which provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated High Satisfactory, driven primarily by the performance in the Little Rock assessment area. Overall, the bank made a significant level of qualified community development investments and grants. The investments and grants exhibit good responsiveness to credit and community development needs, and the bank is occasionally in a leadership position. The bank makes significant use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Little Rock MSA	Excellent
Fayetteville MSA	Adequate
OVERALL	**SIGNIFICANT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Jonesboro MSA	Below
NonMSA Arkansas	Below

As shown in the table below, the bank's total investment and grant activity within its Arkansas assessment areas included $27.8 million in qualified investments and $349,825 in donations. These activities consisted primarily of investments in MBS and LIHTCs supporting affordable housing throughout the Arkansas assessment areas, as well as NMTC supporting community service. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

Arkansas Assessment Areas	Investments($)	Grants/Donations ($)
Little Rock MSA	$26.1 million	$166,130
Fayetteville MSA	$1.7 million	$85,000
Jonesboro MSA	-	$77,195
NonMSA Arkansas	-	$21,500
OVERALL	**$27.8 million**	**$349,825**

As the bank met the community development investment needs of its Arkansas assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $1.3 million in additional investment and $120,092 in additional donation activity in Arkansas, bringing the total amount of qualified investment, grant, and donation activity in the state to $29.6 million. These additional investments included a continuing investment in a small business loan fund benefitting students in the University of Arkansas system starting a business, as well as a new investment in MBS supporting affordable housing loans for LMI individuals in the state.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Little Rock MSA	Reasonably Accessible
Fayetteville MSA	Reasonably Accessible
OVERALL	**REASONABLY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Jonesboro MSA	Exceeds
NonMSA Arkansas	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Little Rock MSA	Not Adversely Affected
Fayetteville MSA	Adversely Affected
OVERALL	**GENERALLY NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Jonesboro MSA	Consistent
NonMSA Arkansas	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Little Rock MSA	Do Not Vary in a Way that Inconveniences
Fayetteville MSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Jonesboro MSA	Consistent
NonMSA Arkansas	Consistent

Community Development Services

The bank provides a relatively high level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Little Rock MSA	Relatively High Level
Fayetteville MSA	Relatively High Level
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Services
Jonesboro MSA	Consistent
NonMSA Arkansas	Consistent

In total, First Horizon Bank employees provided 2,339 hours of community development services to 54 different organizations in Arkansas. The majority of these community development services were conducted in the bank's full-scope assessment areas, with 814 hours of service provided to organizations located in the Little Rock assessment area and 619 hours of service provided to organizations located in the Fayetteville assessment area. Additionally, 275 hours of community development services were provided to eight different organizations that benefited the broader statewide area and thus are not captured in any one individual assessment area.

LITTLE ROCK-NORTH LITTLE ROCK-CONWAY, ARKANSAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LITTLE ROCK ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates five (1.2 percent) of its total branches in the Little Rock assessment area along with two stand-alone ATMs.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	1	0	4

During the review period, the bank closed one branch in this assessment area in 2021, which at the time was located in an upper-income census tract. Based on the bank's branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to the entire assessment area.

General Demographics

This assessment area is composed of Pulaski and Saline counties, two of the six counties that make up the Little Rock-North Little Rock-Conway, AR MSA (Little Rock MSA). According to 2020 census data, the assessment area population was 522,541, which is primarily concentrated in Pulaski County (399,125). Of the 34 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 11th in deposit market share, encompassing 1.7 percent of total deposit dollars.

While only 34 depository institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity in the assessment area. An analysis of 2022 HMDA-reportable loans shows that 385 institutions had loan activity in the assessment area, of which the bank ranked 9th in total HMDA loans. The bank ranked 18th out of 119 institutions with CRA loan activity in the assessment area, based again on 2022 loan activity.

This assessment area covers a metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. The community contact noted specific economic development needs in the assessment area centered around mentorship and technical assistance for small business owners. Lastly, as Little Rock is a fairly large metropolitan area, there are significant opportunities for community development participation by area financial institutions.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	14	10.2%	8,556	6.7%
Moderate	30	21.9%	25,053	19.7%
Middle	54	39.4%	52,344	41.2%
Upper	37	27.0%	41,210	32.4%
Unknown	2	1.5%	0	0.0%
TOTAL	**137**	**100%**	**127,153**	**100%**

As shown above, 32.1 percent of the census tracts in the assessment area are LMI geographies, but only 26.4 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in and around the city of Little Rock in Pulaski County, as Saline County contains no low-income census tracts and only one moderate-income census tract.

Based on 2020 census data, the median family income for the assessment area was $72,976. At the same time, the median family income for the state of Arkansas was $62,067. More recently, the FFIEC estimates the 2021 and 2022 median family income for the entire Little Rock MSA to be $70,600 and $79,000, respectively. The following table displays population percentages of assessment area families by income level compared to the Arkansas family populations.

Family Population by Income Level				
	Assessment Area		Arkansas	
Low	29,266	23.0%	165,087	21.4%
Moderate	20,218	15.9%	136,380	17.7%
Middle	24,553	19.3%	155,142	20.2%
Upper	53,166	41.8%	313,502	40.7%
TOTAL	**127,153**	**100%**	**770,111**	**100%**

As shown in the table above, 38.9 percent of families within the assessment area were considered LMI, which is in line with the LMI family percentages of 39.1 percent in the state of Arkansas. The percentage of families living below the poverty level in the assessment area (10.5 percent), however, falls below the level in the state of Arkansas (11.8 percent). Therefore, when considering these factors, the assessment area appears slightly more affluent than the state of Arkansas.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Arkansas.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$160,499	34.9%	$870
Arkansas	$133,600	37.0%	$760

Based on the data in the table above, homeownership is less affordable in the assessment area than in the state of Arkansas as a whole, even when accounting for higher income levels in the assessment area. Within the assessment area, homeownership is considerably less affordable in Pulaski County based on an affordability ratio of 32.9, compared to Saline County's affordability ratio of 42.0. This has the potential of limiting the bank's ability to originate home purchase loans in the assessment area, as the majority (80.0 percent) of its branches are located in Pulaski County. Additionally, the median age of housing stock differs significantly in the assessment area's counties, with a median age in Pulaski County of 41 years compared to 25 years in Saline County, further impacting the ability of LMI residents to achieve homeownership due to greater ongoing costs associated with older homes.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 281,538 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are government (19.6 percent), healthcare and social assistance (15.0 percent), and retail trade (10.2 percent). The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area as a whole and the state of Arkansas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Arkansas**
2021	4.5%	4.1%
2022	3.3%	3.3%
2023 YTD (September)	2.8%	3.0%

As shown in the table above, unemployment rates in the assessment area were higher than statewide figures at the beginning of the review period but ended the period below the Arkansas statewide figures. This drop was driven by the significant decline in Pulaski County, which began the period with an unemployment rate of 4.9 percent, well above the statewide figure of 4.1 percent at the end of 2021, before falling to 2.9 percent. The unemployment rate in Saline County fell, albeit at a much slower rate, decreasing by a total of 0.7 percent over the same period.

Community Contact Information

For the Little Rock assessment area, one community contact interview was referenced as part of this evaluation. This interview was with an individual specializing in economic development and small business development. The community contact interviewee characterized the local economy as very strong. The area has experienced an increase in jobs and new commercial construction projects. Additionally, two new graduate school programs were opened in downtown Little Rock. The community contact described these as transformational for the area. In addition, several new major employers have entered the region, with no major employers leaving. These new employers are spread across a number of different industries, leading to a steadily declining unemployment rate. The contact noted growth among the community banks that operate in the region and cited the level of banking competition in the area as healthy. This competition extends to the level of physical branches and ATMs, with the area described as being well saturated with physical banking infrastructure. Areas of opportunity for these financial institutions include providing further assistance to small business owners, such as providing mentorships.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LITTLE ROCK ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Little Rock assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Relatively High Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	107	7.0%	$12,065	4.1%
Home Purchase	599	39.4%	$158,282	53.3%
Multifamily Housing	1	0.1%	$650	0.2%
Refinancing	201	13.2%	$49,595	16.7%
Other Purpose LOC	24	1.6%	$3,829	1.3%
Other Purpose Closed/Exempt	7	0.5%	$2,016	0.7%
Total HMDA	**939**	**61.7%**	**$226,437**	**76.2%**
Small Business	583	38.3%	$70,680	23.8%
Small Farm	1	0.1%	$4	<0.1%
TOTAL LOANS	**1,523**	**100.0%**	**$297,121**	**100.0%**

The bank's lending activity in the assessment area represents 1.7 percent of total 2021 and 2022 HMDA and CRA loans by dollar amount and 2.6 percent of total loans by number of originations. By comparison, the bank operates 1.2 percent of its total branches and holds 0.7 percent of total bank deposits in the assessment area. Additionally, as mentioned above, in 2022, the bank ranked 9th in HMDA originations out of 385 financial institutions that reported HMDA lending in the assessment area. Therefore, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Little Rock assessment area.

HMDA Lending

The distribution of HMDA loans to low-income borrowers is considered excellent in 2021 (9.6 percent) and 2022 (13.0 percent), as the bank's performance is well above the performance of peer institutions in the assessment area in both years (5.1 percent and 6.5 percent, respectively). The bank's performance is below the demographic figure in both years, which was 21.7 percent and 23.0 percent, respectively. Given the number of families living below the poverty level, as well as the lower affordability ratio in Pulaski County, where the majority of the bank's branches are located, the bank's significant outperformance of the aggregate primarily drives the excellent performance rating to low-income borrowers.

The bank originated 24.0 percent of its HMDA loans to moderate-income borrowers in 2021 and 24.2 percent of its HMDA loans in 2022. Both years of performance exceeded the aggregate performance of peer institutions (15.0 percent and 17.7 percent, respectively) as well as demographic levels (17.7 percent and 15.9 percent, respectively).

Therefore, performance to moderate-income borrowers across both years, as well as overall performance, is considered excellent.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 35.0 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (40.7 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (90.6 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 47.8 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 82.2 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (53.3 percent) is considered adequate when compared to aggregate lending levels (50.5 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (90.9 percent). There were limited loans originated with unknown revenue figures in 2022, and thus the impact on the evaluation of the bank's performance was negligible.

When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered adequate.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good. As previously mentioned, the assessment area has 14 low-income census tracts and 30 moderate-income census tracts.

HMDA Lending

The bank's distribution of HMDA loans reflects adequate penetration among geographies of different income levels, particularly LMI geographies.

In 2021, the bank originated 1.3 percent of its HMDA loans in low-income census tracts, which is in line with aggregate lending levels (1.7 percent) but was below the percentage of owner-occupied housing units in low-income geographies (3.3 percent). This represents adequate performance. Similarly, the bank's lending in moderate-income geographies in 2021 (9.2 percent) was in line with the aggregate lending level (11.3 percent) but below the demographic figure (17.9 percent), again reflecting adequate performance.

In 2022, the bank's geographic distribution of HMDA loans in low-income census tracts (2.3 percent) is considered poor. This level of lending is below both the performance of peer institutions in the assessment area (4.3 percent) and the demographic figure (4.4 percent). The bank's performance in moderate-income geographies in 2022, however, is considered good. Lending in moderate-income census tracts in 2022 (15.1 percent) was above aggregate lending performance (13.8 percent) and in line with the demographic figure (16.3 percent). When assessing overall performance across both years of data, the bank's geographic distribution of HMDA loans is considered adequate overall.

Small Business Lending

The percentage of small business loans originated in low-income census tracts in 2021 (6.7 percent) and 2022 (9.6 percent) was above the aggregate lending levels (5.2 percent in 2021 and 6.6 percent in 2022) as well as the demographic figure for low-income geographies (5.5 percent and 7.4 percent, respectively). This reflects excellent performance in low-income geographies for both years.

In 2021, the bank originated 19.2 percent of small business loans in moderate-income geographies, which is in line with both aggregate performance (18.8 percent) and demographic levels (21.0 percent), reflecting adequate performance. The bank made 24.4 percent of its small business loans in moderate-income geographies in 2022, which is above both aggregate performance (19.1 percent) and demographic levels (21.2 percent), reflecting excellent performance.

When considering low- and moderate-income geographies combined, the bank's distribution of small business loans in LMI geographies is excellent overall.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 89.7 percent of all assessment area census tracts and 77.5 percent of all LMI geographies. In 2022, the bank had lending activity in 87.6 percent of census tracts in the assessment area and 77.3 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank makes a relatively high level of community development loans in the Little Rock assessment area. As detailed in the table below, the bank made 12 community development loans totaling $10.7 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	1	$5,424	11	$5,284	0	$0	0	$0	**12**	**$10,708**

- The bank originated one community development loan with a purpose of community service totaling $3.0 million, which provided financing for a nonprofit organization serving the unhoused in the Little Rock MSA. The organization plans to use the funds from this loan to construct 14 apartment units, increase its wraparound support services, and provide full-time jobs for LMI individuals in a designated opportunity zone.

- The bank financed one community development loan that qualified as affordable housing for LMI residents. This loan, totaling $5.4 million, will cover infrastructure costs supporting affordable housing units located in a low-income census tract.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the Little Rock assessment area and is often in a leadership position. In total, the bank made $26.3 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed after the table.

Summary of Investments – Little Rock Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
Equity Equivalent	-	$100,000	$100,000
LIHTC	$6.7 million	-	$6.7 million
MBS	$16.1 million	-	$16.1 million
NMTC	$3.2 million	-	$3.2 million
Donations	$166,130	-	$166,130
TOTAL	**$26.2 million**	**$100,000**	**$26.3 million**

- The bank made $16.2 million in new MBS investments during the current period. These investments support permanent financing for affordable housing loans for LMI individuals in the assessment area. The total dollar volume of the bank's current period investments is significant and helps address the need for affordable housing.

- The bank provided a $6.7 million LIHTC investment to fund the acquisition and rehabilitation of a multifamily property with a 100 percent set aside for LMI households. Renovations will include both exterior and interior improvements, such as new HVAC systems, insulation, and kitchen and bathroom remodels.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Little Rock assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

The bank operates five branches in the Little Rock assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	1	0	4	0	**5**
	0.0%	20.0%	0.0%	80.0%	0.0%	**100%**
Census Tracts	10.2%	21.9%	39.4%	27.0%	1.5%	**100%**
Household Population	7.9%	21.2%	40.0%	31.0%	0.0%	**100%**

As shown in the previous table, one of the bank's offices (20.0 percent) is in an LMI geography. Additionally, one of the bank's locations is located near three separate LMI census tracts. Lastly, the bank operates one of its three stand-alone ATMs in a moderate-income census tract in the assessment area. As a result, the bank's service delivery systems are reasonably accessible in the assessment area.

Changes in Branch Locations

The bank closed one office in this assessment area during the review period. This branch was closed in 2021 and was located in an upper-income census tract. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area all operate standard business hours from 8:30 a.m. to 5:00 p.m. Monday through Thursday. Extended lobby hours are offered until 6:00 p.m. on Fridays at all branch locations, including the branch in an LMI census tract. The bank also offers Saturday lobby hours at each branch location. Drive-through facilities are located at each branch in the assessment area and operate during the same hours as the lobby. Lastly, lenders are dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, bank employees provided 814 hours of community development services to 22 different organizations in the Little Rock assessment area.

These community development services included the following noteworthy activities:

- Two employees provided a combined total of 35 community development service hours to a community service organization in a leadership role; 100 percent of aid recipients of this organization are considered LMI.

- Bank employees provided 428 hours of financial literacy training to nine separate organizations in the assessment area, primarily to LMI residents.

- Eighteen bank employees taught homebuyer education courses at nine separate venues over the course of a total of 271 hours to a predominantly LMI audience. This was qualified under the community development criteria related to affordable housing.

FAYETTEVILLE-SPRINGDALE-ROGERS, ARKANSAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FAYETTEVILLE ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates two (0.5 percent) of its total branches in the Fayetteville assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	0	1	1

Each of these offices contains a full-service ATM. During the review period, the bank closed two branches in this assessment area. Lastly, the bank operates one LPO in this assessment area. Therefore, based on its branching network and other delivery systems, the bank is adequately positioned to deliver financial services to the most populous portions of its assessment area.

General Demographics

This assessment area is composed of the entirety Washington and Benton counties, which are two of the three counties that make up the full Fayetteville-Springdale-Rogers, AR (Fayetteville MSA). According to 2020 census data, the assessment area population was 530,204, which is nearly evenly split between the two counties, with Benton County having a population of 284,333 and Washington County having a population of 245,871. Of the 36 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 18th in deposit market share, encompassing 1.0 percent of total deposit dollars.

While only 36 depository institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity in the assessment area. An analysis of 2022 HMDA-reportable loans shows that 473 institutions had HMDA loan activity in the assessment area, of which the bank ranked 8th. The bank ranked 20th out of 116 institutions with CRA loan activity in the assessment area in 2022.

This assessment area covers a metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. Considering that a significant portion of affordable housing stock in the assessment area is in need of repair, a community contact noted home improvement loans are a primary credit need. The contact also indicated that there are opportunities to collaborate with local organizations on affordable housing and small business initiatives.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	7	6.3%	4,664	3.6%
Moderate	24	21.6%	25,307	19.6%
Middle	51	45.9%	57,601	44.7%
Upper	28	25.2%	41,088	31.9%
Unknown	1	0.9%	224	0.2%
TOTAL	**111**	**100%**	**128,884**	**100%**

As shown above, 27.9 percent of the census tracts in the assessment area are LMI geographies, but only 23.2 percent of the family population resides in these tracts. All of the low-income census tracts are located in Washington County, whereas the moderate-income census tracts are more evenly split between the two counties making up the assessment area.

Based on 2020 census data, the median family income for the assessment area was $76,381. At the same time, the median family income for the state of Arkansas was $62,067. More recently, the FFIEC estimates the 2021 and 2022 median family income for the entire Fayetteville MSA to be $71,200 and $83,700, respectively. The following table displays population percentages of assessment area families by income level compared to the Arkansas family populations.

Family Population by Income Level				
	Assessment Area		**Arkansas**	
Low	26,285	20.4%	165,087	21.4%
Moderate	23,401	18.2%	136,380	17.7%
Middle	26,210	20.3%	155,142	20.2%
Upper	52,988	41.1%	313,502	40.7%
TOTAL	**128,884**	**100%**	**770,111**	**100%**

As shown in the table above, 38.6 percent of families within the assessment area were considered LMI, which is nearly equal to the LMI family percentages of 39.1 percent in the state of Arkansas. However, the percentage of families living below the poverty level in the assessment area (8.4 percent) falls below the level in the state of Arkansas (11.8 percent). Considering relative income and poverty levels, the assessment area appears slightly more affluent than the state of Arkansas overall.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Arkansas.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$189,245	32.8%	$870
Arkansas	$133,600	37.0%	$760

Based on the data in the table above, homeownership is less affordable in the assessment area than in the state of Arkansas as a whole, even when accounting for higher income levels in the assessment area. Within the assessment area, median housing values in both counties—Benton, $192,900 and Washington, $184,300—are significantly above the median housing value for the state, $133,600. This impacts the affordability ratio, which is lower in the assessment area than the state. These demographics indicate that homeownership is likely a relative challenge for many LMI residents in the area compared to their counterparts across Arkansas. This was echoed by the community contact, who noted that there is little affordable housing stock in the Fayetteville MSA.

Industry and Employment Demographics

The assessment area supports a diverse business community without any single dominant job category and contains a strong small business sector. BLS industry demographics indicate there are 253,578 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are government (11.6 percent), healthcare and social assistance (11.3 percent), and retail trade (10.6 percent). The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area as a whole and the state of Arkansas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Arkansas**
2021	2.9%	4.1%
2022	2.4%	3.3%
2023 YTD (September)	2.2%	3.0%

As shown in the table above, unemployment rates in the assessment area were lower than statewide figures over the review period. Unemployment rates were nearly identical across the two counties within the assessment area across the review period, with only a 0.2 percent difference at the greatest disparity. Both the assessment area and the state of Arkansas saw their unemployment rates increase in 2020, which was likely a result of pandemic-related disruption of local and state economies, before falling throughout the review period. However, the statewide figure saw a more significant decrease over the review period when compared to the assessment area.

Community Contact Information

For the Fayetteville assessment area, one community contact interview was referenced as part of this evaluation. This interview was with an individual working in local government, specifically with the administration of assistance to LMI individuals. The community contact described the local economy as being generally revitalized, though many individuals who were worse off prior to the pandemic continue to be left behind economically due to business closures and job losses during the pandemic. However, the contact noted more recently an increase in new businesses and an accompanying hiring acceleration. This is occurring against a backdrop of minimal exits or entrances into the area by major employers. As mentioned previously, affordable housing stock is limited for LMI residents in the area and is often in need of repairs. This lack of supply in affordable housing has been exacerbated by the rising interest rate environment, and the contact stated that there is a greater need for partnerships between local foundations and financial institutions to help combat the problem. A sufficient number of financial institutions are operating in the assessment area, and there are bank branches that are accessible to LMI individuals and families, according to the contact. One additional area of opportunity for these financial institutions is working with small businesses to provide financial education and entrepreneurial training.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Fayetteville assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Few if Any

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	107	6.2%	$12,100	2.7%
Home Purchase	760	44.3%	$229,461	51.1%
Multifamily Housing	2	0.1%	$33,151	7.4%
Refinancing	520	30.3%	$124,152	27.7%
Other Purpose LOC	26	1.5%	$3,061	0.7%
Other Purpose Closed/Exempt	19	1.1%	$4,623	1.0%
Total HMDA	**1,434**	**83.6%**	**$406,548**	**90.6%**
Small Business	282	16.4%	$42,194	9.4%
Small Farm	3	0.2%	73	<0.1%
TOTAL LOANS	**1,719**	**100.0%**	**$448,815**	**100.0%**

The bank's lending activity in the assessment area represents 2.9 percent of total 2021 and 2022 HMDA and CRA loans by number and 2.6 percent by dollar amount. By comparison, the bank operates only 0.5 percent of its total branches and holds just 0.3 percent of total bank deposits in the assessment area. Additionally, as mentioned previously, in 2022, the bank ranked 8th out of 473 lenders in HMDA originations. Therefore, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is adequate in the Fayetteville assessment area when reviewing the bank's performance across both lending products.

HMDA Lending

The distribution of HMDA loans to low-income borrowers is considered poor in 2021 (2.8 percent) and 2022 (2.9 percent), as the bank's performance is below the performance of peer institutions in the assessment area in 2021 (5.2 percent) and in 2022 (5.7 percent). The bank's performance is also well below the demographic figure in both years, which was 19.9 percent in 2021 and 20.4 percent in 2022.

The bank originated 13.1 percent of its HMDA loans to moderate-income borrowers in 2021, which is in line with aggregate lending levels (13.2 percent) but below the percentage of families who are moderate income (18.5 percent) and reflects adequate performance. Similarly, the bank's level of lending to moderate-income borrowers in 2022 (15.9 percent) is above the aggregate (14.3 percent) and in line with demographic levels (18.2 percent) and thus is considered adequate.

When considering combined performance in both LMI categories, the distribution of HMDA loans by borrower's income level is adequate overall.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is adequate. In 2021, the bank made 25.4 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (40.3 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.8 percent). However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 26.3 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 78.6 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects adequate performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (46.4 percent) is considered adequate when compared to aggregate lending levels (51.4 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.7 percent). There were limited loans that were originated with unknown revenue figures in 2022, and thus the impact on the evaluation of the bank's performance was negligible. When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered adequate.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate, with equal emphasis placed on HMDA and small business lending. As previously mentioned, the assessment area has seven low-income census tracts and 24 moderate-income census tracts.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is adequate overall.

The percentage of HMDA loans originated in low-income census tracts in 2021 (0.7 percent) and 2022 (1.0 percent) was in line with aggregate lending levels (0.5 percent in 2021 and 1.4 percent in 2022) and in line with the percentage of owner-occupied housing in low-income census tracts (0.7 percent in 2021 and 1.3 percent in 2022); this reflects adequate performance in low-income geographies for both years.

In 2021, the bank originated 10.2 percent of HMDA loans in moderate-income geographies in the assessment area, which was in line with aggregate performance (10.7 percent) but below demographic levels (15.4 percent), reflecting adequate performance. In 2022, the percentage of HMDA loans in moderate-income geographies declined to 8.2 percent, which was below both aggregate lending levels (12.8 percent) and the demographic figure (16.5 percent) and is considered poor.

Small Business Lending

When considering combined performance across both income categories, the bank's distribution of small business loans in LMI geographies is adequate overall.

The percentage of small business loans originated in low-income census tracts in 2021 (3.8 percent) was above both aggregate lending levels (1.5 percent) and the demographic figure for low-income geographies (1.9 percent), reflecting excellent performance. In 2022, the percentage of the bank's small business lending in low-income geographies (2.9 percent) was in line with both aggregate lending levels (2.8 percent) and the demographic figure for low-income geographies (3.5 percent); this reflects adequate performance.

In 2021, the bank originated only 7.0 percent of small business loans in moderate-income geographies, which is below aggregate performance (15.2 percent) and demographic levels (16.7 percent), reflecting poor performance. Conversely, the bank made 13.0 percent of its small business loans in moderate-income geographies in 2022, which is closer to aggregate performance (17.2 percent) and demographic levels (19.7 percent), reflecting adequate performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 98.8 percent of all assessment area census tracts but originated loans in all LMI geographies. In 2022, the bank had lending activity in 91.0 percent of census tracts in the assessment area and 80.7 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank makes few if any community development loans in the Fayetteville assessment area. During the review period, the bank did not originate any loans that were qualified for community development activity.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants in the Fayetteville assessment area and is rarely in a leadership position. In total, the bank made $1.8 million in qualified investments exclusively through MBS, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Fayetteville Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
MBS	$1.7 million	-	$1.7 million
Donations	$85,000	-	$85,000
TOTAL	**$1.8 million**	**-**	**$1.8 million**

- The bank made three separate investments totaling $1.7 million in new MBS investments during the current review period. These investments support permanent financing for affordable housing loans for LMI individuals in the assessment area and help address the need for affordable housing noted by the community contact.

- The bank made four donations totaling $21,000 to two different organizations working to address the need for affordable housing for LMI residents across the review period.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Fayetteville assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

The bank operates two branches in the Fayetteville assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	1	1	0	**2**
	0.0%	0.0%	50.0%	50.0%	0.0%	**100%**
Census Tracts	6.3%	21.6%	46.0%	25.2%	0.9%	**100%**
Household Population	5.6%	20.4%	43.2%	30.0%	0.8%	**100%**

As shown in the previous table, none of the bank's offices are in LMI geographies. However, both bank branches are located near moderate-income census tracts, with one branch located near an additional low-income census tract as well. Additionally, the bank operates an LPO in a moderate-income census tract in the assessment area. As a result, the bank's service delivery systems are reasonably accessible in the assessment area.

Changes in Branch Locations

During the review period, the bank closed two of its branch locations: one branch in a moderate-income census tract in Washington County and one branch in a middle-income census tract in Benton County. Both branches were closed in 2021. The closed branch location in a moderate-income census tract was the bank's only branch in an LMI geography in the assessment area and was the nearest First Horizon branch location to several nearby LMI geographies as well. Given these factors, the changes in branch locations have adversely affected the accessibility of the bank's service delivery systems, particularly to LMI geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area all operate standard business hours from 8:30 a.m. to 5:00 p.m. Monday through Thursday. Extended lobby hours are offered until 5:30 p.m. or 6:00 p.m. on Fridays at both branch locations. The bank also offers Saturday lobby hours at each branch location. Drive-through facilities are located at each branch in the assessment area and operate during similar hours as the lobby. Lastly, lenders are dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, First Horizon Bank employees provided 619 hours of community development services to six different organizations in the Fayetteville assessment area.

These community development services included the following noteworthy activities:

- During the review period, one bank employee, serving on the board of directors, provided 486 community service hours for an organization helping to improve access to affordable housing for area LMI residents, a need in the assessment area cited by the community contact.

- Five bank employees provided homebuyer education training over the course of 34 hours, addressing affordable housing need in the area.

- Bank employees also provided 58 hours of community service hours, offering their financial expertise to organizations that worked with LMI individuals, often teaching financial literacy courses to area students.

JONESBORO, ARKANSAS MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JONESBORO ASSESSMENT AREA

The bank has delineated Craighead County as its Jonesboro assessment area, which is one of the two counties in the full Jonesboro, AR MSA. The bank operates two branches in this assessment area and closed one branch in a middle-income census tract during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	1	5	9	7	0	**22**
	4.5%	22.7%	40.9%	31.8%	0.0%	**100%**
Family Population	806	5,331	11,060	10,632	0	**27,829**
	2.9%	19.2%	39.7%	38.2%	0.0%	**100%**
Household Population	1,748	9,249	17,632	13,574	0	**42,203**
	4.1%	21.9%	41.8%	32.2%	0.0%	**100%**
Business Institutions	89	1,025	1,417	1,189	0	**3,720**
	2.4%	27.6%	38.1%	32.0%	0.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	5,771	4,423	5,435	12,200	**27,829**
	20.7%	15.9%	19.5%	43.8%	**100%**
Household Population	9,574	7,137	7,015	18,477	**42,203**
	22.7%	16.9%	16.6%	43.8%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JONESBORO ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Arkansas (which is based on the full-scope review areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Below
OVERALL	**CONSISTENT**

While the bank had a satisfactory level of lending activity in this assessment area, that performance was below the excellent level of lending activity for the state of Arkansas based on the full-scope review assessment areas. Conversely, the bank did not make any community development loans in this assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in the Jonesboro assessment area is below the performance level in the state of Arkansas overall (which is based on the full-scope review areas). The bank did not make any investments in the assessment area during the review period but did receive credit for 18 donations totaling $77,195.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with performance in the state of Arkansas (which is based on the full-scope review areas), as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to seven organizations totaling 314 service hours, which is consistent with the bank's performance in Arkansas full-scope review assessment areas.

NONMETROPOLITAN ARKANSAS STATEWIDE AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMSA ARKANSAS

The bank's nonMSA Arkansas assessment area consists of Lawrence, Jackson, and Randolph counties, three contiguous counties in the northeast portion of Arkansas. The bank operates three branches in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	0	2	15	0	0	**17**
	0.0%	11.8%	88.2%	0.0%	0.0%	**100%**
Family Population	0	1,219	12,092	0	0	**13,311**
	0.0%	9.2%	90.8%	0.0%	0.0%	**100%**
Household Population	0	2,082	18,037	0	0	**20,119**
	0.0%	10.4%	89.7%	0.0%	0.0%	**100%**
Business Institutions	0	85	1,170	0	0	**1,255**
	0.0%	6.8%	93.2%	0.0%	0.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	2,863	2,478	2,887	5,083	**13,311**
	21.5%	18.6%	21.7%	38.2%	**100%**
Household Population	5,198	3,443	3,522	7,956	**20,119**
	25.8%	17.1%	17.5%	39.5%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMSA ARKANSAS

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Arkansas (which is based on the full-scope review areas), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Consistent
OVERALL	**CONSISTENT**

While the bank had a satisfactory level of lending activity in this assessment area, that performance was below the excellent level of lending activity for the state of Arkansas based on the full-scope review assessment areas. Secondly, the bank made one community development loan totaling $10.3 million that helped finance the purchase and expansion of a 167-bed senior living facility with a majority of LMI residents.

INVESTMENT TEST

The bank's investment performance in the nonMSA Arkansas assessment area is below the performance level in the state of Arkansas overall (which is based on the full-scope review areas). The bank did not make any investments in the assessment area during the review period but did receive credit for seven donations totaling $21,500.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with performance in the Arkansas full-scope review areas, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development services to 11 organizations totaling 317 service hours, which is consistent the bank's performance in Arkansas full-scope review assessment areas.

TEXAS

CRA RATING FOR TEXAS: **SATISFACTORY**

The Lending Test is rated: **Low Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Texas include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in the leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the Texas assessment areas, particularly LMI geographies or individuals.
- The bank provides a relatively high level of community development services throughout the Texas assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Texas assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in two Texas assessment areas—the Houston assessment area and the Dallas assessment area; however, only the Houston assessment area was reviewed under full-scope procedures. Therefore, given the branch structure and loan/deposit activity, CRA performance in the Houston assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Texas, one community contact interview was utilized. This interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from this interview are included in the *Description of Institution's Operations* section of the Houston assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS

The following table gives additional detail regarding the bank's operations within Texas.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Houston MSA	6	75.0%	$1,655,502	74.9%	Full-Scope
Dallas MSA	2	25.0%	$553,586	25.1%	Limited-Scope
TOTAL	**8**	**100%**	**$2,209,088**	**100%**	**1 Full-Scope**

The bank operates eight branches (1.9 percent of total branches) throughout the two CRA assessment areas in the state of Texas. Total deposits in the state total $2.2 billion, which represents 3.3 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank operates two LPO locations, one located in the Houston assessment area and the other located in the Dallas assessment area. The bank's operations in the state are predominantly located in the Houston assessment area, which primarily determined the bank's statewide ratings. During the review period, the bank closed two branches and relocated one branch, all in the Houston assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in Texas is rated Low Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level
Product Innovation	Makes Extensive Use
OVERALL	**LOW SATISFACTORY**

Lending Activity

Overall, lending levels reflect good responsiveness to the credit needs of the bank's full-scope review assessment area, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Houston MSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Lending Activity
Dallas MSA	Exceeds

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as driven by performance in the full-scope review assessment area..

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Houston MSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Dallas MSA	Below

The overall geographic distribution of loans reflects adequate penetration throughout the full-scope review assessment area, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Houston MSA	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Dallas MSA	Below

Community Development Lending Activity

Overall, the bank makes an adequate level of community development loans, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Houston MSA	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Community Development Lending
Dallas MSA	Consistent

During the review period, the bank originated 18 community development loans inside its assessment areas or the broader statewide area, totaling $84.1 million. The bank's community development lending activity included eight PPP loans totaling $12.8 million that were deemed responsive to area community development needs and positively affected the bank's overall rating. In addition to meeting the community development lending needs of its own assessment areas, the bank made two loans totaling $41.2 million outside its Texas assessment areas but within the state.

One of these loans made outside of the assessment areas was for $40.0 million and provided financing for the construction of a multifamily residential property development that will have a majority of its units set aside for LMI individuals at affordable rental rates. The second of these two loans was a PPP loan that qualified under revitalization/stabilization, as the loan helped to retain jobs with a company headquartered in an LMI geography.

Product Innovation

The bank makes extensive use of innovative and flexible lending practices in serving the credit needs of the assessment areas and the broader state. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section.

The bank's use of flexible and/or innovative lending products in the area is described as follows:

- The bank made a considerable number of loans through its various affordable mortgage programs in the Texas assessment areas and the broader statewide area. This included 43 First Horizon Home Start loans totaling $11.4 million, 13 CRA HomeReady loans totaling $2.7 million, and 19 loans totaling $4.9 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs. These loan programs are particularly impactful given the need for more affordable housing for LMI borrowers described by a community contact.

- Through its down payment assistance programs, the bank made 39 grants totaling $365,277 to LMI borrowers or borrowers with property in LMI geographies in the assessment areas or the broader state. These grants are considered responsive given their role in assisting LMI borrowers in achieving homeownership.

- The bank made three loans totaling $2.9 million to small businesses in the Houston assessment area through SBA loan programs, which provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated High Satisfactory, driven by the performance in the Houston assessment area. Overall, the bank made a significant level of qualified community development investments and grants, and it is occasionally in a leadership position. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Houston MSA	Significant Level
OVERALL	**SIGNIFICANT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Dallas MSA	Exceeds

As shown in the following table, the bank's total investment and grant activity included $42.7 million in qualified investments and $561,012 in donations within the bank's Texas assessment areas. These activities consisted primarily of investments in MBS and LIHTCs supporting affordable housing throughout the Texas assessment areas. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

Texas Assessment Areas	Investments($)	Grants/Donations ($)
Houston MSA	$21.3 million	$325,500
Dallas MSA	$21.4 million	$235,512
OVERALL	**$42.7 million**	**$561,012**

As the bank met the community development investment needs of its Texas assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $13.7 million in additional investment and $22,000 in additional donation activity in Texas, bringing the total amount of qualified investment, grant, and donation activity in the state to $57.0 million. These additional investments included continuing investments in affordable housing funds and a small business loan fund, as well as new investments in MBS supporting affordable housing loans for LMI individuals in the state and a new investment in a LIHTC project in Spring, Texas.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels in the Texas full-scope review assessment area.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Houston MSA	Reasonably Accessible
OVERALL	**REASONABLY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Dallas MSA	Below

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Houston MSA	Not Adversely Affected
OVERALL	**NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Dallas MSA	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Houston MSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Dallas MSA	Consistent

Community Development Services

The bank provides a relatively high level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Houston MSA	Relatively High Level
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Services
Dallas MSA	Exceeds

In total, First Horizon Bank employees provided 1,751 hours of community development services to 51 different organizations in Texas. Overall, this level of community development services is in line with the bank's performance at the previous evaluation. The number of community service hours is nearly evenly split between the two assessment areas, with 860 hours of service provided in the Houston assessment area and 844 hours of service provided in the Dallas assessment area (and 47 hours in statewide areas outside of assessment areas).

HOUSTON-PASADENA-THE WOODLANDS, TEXAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOUSTON ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates six (1.4 percent) of its total branches in the Houston assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
0	0	2	3	1

During the review period, the bank closed two branches in this assessment area and relocated a third branch. In addition, the bank operates one LPO in the assessment area. Based on the bank's limited branch network, the size and population of the assessment area, and the number of financial institutions that reported originating loans within the assessment area, the bank is not well positioned to deliver financial services to the entirety of the assessment area, particularly Fort Bend County.

General Demographics

This assessment area is composed of two Texas counties, Harris and Fort Bend. These two counties are a part of the larger ten-county Houston-Pasadena-The Woodlands, TX MSA (Houston MSA). According to 2020 census data, the assessment area population was 5.6 million, which is concentrated in Harris County (4.7 million), which contains the city of Houston. Of the 87 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 17th in deposit market share, encompassing 0.6 percent of total deposit dollars.

While 87 depository institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity in the assessment area. An analysis of 2022 HMDA-reportable loans shows that 939 institutions had loan activity in the assessment area, of which the bank ranked 76th. The bank ranked 72nd out of 260 institutions in 2022 with CRA loan activity in the assessment area.

This assessment area covers a heavily populated metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. Additionally, as the assessment area includes one of the largest cities in the country, there is ample opportunity for community development involvement for financial institutions. A community contact noted specific needs in the assessment area related to strengthening the physical banking/branch presence in LMI areas as well as financial literacy training for small business owners.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	203	16.3%	160,272	12.2%
Moderate	337	27.0%	327,980	24.9%
Middle	306	24.5%	363,999	27.6%
Upper	363	29.1%	450,170	34.1%
Unknown	39	3.1%	16,060	1.2%
TOTAL	**1,248**	**100%**	**1,318,481**	**100%**

As shown above, 43.3 percent of the census tracts in the assessment area are LMI geographies, with 37.1 percent of the family population residing in these tracts. These LMI areas are primarily located near and around the downtown area of the city of Houston in Harris County.

Based on 2020 census data, the median family income for the assessment area was $77,991. At the same time, the median family income for the state of Texas was $76,073. More recently, the FFIEC estimates the 2021 and 2022 median family income for the entirety of the Houston MSA to be $79,800 and $90,800, respectively. The following table displays population percentages of assessment area families by income level compared to the Texas family populations.

Family Population by Income Level				
	Assessment Area		**Texas**	
Low	331,148	25.1%	1,538,520	22.5%
Moderate	225,408	17.1%	1,173,469	17.2%
Middle	233,821	17.7%	1,297,356	19.0%
Upper	528,104	40.1%	2,829,555	41.4%
TOTAL	**1,318,481**	**100%**	**6,838,900**	**100%**

As shown in the table above, 42.2 percent of families within the assessment area were considered LMI, which is slightly above the LMI family percentages of 39.7 percent in the state of Texas. Additionally, the percentage of families living below the poverty level in the assessment area (11.6 percent) is also slightly above the level in the state of Texas (10.9 percent). Considering these factors, the assessment area appears slightly less affluent than the state of Texas.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Texas.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$203,205	32.8%	$1,133
Texas	$187,200	34.1%	$1,082

Based on the data in the preceding table, homeownership is less affordable in the assessment area than in the state of Texas as a whole, even when accounting for the slightly higher income levels in the assessment area. Within the assessment area, median housing values are vastly different, with median housing value in Fort Bend County ($277,600) significantly exceeding Harris County ($189,400). Similarly, median gross rents are significantly higher in Fort Bend County ($1,474) compared to Harris County ($1,115). These demographics indicate that homeownership or affordable rental options are likely a challenge for many LMI residents in the area, particularly those in Fort Bend County. This was echoed by a community contact, who noted that there has been little new affordable housing stock development, particularly for single-family homes.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 2.6 million paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are government (12.1 percent), healthcare and social assistance (11.6 percent), and accommodation and food services (9.3 percent). The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area as a whole and the state of Texas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Texas**
2021	6.3%	5.6%
2022	4.2%	3.9%
2023 YTD (September)	4.5%	4.2%

As shown in the table above, unemployment rates in the assessment area were higher than statewide figures over the review period. Unemployment rates were higher in Harris County throughout the review period, peaking in 2021 with an annual rate average of 6.4 percent. At the same time, the unemployment rate in Fort Bend County was 5.9 percent. This disparity between the two counties decreased slightly throughout the review period, and the counties ended YTD 2023 with unemployment rates of 4.6 percent in Harris County and 4.2 percent in Fort Bend County. Like the two counties, the state also saw its overall unemployment rate fall initially before a modest rise during the review period. As with the country as a whole, the pandemic significantly impacted the area's unemployment rate, and the community contact stated the area is still rebounding economically.

Community Contact Information

For the Houston assessment area, one community contact interview was utilized as part of this evaluation. This interview was with the executive director of a local nonprofit working to revitalize a portion of the assessment area. The community contact interviewee characterized the local economy as bifurcated, with many areas and people doing well economically, whereas others are not. The downtown Houston area was described as doing well relative to urban residential neighborhoods. The community contact stated that LMI neighborhoods were less likely to have access to financial services. Looking at the assessment area in its entirety, however, the contact stated that there are a number of national, regional, and local banks operating in the area alongside credit unions.

Another area of need specific to LMI residents in the assessment area concerns housing affordability. The contact described the area as lacking affordable housing stock, stating that affordable housing is not well dispersed throughout the area nor capable of meeting the demands of LMI individuals. Part of the reason for this, according to the contact, was a lack of affordable land in the area. One other area of concern identified by the contact is the lack of affordability in communities directly surrounding the area's major employers. Opportunities for financial institutions to improve conditions for the LMI residents of the area include greater access to financial literacy education both for individuals looking to access the financial system and small business owners looking to improve their business development plans. Additionally, a greater engagement with CDFIs in the area was mentioned as being an avenue to benefit the local LMI communities in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOUSTON ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Houston assessment area.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	45	4.4%	$7,132	1.3%
Home Purchase	471	45.6%	$286,526	54.2%
Multifamily Housing	3	0.3%	$39,688	7.5%
Refinancing	191	18.5%	$120,808	22.9%
Other Purpose LOC	18	1.7%	$3,280	0.6%
Other Purpose Closed/Exempt	16	1.5%	$13,399	2.5%
Purpose Not Applicable	1	0.1%	$28	0.0%
Total HMDA	**745**	**72.1%**	**$470,861**	**89.1%**
Small Business	289	27.9%	$57,614	10.9%
Small Farm	1	0.1%	$50	<0.1%
TOTAL LOANS	**1,034**	**100%**	**$528,475**	**100%**

The bank's lending activity in the assessment area represents 1.8 percent of total 2021 and 2022 HMDA and CRA loans by number and 3.1 percent by dollar. By comparison, the bank operates 1.4 percent of its total branches and holds 2.5 percent of total bank deposits in the assessment area. Therefore, when also factoring in the significant number of financial institutions in the assessment area described by both the community contact and the HMDA and CRA loan originator data, the bank's lending activity levels reflect good responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Houston assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is good overall.

The bank originated 7.2 percent of its HMDA loans to low-income borrowers in 2021, which almost triples the performance of peer institutions in the assessment area (2.5 percent). Although this was below the percentage of assessment area families who are low income (25.7 percent), the bank's performance is considered good. The bank originated 11.8 percent of its HMDA loans to moderate-income borrowers, which was in line with lending levels (12.2 percent) but was slightly below the demographic figure (16.4 percent), reflecting adequate performance.

In 2022, the bank originated 7.0 percent of its HMDA loans to low-income borrowers, which was above the aggregate lending level (4.0 percent) while being well below the demographic figure (25.1 percent) and is considered good. The bank made 12.8 percent of its HMDA loans to moderate-income borrowers, which was in line with the 15.0 percent for other lenders in the assessment area but below the demographic figure (17.1 percent), reflecting adequate performance.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 32.0 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (41.7 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.7 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 39.3 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 75.3 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (51.8 percent) is considered adequate when compared to aggregate lending levels (50.1 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.9 percent). There were limited loans that were originated with unknown revenue figures in 2022, and thus the impact on the evaluation of the bank's performance was negligible.

When considering the bank's performance across both years of data reviewed, of which 2021 had considerably higher volume (206 loans originated in 2021 against 83 originated in 2022), and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate. As previously mentioned, the assessment area has 203 low-income census tracts and 337 moderate-income census tracts.

HMDA Lending

The bank's distribution of HMDA loans reflects adequate penetration among geographies of different income levels.

In 2021, the bank originated 6.5 percent of its HMDA loans in low-income census tracts, which is in line with demographic lending levels (6.4 percent) but greatly exceeds the percentage of aggregate performance in low-income geographies (3.3 percent), reflecting excellent performance. The bank's lending in moderate-income geographies (14.6 percent) was above the aggregate lending level (12.2 percent) but below the demographic figure (22.7 percent), reflecting good performance.

In 2022, the bank's geographic distribution of HMDA loans in low-income census tracts (4.6 percent) is considered adequate. This level of lending is also in line with the performance of peer institutions in the assessment area (4.5 percent) and the demographic figure (6.2 percent). Similarly, the bank's lending in moderate-income census tracts (14.9 percent) was in line with aggregate lending performance (16.1 percent) but below the demographic figure (21.4 percent), reflecting adequate performance.

Small Business Lending

When considering low- and moderate-income geographies combined, the bank's distribution of small business loans in LMI geographies is good overall.

The percentage of small business loans originated in low-income census tracts in 2021 (10.7 percent) and 2022 (9.6 percent) was in line with aggregate lending levels (11.0 percent in 2021 and 9.2 percent in 2022) as well as with the demographic figures for low-income geographies (11.5 percent in 2021 and 10.1 percent in 2022). This reflects adequate performance in low-income geographies for both years.

In 2021, the bank originated 21.8 percent of its small business loans in moderate-income geographies, which is slightly above aggregate performance (19.3 percent) and demographic levels (19.9 percent), reflecting good performance. The bank made 26.5 percent of its small business loans in moderate-income geographies in 2022, which is above aggregate performance (20.0 percent) and demographic levels (21.3 percent), reflecting excellent performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 37.5 percent of all assessment area census tracts and 28.7 percent of all LMI geographies. In 2022, the bank had lending activity in 22.3 percent of census tracts in the assessment area and 14.1 percent of LMI geographies in the assessment area. While the LMI loan dispersion is low, this is consistent with the bank's overall loan dispersion and with the bank's limited branch presence in the assessment area. Therefore, this dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the Houston assessment area. As detailed in the table below, the bank made six community development loans totaling $26.4 million and five PPP community development loans totaling $9.1 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	2	$18,712	1	$2,010	0	$0	3	$5,673	**6**	**$26,395**
PPP Loans	0	$0	0	$0	5	$9,051	0	$0	**5**	**$9,051**

- The bank originated two community development loans with a purpose of affordable housing, totaling $18.7 million. These loans provided funding for affordable multifamily housing developments. As noted by community contacts and assessment area housing demographics, the assessment area has a need for affordable housing options for LMI residents.

- One loan totaling $2.0 million financed the improvements of a pediatric facility specializing in helping children with short- and long-term skilled nursing needs. This location predominantly provides treatment for individuals relying on Medicaid.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the Houston assessment area and is occasionally in a leadership position. In total, the bank made $21.6 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed after the table.

Summary of Investments – Houston Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
Municipal/Private Bonds	-	$11.4 million	**$11.4 million**
MBS	$9.9 million	-	**$9.9 million**
Donations	$325,500	-	**$325,500**
TOTAL	**$10.2 million**	**$11.4 million**	**$21.6 million**

- The bank made $9.9 million in new MBS investments during the current period. These investments support permanent financing for affordable housing loans for LMI individuals in the assessment area. The total dollar volume of the bank's current period investments is significant and helps address the need for affordable housing that was cited by the community contact and is therefore particularly responsive.

- Additionally, the bank provided a $20,000 donation to an organization that provides no-cost home repairs and modifications to low-income elderly, U.S. military veterans, homeowners with disabilities, and working families throughout Houston/Harris County.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Houston assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High

Accessibility of Delivery Systems

The bank operates six branches in the Houston assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	2	3	1	**6**
	0.0%	0.0%	33.3%	50.0%	16.7%	**100%**
Census Tracts	16.3%	27.0%	24.5%	29.1%	3.1%	**100%**
Household Population	13.2%	25.3%	26.7%	33.0%	1.9%	**100%**

As shown in the previous table, none of the bank's offices are in LMI geographies. However, one of the bank's offices is located less than one mile from a moderate-income census tract. Additionally, one of the bank's branches that was previously located in a moderate-income designated census tract is now located in an upper-income designated census tract after the updated census tract designations following the 2020 census. As a result, the bank's service delivery systems are reasonably accessible in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices located in LMI census tracts in this assessment area during the review period. The bank did close two branches that were located in upper-income census tracts and relocate one branch within a middle-income census tract. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. Drive-through facilities are located at five of the six branches in the assessment area, and lenders are dispersed throughout the assessment area's branches.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, First Horizon Bank employees provided 860 hours of community development services to 17 different organizations in the Houston assessment area.

These community development services included the following noteworthy activities:

- The bank's employees provided 804 community development service hours to various community service organizations and schools in the assessment area. These efforts consisted of bank employees providing technical assistance and serving on the board of directors of organizations providing services targeted to LMI individuals in addition to financial literacy efforts at several schools.

- One bank employee provided 50 hours serving in a leadership role providing technical assistance to an organization that works toward providing affordable housing to area LMI residents, a noted need in the area.

DALLAS-PLANO-IRVING, TEXAS MD

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DALLAS ASSESSMENT AREA

The bank has designated Dallas, Denton, and Collin counties as its Dallas assessment area. These counties represent three of the seven counties in the Dallas-Plano-Irving, TX MD, which is part of the larger Dallas-Fort Worth-Arlington, TX MSA. The bank operates two branches and an LPO in this assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	114	270	286	369	19	**1,058**
	10.8%	25.5%	27.0%	34.9%	1.8%	**100%**
Family Population	105,036	258,695	297,604	413,702	6,000	**1,081,037**
	9.7%	23.9%	27.5%	38.3%	0.6%	**100%**
Household Population	174,236	394,043	449,901	565,026	16,866	**1,600,072**
	10.9%	24.6%	28.1%	35.3%	1.1%	**100%**
Business Institutions	16,249	50,963	81,373	120,158	2,837	**271,580**
	6.0%	18.8%	30.0%	44.2%	1.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	246,222	185,684	199,934	449,197	**1,081,037**
	22.8%	17.2%	18.5%	41.6%	**100%**
Household Population	373,716	274,144	279,721	672,491	**1,600,072**
	23.4%	17.1%	17.5%	42.0%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is below the Lending Test performance in the Houston full-scope review assessment area, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Exceeds
Borrower Distribution	Below
Geographic Distribution	Below
Community Development Lending Activity	Consistent
OVERALL	**BELOW**

During the review period, the bank made five community development loans totaling $7.4 million in the Dallas assessment area. These included two PPP community development loans totaling $2.5 million that supported businesses impacted by the pandemic in the assessment area. Additionally, the bank extended a $2.5 million line of credit to a CDFI that funds loans for small businesses in the assessment area.

INVESTMENT TEST

The bank's investment performance in the Dallas assessment area exceeds the performance level in the Houston full-scope review assessment area. The bank had qualified investment and grant activity totaling $21.5 million, $8.3 million of which was made in the current review period. Furthermore, 25 donations were made to organizations serving this assessment area totaling $235,512.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Houston full-scope review assessment area, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Exceeds
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to 30 organizations totaling 844 service hours, which is consistent with the bank's performance in Texas.

GEORGIA

CRA RATING FOR GEORGIA: **SATISFACTORY**

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Georgia include the following:

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The bank is a leader in making community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in the leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the Georgia assessment areas, particularly LMI geographies or individuals.
- The bank is a leader in providing community development services throughout the Georgia assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Georgia assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in three assessment areas throughout Georgia, located in one MSA and two noncontiguous nonMSA assessment areas. Performance in the nonMSA assessment areas was combined for analysis, resulting in one set of performance conclusions for nonMSA Georgia. Only one of the bank's Georgia assessment areas, the Atlanta assessment area, was reviewed under full-scope procedures, and thus drives the overall state performance ratings. This determination was based on the bank's branch structure and loan/deposit activity.

To augment the evaluation of the full-scope review assessment area in Georgia, two community contact interviews were conducted. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* section under the Atlanta assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

The following table gives additional detail regarding the bank's operations within Georgia.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Atlanta MSA	9	81.8%	$1,407,030	94.1%	Full-Scope
NonMSA Georgia	2	18.2%	$87,976	5.9%	Limited-Scope
TOTAL	**11**	**100%**	**$1,495,006**	**100%**	**1 Full-Scope**

The bank operates 11 branches (2.6 percent of total branches) throughout the CRA assessment areas in the state of Georgia. Total deposits in the state total $1.5 billion, which represents 2.2 percent of total bank deposits. During the review period, the bank did not close or open any branches in either of the assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

The bank's performance under the Lending Test in Georgia is rated High Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Leader
Product Innovation	Makes Extensive Use
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect excellent responsiveness to the credit needs of the bank's full-scope review assessment area, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Atlanta MSA	Excellent
OVERALL	**Excellent**

Limited-Scope Assessment Areas	Lending Activity
NonMSA Georgia	Below

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is adequate, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Atlanta MSA	Adequate
OVERALL	**Adequate**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
NonMSA Georgia	Consistent

The overall geographic distribution of loans reflects adequate penetration throughout the full-scope review assessment area, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Atlanta MSA	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
NonMSA Georgia	Below

Community Development Lending Activity

Overall, the bank is a leader in making community development loans in the full-scope review assessment area.

Full-Scope Assessment Areas	Community Development Lending
Atlanta MSA	Leader
OVERALL	**LEADER**

Limited-Scope Assessment Areas	Community Development Lending
NonMSA Georgia	Below

During the review period, the bank originated or renewed 13 community development loans inside its assessment areas, totaling $57.5 million. The bank is a leader in making community development loans in the Atlanta assessment area, which drives the overall rating. The bank's community development lending activity included four PPP loans totaling $6.8 million that were deemed responsive to area community development needs and positively affected the overall rating. In addition to meeting the community development lending needs of its own assessment areas, the bank made two additional PPP loans totaling $2.3 million outside its assessment areas but within the state of Georgia, bringing the total amount of community development loans in the state to $59.7 million.

Product Innovation

The bank makes extensive use of innovative and flexible lending practices in serving the credit needs of the assessment areas and the broader state. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section. The bank's use of flexible and/or innovative lending products in the state is described as follows:

- The bank made a considerable number of loans through its various affordable mortgage programs in the Georgia assessment areas and the broader state. This included 83 First Horizon Home Start loans totaling $23.4 million, 11 CRA HomeReady loans totaling $2.6 million, and 29 loans totaling $7.1 million through the Fannie Mae HomeReady and Freddie Mac Home Possible programs. These loan programs are particularly impactful in the assessment area given the need for greater levels of affordable housing in the area described by a community contact.

- Through its down payment assistance programs, the bank made 65 grants totaling $403,000 to LMI borrowers or borrowers with property in LMI geographies in the assessment areas or the broader state. These grants are considered responsive given their role in assisting LMI borrowers in achieving homeownership.

- The bank made nine loans totaling $12.8 million to small businesses in Georgia through SBA loan programs that provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated High Satisfactory, driven by the performance in the Atlanta MSA assessment area. Overall, the bank made a significant level of qualified community development investments and grants. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Atlanta MSA	Significant
OVERALL	**SIGNIFICANT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
NonMSA Georgia	Below

As shown in the table below, the bank's total investment and grant activity in the Georgia assessment areas included $49.4 million in qualified investments and $558,150 in donations. These activities consisted primarily of investments in MBS, LIHTCs, and municipal bonds supporting affordable housing, as well as a municipal bond supporting revitalization efforts in LMI areas.

Georgia Assessment Areas	Investments($)	Grants/Donations ($)
Atlanta MSA	$49.4 million	$555,650
NonMSA Georgia	-	$2,500
OVERALL	**$49.4 million**	**$558,150**

As the bank met the community development investment needs of its Georgia assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $25.1 million in additional investment and $20,000 in additional donation activity in Georgia, bringing the total amount of qualified investment, grant, and donation activity in the state to $75.1 million. These additional investments consisted of a variety of investment vehicles, including municipal bonds, LIHTC investments, and MBS, all of which supported affordable housing development or preservation for LMI residents in the state.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Atlanta MSA	Reasonably Accessible
OVERALL	**REASONABLY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
NonMSA Georgia	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Atlanta MSA	Not Adversely Affected
OVERALL	**NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
NonMSA Georgia	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Atlanta MSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
NonMSA Georgia	Consistent

Community Development Services

The bank is a leader in providing community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Atlanta MSA	Leader
OVERALL	**LEADER**

Limited-Scope Assessment Areas	Community Development Services
NonMSA Georgia	Below

First Horizon employees provided community development service activities to 29 different organizations in Georgia totaling 1,173 hours.

ATLANTA-SANDY SPRINGS-ROSWELL, GEORGIA MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ATLANTA ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates nine (2.2 percent) of its total branches in the Atlanta assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**	**Unknown-Income**
0	2	2	4	1

During the review period, the bank did not open or close any branches in this assessment area. Based on the bank's branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to the entire assessment area.

General Demographics

This assessment area includes Cherokee, Cobb, DeKalb, Forsyth, Fulton, and Gwinnett counties. These six counties are part of the much larger full Atlanta-Sandy Springs-Roswell, GA MSA (Atlanta MSA), which consists of 29 counties. According to 2020 census data, the assessment area population was 4,072,206, which is most heavily concentrated in Fulton County (1.1 million) and Gwinnett County (957,062). Of the 68 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 15th in deposit market share, encompassing 0.7 percent of total deposit dollars.

While 68 depository institutions operate a branch in the assessment area, a significantly higher number of institutions reported loan activity in the assessment area. An analysis of 2022 HMDA-reportable loans shows that 872 institutions had loan activity in the assessment area, of which the bank ranked 61st in total HMDA loans. The bank ranked 33rd out of 236 institutions with CRA loan activity in the assessment area.

This assessment area covers a large metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels. Community contacts noted specific credit-related needs in the assessment area, emphasizing small business credit continually being an unmet challenge in the area. Contacts also indicated that there are ample opportunities for financial institutions to participate in community development activities throughout the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	87	8.4%	56,510	6.0%
Moderate	204	19.6%	178,043	18.9%
Middle	273	26.3%	267,972	28.4%
Upper	431	41.4%	424,849	45.1%
Unknown	45	4.3%	15,447	1.6%
TOTAL	**1,040**	**100%**	**942,821**	**100%**

As shown above, 28.0 percent of the census tracts in the assessment area are LMI geographies, but only 24.9 percent of the family population resides in these tracts. These LMI areas are dispersed across the entire assessment area but are most heavily concentrated in Fulton, Dekalb, and Gwinnett counties.

Based on 2020 census data, the median family income for the assessment area was $92,533. At the same time, the median family income for the state of Georgia was $74,127. More recently, the FFIEC estimates the 2021 and 2022 median family income for the entire Atlanta MSA to be $85,700 and $95,700, respectively. The following table displays population percentages of assessment area families by income level compared to the Georgia family populations.

Family Population by Income Level				
	Assessment Area		**Atlanta MSA**	
Low	190,532	20.2%	316,936	21.9%
Moderate	146,556	15.5%	247,945	17.2%
Middle	172,147	18.3%	283,978	19.7%
Upper	433,586	46.0%	595,703	41.2%
TOTAL	**942,821**	**100%**	**2,565,233**	**100%**

As shown in the table above, 35.7 percent of families within the assessment area were considered LMI, which is below the LMI family percentages of 39.1 percent in the full Atlanta MSA. Additionally, the percentage of families living below the poverty level in the assessment area (7.9 percent) falls below the level in the full Atlanta MSA (9.4 percent). Considering these factors, the assessment area appears more affluent than the full Atlanta MSA.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Georgia.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$271,709	27.8%	$1,273
Atlanta MSA	$233,739	30.5%	$1,204

Based on the data in the table above, homeownership is less affordable in the assessment area than in the full Atlanta MSA, even when accounting for higher income levels in the assessment area. In addition, rents are much higher in the assessment area than in the MSA as a whole. This data indicates that homeownership or affordable rental options may be a challenge for many LMI residents in the area, compared to those in the full Atlanta MSA. This was echoed by community contacts, who noted that there has been little new affordable housing stock development.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate that there are 2.2 million paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (11.6 percent), government (11.0 percent), and professional and technical services (10.0 percent). The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area as a whole and the state of Georgia.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**Georgia**
2021	3.8%	3.9%
2022	2.8%	3.0%
2023 YTD (September)	3.2%	3.4%

As shown in the table above, unemployment rates in the assessment area moved lower in conjunction with the statewide figures from 2021 to 2022 before both groups experienced increases during 2023. Generally, unemployment rates were highest in Fulton County throughout the review period, consistently exceeding the state numbers. Conversely, Forsyth County had the lowest unemployment rate throughout the six-county assessment area and consistently was lower than the state of Georgia.

Community Contact Information

For the Atlanta assessment area, two community contact interviews were referenced as part of this evaluation. One interview was with an individual specializing in economic development, and one was with an individual working toward developing affordable housing. The community contact interviewees characterized the local economy as good, having experienced a swift rebound after the pandemic. This has led the contacts to notice a significant decline in the local unemployment rate, as reflected in the official data described earlier. This economic environment, along with significant population growth, has played a role in an uptick in new housing construction, but these homes are largely unaffordable to the LMI population. Affordable housing is a major need in the area for the less affluent population, according to the contacts. Financial institutions in the area are broadly accessible and meet the credit needs of much of the area. Specific needs highlighted include credit programs targeting minority- and women-owned small businesses. In addition, financial literacy training, both for individuals and small business owners, was cited as an opportunity for community development for financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ATLANTA ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Atlanta assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Leader

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	125	5.9%	$24,915	3.1%
Home Purchase	506	24.1%	$293,761	36.2%
Multifamily Housing	6	0.3%	$60,844	7.5%
Refinancing	369	17.5%	$182,011	22.4%
Other Purpose LOC	45	2.1%	$11,601	1.4%
Other Purpose Closed/Exempt	15	0.7%	$7,583	0.9%
Purpose Not Applicable	2	0.1%	$105	0.0%
Total HMDA	**1,068**	**50.76%**	**$580,820**	**71.47%**
Small Business	1,035	49.19%	$231,373	28.47%
Small Farm	1	0.1%	$500	0.1%
TOTAL LOANS	**2,104**	**100.0%**	**$812,693**	**100.0%**

The bank's lending activity in the assessment area represents 3.6 percent of total 2021 and 2022 HMDA and CRA loans by number and 4.7 percent by dollar. These figures exceed the 2.2 percent of the bank's total branches and 2.1 percent of total bank deposits held in the assessment area. Therefore, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is adequate in the Atlanta assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is adequate overall.

The distribution of HMDA loans to low-income borrowers is considered good in 2021 (8.1 percent) and 2022 (7.6 percent), as the bank's performance is above the performance of peer institutions in the assessment area in 2021 (5.0 percent) and in 2022 (5.2 percent) but below the demographic figure in both years, which was 21.8 percent in 2021 and 20.2 percent in 2022.

The bank originated 12.0 percent of its HMDA loans to moderate-income borrowers in 2021, which is in line with aggregate lending levels (14.3 percent) but below the percentage of families who are moderate income (15.5 percent) and reflects adequate performance. The bank's level of lending to moderate-income borrowers in 2022 (11.8 percent) is below both the aggregate (15.5 percent) and demographic levels (15.5 percent) but still reflective of adequate performance overall.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 22.0 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (42.6 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (93.0 percent). However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 50.9 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 67.6 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (39.4 percent) is considered adequate when compared to aggregate lending levels (48.5 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (93.2 percent). There were limited loans originated with unknown revenue figures in 2022, and thus the impact on the evaluation of the bank's performance was negligible.

When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered adequate.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate. As previously mentioned, the assessment area has 87 low-income census tracts and 204 moderate-income census tracts.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is good overall.

The percentage of HMDA loans originated in low-income census tracts in 2021 (4.5 percent) and 2022 (4.5 percent) was above aggregate lending levels (3.7 percent in 2021 and 3.8 percent in 2022). This performance was in line with the percentage of owner-occupied housing in low-income census tracts in 2021 (3.8 percent) and above the percentage in 2022 (3.2 percent). Therefore, performance in low-income census tracts is considered good in both 2021 and 2022

The bank originated 15.6 percent of HMDA loans in moderate-income geographies in the assessment area in 2021 and 15.5 percent in 2022. This performance in 2021 was above aggregate performance (13.9 percent) and in line with demographic data (16.0 percent). The bank's 2022 performance was slightly above both demographic data (14.9 percent) and aggregate performance (15.2 percent). This is reflective of good performance across both years.

Small Business Lending

The bank's distribution of small business loans in LMI geographies is poor overall.

The percentage of small business loans originated in low-income census tracts in 2021 (1.6 percent) was below both the aggregate lending levels (5.9 percent) and the demographic figure for low-income geographies (6.0 percent). This reflects poor performance. In 2022, the bank originated 3.7 percent of its small business loans in low-income geographies, which is in line with aggregate performance (4.5 percent) and demographic levels (5.1 percent), reflecting adequate performance.

In 2021, the percentage of small business loans originated in moderate-income geographies (13.8 percent) was below both the aggregate lending level (19.6 percent) and the demographic figure for moderate-income geographies (19.7 percent), which is considered poor. Similarly, the bank's lending to small businesses in moderate-income geographies in 2022 is considered poor, as the bank's lending level (12.5 percent) is below aggregate performance (18.6 percent) and demographic levels (19.5 percent).

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 62.6 percent of all assessment area census tracts and 51.5 percent of all LMI geographies. In 2022, the bank had lending activity in 37.4 percent of census tracts in the assessment area and 30.6 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Atlanta assessment area. As detailed in the table below, the bank made nine community development loans totaling $50.7 million and four PPP community development loans totaling $6.8 million. The most impactful of these loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)	#	$ (000s)
CD Loans	3	$15,000	4	$3,500	2	$32,200	0	$0	**9**	**$50,700**
PPP Loans	0	$0	0	$0	4	$6,776	0	$0	**4**	**$6,776**

- The bank originated three community development loans with a purpose of affordable housing totaling $15.0 million. These loans provided financing for both affordable multifamily and single-family housing developments. As noted by community contacts, the assessment area has a need for affordable housing options for LMI individuals.

- The bank financed one $13.2 million dollar loan that revitalized and stabilized an LMI geography through the rehabilitation of a multipurpose facility that will include housing, retail, and commercial space. This project is in line with a local government economic development plan and is expected to create numerous permanent local jobs.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. In total, the bank made $49.9 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Atlanta Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
Municipal/Private Bonds	-	$8.1 million	**$8.1 million**
LIHTC	-	$216,257	**$216,257**
MBS	$37.4 million	-	**$37.4 million**
Municipal Bond	$2.1 million	-	**$2.1 million**
Other	$1.5 million	-	**$1.5 million**
Donations	$555,650	-	**$555,650**
TOTAL	**$41.6 million**	**$8.3 million**	**$49.9 million**

- The bank provided a $1.5 million investment in a multipurpose facility in the assessment area. This project supports the stabilization of an LMI area targeted for redevelopment and revitalization by the master plan for the Atlanta Beltline major initiative. The project supports two of the major goals outlined in the Atlanta Beltline master plan, including historic preservation and economic development.

- The bank made one LIHTC investment supporting the acquisition and rehabilitation of an 80-unit property. The property consists of one-, two-, and three-bedroom units to meet a variety of housing needs for LMI families, with all the units reserved for LMI residents. This targets a specific need cited by community contacts.

- The bank provided a $33,000 donation to Atlanta Neighborhood Development Partnership (ANDP), which has a focus on affordable housing and supports its mission through development, lending, policy research, and advocacy. ANDP has supported the creation of more than 11,000 units of housing for LMI individuals, a noted need in the community.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Atlanta assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates nine branches in the Atlanta assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	2	2	4	1	**9**
	0.0%	22.2%	22.2%	44.4%	11.1%	**100%**
Census Tracts	8.4%	19.6%	26.3%	41.4%	4.3%	**100%**
Household Population	7.2%	20.3%	26.9%	42.6%	3.1%	**100%**

As shown in the previous table, two of the bank's offices are in LMI geographies. This accounts for 22.2 percent of the total assessment area branches and is in line with the percentage of LMI census tracts (28.0 percent) and the household population in these tracts (27.5 percent). As a result, the bank's service delivery systems are reasonably accessible in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices in this assessment area during the review period. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. Drive-through facilities are located at seven branches in the assessment area, including one of the bank's branches in LMI census tracts. Lastly, lenders are dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 1,077 hours of community development services to 23 different organizations in the Atlanta assessment area. This service level compares favorably to other similarly situated peers in the assessment area.

These community development services included the following noteworthy activities:

- One bank employee provided 60 hours of service serving on the board of directors and providing technical assistance to a community development organization working toward preventing homelessness and providing financial literacy training, a noted need in the area.

- One bank employee served on the board of directors of an organization helping to develop and finance affordable housing in the assessment area, another need cited by interviews with community contacts.

NONMETROPOLITAN GEORGIA STATEWIDE AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's combined nonMSA Georgia review area consists of two noncontiguous counties, Lumpkin and Wayne, resulting in two noncontiguous assessment areas. Given similar economic and demographic characteristics between these two areas, demographics and performance conclusions are presented here on a combined basis. The bank operates two branches in the combined assessment areas and did not open or close any branches during the review period. The tables below detail key demographics relating to the combined assessment areas.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	0	1	10	4	0	**15**
	0.0%	6.7%	66.7%	26.7%	0.0%	**100%**
Family Population	0	907	9,726	4,389	0	**15,022**
	0.0%	6.0%	64.7%	29.2%	0.0%	**100%**
Household Population	0	1,693	14,731	5,921	0	**22,345**
	0.0%	7.6%	65.9%	26.5%	0.0%	**100%**
Business Institutions	0	116	1,528	654	0	**2,298**
	0.0%	5.0%	66.5%	28.5%	0.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	2,678	2,541	2,769	7,034	**15,022**
	17.8%	16.9%	18.4%	46.8%	**100%**
Household Population	5,414	3,255	3,280	10,396	**22,345**
	24.2%	14.6%	14.7%	46.5%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's overall lending performance in the combined assessment areas is below the Lending Test performance in the state of Georgia full-scope review assessment area, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Below
Borrower Distribution	Consistent
Geographic Distribution	Below
Community Development Lending Activity	Below
OVERALL	**BELOW**

The bank did not make any community development loans in the combined assessment areas during the review period.

INVESTMENT TEST

The bank's investment performance in nonMSA assessment areas is below the performance level in the Georgia full-scope review assessment area. The bank did not make any investments in the assessment areas during the review period but did receive credit for four donations totaling $2,500.

SERVICE TEST

The bank's Service Test performance in the combined assessment areas is consistent with the performance in the Georgia full-scope review assessment area, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to three organizations totaling 48 service hours, which is below the bank's performance in the Georgia full-scope review assessment area.

SOUTH CAROLINA

CRA RATING FOR SOUTH CAROLINA: **SATISFACTORY**

The Lending Test is rated: **Low Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **Low Satisfactory**

The major factors supporting the rating for the state of South Carolina include the following:

- The bank's lending levels reflect adequate responsiveness to the credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The bank makes few if any community development loans in South Carolina.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in the leadership position.
- The bank's service delivery systems are unreasonably inaccessible to the bank's geographies and individuals of different income levels in the South Carolina assessment areas. The bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the South Carolina assessment areas, particularly LMI geographies or individuals.
- The bank is a leader in providing community development services throughout the South Carolina assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the South Carolina assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section.

The bank operates in three assessment areas throughout South Carolina, two in MSAs and one in a CSA. The bank's Greenville CSA assessment area was the only assessment area reviewed under full-scope procedures and thus carried the greatest weight when determining overall state conclusions.

To augment the evaluation of the full-scope review assessment area in South Carolina, one community contact interview was conducted. This interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from this interview are included in the *Description of Institution's Operations* section of the Greenville assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH CAROLINA

The following table gives additional detail regarding the bank's operations within South Carolina.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
Greenville CSA	5	55.6%	$277,980	59.1%	Full-Scope
Columbia MSA	3	33.3%	$92,580	19.7%	Limited-Scope
Charleston MSA	1	11.1%	$99,950	21.2%	Limited-Scope
TOTAL	**9**	**100%**	**$470,510**	**100%**	**1 Full-Scope**

The bank operates nine branches (2.2 percent of total branches) throughout the three CRA assessment areas in the state of South Carolina. Total deposits in the state total $470.5 million, which represents 0.7 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank operates one LPO in the Greenville assessment area. The bank's operations in the state are predominantly concentrated in the Greenville assessment area, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed one branch in South Carolina, in the Columbia assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in South Carolina is rated Low Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Few if Any
Product Innovation	Makes Extensive Use
OVERALL	**LOW SATISFACTORY**

Lending Activity

Overall, lending levels reflect adequate responsiveness to the credit needs of the bank's combined assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Greenville CSA	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Lending Activity
Columbia MSA	Consistent
Charleston MSA	Consistent

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Greenville CSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Columbia MSA	Consistent
Charleston MSA	Consistent

The overall geographic distribution of loans reflects good penetration throughout the South Carolina full-scope review assessment area, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
Greenville CSA	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Columbia MSA	Consistent
Charleston MSA	Below

Community Development Lending Activity

Overall, the bank makes few if any community development loans in South Carolina, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Greenville CSA	Few if Any
OVERALL	**FEW IF ANY**

Limited-Scope Assessment Areas	Community Development Lending
Columbia MSA	Consistent
Charleston MSA	Exceeds

During the review period, the bank did not make any community development loans in the Greenville assessment area but did make two community development loans totaling $1.8 million in the Charleston limited-scope review assessment area.

Product Innovation

The bank makes extensive use of innovative and flexible lending practices in serving the credit needs of the assessment areas and the broader state. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section. The bank's use of flexible and/or innovative lending products in the state is described as follows:

- The bank made a considerable number of loans through its various affordable mortgage programs in the South Carolina assessment areas and the broader state. This included 18 First Horizon Home Start loans totaling $3.6 million.

- Through its down payment assistance programs, the bank made three grants totaling $24,000 to LMI borrowers or borrowers with property in LMI geographies in the assessment areas or the broader state. These grants are considered responsive, given their role in assisting LMI borrowers in achieving homeownership.

- The bank made two loans totaling $550,000 to small businesses in the Greenville assessment area through SBA loan programs that provide small businesses access to capital with more flexible terms than conventional commercial financing.

INVESTMENT TEST

The bank's performance under the Investment Test is rated High Satisfactory, driven by the performance in the Greenville assessment area. Overall, the bank made a significant level of qualified community development investments and grants. The investments and grants exhibit good responsiveness to credit and community development needs, and the bank is occasionally in a leadership position. The bank makes significant use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Greenville CSA	Significant Level
OVERALL	**SIGNIFICANT LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Columbia MSA	Consistent
Charleston MSA	Consistent

As shown in the table below, the bank's total investment and grant activity included $31.7 million in qualified investments and $637,189 in donations throughout the bank's South Carolina assessment areas. These activities consisted primarily of investments in MBS, LIHTCs, and municipal bonds supporting affordable housing throughout the South Carolina assessment areas. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

South Carolina Assessment Areas	Investments ($)	Grants/Donations ($)
Greensville CSA	$20.2 million	$112,810
Columbia MSA	$5.7 million	$390,879
Charleston MSA	$5.8 million	$133,500
OVERALL	**$31.7 million**	**$637,189**

As the bank met the community development investment needs of its South Carolina assessment areas, additional consideration was given to investments that benefited a broader statewide area. This included $9.9 million in additional investment and $26,750 in additional donation activity in South Carolina, bringing the total amount of qualified investment, grant, and donation activity in the state to $42.3 million. These additional investments included continuing investments in an affordable housing loan fund, a small business loan fund, and a municipal bond, as well as new investments in a LIHTC project in Easley, South Carolina, and in an affordable housing fund supporting affordable home loans for LMI residents in the state.

SERVICE TEST

The bank's performance under the Service Test is rated Low Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Unreasonably Inaccessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
OVERALL	**LOW SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are unreasonably inaccessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Greenville CSA	Unreasonably Inaccessible
OVERALL	**UNREASONABLY INACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Columbia MSA	Exceeds
Charleston MSA	Exceeds

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Greenville CSA	Not Adversely Affected
OVERALL	**NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Columbia MSA	Consistent
Charleston MSA	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Greenville CSA	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Columbia MSA	Consistent
Charleston MSA	Consistent

Community Development Services

The bank is a leader in providing community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Greenville CSA	Leader
OVERALL	**LEADER**

Limited-Scope Assessment Areas	Community Development Services
Columbia MSA	Below
Charleston MSA	Below

In total, First Horizon Bank employees provided 426 hours of community development services to 27 different organizations in South Carolina. Overall, this level of community development services is in considerably greater than the bank's performance at the previous evaluation. Bank employees served in numerous capacities across these varied organizations, and details of the most impactful of these services are included in the *Community Development Services* section for the Greenville assessment area.

GREENVILLE-SPARTANBURG-ANDERSON, SOUTH CAROLINA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREENVILLE ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates five (1.2 percent) of its total branches in the Greenville assessment area. In addition, the bank operates one LPO located at the same address as an upper-income branch.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	0	2	3

During the review period, the bank did not open or close any branches in this assessment area. Based on the bank's branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to the entire assessment area.

General Demographics

This assessment area is composed of Greenville and Spartanburg counties, two of the ten counties that make up the entirety of the Greenville-Spartanburg-Anderson, SC CSA. According to 2020 census data, the assessment area population was 853,531, with the majority of the population located in Greenville County (525,534). Of the 37 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 17th in deposit market share, encompassing 1.1 percent of total deposit dollars.

While 37 depository institutions operate a branch in the assessment area, a considerably larger number of institutions reported loan activity in the assessment area. An analysis of 2022 HMDA-reportable loans shows that 585 institutions had loan activity in the assessment area, of which the bank ranked 92nd in total HMDA loan originations. The bank ranked 57th out of 132 institutions with CRA loan activity in the assessment area.

The assessment area credit needs include a blend of consumer and commercial loan products. Additionally, community contact comments indicated two key challenges in the assessment area: one, a large portion of the affordable housing stock is older and inefficient; and two, a significant segment of the population is unbanked. Based on these comments, critical community development needs in the assessment area include affordable home improvement loans and financial literacy-related outreach efforts aimed at unbanked individuals. Lastly, based on discussions with the community contact, there are ample community development opportunities available for financial institutions that operate within the assessment area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	12	5.7%	7,511	3.5%
Moderate	47	22.4%	33,240	15.6%
Middle	85	40.5%	93,123	43.7%
Upper	63	30.0%	78,112	36.6%
Unknown	3	1.4%	1,207	0.6%
TOTAL	**210**	**100%**	**213,193**	**100%**

As shown above, 28.1 percent of the census tracts in the assessment area are LMI geographies, but a much smaller percentage (19.1 percent) of the family population resides in these tracts. These LMI areas are split relatively evenly between the two counties.

Based on 2020 census data, the median family income for the assessment area was $72,746. At the same time, the median family income for the state of South Carolina was $68,813. More recently, the FFIEC estimates the 2021 and 2022 median family income for the Greenville-Anderson, SC MSA to be $73,100 and $80,300, respectively, and the Spartanburg, SC MSA to be $68,800 and $74,700, respectively. The following table displays population percentages of assessment area families by income level compared to the South Carolina family populations.

Family Population by Income Level				
	Assessment Area		**South Carolina**	
Low	40,862	19.2%	277,164	21.6%
Moderate	36,295	17.0%	226,941	17.7%
Middle	43,231	20.3%	255,012	19.9%
Upper	92,805	43.5%	521,506	40.7%
TOTAL	**213,193**	**100%**	**1,280,623**	**100%**

As shown in the table above, 36.2 percent of families within the assessment area were considered LMI, which is below the LMI family percentages of 39.3 percent in the state of South Carolina. Additionally, the percentage of families living below the poverty level in the assessment area (8.8 percent) falls below the level in the state of South Carolina (10.5 percent). Considering these factors, the assessment area appears slightly more affluent than the state of South Carolina.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of South Carolina.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$177,309	33.3%	$906
South Carolina	$170,100	32.3%	$918

Based on the data in the table above, homeownership is similarly affordable in the assessment area and the state of South Carolina as a whole. Within the assessment area, the median housing value is $177,309, which is slightly above the median housing value in the state of South Carolina, $170,100. Due to the marginally higher incomes in the assessment area, however, the affordability ratio (33.3 percent) is also modestly higher than the affordability ratio of the state (32.3 percent). In addition, rents are in line with each other in the assessment area and South Carolina as a whole.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate there are 440,019 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are manufacturing (15.4 percent), government (13.0 percent), and retail trade (10.5 percent). The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area as a whole and the state of South Carolina.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**South Carolina**
2021	3.6%	3.9%
2022	2.9%	3.2%
2023 YTD (September)	2.9%	3.1%

As shown in the table above, unemployment rates in the assessment area were consistently lower than statewide figures over the review period. Both the assessment area and the state as a whole saw considerable decreases in the unemployment levels during the review period. The state as a whole began the time frame with a slightly higher unemployment rate and ended the review period with a slightly higher unemployment rate, with the assessment area experiencing a marginally slower decline.

Community Contact Information

For the assessment area, one community contact interview was utilized as part of this evaluation. This interview was with an individual representing a nonprofit organization specializing in affordable housing. The community contact interviewee characterized the local economy as heavily influenced by the state of manufacturing in the area. This sector has long been a leading industry in the area, and the contact specifically cited the BMW manufacturing facility as a large employer in the area. Additionally, another large company has been building a distribution center in the area, bringing further economic opportunities for residents. However, the contact noted that this growth has also resulted in an increased cost of living in the area. The contact noted that the general banking needs of LMI individuals and small businesses were being met by local financial institutions, though there were still pockets of un- and underbanked individuals in the area. There are a sufficient number of physical branches in most communities in the area, though the contact stated that additional ATMs could be beneficial. Although residents have the ability to access the branches of financial institutions, a considerable segment of the population is lacking in financial literacy, which has led to many residents having credit scores lower than many banking products require. Lastly, the contact opined on the state of the housing market in the assessment area. Although the area housing stock consists largely of single-family homes, the assessment area is currently in the middle of a considerable townhome building surge. The existing single-family homes are generally older and are less energy efficient than new builds, decreasing their affordability for LMI residents. Further, the contact stated there is a need for affordable housing stock in the area that is accessible to LMI residents, which is currently constrained due to increasing home prices and the construction of more expensive single-family townhomes, as well as increasing prices of rental units.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREENVILLE ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Greenville assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Lending Activity	Few if Any

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	12	3.0%	$1,148	1.7%
Home Purchase	49	12.0%	$17,067	25.2%
Refinancing	49	12.0%	$14,664	21.6%
Other Purpose LOC	5	1.2%	$1,190	1.8%
Total HMDA	**115**	**28.3%**	**$34,069**	**50.2%**
Small Business	292	71.7%	$33,786	49.8%
TOTAL LOANS	**407**	**100.0%**	**$67,855**	**100.0%**

The bank's lending activity in the assessment area represents 0.7 percent of total 2021 and 2022 HMDA and CRA loans by number and 0.4 percent by dollar. By comparison, the bank operates 1.2 percent of its total branches and holds 0.4 percent of total bank deposits in the assessment area. While its lending levels were below the share of branches in the assessment area, the bank is in line with or above the percentage of deposits when factoring in number and dollar percentages. Therefore, the bank's lending activity levels reflect adequate responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Greenville assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is good overall.

The distribution of HMDA loans to low-income borrowers is considered excellent in 2021 (20.7 percent) and 2022 (24.6 percent), as the bank's performance is well above the performance of peer institutions in the assessment area in 2021 (5.8 percent) and in 2022 (6.2 percent). The bank's performance is also in line with the demographic figure in 2021 (21.3 percent) and above it in 2022 (19.2 percent).

The bank originated 17.2 percent of its HMDA loans to moderate-income borrowers in 2021, which is in between aggregate lending levels (18.3 percent) and the percentage of families who are moderate income (16.3 percent), reflecting adequate performance. The bank's level of lending to moderate-income borrowers in 2022 (14.0 percent) is in line with both aggregate (18.7 percent) and demographic levels (17.0 percent); this is also reflective of adequate performance, considering affordable housing challenges in this assessment area, as confirmed by information from a community contact.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 22.7 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (47.0 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.0 percent). However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 65.5 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 86.5 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (63.0 percent) is considered good when compared to aggregate lending levels (50.0 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.3 percent). There were limited loans originated with unknown revenue figures in 2022, and thus the impact on the evaluation of the bank's performance was negligible.

When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good based on performance in both loan categories. As previously mentioned, the assessment area has 12 low-income census tracts and 47 moderate-income census tracts.

HMDA Lending

The bank's distribution of HMDA loans across both years reflects good penetration among geographies of different income levels, particularly LMI geographies.

In 2021, the bank originated 3.4 percent of its HMDA loans in low-income census tracts, which is above the aggregate lending levels (2.5 percent) and in line with the percentage of owner-occupied housing units in low-income geographies (3.2 percent). Therefore, the bank's performance is considered good. The bank's lending in moderate-income geographies in 2021 (10.3 percent) was in line with the aggregate lending level (9.8 percent) but below the demographic figure (14.5 percent), reflecting adequate performance.

In 2022, the bank's geographic distribution of HMDA loans in low-income census tracts is considered poor, as it did not originate any HMDA loans in these areas. This level of lending is below the performance of peer institutions in the assessment area (1.9 percent) and the demographic figure (2.4 percent). Lending in moderate-income census tracts in 2022 (17.5 percent), however, was well above both the aggregate lending performance (12.7 percent) and the demographic figure (13.4 percent), reflecting excellent performance. When assessing overall performance across both years of data, given the bank's lending percentages exceeded the combined LMI aggregate across both years of data reviewed, overall performance is considered good.

Small Business Lending

Considering bank performance in LMI areas from both years of data, the overall geographic distribution of small business loans is good.

The percentage of small business loans originated in low-income census tracts in 2021 (4.6 percent) was in line with aggregate lending levels (4.9 percent) and the demographic figure for low-income geographies (5.4 percent), reflecting adequate performance. The percentage of small business loans originated in moderate-income census tracts in 2021 (23.9 percent) was well above aggregate lending levels (14.4 percent) and the demographic figure for low-income geographies (16.7 percent), reflecting excellent performance.

In 2022, the bank's performance in low-income census tracts dipped, as only 1.9 percent of small business loans were made to borrowers in low-income geographies; this level of lending is below aggregate performance (2.9 percent) and demographic levels (3.1 percent), reflecting poor

performance. Similarly to 2021, however, the bank made 22.2 percent of its small business loans in moderate-income geographies in 2022, which is again above both aggregate performance (14.7 percent) and demographic levels (17.4 percent), reflecting excellent performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 63.3 percent of all assessment area census tracts and 50.9 percent of all LMI geographies. In 2022, the bank had lending activity in 33.8 percent of census tracts in the assessment area and 23.7 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

During the review period, the bank did not originate any community development loans. This is a decrease from the previous examination, when the bank made eight community development loans totaling $15.6 million.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. In total, the bank made $20.3 million in qualified investments, grants, and donations through a variety of channels, as detailed in the table below. The most impactful of these investments are discussed below the table.

Summary of Investments – Greenville Assessment Area			
Investment Type	**Current Period**	**Prior Period, Still Outstanding**	**Total**
Municipal/Private Bonds	-	$9.7 million	**$9.7 million**
Deposits	-	$250,706	**$250,706**
LIHTC	-	$6.6 million	**$6.6 million**
MBS	$1.2 million	$2.0 million	**$3.2 million**
NMTC	-	$480,000	**$480,000**
Donations	$112,810	-	**$112,810**
TOTAL	**$1.3 million**	**$19.0 million**	**$20.3 million**

- The bank made $1.2 million in new MBS investments during the current period. These investments support permanent financing for affordable housing loans for LMI individuals in the assessment area. The total dollar volume of the bank's current period investments is significant and helps address the need for affordable housing.

- Additionally, the bank provided several donations in support of affordable housing, including a $7,500 donation to an organization that provides market-value rentals at below-market rates for LMI families.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Greenville assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Unreasonably Inaccessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates five branches in the Greenville assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	2	3	0	**5**
	0.0%	0.0%	40.0%	60.0%	0.0%	**100%**
Census Tracts	5.7%	22.4%	40.5%	30.0%	1.4%	**100%**
Household Population	3.8%	18.0%	42.9%	34.5%	0.8%	**100%**

As shown in the previous table, none of the bank's offices are in LMI geographies. This compares to 28.1 percent of the assessment areas census tracts being designated LMI and 21.8 percent of the household population being classified as LMI. As a result, the bank's service delivery systems are unreasonably inaccessible to portions of the bank's geographies and to individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices in this assessment area during the review period. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area generally operate standard business hours from 9:00 a.m. to 4:00 p.m. or 5:00 p.m. Monday through Friday. Drive-through facilities are located at four of the five branches in the assessment area. Lastly, lenders are dispersed throughout the assessment area's branches.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 215 hours of community development services to ten different organizations in the Greenville assessment area.

These community development services included the following noteworthy activities:

- First Horizon Bank employees provided 73 community development service hours teaching financial literacy classes for LMI high school students in the area, a need cited during the community contact interview.

- At a separate school, the bank's employees provided 32 community development service hours teaching financial literacy classes for LMI elementary school students in the area.

- One bank employee served in a leadership role and provided 82 hours of service to one community service organization dedicated to benefiting LMI individuals in the assessment area.

COLUMBIA, SOUTH CAROLINA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA ASSESSMENT AREA

The bank operates three branches in this assessment area, which includes the entirety of Richland County, one of six counties in the Columbia, SC MSA. The bank closed one branch located in a middle-income census tract in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	10	25	29	28	6	**98**
	10.2%	25.5%	29.6%	28.6%	6.1%	**100%**
Family Population	5,297	17,877	37,105	31,466	1,048	**92,773**
	5.7%	19.3%	40.0%	33.9%	1.1%	**100%**
Household Population	9,080	38,552	55,882	49,329	2,635	**155,478**
	5.8%	24.8%	35.9%	31.7%	1.7%	**100%**
Business Institutions	1,111	5,414	6,668	6,263	553	**20,009**
	5.6%	27.1%	33.3%	31.3%	2.8%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	22.245	14,840	16,865	38,823	**92,773**
	24.0%	16.0%	18.2%	41.8%	**100%**
Household Population	39,293	25,561	26,812	63,812	**155,478**
	25.3%	16.4%	17.2%	41.0%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBIA ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the Greenville assessment area (the full-scope MSA assessment area), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Consistent
OVERALL	**CONSISTENT**

During the review period, the bank did not originate any community development loans in this assessment area.

INVESTMENT TEST

During the review period, the bank made three community development investments totaling $5.7 million, with investments totaling $5.4 million made in the current period. Additionally, eight donations were made totaling $390,879. This is consistent with the significant level of investments and grants made by the bank in the Greenville full-scope review assessment area.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Greenville assessment area, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the South Carolina full-scope review assessment area. During the review period, bank employees provided community development service activities to 12 organizations totaling 99 hours.

CHARLESTON-NORTH CHARLESTON, SOUTH CAROLINA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLESTON ASSESSMENT AREA

The bank operates one branch in this assessment area, which consists of the entirety of Charleston County, one of three counties in the Charleston-North Charleston, SC MSA. The bank did not open or close any branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	8	20	26	41	4	**99**
	8.1%	20.2%	26.3%	41.4%	4.0%	**100%**
Family Population	6,467	17,009	23,503	45,695	1,138	**93,812**
	6.9%	18.1%	25.1%	48.7%	1.2%	**100%**
Household Population	11,675	33,677	43,192	72,239	2,628	**163,411**
	7.1%	20.6%	26.4%	44.2%	1.6%	**100%**
Business Institutions	1,926	4,757	6,484	12,499	528	**26,194**
	7.4%	18.2%	24.8%	47.7%	2.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	19,895	14,452	16,971	42,494	**93,812**
	21.2%	15.4%	18.1%	45.3%	**100%**
Household Population	40,300	25,011	27,133	70,967	**163,411**
	24.7%	15.3%	16.6%	43.4%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLESTON ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in the Greenville assessment area (the full-scope assessment area), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Below
Community Development Lending Activity	Exceeds
OVERALL	**CONSISTENT**

During the review period, the bank made one community development loan totaling $504,000. This loan qualified for a community development purpose of affordable housing. In addition, the bank received credit for one PPP community development loan totaling $1.2 million.

INVESTMENT TEST

During the review period, the bank made four community development investments totaling $5.8 million, including $5.6 million in investments made in the current period. Furthermore, 11 donations were made totaling $133,500. This performance is consistent with the significant level of investments and grants made by the bank in the Greenville full-scope review assessment area.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Greenville assessment area, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

While the bank provides a satisfactory level of community development services in this assessment area, this performance was below statewide levels, as the bank was a leader in providing community development services in the South Carolina full-scope review assessment area. During the review period, bank employees provided community development service activities to three organizations totaling 71 hours.

VIRGINIA

CRA RATING FOR VIRGINIA: **SATISFACTORY**

The Lending Test is rated: **Low Satisfactory**
The Investment Test is rated: **Needs to Improve**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Virginia include the following:

- The bank's lending levels reflect poor responsiveness to the credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The bank makes few if any community development loans in Virginia.
- The bank makes use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes a poor level of qualified community development investments and grants.
- Service delivery systems are readily accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems. Business hours and banking services do not vary in a way that inconveniences certain portions of the Virginia assessment areas, particularly LMI geographies or individuals.
- The bank provides an adequate level of community development services throughout the Virginia assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Virginia assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in four assessment areas throughout Virginia, with three noncontiguous nonMSA assessment areas and one assessment area in the Roanoke, VA MSA. Performance in the nonMSA assessment areas was combined for analysis and evaluated using full-scope review procedures, resulting in one set of performance conclusions for nonMSA Virginia areas; consequently, performance in the nonMSA Virginia combined area drove overall state rating conclusions.

To augment the evaluation of the full-scope review combined area in Virginia, one community contact interview was conducted. This interview was used to ascertain specific community credit needs and provide context with which to evaluate the bank's responsiveness to these needs. Details from this interview are included in the *Description of Institution's Operations* sections applicable to the nonMSA assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN VIRGINIA

The following table gives additional detail regarding the bank's operations within Virginia.

Assessment Area	Offices		Deposits		Review Procedures
	#	%	$	%	
NonMSA Virginia	6	75.0%	$367,687	70.5%	Full-Scope
Roanoke MSA	2	25.0%	$154,198	29.5%	Limited-Scope
TOTAL	**8**	**100%**	**$521,885**	**100%**	**1 Full-Scope**

The bank operates eight branches (1.9 percent of total branches) throughout the three assessment areas in the state of Virginia. Total deposits in the state total $521.9 million, which represents 0.8 percent of total bank deposits. As displayed in the table above, the majority of these branches and deposits are located in nonMSA Virginia assessment areas. During the review period, the bank did not open or close any branches in the state of Virginia.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

LENDING TEST

The bank's performance under the Lending Test in Virginia is rated Low Satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Poor
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Few if Any
Product Innovation	Makes Use
OVERALL	**LOW SATISFACTORY**

Lending Activity

Overall, lending levels reflect poor responsiveness to the credit needs of the bank's combined assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
NonMSA Virginia	Poor
OVERALL	**POOR**

Limited-Scope Assessment Areas	Lending Activity
Roanoke MSA	Consistent

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
NonMSA Virginia	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Roanoke MSA	Consistent

The overall geographic distribution of loans reflects adequate penetration throughout the assessment areas, as displayed below.

Full-Scope Assessment Areas	Geographic Distribution of Loans
NonMSA Virginia	Adequate
OVERALL	**ADEQUATE**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Roanoke MSA	Consistent

Community Development Lending Activity

The bank makes few if any community development loans in Virginia, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
NonMSA Virginia	Few if Any
OVERALL	**FEW IF ANY**

Limited-Scope Assessment Areas	Community Development Lending
Roanoke MSA	Consistent

During the review period, the bank did not originate or renew any community development loans inside its Virginia assessment areas.

Product Innovation

The bank makes use of innovative and flexible lending practices in serving the credit needs of the assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section.

The bank's use of flexible and/or innovative lending products in the state is described as follows:

- The bank made a number of loans through its various affordable mortgage programs in the Virginia assessment areas and the broader state. This included six First Horizon Home Start loans totaling $669,450 and two loans totaling $124,200 through the Freddie Mac Home Possible program.

- Through its down payment assistance programs, the bank made one grant totaling $5,000 to an LMI borrower or borrower with property in an LMI geography.

INVESTMENT TEST

The bank's performance under the Investment Test is rated Needs to Improve, driven primarily by the performance in the Virginia nonMSA assessment areas. Overall, the bank made a poor level of qualified community development investments and grants. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
NonMSA Virginia	Poor
OVERALL	**POOR**

Limited-Scope Assessment Areas	Investment and Grant Activity
Roanoke MSA	Exceeds

As shown in the table below, the bank's investment and grant activity totaled $255,035. These activities consisted primarily of one MBS investment supporting affordable housing in Virginia.

Virginia Assessment Areas	Investments ($)	Grants/Donations ($)
NonMSA Virginia	-	$13,000
Roanoke MSA	$240,035	$2,000
OVERALL	**$240,035**	**$15,000**

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are readily accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
NonMSA Virginia	Readily Accessible
OVERALL	**READILY ACCESSIBLE**

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Roanoke MSA	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
NonMSA Virginia	Not Adversely Affected
OVERALL	**NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Roanoke MSA	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
NonMSA Virginia	Do Not Vary in a Way that Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Roanoke MSA	Consistent

Community Development Services

The bank provides an adequate level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
NonMSA Virginia	Adequate Level
OVERALL	**ADEQUATE LEVEL**

Limited-Scope Assessment Areas	Community Development Services
Roanoke MSA	Below

In total, bank employees provided community development service activities to 16 different organizations for a total of 248 hours. The majority of these hours were completed in nonMSA Virginia. In addition to meeting the community development service needs of the Virginia assessment areas, bank employees provided 248 hours of community development services to eight different organizations outside of the bank's assessment areas but in the broader, statewide area.

NONMETROPOLITAN VIRGINIA STATEWIDE AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMSA VIRGINIA

Bank Structure

As shown in the table below, the bank operates six (1.4 percent) of its total branches in nonMSA Virginia assessment areas.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
1	1	3	1

Each of these offices contains at least one full-service ATM. During the review period, the bank did not open or close any branches in this assessment area. Based on the branch network and other service delivery systems, the bank is positioned to adequately deliver financial services to its nonMSA Virginia assessment areas.

General Demographics

The bank's nonMSA Virginia review area consists of three separate assessment areas: the Virginia nonMSA assessment area one is made up of Henry and Patrick counties, along with the city of Martinsville (which a county equivalent within Henry County); assessment area two consists of Halifax County; and the third assessment area consists of Accomack and Northampton counties. Accomack and Northampton counties are adjacent to each other on the eastern edge of the commonwealth. These counties make up the eastern shore, between the Chesapeake Bay and the Atlantic Ocean. Halifax, Henry, and Patrick counties and Martinsville are centrally located along the southern border of the state. Given their similar demographic characteristics, economic conditions, and credit needs, the analyses of the three assessment areas are presented here on a combined assessment area basis.

The combined assessment area has a total population of 161,758. Henry County is the largest of the five counties, with a population of 50,948. Halifax and Accomack counties are similarly sized, with populations of 34,022 and 33,413, respectively. Lastly, Northampton County, Patrick County, and Martinsville are also relatively similar in population, each with populations between 12,282 and 17,608.

The assessment areas' size is considerable, yet the assessment area hosts relatively few financial institutions. In total, 15 FDIC-insured depository institutions operate 44 branches throughout the assessment areas. The bank is the 3rd largest financial institution in the combined assessment area by deposit market share (11.3 percent) and is tied for 2nd when ranked by total branches. Deposits held in nonMSA Virginia represent 0.6 percent of total bank deposits.

Despite the relatively few institutions operating in the area, a considerable number of financial institutions have originated HMDA and CRA loans within the assessment areas. In 2022, a total of 299 organizations originated at least one HMDA loan in the assessment areas and 76 organizations

originated at least one CRA loan. The bank ranked 20th in both loan categories by number of loans originated in the combined assessment area. This, along with its significant deposit market share, demonstrates the bank's importance in the combined areas, despite a relatively small branch presence.

The combined assessment area credit needs include a blend of consumer and commercial loan products. Additionally, a community contact familiar with the assessment area pointed to a need for small business development training to help local entrepreneurs access needed financing to start and grow businesses.

Income and Wealth Demographics

The following table summarizes the distribution of the combined assessment area census tracts by income level and the family population within those tracts.

Assessment Areas Demographics by Geography Income Level				
	Census Tracts		**Family Population**	
Low	2	3.6%	1,201	2.9%
Moderate	13	23.2%	10,042	24.0%
Middle	30	53.6%	25,905	62.0%
Upper	6	10.7%	4,659	11.1%
Unknown	5	8.9%	0	0%
TOTAL	**56**	**100%**	**41,807**	**100%**

As shown above, 26.8 percent of the census tracts in the assessment areas are LMI geographies, with 26.9 percent of the family population residing in these tracts. These LMI census tracts are located in Accomack, Halifax, and Henry counties, as well as the city of Martinsville. While Patrick County does not contain any LMI census tracts, all six middle-income census tracts are designated underserved due to their rural nature. Accomack County and the city of Martinsville also contain middle-income distressed census tracts due to population loss.

Based on 2020 census data, the median family income for the combined assessment areas was $55,794. At the same time, the median family income for the entirety of nonMSA Virginia was $60,947. More recently, the FFIEC estimates the 2022 median family income for nonMSA Virginia to be $67,800. The following table displays population percentages of assessment area families by income level compared to the Virginia family populations.

Family Population by Income Level				
	Assessment Areas		**NonMSA Virginia**	
Low	9,942	23.8%	57,812	20.9%
Moderate	8,168	19.5%	50,453	18.3%
Middle	8,639	20.7%	56,053	20.3%
Upper	15,058	36.0%	111,904	40.5%
TOTAL	**41,807**	**100%**	**276,222**	**100%**

As shown in the previous table, 43.3 percent of families within the assessment areas were considered LMI, which is above the LMI family percentages of 39.2 percent in nonMSA Virginia. Similarly, the percentage of families living below the poverty level in the assessment areas (12.4 percent) is slightly above the level in nonMSA Virginia (11.5 percent). Considering these factors, the combined assessment areas appear less affluent than the entirety of nonMSA Virginia.

Housing Demographics

The following table displays housing demographics for the assessment areas and nonMSA Virginia as a whole.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$118,356	36.0%	$675
NonMSA Virginia	$144,845	33.0%	$719

Based on the data in the table above, homeownership is more affordable in the assessment areas than in nonMSA Virginia as a whole, though these figures do vary depending on location. Within the assessment areas, homeownership is least affordable in Northampton County based on an affordability ratio of 26.2 percent, while the city of Martinsville is considerably more affordable, with an affordability ratio of 45.8 percent. In addition, rents vary considerably in the assessment areas, with Accomack County having the highest median gross rent of $825 compared to Henry County's median gross rent of $600. Therefore, although housing is generally more affordable in the combined assessment areas compared to nonMSA Virginia as a whole, due to wide disparities impacting affordability within the assessment areas, LMI residents in certain areas may face significant barriers to owning or renting a home.

Industry and Employment Demographics

The assessment areas support a strong small business sector, with 91.5 percent of businesses in the combined areas having revenues of $1 million or less. BLS industry demographics indicate there are 56,833 paid employees in the assessment areas. By percentage of employees, the three largest job categories in the assessment area are manufacturing (20.2 percent), government (18.7 percent), and retail trade (11.2 percent). The following table details unemployment data from the BLS (not seasonally adjusted), for the assessment areas and nonMSA Virginia as a whole.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**NonMSA Virginia**
2021	4.8%	4.4%
2022	3.6%	3.4%
2023 YTD (September)	3.7%	3.4%

As shown in the table above, unemployment rates in the assessment areas experienced a decline from 2021 to 2023 YTD (September). This decline was not even across the board, with certain

counties in the assessment areas experiencing increasing unemployment from 2022 to 2023 YTD (September), including in Accomack County, which saw unemployment increase in that time frame by 0.2 percent. Halifax County saw its unemployment rate increase by 0.1 percent, whereas the remaining counties and the city of Martinsville all saw their unemployment rates hold steady, as did the unemployment rate in nonMSA Virginia.

Community Contact Information

For the nonMSA Virginia assessment areas, one community contact interview was referenced as part of this evaluation. This interview was conducted with a local government official specializing in community development. Speaking with an emphasis on the economic conditions in Henry, Patrick, and Halifax counties and the city of Martinsville, the contact stated that the local area has experienced slow growth in recent years. A considerable drag on the local economy was attributed to a lack of major new employers entering the region. Despite this, expansion among existing employers and an increasing population of remote workers moving to the area due to its lower cost of living has provided some opportunities for the local economy. Housing stock in the area was described as being older, presenting challenges to homeownership for those unable to take on homes in need of repair. Additionally, recent inflationary pressures on building costs have decreased infrastructure investments, limiting new home construction in the area. The contact further attributed housing challenges in the area to many residents having low credit scores. This presents an opportunity for financial institutions to provide financial literacy training to residents. Lastly, the contact described a banking environment impacted by bank consolidation and branch closures, which has had a negative impact on the availability of financial services for LMI residents.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMSA VIRGINIA

LENDING TEST

The following table displays the bank's performance under the Lending Test in nonMSA Virginia.

Lending Test Summary	
Lending Activity	Poor
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Lending Activity	Few if Any

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	18	12.9%	$1,491	12.4%
Home Purchase	11	7.9%	$1,341	11.2%
Refinancing	50	35.7%	$6,013	50.0%
Other Purpose LOC	13	9.3%	$649	5.4%
Total HMDA	**92**	**65.7%**	**$9,494**	**79.0%**
Small Business	48	34.3%	$2,532	21.1%
Small Farm	14	9.1%	$311	2.5%
TOTAL LOANS	**140**	**100%**	**$12,026**	**100%**

The bank's lending activity in the assessment area represents 0.3 percent of the total number of 2021 and 2022 HMDA and CRA loans by number and 0.1 percent by dollar. By comparison, the bank operates 1.4 percent of its total branches and holds 0.6 percent of total bank deposits in the assessment area. Therefore, the bank's lending activity levels reflect poor responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the nonMSA Virginia assessment areas.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is good overall.

The bank originated 7.0 percent of its HMDA loans to low-income borrowers in 2021, which was in line with the performance of peer institutions in the assessment area (5.9 percent) but below the percentage of assessment area families who are low income (24.4 percent). Therefore, the bank's performance is considered adequate. In 2022, the bank originated 14.3 percent of its HMDA loans to low-income borrowers, which compared favorably to aggregate lending levels (7.7 percent) but was also below the demographic figure (23.8 percent), reflecting good performance.

In 2021, the bank originated 23.3 percent of its HMDA loans to moderate-income borrowers, which was well above the aggregate lending level (14.8 percent) and above the demographic figure (19.2 percent) and is considered excellent. In 2022, the bank made 20.4 percent of its HMDA loans to moderate-income borrowers, as compared to 18.9 percent for other lenders in the assessment area and the demographic figure (19.5 percent), reflecting good performance.

Small Business

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, its distribution of small business loans by borrower's profile is good. In 2021, the bank made 22.9 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (48.9 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (91.5 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 54.3 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 94.7 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (84.6 percent) is considered good when compared to aggregate lending levels (58.6 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (91.5 percent). There were no loans originated with unknown revenue figures in 2022, and thus there was no impact on the evaluation of the bank's performance.

When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in nonMSA Virginia assessment areas is adequate. As previously mentioned, the assessment areas contain 2 low-income census tracts and 13 moderate-income census tracts; this information is based on census demographics as of 2022. However, in 2021, there were no low-income census tracts in the combined assessment areas. Consequently, as discussed below, geographic distribution performance in low-income geographies is only based on 2022 lending activity.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is adequate overall.

While the bank did not originate any HMDA loans in low-income census tracts in 2022, comparison data indicates a very low level of lending opportunity in these geographies: aggregate lending levels (1.9 percent) and owner-occupied housing units in low-income census tracts (2.3 percent); consequently, the bank's distribution of HMDA loans in low-income geographies is adequate.

In 2021, the bank originated 20.9 percent of HMDA loans in moderate-income geographies, which was above the aggregate performance (15.0 percent) and in line with demographic levels (23.2 percent), reflecting good performance. In 2022, the percentage of HMDA loans in moderate-income geographies declined slightly to 20.4 percent, which was in line with aggregate lending levels (20.8 percent) but below the demographic figure (23.2 percent) and is considered adequate.

Small Business Lending

The bank did not originate any small business loans in low-income census tracts in 2022. This is below aggregate lending levels (2.8 percent) and the demographic figure for low-income geographies (2.6 percent). This reflects poor performance in low-income geographies.

In 2021, the bank originated 22.9 percent of small business loans in moderate-income geographies, which is above both aggregate performance (16.8 percent) and demographic levels (17.9 percent), reflecting excellent performance. In 2022, the bank made 15.4 percent of its small business loans in moderate-income geographies, which is slightly below aggregate performance (21.1 percent) and demographic levels (21.8 percent), reflecting adequate performance.

When considering performance across low- and moderate-income geographies and both years, the bank's distribution of small business loans in LMI geographies is adequate overall.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 56.3 percent of all assessment area census tracts and 50.0 percent of all LMI geographies. In 2022, the bank had lending activity in 55.4 percent of census tracts in the assessment area and 40.0 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank did not originate any community development loans in nonMSA Virginia assessment areas during the review period.

INVESTMENT TEST

The bank makes a poor level of qualified community development investments and grants within nonMSA Virginia assessment areas. During the review period, the bank did not make any qualified community development investments in the assessment area. The bank did, however, make ten donations totaling $13,000 to community development organizations.

SERVICE TEST

The following table displays the bank's performance under the Service Test in nonMSA Virginia.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level

Accessibility of Delivery Systems

The bank operates six branches in the combined assessment areas. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	1	1	3	1	0	**6**
	16.7%	16.7%	50.0%	16.7%	0.0%	**100%**
Census Tracts	3.6%	23.2%	53.6%	10.7%	8.9%	**100%**
Household Population	2.7%	24.9%	61.2%	11.2%	0.0%	**100%**

As shown in the previous table, two of the bank's offices are in LMI geographies. This accounts for 33.3 percent of total bank branches in the assessment area. This is above both the percentage of total LMI census tracts (26.8 percent) and the percentage of the household population living in these census tracts (27.6 percent). As a result, the bank's service delivery systems are readily accessible in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices in the nonMSA Virginia assessment areas during the review period. As a result, the bank's record of opening and closing offices has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branches in the assessment area operate standard business hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. Drive-through facilities are located at five of the six branches in the assessment area, including both branches in LMI census tracts. Lastly, all facilities include at least one full-service ATM on site.

Community Development Services

The bank provides an adequate level of community development services in the nonMSA Virginia assessment areas. During the review period, bank employees provided 178 hours of community development services to 14 different organizations in the assessment areas. These community development services included several bank employees providing financial literacy education, an area need noted by a community contact.

ROANOKE, VIRGINIA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ROANOKE ASSESSMENT AREA

The bank operates two branches in this assessment area, which includes the entirety of Franklin County, one of six counties/county equivalents in the Roanoke, VA MSA. The bank did not open or close any branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	0	4	9	3	0	**16**
	0%	25.0%	56.3%	18.8%	0%	**100%**
Family Population	0	3,040	9,610	2,825	0	**15,475**
	0%	19.6%	62.1%	18.3%	0%	**100%**
Household Population	0	5,159	13,825	3,746	0	**22,730**
	0%	22.7%	60.8%	16.5%	0%	**100%**
Business Institutions	0	545	1,201	591	0	**2,337**
	0%	23.3%	51.4%	25.3%	0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	3,454	2,856	3,471	5,694	**15,475**
	22.3%	18.5%	22.4%	36.8%	**100%**
Household Population	5,847	3,075	4,600	9,208	**22,730**
	25.7%	13.5%	20.2%	40.5%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ROANOKE ASSESSMENT AREA

LENDING TEST

The bank's overall lending performance in this assessment area is consistent with Lending Test performance in nonMSA Virginia (the full-scope assessment area), as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Borrower Distribution	Consistent
Geographic Distribution	Consistent
Community Development Lending Activity	Consistent
OVERALL	**CONSISTENT**

During the review period, the bank did not originate any community development loans in this assessment area.

INVESTMENT TEST

During the review period, the bank had one current period community development investment in an MBS totaling $240,034. Furthermore, two donations were made totaling $2,000. This performance exceeds the poor level of investments and grants made by the bank in the nonMSA Virginia full-scope review assessment areas.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with performance in nonMSA Virginia assessment areas, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	**CONSISTENT**

During the review period, bank employees provided community development service activities to two organizations totaling 70 hours, which is below the bank's performance in the nonMSA Virginia combined assessment areas.

NEW YORK

CRA RATING FOR NEW YORK:	**SATISFACTORY**
The Lending Test is rated:	**Low Satisfactory**
The Investment Test is rated:	**Low Satisfactory**
The Service Test is rated	**Low Satisfactory**

Factors supporting the ratings for the state of New York include:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the assessment area.
- The distribution of loans by borrower's income or revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the New York MSA assessment area.
- The bank makes an adequate level of community development loans throughout the assessment area.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in a leadership position in New York.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank provides an adequate level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the New York assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. The New York MSA assessment area was reviewed under full-scope examination procedures and included information obtained from one community contact. This interview was used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from this community contact interview are included in the next section.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW YORK

Bank Structure

As of the evaluation date, the bank operates one branch in one New York assessment area. During the review period, the bank closed one branch and opened another branch; both locations of which are in unknown-income designated census tracts. Bank deposits in New York as of June 30, 2023, total $716.4 million, or 1.1 percent of total deposits. Considering its limited branch network within this highly competitive and densely populated area, the bank is not well positioned to serve the entire assessment area.

General Demographics

The bank's New York assessment area is composed of New York County, which is 1 county in the 11-county New York-Jersey City-White Plains, NY–NJ MD (New York MD). This county contains the entirety of Manhattan and has a population of 1.7 million people. Based on FDIC Deposit Market Share Report data as of June 30, 2023, there were 86 FDIC-insured depository institutions operating 557 branches within the assessment area. The bank ranked 37th in terms of deposit market share, with less than 0.1 percent of total deposit dollars. While there are 86 financial institutions operating a branch in the assessment area, an analysis of reported HMDA and CRA lending activity for 2022 shows that a much higher number of institutions had lending activity in the assessment area. The bank ranked 39th out of 265 financial institutions in the assessment area with HMDA lending activity and 59th out of 215 institutions with CRA lending activity.

As one of the most important economic regions in the world and a central hub for many industries, including finance, international trade, real estate, and manufacturing, the New York City region has a high demand for diverse and often highly specialized banking services. Additionally, according to the community contact interview, other significant credit and community development needs include financial literacy training. Additionally, affordable housing is a current need in the assessment area, with current supply affected significantly by recent interest rate increases. Lastly, one unique area of need remarked upon was bilingual or multilingual bank employees to meet the needs of the incredibly diverse demographics of New York City.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	36	11.6%	48,143	14.8%
Moderate	44	14.2%	56,991	17.5%
Middle	32	10.3%	32,267	9.9%
Upper	175	56.5%	181,528	55.8%
Unknown	23	7.4%	6,554	2.0%
TOTAL	**310**	**100%**	**325,483**	**100%**

As shown in the previous table, 25.8 percent of census tracts in the assessment area are designated as LMI, while 32.3 percent of assessment area families reside within those tracts. The majority of these LMI tracts are located north of Central Park, with another cluster located near the southeast corner of Manhattan. The majority of assessment area geographies (56.5 percent) are upper-income, and the majority of families (55.8%) live in those upper-income census tracts. Conversely, geographies and families are spread fairly evenly by low-, moderate-, and middle-income categories.

Based on 2020 census data, the median family income for the assessment area was $114,659. This income figure was higher than the median family income for the New York MD ($85,483) as a whole. More recently, the FFIEC estimated the median family income for the New York MD to be $85,500 in 2021 and $99,000 in 2022. The following table displays the distribution of assessment area families by income level compared to the New York MD as a whole.

Family Population by Income Level				
	Assessment Area		**New York MD**	
Low	79,178	24.3%	731,058	26.3%
Moderate	35,953	11.0%	415,633	15.0%
Middle	35,775	11.0%	443,828	16.0%
Upper	174,595	53.6%	1,187,171	42.7%
TOTAL	**325,483**	**100%**	**2,777,690**	**100%**

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (35.3 percent) than reside in LMI census tracts (25.8 percent). Overall, the distribution of families by income level in the assessment area is aligned with the New York MD with respect to low-income families, whereas the populations of the remaining income categories vary significantly. The largest difference is found in the percentage of upper-income families in the assessment area (53.6 percent) compared to the percentage of upper-income families in the New York MD (42.7 percent). However, the percentage of families below the poverty level in the assessment area (12.0 percent) is in line with the New York MD (11.9 percent). Therefore, considering income levels and family demographics, the assessment area is more affluent than the entirety of the New York MD.

Housing Demographics

The following table displays housing demographics for the assessment area and the New York MD.

Housing Demographics			
Dataset	**Median Housing Value**	**Affordability Ratio**	**Median Gross Rent (Monthly)**
Assessment Area	$1,033,012	8.7%	$1,786
New York MD	$553,158	13.3%	$1,486

Housing in the assessment area is less affordable than in the New York MD, as demonstrated across the factors laid out in the table above. Median housing values in the assessment area are nearly double the New York MD as a whole, with the assessment area's affordability ratio being significantly lower than the New York MD. Median gross rents are more in line with each other, but there is still a premium paid for rents in the assessment area. Additionally, the percentage of

rental units in the assessment area (65.1 percent of total housing units) is higher than the percentage of rental units in the New York MD (55.5 percent), suggesting a limited availability of homes for purchase in the assessment area.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. BLS industry demographics indicate there are 2.2 million paid private-sector employees in the New York assessment area, with the three largest industries by number of employees being professional and technical services (15.6 percent), finance and insurance (13.0 percent), and healthcare and social assistance (10.5 percent). The assessment area also supports a strong small business sector, with 85.2 percent of assessment area businesses having annual revenues of $1 million or less.

The table below details unemployment data from the BLS (not seasonally adjusted), for the assessment area compared to the New York MD.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	**Assessment Area**	**New York MD**
2021	7.7%	8.8%
2022	4.6%	5.0%
2023 YTD (September)	4.8%	4.9%

As shown in the table above, unemployment levels in the assessment area have decreased considerably since 2021, falling by nearly 3 percentage points. Unemployment levels in the New York MD as a whole have fallen further, almost 4 percentage points, but from a higher baseline. Lastly, in all three years of data presented, the New York MD had a higher level of unemployment than the New York assessment area.

Community Contact Information

For the New York assessment area, one community contact interview was referenced as part of this evaluation. This interview was conducted with an individual representing an organization focused on providing affordable housing and community services to LMI individuals residing within the broader New York-New Jersey multistate area. The contact described numerous difficulties for LMI individuals becoming homeowners in the bank's assessment area. These include not only long-standing issues such as elevated housing costs but also more recent difficulties that include the higher interest rate environment. Additional impediments to affordable housing cited were zoning regulations, as well as local resistance to multifamily housing, accessory dwelling units, and basement apartments. The higher interest rate environment has also represented a hurdle for small businesses operating in the area to access credit. Areas of opportunity specifically mentioned for financial institutions were loan and deposit products with greater flexibility. Fees common for overdrafts and late payments were described as crippling for many LMI individuals in the area. Additionally, age-based financial education centered on building credit was described as a need in the area. Lastly, as referenced earlier, diverse and multilingual bank staff was highlighted as being crucial in meeting the needs of the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

The bank's Lending Test performance in the New York assessment area is rated Low Satisfactory. The following table displays the bank's performance under the Lending Test in the New York assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Lending Activity	Adequate Level
Product Innovation	No Use
LENDING TEST RATING	**LOW SATISFACTORY**

Lending Activity

The following table displays the bank's combined 2021 and 2022 lending volume in the New York assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	1	0.6%	$750	0.4%
Home Purchase	81	47.9%	$119,902	60.9%
Multifamily Housing	2	1.2%	$21,000	10.7%
Refinancing	22	13.0%	$29,046	14.8%
Other Purpose Closed/Exempt	8	4.7%	$11,995	6.1%
Total HMDA	**114**	**67.5%**	**$182,693**	**92.8%**
Small Business	55	32.5%	$14,284	7.3%
TOTAL LOANS	**169**	**100%**	**$196,977**	**100%**

Loans made in the New York assessment area represent 0.3 percent of total 2021 and 2022 HMDA and CRA loans made within the bank's combined assessment areas by number and 1.1 percent by dollar amount. While the percentage of loans based on the number of loans is below the current percentage of total bank deposits (1.1 percent), the level of lending by dollar amount is similar to the percentage of total bank deposits in the assessment area. Additionally, both the number and dollar percentage are higher than the percentage of total bank branches in the assessment area (0.2 percent). Therefore, the bank's lending activity reflects adequate responsiveness to the credit needs of the New York assessment area.

Loan Distribution by Borrower's Profile

The bank's overall loan distribution by borrower's profile is adequate.

HMDA Lending

Overall, the bank's borrower distribution of HMDA loans is poor.

In both 2021 and 2022, the bank did not originate any HMDA loans to low- or moderate-income borrowers. This was below aggregate lending levels to low-income borrowers across both years (0.2 percent and 0.4 percent in 2021 and 2022, respectively) and the demographic figure across both years (25.2 percent and 24.3 percent, respectively), reflecting poor performance. Similarly, the bank's lending to moderate-income borrowers was below aggregate lending levels across both years (1.5 percent and 2.0 percent, respectively), as well as demographic figures (11.4 percent and 11.0 percent, respectively). This also reflects poor performance with moderate-income borrowers across both years.

Small Business Lending

Although the bank's performance in 2021 might appear poor, after considering the impacts of the pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2021, the bank made 19.0 percent of its small business loans to businesses with annual revenues of $1 million or less, which is below the aggregate lending level (33.0 percent) and the demographic estimate of businesses in the assessment area with this revenue profile (85.2 percent).

However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 45.2 percent of the bank's 2021 small business loans in the assessment area were reported with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 57.9 percent of small business loans with unknown revenue in 2021 had loan sizes of $100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community in the assessment area and reflects good performance.

In 2022, the percentage of bank loans to businesses with annual revenues of $1 million or less (38.5 percent) is considered adequate when compared to aggregate lending levels (41.3 percent) and the demographic estimate of small businesses in the assessment area with this revenue profile (85.2 percent). Compared to 2021, a smaller number of small business loans were originated with unknown revenue figures in 2022 and did not materially impact the evaluation of the bank's performance.

When considering the bank's performance across both years of data reviewed and the impact of the bank's PPP lending, the overall distribution of small business loans by borrower's profile is considered good.

Geographic Distribution of Loans

The bank's geographic distribution of loans is adequate overall, based on both loan products reviewed.

HMDA Lending

The overall distribution of HMDA loans by geography income level is adequate.

In 2021, the bank originated 3.3 percent of its HMDA loans in low-income geographies, as compared with 2.4 percent by peer institutions in the assessment area and demographic figures of 2.1 percent, reflecting adequate performance. The bank's HMDA lending in low-income geographies in 2022 (1.9 percent) is also considered adequate, as its performance was in line with aggregate lenders (3.3 percent) and demographic levels (2.7 percent).

HMDA lending in moderate-income geographies reflected significant swings in performance over the review period and is poor in 2021 and excellent in 2022. The bank's level of lending in moderate-income geographies (1.6 percent) in 2021 was below both aggregate lending levels (7.2 percent) and demographic figures (6.8 percent). This performance reversed in 2022, when the percentage of HMDA loans made in moderate-income geographies (7.5 percent) exceeded both aggregate lending levels (5.4 percent) and demographic figures (6.3 percent).

Small Business Lending

The bank's record of lending to small businesses in LMI geographies is poor overall. It did not originate any small business loans in low-income geographies in either year. This was below the aggregate level of performance in both years (4.1 percent and 4.2 percent, respectively), as well as the demographic figure (3.6 percent and 4.0 percent, respectively), reflecting poor performance across low-income geographies for 2021 and 2022.

Small business lending in moderate-income census tracts in 2021 and 2022 saw modest improvements in the bank's lending levels relative to its performance in low-income census tracts. The bank originated 4.8 percent of its small business loans in moderate-income census tracts in 2021, which was lower than peer institutions in the assessment area (8.1 percent) and the demographic figure (7.3 percent) and reflected poor performance. Performance in 2022 was adequate, as the bank's lending in moderate-income geographies (7.7 percent) was in line with aggregate lending levels (6.7 percent) and the demographic figure (5.8 percent).

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 22.9 percent of all assessment area census tracts and 5.5 percent of all LMI geographies. In 2022, the bank had lending activity in 15.8 percent of census tracts in the assessment area and 7.5 percent of LMI geographies in the assessment area. While the LMI dispersion was low, this performance is in line with the bank's similarly low overall dispersion and is consistent with the bank's extremely limited branch presence in a highly competitive market. Therefore, this dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank makes an adequate level of community development loans in the New York assessment area. The bank originated one community development loan with a purpose of affordable housing, totaling $4.7 million. This loan provided funding for affordable, rent-controlled, multifamily housing. As noted by community contacts, the assessment area has a need for affordable housing options for LMI borrowers.

INVESTMENT TEST

The bank's Investment Test performance in the New York assessment area is rated Low Satisfactory. The bank made an adequate level of qualified community development investments and grants in the assessment area. The bank made one new qualified community development investment of $2.4 million in the assessment area in an MBS, in addition to $238,742 in investments made prior to this review period but still outstanding that benefited the state of New York as a whole. In addition to these investments, the bank made five community development donations totaling $47,500 benefiting the assessment area and one additional donation totaling $10,000 that benefited the broader state. These donations supported community service organizations providing LMI individuals with health services, as well as affordable housing in the area, a need described in the community contact interview. Of the five donations made in the assessment area, four, totaling $42,500, were made to the same organization providing wraparound services to LMI individuals seeking to purchase homes in the assessment area.

SERVICE TEST

The bank's performance under the Service Test in the New York assessment area is rated Low Satisfactory. The following table displays the bank's performance under the Service Test.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level
SERVICE TEST RATING	**LOW SATISFACTORY**

Accessibility of Delivery Systems

The bank operates one branch in the New York assessment area, which is in an unknown income level census tract. In comparison, the table below displays the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	0	0	1	**1**
	0%	0%	0%	0%	100%	**100%**
Census Tracts	11.6%	14.2%	10.3%	56.5%	7.4%	**100%**
Household Population	12.2%	15.1%	9.9%	60.3%	2.6%	**100%**

While the bank's percentage of branches located in LMI census tracts is below the percentage of LMI census tracts and the percentage of LMI household population, the bank's sole branch is located near numerous LMI census tracts within the assessment area. Therefore, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels.

Changes in Branch Locations

The bank's record of opening and closing branches in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and individuals, as the bank closed one and opened one branch in an unknown-income designated census tract.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. The bank's branch in the assessment area operates from 9 a.m. to 4 p.m. Monday through Friday, and these hours are generally in line with the hours of operation across the entirety of the bank's branches. Lastly, the branch operates with mortgage loan originators on site, providing access to home mortgage lending to LMI borrowers, a need described by the community contact.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. During the review period, bank employees provided a total of 177 hours of community development services to five different organizations in the assessment area.

These community development services included the following noteworthy activities:

- Bank employees provided 69 hours of community development services to an organization providing wraparound services targeting homeownership for LMI individuals, a noted need in the assessment area. These efforts consisted of bank employees providing technical assistance and serving in leadership positions for the organization.

- One bank employee provided financial literacy training to an organization working toward alleviating the problem of chronic unemployment. This individual provided 72 hours of service across the review period, benefiting the assessment area's LMI population.

APPENDIX A – SCOPE OF EXAMINATION TABLES

Scope of Examination		
TIME PERIOD REVIEWED	January 1, 2021 – December 31, 2022 for HMDA, small business, and small farm lending September 30, 2020 – March 17, 2024 for community development loans, investment, and service activities	
FINANCIAL INSTITUTION First Horizon Bank Memphis, Tennessee		**PRODUCTS REVIEWED** HMDA Small Business Small Farm
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**	**PRODUCTS REVIEWED**
Not Applicable		

Assessment Area – Examination Scope Details					
Assessment Area	**Rated Area**	**# of Offices**	**Deposits $ (000s) (as of June 30, 2023)**	**Branches Visited**	**CRA Review Procedures**
Memphis Multistate MSA	Memphis	33	$14,168,498	0	Full-Scope
Chattanooga Multistate MSA	Chattanooga	17	$3,197,768	0	Full-Scope
Charlotte Multistate MSA	Charlotte	13	$1,005,276	0	Full-Scope
Nashville CSA	Tennessee	42	$5,974,869	0	Full-Scope
Knoxville CSA	Tennessee	30	$5,125,178	0	Full-Scope
Johnson City CSA	Tennessee	11	$1,615,621	0	Limited-Scope
Jackson MSA	Tennessee	2	$289,976	0	Limited-Scope
Clarksville MSA	Tennessee	1	$83,789	0	Limited-Scope
NonMSA Tennessee	Tennessee	6	$1,047,927	0	Full-Scope
Miami CSA	Florida	37	$6,711,213	0	Full-Scope
Fort Myers CSA	Florida	16	$2,674,933	0	Full-Scope
Orlando CSA	Florida	9	$1,020,630	0	Full-Scope
Tampa MSA	Florida	5	$575,337	0	Limited-Scope
Sarasota MSA	Florida	7	$509,982	0	Limited-Scope
Jacksonville MSA	Florida	2	$140,460	0	Limited-Scope
New Orleans MSA	Louisiana	19	$2,063,595	0	Full-Scope
Lafayette CSA	Louisiana	16	$2,411,400	0	Full-Scope
Lake Charles MSA	Louisiana	6	$981,090	0	Full-Scope
Baton Rouge MSA	Louisiana	6	$1,348,731	0	Limited-Scope
Monroe CSA	Louisiana	5	$366,939	0	Limited-Scope
Shreveport MSA	Louisiana	2	$229,705	0	Limited-Scope
Houma MSA	Louisiana	1	$55,841	0	Limited-Scope
NonMSA Louisiana	Louisiana	1	$84,814	0	Limited-Scope
Greensboro CSA	North Carolina	27	$2,024,420	0	Full-Scope
Raleigh CSA	North Carolina	24	$2,503,806	0	Full-Scope
Hickory MSA	North Carolina	7	$869,832	0	Limited-Scope
Asheville MSA	North Carolina	3	$244,364	0	Limited-Scope
Fayetteville MSA	North Carolina	2	$100,217	0	Limited-Scope
NonMSA North Carolina	North Carolina	4	$294,274	0	Limited-Scope
Birmingham MSA	Alabama	7	$1,094,029	0	Full-Scope
Mobile CSA	Alabama	3	$973,505	0	Limited-Scope
Huntsville MSA	Alabama	3	$232,368	0	Limited-Scope
Little Rock MSA	Arkansas	5	$487,120	0	Full-Scope
Fayetteville MSA	Arkansas	2	$167,964	0	Full-Scope

Assessment Area – Examination Scope Details					
Assessment Area	**Rated Area**	**# of Offices**	**Deposits $ (000s) (as of June 30, 2023)**	**Branches Visited**	**CRA Review Procedures**
Jonesboro MSA	Arkansas	2	$299,256	0	Limited-Scope
NonMSA Arkansas	Arkansas	3	$204,445	0	Limited-Scope
Houston MSA	Texas	6	$1,655,502	0	Full-Scope
Dallas MD	Texas	2	$553,586	0	Limited-Scope
Atlanta MSA	Georgia	9	$1,407,030	0	Full-Scope
NonMSA Georgia	Georgia	2	$87,976	0	Limited-Scope
Greenville CSA	South Carolina	5	$277,980	0	Full-Scope
Columbia MSA	South Carolina	3	$92,580	0	Limited-Scope
Charleston MSA	South Carolina	1	$99,950	0	Limited-Scope
NonMSA Virginia	Virginia	6	$367,687	0	Full-Scope
Roanoke MSA	Virginia	2	$154,198	0	Limited-Scope
New York MSA	New York	1	$716,353	0	Full-Scope
OVERALL		**416**	**$66,592,014**	**0**	**22 Full-Scope**

APPENDIX B – SUMMARY OF STATE AND MULTISTATE METROPOLITAN STATISTICAL AREA RATINGS

State or Multistate MSA	Lending Test	Investment Test	Service Test	Overall
Memphis Multistate MSA	High Satisfactory	Outstanding	High Satisfactory	**Satisfactory**
Chattanooga Multistate MSA	High Satisfactory	Outstanding	High Satisfactory	**Satisfactory**
Charlotte Multistate MSA	High Satisfactory	Outstanding	Outstanding	**Outstanding**
Tennessee	Low Satisfactory	Outstanding	High Satisfactory	**Satisfactory**
Florida	High Satisfactory	Outstanding	High Satisfactory	**Satisfactory**
Louisiana	High Satisfactory	High Satisfactory	High Satisfactory	**Satisfactory**
North Carolina	High Satisfactory	Outstanding	Low Satisfactory	**Satisfactory**
Alabama	High Satisfactory	Low Satisfactory	High Satisfactory	**Satisfactory**
Arkansas	High Satisfactory	High Satisfactory	High Satisfactory	**Satisfactory**
Texas	Low Satisfactory	High Satisfactory	High Satisfactory	**Satisfactory**
Georgia	High Satisfactory	High Satisfactory	High Satisfactory	**Satisfactory**
South Carolina	Low Satisfactory	High Satisfactory	Low Satisfactory	**Satisfactory**
Virginia	Low Satisfactory	Needs to Improve	High Satisfactory	**Satisfactory**
New York	Low Satisfactory	Low Satisfactory	Low Satisfactory	**Satisfactory**

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area for large banks. Summing the points from the Lending, Service, and Investment Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC's *Interagency Large Institution CRA Examination Procedures.*

State or Multistate MSA	Lending	Investment	Service Test	Total	Overall
Memphis Multistate MSA	9	6	4	19	**Satisfactory**
Chattanooga Multistate MSA	9	6	4	19	**Satisfactory**
Charlotte Multistate MSA	9	6	6	21	**Outstanding**
Tennessee	6	6	4	16	**Satisfactory**
Florida	9	6	4	19	**Satisfactory**
Louisiana	9	4	4	17	**Satisfactory**
North Carolina	9	6	3	18	**Satisfactory**
Alabama	9	3	4	16	**Satisfactory**
Arkansas	9	4	4	17	**Satisfactory**
Texas	6	4	4	14	**Satisfactory**
Georgia	9	4	4	17	**Satisfactory**
South Carolina	6	4	3	13	**Satisfactory**
Virginia	6	1	4	11	**Satisfactory**
New York	6	3	3	12	**Satisfactory**

APPENDIX C – LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

Memphis Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	18	3.5%	3.1%	$2,184	1.3%	1.4%	24.4%
Moderate	83	16.2%	13.0%	$14,407	8.9%	8.6%	15.5%
Middle	92	18.0%	18.2%	$20,499	12.6%	16.3%	17.1%
Upper	317	61.9%	41.7%	$124,577	76.5%	50.3%	42.9%
Unknown	2	0.4%	24.0%	$1,088	0.7%	23.3%	0.0%
TOTAL	**512**	**100.0%**	**100.0%**	**$162,755**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	25	4.3%	3.5%	$2,039	1.4%	1.6%	24.4%
Moderate	63	10.9%	10.3%	$8,637	6.0%	6.7%	15.5%
Middle	105	18.2%	17.8%	$16,348	11.3%	14.2%	17.1%
Upper	364	63.0%	44.9%	$110,751	76.6%	52.6%	42.9%
Unknown	21	3.6%	23.5%	$6,886	4.8%	24.9%	0.0%
TOTAL	**578**	**100.0%**	**100.0%**	**$144,661**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	5	3.1%	5.3%	$280	1.8%	2.5%	24.4%
Moderate	18	11.0%	11.2%	$1,323	8.6%	6.9%	15.5%
Middle	18	11.0%	18.3%	$987	6.4%	14.9%	17.1%
Upper	114	69.9%	60.2%	$12,229	79.5%	71.2%	42.9%
Unknown	8	4.9%	5.0%	$558	3.6%	4.5%	0.0%
TOTAL	**163**	**100.0%**	**100.0%**	**$15,377**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	1.7%	3.6%	$70	0.9%	1.5%	24.4%
Moderate	4	6.8%	8.6%	$226	2.8%	4.4%	15.5%
Middle	15	25.4%	15.4%	$1,181	14.4%	10.6%	17.1%
Upper	36	61.0%	69.1%	$6,430	78.7%	80.2%	42.9%
Unknown	3	5.1%	3.4%	$268	3.3%	3.3%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$8,175**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	5.9%	6.1%	$37	1.1%	2.4%	24.4%
Moderate	2	11.8%	14.0%	$188	5.5%	8.3%	15.5%
Middle	4	23.5%	20.1%	$583	17.2%	17.5%	17.1%
Upper	10	58.8%	46.7%	$2,582	76.2%	54.6%	42.9%
Unknown	0	0.0%	13.2%	$0	0.0%	17.2%	0.0%
TOTAL	**17**	**100.0%**	**100.0%**	**$3,390**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.6%	$0	0.0%	0.3%	24.4%
Moderate	0	0.0%	1.1%	$0	0.0%	0.9%	15.5%
Middle	0	0.0%	0.6%	$0	0.0%	0.8%	17.1%
Upper	0	0.0%	0.8%	$0	0.0%	1.2%	42.9%
Unknown	0	0.0%	96.8%	$0	0.0%	96.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	5.1%	$0	0.0%	0.7%	N/A
Unknown	2	100.0%	94.9%	$623	100.0%	99.3%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$623**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	50	3.8%	3.3%	$4,610	1.4%	1.4%	24.4%
Moderate	170	12.8%	11.3%	$24,781	7.4%	7.0%	15.5%
Middle	234	17.6%	17.7%	$39,598	11.8%	14.0%	17.1%
Upper	841	63.2%	43.7%	$256,569	76.6%	47.9%	42.9%
Unknown	36	2.7%	24.0%	$9,423	2.8%	29.6%	0.0%
TOTAL	**1,331**	**100.0%**	**100.0%**	**$334,981**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	36	8.8%	3.4%	$4,580	3.3%	1.5%	23.3%
Moderate	76	18.5%	12.7%	$14,193	10.3%	8.2%	15.9%
Middle	70	17.0%	18.7%	$17,347	12.6%	16.8%	18.0%
Upper	222	54.0%	40.5%	$97,794	70.9%	49.6%	42.8%
Unknown	7	1.7%	24.7%	$3,993	2.9%	23.9%	0.0%
TOTAL	**411**	**100.0%**	**100.0%**	**$137,907**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	10	4.5%	7.2%	$751	1.4%	3.7%	23.3%
Moderate	37	16.8%	15.9%	$4,358	7.9%	11.5%	15.9%
Middle	37	16.8%	22.5%	$4,816	8.7%	20.0%	18.0%
Upper	134	60.9%	38.9%	$44,825	81.3%	48.8%	42.8%
Unknown	2	0.9%	15.5%	$357	0.6%	16.0%	0.0%
TOTAL	**220**	**100.0%**	**100.0%**	**$55,107**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	13	5.8%	9.2%	$535	2.0%	3.8%	23.3%
Moderate	15	6.6%	17.3%	$739	2.7%	8.8%	15.9%
Middle	37	16.4%	23.0%	$1,747	6.5%	15.6%	18.0%
Upper	161	71.2%	45.8%	$23,950	88.8%	67.2%	42.8%
Unknown	0	0.0%	4.7%	$0	0.0%	4.6%	0.0%
TOTAL	**226**	**100.0%**	**100.0%**	**$26,971**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	6	9.0%	5.9%	$323	2.7%	2.6%	23.3%
Moderate	6	9.0%	13.9%	$380	3.2%	7.2%	15.9%
Middle	15	22.4%	21.3%	$1,824	15.5%	13.7%	18.0%
Upper	40	59.7%	55.7%	$9,269	78.6%	73.3%	42.8%
Unknown	0	0.0%	3.1%	$0	0.0%	3.1%	0.0%
TOTAL	**67**	**100.0%**	**100.0%**	**$11,796**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.2%	$0	0.0%	4.8%	23.3%
Moderate	0	0.0%	13.2%	$0	0.0%	6.8%	15.9%
Middle	1	10.0%	20.0%	$18	0.8%	14.7%	18.0%
Upper	7	70.0%	48.1%	$1,481	61.7%	61.1%	42.8%
Unknown	2	20.0%	10.5%	$900	37.5%	12.6%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$2,399**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	9.1%	$0	0.0%	3.7%	23.3%
Moderate	0	0.0%	1.8%	$0	0.0%	1.5%	15.9%
Middle	0	0.0%	1.3%	$0	0.0%	1.6%	18.0%
Upper	0	0.0%	0.8%	$0	0.0%	1.1%	42.8%
Unknown	0	0.0%	87.0%	$0	0.0%	92.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.5%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	5.4%	$0	0.0%	0.5%	N/A
Unknown	1	100.0%	94.1%	$17,900	100.0%	99.5%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$17,900**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	65	7.0%	5.2%	$6,189	2.5%	1.8%	23.3%
Moderate	134	14.3%	13.8%	$19,670	7.8%	7.6%	15.9%
Middle	160	17.1%	20.0%	$25,752	10.2%	14.8%	18.0%
Upper	564	60.3%	40.6%	$177,319	70.3%	42.5%	42.8%
Unknown	12	1.3%	20.5%	$23,150	9.2%	33.2%	0.0%
TOTAL	**935**	**100.0%**	**100.0%**	**$252,080**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	25	4.9%	5.6%	$3,095	1.9%	2.2%	11.0%
Moderate	30	5.9%	12.1%	$5,214	3.2%	6.3%	16.9%
Middle	80	15.6%	21.0%	$15,933	9.8%	16.5%	22.0%
Upper	377	73.6%	61.2%	$138,513	85.1%	74.9%	49.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**512**	**100.0%**	**100.0%**	**$162,755**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	8	1.4%	2.3%	$724	0.5%	1.2%	11.0%
Moderate	24	4.2%	7.2%	$3,153	2.2%	4.0%	16.9%
Middle	70	12.1%	18.7%	$10,547	7.3%	13.7%	22.0%
Upper	476	82.4%	71.7%	$130,237	90.0%	81.1%	49.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**578**	**100.0%**	**100.0%**	**$144,661**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	2.5%	7.7%	$270	1.8%	2.7%	11.0%
Moderate	6	3.7%	11.7%	$342	2.2%	6.2%	16.9%
Middle	20	12.3%	17.8%	$1,155	7.5%	13.9%	22.0%
Upper	133	81.6%	62.6%	$13,610	88.5%	77.0%	49.9%
Unknown	0	0.0%	0.1%	$0	0.0%	0.2%	0.1%
TOTAL	**163**	**100.0%**	**100.0%**	**$15,377**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	1.7%	2.6%	$28	0.3%	1.3%	11.0%
Moderate	3	5.1%	5.1%	$129	1.6%	2.3%	16.9%
Middle	7	11.9%	16.5%	$717	8.8%	9.9%	22.0%
Upper	48	81.4%	75.8%	$7,301	89.3%	86.5%	49.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**59**	**100.0%**	**100.0%**	**$8,175**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	3	17.6%	6.3%	$191	5.6%	2.5%	11.0%
Moderate	1	5.9%	9.6%	$100	2.9%	4.9%	16.9%
Middle	0	0.0%	21.3%	$0	0.0%	14.5%	22.0%
Upper	13	76.5%	62.7%	$3,099	91.4%	78.1%	49.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**17**	**100.0%**	**100.0%**	**$3,390**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.9%	$0	0.0%	2.8%	11.0%
Moderate	0	0.0%	17.5%	$0	0.0%	9.6%	16.9%
Middle	0	0.0%	30.0%	$0	0.0%	27.7%	22.0%
Upper	0	0.0%	44.6%	$0	0.0%	59.8%	49.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	50.0%	36.4%	$450	72.2%	24.6%	30.2%
Moderate	0	0.0%	19.7%	$0	0.0%	9.9%	21.9%
Middle	1	50.0%	24.2%	$173	27.8%	31.1%	16.3%
Upper	0	0.0%	19.7%	$0	0.0%	34.3%	31.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.6%
TOTAL	**2**	**100.0%**	**100.0%**	**$623**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	42	3.2%	4.1%	$4,758	1.4%	3.4%	11.0%
Moderate	64	4.8%	9.6%	$8,938	2.7%	5.5%	16.9%
Middle	178	13.4%	19.8%	$28,525	8.5%	16.3%	22.0%
Upper	1,047	78.7%	66.6%	$292,760	87.4%	74.8%	49.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**1,331**	**100.0%**	**100.0%**	**$334,981**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	30	7.3%	5.3%	$3,725	2.7%	2.2%	7.0%
Moderate	71	17.3%	17.2%	$11,160	8.1%	9.5%	20.8%
Middle	57	13.9%	26.9%	$14,883	10.8%	22.9%	26.2%
Upper	252	61.3%	50.3%	$108,020	78.3%	65.2%	45.7%
Unknown	1	0.2%	0.3%	$119	0.1%	0.3%	0.3%
TOTAL	**411**	**100.0%**	**100.0%**	**$137,907**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	7	3.2%	4.9%	$417	0.8%	2.4%	7.0%
Moderate	20	9.1%	16.7%	$2,176	3.9%	10.5%	20.8%
Middle	35	15.9%	28.3%	$4,963	9.0%	23.4%	26.2%
Upper	158	71.8%	49.9%	$47,551	86.3%	63.5%	45.7%
Unknown	0	0.0%	0.2%	$0	0.0%	0.2%	0.3%
TOTAL	**220**	**100.0%**	**100.0%**	**$55,107**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	7	3.1%	6.8%	$305	1.1%	2.5%	7.0%
Moderate	20	8.8%	19.1%	$1,608	6.0%	9.3%	20.8%
Middle	35	15.5%	25.5%	$1,909	7.1%	18.3%	26.2%
Upper	163	72.1%	48.2%	$23,089	85.6%	69.4%	45.7%
Unknown	1	0.4%	0.4%	$60	0.2%	0.5%	0.3%
TOTAL	**226**	**100.0%**	**100.0%**	**$26,971**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	3	4.5%	4.6%	$285	2.4%	1.9%	7.0%
Moderate	5	7.5%	15.5%	$230	1.9%	7.4%	20.8%
Middle	12	17.9%	24.8%	$1,851	15.7%	17.5%	26.2%
Upper	47	70.1%	54.9%	$9,430	79.9%	72.9%	45.7%
Unknown	0	0.0%	0.2%	$0	0.0%	0.3%	0.3%
TOTAL	**67**	**100.0%**	**100.0%**	**$11,796**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	7.2%	$0	0.0%	4.0%	7.0%
Moderate	0	0.0%	13.2%	$0	0.0%	7.2%	20.8%
Middle	3	30.0%	25.1%	$718	29.9%	18.5%	26.2%
Upper	7	70.0%	54.1%	$1,681	70.1%	70.2%	45.7%
Unknown	0	0.0%	0.4%	$0	0.0%	0.1%	0.3%
TOTAL	**10**	**100.0%**	**100.0%**	**$2,399**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	9.9%	$0	0.0%	4.6%	7.0%
Moderate	0	0.0%	34.9%	$0	0.0%	26.0%	20.8%
Middle	0	0.0%	30.5%	$0	0.0%	29.6%	26.2%
Upper	0	0.0%	24.5%	$0	0.0%	39.7%	45.7%
Unknown	0	0.0%	0.3%	$0	0.0%	0.0%	0.3%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	27.1%	$0	0.0%	18.9%	23.0%
Moderate	0	0.0%	32.0%	$0	0.0%	11.3%	24.6%
Middle	0	0.0%	22.2%	$0	0.0%	34.5%	23.7%
Upper	0	0.0%	15.3%	$0	0.0%	30.8%	25.9%
Unknown	1	100.0%	3.4%	$17,900	100.0%	4.5%	2.8%
TOTAL	**1**	**100.0%**	**100.0%**	**$17,900**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	47	5.0%	5.5%	$4,732	1.9%	4.8%	7.0%
Moderate	116	12.4%	17.3%	$15,174	6.0%	10.0%	20.8%
Middle	142	15.2%	27.1%	$24,324	9.6%	24.6%	26.2%
Upper	627	67.1%	49.8%	$189,771	75.3%	59.7%	45.7%
Unknown	3	0.3%	0.3%	$18,079	7.2%	0.9%	0.3%
TOTAL	**935**	**100.0%**	**100.0%**	**$252,080**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	445	29.6%	39.1%	$25,228	12.9%	26.8%	91.0%
		Over $1 Million/ Unknown	1,059	70.4%	60.9%	$169,844	87.1%	73.2%	9.0%
		TOTAL	**1,504**	**100.0%**	**100.0%**	**$195,072**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	1,070	71.1%	91.6%	$31,037	15.9%	33.9%	
		$100,001–$250,000	199	13.2%	4.4%	$32,912	16.9%	16.8%	
		$250,001–$1 Million	235	15.6%	4.0%	$131,123	67.2%	49.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**1,504**	**100.0%**	**100.0%**	**$195,072**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	401	90.1%		$10,744	42.6%		
		$100,001–$250,000	20	4.5%		$2,905	11.5%		
		$250,001–$1 Million	24	5.4%		$11,579	45.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**445**	**100.0%**		**$25,228**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	144	33.3%	46.8%	$18,068	15.6%	32.1%	91.4%
		Over $1 Million/ Unknown	288	66.7%	53.2%	$97,438	84.4%	67.9%	8.6%
		TOTAL	**432**	**100.0%**	**100.0%**	**$115,506**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	198	45.8%	93.0%	$9,653	8.4%	34.8%	
		$100,001–$250,000	84	19.4%	3.7%	$15,333	13.3%	16.4%	
		$250,001–$1 Million	150	34.7%	3.4%	$90,520	78.4%	48.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**432**	**100.0%**	**100.0%**	**$115,506**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	105	72.9%		$4,296	23.8%		
		$100,001–$250,000	16	11.1%		$2,610	14.4%		
		$250,001–$1 Million	23	16.0%		$11,162	61.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**144**	**100.0%**		**$18,068**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	162	10.8%	11.7%	$21,259	10.9%	11.2%	13.0%
Moderate	200	13.3%	15.9%	$37,604	19.3%	16.4%	16.5%
Middle	244	16.2%	19.9%	$32,546	16.7%	18.2%	20.3%
Upper	885	58.8%	51.3%	$99,955	51.2%	51.8%	49.2%
Unknown	13	0.9%	1.2%	$3,708	1.9%	2.5%	0.9%
TOTAL	**1,504**	**100.0%**	**100.0%**	**$195,072**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	46	10.6%	7.9%	$14,690	12.7%	9.5%	9.3%
Moderate	89	20.6%	19.5%	$35,200	30.5%	22.2%	22.2%
Middle	106	24.5%	23.2%	$20,502	17.7%	19.5%	24.1%
Upper	177	41.0%	47.3%	$42,065	36.4%	43.5%	42.2%
Unknown	14	3.2%	2.1%	$3,049	2.6%	5.2%	2.2%
TOTAL	**432**	**100.0%**	**100.0%**	**$115,506**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Chattanooga Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	12	14.0%	4.6%	$1,666	5.4%	2.4%	20.3%
Moderate	16	18.6%	18.5%	$3,017	9.7%	13.4%	16.8%
Middle	8	9.3%	20.2%	$1,410	4.5%	18.3%	19.6%
Upper	50	58.1%	39.4%	$24,962	80.4%	49.1%	43.3%
Unknown	0	0.0%	17.3%	$0	0.0%	16.8%	0.0%
TOTAL	**86**	**100.0%**	**100.0%**	**$31,055**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	15	8.0%	4.9%	$1,469	2.7%	2.7%	20.3%
Moderate	29	15.4%	15.2%	$3,190	5.9%	10.6%	16.8%
Middle	29	15.4%	18.6%	$4,067	7.6%	16.1%	19.6%
Upper	113	60.1%	36.8%	$44,851	83.3%	46.1%	43.3%
Unknown	2	1.1%	24.5%	$275	0.5%	24.4%	0.0%
TOTAL	**188**	**100.0%**	**100.0%**	**$53,852**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	7	12.5%	8.3%	$279	5.0%	4.2%	20.3%
Moderate	6	10.7%	15.7%	$339	6.1%	11.6%	16.8%
Middle	12	21.4%	20.9%	$749	13.4%	19.4%	19.6%
Upper	30	53.6%	51.8%	$4,194	74.9%	61.3%	43.3%
Unknown	1	1.8%	3.4%	$40	0.7%	3.4%	0.0%
TOTAL	**56**	**100.0%**	**100.0%**	**$5,601**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	4.9%	5.5%	$98	1.2%	2.1%	20.3%
Moderate	3	7.3%	14.4%	$326	3.9%	7.5%	16.8%
Middle	7	17.1%	19.1%	$725	8.7%	13.2%	19.6%
Upper	29	70.7%	57.8%	$7,172	86.2%	74.1%	43.3%
Unknown	0	0.0%	3.3%	$0	0.0%	3.1%	0.0%
TOTAL	**41**	**100.0%**	**100.0%**	**$8,321**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	9.5%	$0	0.0%	4.6%	20.3%
Moderate	0	0.0%	19.3%	$0	0.0%	12.1%	16.8%
Middle	1	14.3%	19.6%	$224	8.3%	14.7%	19.6%
Upper	4	57.1%	39.9%	$1,161	43.2%	52.3%	43.3%
Unknown	2	28.6%	11.8%	$1,305	48.5%	16.3%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$2,690**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	3	75.0%	2.8%	$197	73.8%	1.7%	20.3%
Moderate	1	25.0%	2.8%	$70	26.2%	1.8%	16.8%
Middle	0	0.0%	1.1%	$0	0.0%	0.9%	19.6%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.3%
Unknown	0	0.0%	93.3%	$0	0.0%	95.6%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$267**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.6%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.6%	$0	0.0%	0.1%	N/A
Middle	0	0.0%	1.1%	$0	0.0%	0.1%	N/A
Upper	0	0.0%	12.2%	$0	0.0%	1.9%	N/A
Unknown	1	100.0%	85.6%	$545	100.0%	97.8%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$545**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	39	10.2%	4.9%	$3,709	3.6%	2.4%	20.3%
Moderate	55	14.4%	16.4%	$6,942	6.8%	11.0%	16.8%
Middle	57	14.9%	19.1%	$7,175	7.0%	15.7%	19.6%
Upper	226	59.0%	38.4%	$82,340	80.5%	44.2%	43.3%
Unknown	6	1.6%	21.2%	$2,165	2.1%	26.8%	0.0%
TOTAL	**383**	**100.0%**	**100.0%**	**$102,331**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	5	5.2%	3.1%	$474	1.0%	1.4%	19.4%
Moderate	17	17.5%	15.2%	$3,156	7.0%	10.2%	17.1%
Middle	12	12.4%	21.0%	$3,879	8.6%	18.3%	19.8%
Upper	53	54.6%	43.4%	$32,117	70.9%	53.5%	43.7%
Unknown	10	10.3%	17.3%	$5,689	12.6%	16.5%	0.0%
TOTAL	**97**	**100.0%**	**100.0%**	**$45,315**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	12	10.7%	8.7%	$921	3.7%	4.8%	19.4%
Moderate	26	23.2%	19.4%	$3,218	12.8%	14.3%	17.1%
Middle	13	11.6%	21.8%	$2,300	9.2%	19.6%	19.8%
Upper	59	52.7%	34.3%	$18,404	73.4%	44.7%	43.7%
Unknown	2	1.8%	15.8%	$245	1.0%	16.6%	0.0%
TOTAL	**112**	**100.0%**	**100.0%**	**$25,088**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	7	5.2%	7.6%	$405	2.6%	3.6%	19.4%
Moderate	22	16.4%	14.6%	$1,356	8.9%	9.1%	17.1%
Middle	30	22.4%	22.2%	$2,684	17.5%	17.9%	19.8%
Upper	75	56.0%	52.7%	$10,854	70.9%	65.7%	43.7%
Unknown	0	0.0%	2.9%	$0	0.0%	3.7%	0.0%
TOTAL	**134**	**100.0%**	**100.0%**	**$15,299**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	4	8.7%	4.8%	$142	1.9%	2.3%	19.4%
Moderate	7	15.2%	12.6%	$525	6.8%	6.7%	17.1%
Middle	6	13.0%	22.6%	$442	5.8%	15.7%	19.8%
Upper	29	63.0%	57.6%	$6,561	85.5%	73.8%	43.7%
Unknown	0	0.0%	2.4%	$0	0.0%	1.6%	0.0%
TOTAL	**46**	**100.0%**	**100.0%**	**$7,670**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	10.2%	$0	0.0%	5.4%	19.4%
Moderate	3	27.3%	18.3%	$260	6.0%	11.0%	17.1%
Middle	2	18.2%	19.7%	$60	1.4%	13.4%	19.8%
Upper	5	45.5%	46.2%	$3,555	81.6%	64.2%	43.7%
Unknown	1	9.1%	5.6%	$480	11.0%	6.0%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$4,355**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.1%	$0	0.0%	1.0%	19.4%
Moderate	0	0.0%	1.4%	$0	0.0%	1.8%	17.1%
Middle	0	0.0%	0.7%	$0	0.0%	0.6%	19.8%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.7%
Unknown	0	0.0%	95.9%	$0	0.0%	96.6%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.7%	$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.3%	$0	0.0%	0.1%	N/A
Upper	0	0.0%	18.3%	$0	0.0%	2.2%	N/A
Unknown	1	100.0%	79.7%	$2,808	100.0%	97.6%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$2,808**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	28	7.0%	5.4%	$1,942	1.9%	2.2%	19.4%
Moderate	75	18.7%	16.2%	$8,515	8.5%	9.7%	17.1%
Middle	63	15.7%	21.1%	$9,365	9.3%	15.9%	19.8%
Upper	221	55.1%	41.5%	$71,491	71.1%	45.2%	43.7%
Unknown	14	3.5%	15.8%	$9,222	9.2%	27.0%	0.0%
TOTAL	**401**	**100.0%**	**100.0%**	**$100,535**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	8	9.3%	3.9%	$749	2.4%	2.8%	3.8%
Moderate	7	8.1%	9.5%	$1,528	4.9%	6.7%	10.9%
Middle	28	32.6%	39.5%	$10,028	32.3%	35.9%	41.0%
Upper	43	50.0%	47.1%	$18,750	60.4%	54.6%	44.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**86**	**100.0%**	**100.0%**	**$31,055**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	1.6%	2.3%	$319	0.6%	1.9%	3.8%
Moderate	12	6.4%	7.7%	$2,452	4.6%	5.3%	10.9%
Middle	62	33.0%	38.9%	$13,418	24.9%	34.3%	41.0%
Upper	111	59.0%	51.1%	$37,663	69.9%	58.6%	44.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**188**	**100.0%**	**100.0%**	**$53,852**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.3%	$0	0.0%	1.6%	3.8%
Moderate	4	7.1%	7.4%	$160	2.9%	6.3%	10.9%
Middle	24	42.9%	37.3%	$2,652	47.3%	34.7%	41.0%
Upper	28	50.0%	53.0%	$2,789	49.8%	57.5%	44.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**56**	**100.0%**	**100.0%**	**$5,601**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	2.4%	1.6%	$500	6.0%	1.5%	3.8%
Moderate	4	9.8%	6.4%	$1,563	18.8%	5.2%	10.9%
Middle	6	14.6%	33.4%	$971	11.7%	29.6%	41.0%
Upper	30	73.2%	58.6%	$5,287	63.5%	63.7%	44.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**41**	**100.0%**	**100.0%**	**$8,321**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.1%	$0	0.0%	2.2%	3.8%
Moderate	2	28.6%	8.8%	$373	13.9%	6.0%	10.9%
Middle	2	28.6%	39.2%	$729	27.1%	36.6%	41.0%
Upper	3	42.9%	48.0%	$1,588	59.0%	55.3%	44.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$2,690**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	2	50.0%	10.7%	$126	47.2%	7.9%	3.8%
Moderate	2	50.0%	15.2%	$141	52.8%	11.3%	10.9%
Middle	0	0.0%	40.4%	$0	0.0%	36.8%	41.0%
Upper	0	0.0%	33.7%	$0	0.0%	44.0%	44.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$267**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	17.8%	$0	0.0%	12.2%	17.0%
Moderate	0	0.0%	16.1%	$0	0.0%	8.8%	15.7%
Middle	0	0.0%	46.7%	$0	0.0%	44.4%	38.4%
Upper	1	100.0%	19.4%	$545	100.0%	34.6%	28.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$545**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	14	3.7%	3.1%	$1,694	1.7%	3.1%	3.8%
Moderate	31	8.1%	8.5%	$6,217	6.1%	6.2%	10.9%
Middle	122	31.9%	39.0%	$27,798	27.2%	35.8%	41.0%
Upper	216	56.4%	49.3%	$66,622	65.1%	54.8%	44.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**383**	**100.0%**	**100.0%**	**$102,331**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	11	11.3%	3.3%	$1,627	3.6%	2.4%	3.0%
Moderate	8	8.2%	11.4%	$1,920	4.2%	9.3%	10.5%
Middle	31	32.0%	48.6%	$12,625	27.9%	44.1%	52.7%
Upper	46	47.4%	36.2%	$28,943	63.9%	43.8%	33.1%
Unknown	1	1.0%	0.5%	$200	0.4%	0.3%	0.7%
TOTAL	**97**	**100.0%**	**100.0%**	**$45,315**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	3.6%	2.8%	$611	2.4%	2.1%	3.0%
Moderate	15	13.4%	11.1%	$1,709	6.8%	8.6%	10.5%
Middle	44	39.3%	50.5%	$8,977	35.8%	47.0%	52.7%
Upper	49	43.8%	35.1%	$13,791	55.0%	42.0%	33.1%
Unknown	0	0.0%	0.4%	$0	0.0%	0.3%	0.7%
TOTAL	**112**	**100.0%**	**100.0%**	**$25,088**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	3.0%	2.2%	$490	3.2%	2.1%	3.0%
Moderate	12	9.0%	10.3%	$776	5.1%	9.2%	10.5%
Middle	53	39.6%	44.5%	$5,913	38.6%	39.6%	52.7%
Upper	63	47.0%	42.3%	$8,045	52.6%	48.7%	33.1%
Unknown	2	1.5%	0.7%	$75	0.5%	0.4%	0.7%
TOTAL	**134**	**100.0%**	**100.0%**	**$15,299**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.6%	$0	0.0%	1.1%	3.0%
Moderate	5	10.9%	7.7%	$287	3.7%	5.4%	10.5%
Middle	17	37.0%	46.9%	$2,852	37.2%	41.8%	52.7%
Upper	24	52.2%	43.4%	$4,531	59.1%	51.5%	33.1%
Unknown	0	0.0%	0.4%	$0	0.0%	0.2%	0.7%
TOTAL	**46**	**100.0%**	**100.0%**	**$7,670**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.0%	$0	0.0%	3.3%	3.0%
Moderate	1	9.1%	7.6%	$30	0.7%	5.2%	10.5%
Middle	4	36.4%	50.2%	$314	7.2%	46.2%	52.7%
Upper	6	54.5%	38.6%	$4,011	92.1%	45.1%	33.1%
Unknown	0	0.0%	0.6%	$0	0.0%	0.2%	0.7%
TOTAL	**11**	**100.0%**	**100.0%**	**$4,355**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.1%	$0	0.0%	3.2%	3.0%
Moderate	0	0.0%	9.0%	$0	0.0%	9.0%	10.5%
Middle	0	0.0%	64.8%	$0	0.0%	56.5%	52.7%
Upper	0	0.0%	20.7%	$0	0.0%	30.3%	33.1%
Unknown	0	0.0%	1.4%	$0	0.0%	1.1%	0.7%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	6.5%	$0	0.0%	1.0%	13.2%
Moderate	0	0.0%	32.0%	$0	0.0%	11.3%	16.3%
Middle	1	100.0%	43.1%	$2,808	100.0%	19.6%	42.0%
Upper	0	0.0%	18.3%	$0	0.0%	68.1%	28.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**1**	**100.0%**	**100.0%**	**$2,808**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	19	4.7%	3.0%	$2,728	2.7%	2.1%	3.0%
Moderate	41	10.2%	11.1%	$4,722	4.7%	9.3%	10.5%
Middle	150	37.4%	49.0%	$33,489	33.3%	41.3%	52.7%
Upper	188	46.9%	36.4%	$59,321	59.0%	47.0%	33.1%
Unknown	3	0.7%	0.5%	$275	0.3%	0.3%	0.7%
TOTAL	**401**	**100.0%**	**100.0%**	**$100,535**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	168	25.8%	45.7%	$17,323	16.4%	32.6%	91.6%
		Over $1 Million/ Unknown	482	74.2%	54.3%	$88,434	83.6%	67.4%	8.4%
		TOTAL	**650**	**100.0%**	**100.0%**	**$105,757**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	390	60.0%	86.0%	$12,905	12.2%	23.1%	
		$100,001–$250,000	121	18.6%	7.1%	$20,486	19.4%	19.3%	
		$250,001–$1 Million	139	21.4%	6.9%	$72,366	68.4%	57.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**650**	**100.0%**	**100.0%**	**$105,757**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	130	77.4%		$3,800	21.9%		
		$100,001–$250,000	18	10.7%		$2,848	16.4%		
		$250,001–$1 Million	20	11.9%		$10,675	61.6%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**168**	**100.0%**		**$17,323**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	77	31.0%	51.1%	$17,335	22.8%	37.4%	91.7%
		Over $1 Million/ Unknown	171	69.0%	48.9%	$58,776	77.2%	62.6%	8.3%
		TOTAL	**248**	**100.0%**	**100.0%**	**$76,111**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	84	33.9%	89.3%	$4,688	6.2%	25.9%	
		$100,001–$250,000	56	22.6%	5.0%	$10,722	14.1%	16.7%	
		$250,001–$1 Million	108	43.5%	5.7%	$60,701	79.8%	57.5%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**248**	**100.0%**	**100.0%**	**$76,111**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	45	58.4%		$1,803	10.4%		
		$100,001–$250,000	8	10.4%		$1,412	8.1%		
		$250,001–$1 Million	24	31.2%		$14,120	81.5%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**77**	**100.0%**		**$17,335**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	76	11.7%	8.3%	$16,213	15.3%	13.6%	7.5%
Moderate	88	13.5%	12.9%	$18,031	17.0%	14.9%	14.0%
Middle	243	37.4%	38.1%	$41,659	39.4%	37.1%	40.5%
Upper	243	37.4%	40.2%	$29,854	28.2%	34.1%	37.8%
Unknown	0	0.0%	0.5%	$0	0.0%	0.3%	0.1%
TOTAL	**650**	**100.0%**	**100.0%**	**$105,757**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	28	11.3%	6.2%	$8,008	10.5%	10.3%	6.1%
Moderate	69	27.8%	17.8%	$23,200	30.5%	23.0%	18.4%
Middle	80	32.3%	39.5%	$25,293	33.2%	32.3%	42.1%
Upper	70	28.2%	35.7%	$19,210	25.2%	34.0%	32.9%
Unknown	1	0.4%	0.8%	$400	0.5%	0.4%	0.6%
TOTAL	**248**	**100.0%**	**100.0%**	**$76,111**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Charlotte Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	16	16.7%	4.8%	$2,346	5.4%	2.3%	23.0%
Moderate	15	15.6%	16.5%	$3,358	7.7%	10.9%	16.8%
Middle	12	12.5%	20.2%	$3,458	7.9%	17.0%	18.3%
Upper	52	54.2%	44.4%	$33,921	77.6%	56.1%	41.9%
Unknown	1	1.0%	14.1%	$602	1.4%	13.7%	0.0%
TOTAL	**96**	**100.0%**	**100.0%**	**$43,685**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	19	11.8%	5.1%	$2,192	3.9%	2.5%	23.0%
Moderate	25	15.5%	14.0%	$3,773	6.8%	9.0%	16.8%
Middle	22	13.7%	19.0%	$4,039	7.2%	15.1%	18.3%
Upper	77	47.8%	44.4%	$39,675	71.2%	56.0%	41.9%
Unknown	18	11.2%	17.4%	$6,051	10.9%	17.4%	0.0%
TOTAL	**161**	**100.0%**	**100.0%**	**$55,730**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.5%	$0	0.0%	2.2%	23.0%
Moderate	1	7.7%	10.2%	$80	3.5%	5.9%	16.8%
Middle	3	23.1%	15.9%	$175	7.7%	10.8%	18.3%
Upper	9	69.2%	66.4%	$2,024	88.8%	77.2%	41.9%
Unknown	0	0.0%	3.1%	$0	0.0%	3.9%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$2,279**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	5.9%	3.4%	$83	1.9%	1.7%	23.0%
Moderate	4	11.8%	9.9%	$185	4.2%	4.9%	16.8%
Middle	6	17.6%	16.6%	$566	12.8%	9.1%	18.3%
Upper	19	55.9%	67.2%	$3,397	76.6%	81.0%	41.9%
Unknown	3	8.8%	3.0%	$201	4.5%	3.3%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$4,432**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	7.4%	$0	0.0%	3.5%	23.0%
Moderate	2	40.0%	16.3%	$143	16.0%	7.0%	16.8%
Middle	2	40.0%	17.6%	$211	23.6%	9.0%	18.3%
Upper	1	20.0%	53.3%	$540	60.4%	74.3%	41.9%
Unknown	0	0.0%	5.4%	$0	0.0%	6.3%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$894**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.4%	$0	0.0%	2.7%	23.0%
Moderate	0	0.0%	3.0%	$0	0.0%	2.8%	16.8%
Middle	0	0.0%	0.8%	$0	0.0%	1.0%	18.3%
Upper	0	0.0%	0.4%	$0	0.0%	0.6%	41.9%
Unknown	0	0.0%	92.3%	$0	0.0%	93.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.5%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	99.5%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	37	12.0%	4.9%	$4,621	4.3%	2.3%	23.0%
Moderate	47	15.2%	14.6%	$7,539	7.0%	9.3%	16.8%
Middle	45	14.6%	19.1%	$8,449	7.9%	14.9%	18.3%
Upper	158	51.1%	45.4%	$79,557	74.3%	53.8%	41.9%
Unknown	22	7.1%	15.9%	$6,854	6.4%	19.7%	0.0%
TOTAL	**309**	**100.0%**	**100.0%**	**$107,020**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	17	13.6%	4.9%	$3,717	5.9%	2.2%	21.8%
Moderate	21	16.8%	17.1%	$4,667	7.4%	11.1%	17.9%
Middle	15	12.0%	21.5%	$4,553	7.3%	18.1%	19.5%
Upper	71	56.8%	41.8%	$49,319	78.6%	54.2%	40.9%
Unknown	1	0.8%	14.7%	$478	0.8%	14.3%	0.0%
TOTAL	**125**	**100.0%**	**100.0%**	**$62,734**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	15	16.9%	11.9%	$2,083	7.4%	6.5%	21.8%
Moderate	14	15.7%	22.1%	$1,960	7.0%	16.2%	17.9%
Middle	14	15.7%	22.1%	$2,326	8.3%	20.0%	19.5%
Upper	45	50.6%	33.4%	$21,473	76.6%	45.3%	40.9%
Unknown	1	1.1%	10.5%	$179	0.6%	12.0%	0.0%
TOTAL	**89**	**100.0%**	**100.0%**	**$28,021**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	12	17.1%	5.5%	$609	6.7%	2.8%	21.8%
Moderate	5	7.1%	13.6%	$399	4.4%	7.8%	17.9%
Middle	16	22.9%	21.2%	$1,135	12.5%	15.1%	19.5%
Upper	35	50.0%	56.8%	$6,343	70.1%	71.0%	40.9%
Unknown	2	2.9%	3.0%	$566	6.3%	3.3%	0.0%
TOTAL	**70**	**100.0%**	**100.0%**	**$9,052**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	4.2%	4.6%	$50	1.0%	2.3%	21.8%
Moderate	4	16.7%	13.3%	$430	9.0%	6.5%	17.9%
Middle	5	20.8%	21.5%	$628	13.1%	14.0%	19.5%
Upper	14	58.3%	56.2%	$3,670	76.8%	72.5%	40.9%
Unknown	0	0.0%	4.4%	$0	0.0%	4.6%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$4,778**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	16.7%	10.0%	$155	9.9%	4.4%	21.8%
Moderate	0	0.0%	17.7%	$0	0.0%	9.7%	17.9%
Middle	1	16.7%	20.4%	$105	6.7%	13.5%	19.5%
Upper	3	50.0%	44.8%	$955	61.0%	65.0%	40.9%
Unknown	1	16.7%	7.2%	$350	22.4%	7.4%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,565**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	1	100.0%	3.7%	$63	100.0%	2.8%	21.8%
Moderate	0	0.0%	1.5%	$0	0.0%	2.0%	17.9%
Middle	0	0.0%	0.9%	$0	0.0%	1.1%	19.5%
Upper	0	0.0%	0.4%	$0	0.0%	0.4%	40.9%
Unknown	0	0.0%	93.5%	$0	0.0%	93.7%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$63**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.8%	$0	0.0%	0.0%	N/A
Unknown	2	100.0%	99.2%	$58,880	100.0%	100.0%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$58,880**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	47	14.8%	7.2%	$6,677	4.0%	3.0%	21.8%
Moderate	44	13.9%	18.0%	$7,456	4.5%	10.6%	17.9%
Middle	51	16.1%	21.4%	$8,747	5.3%	15.9%	19.5%
Upper	168	53.0%	41.0%	$81,760	49.5%	45.7%	40.9%
Unknown	7	2.2%	12.4%	$60,453	36.6%	24.8%	0.0%
TOTAL	**317**	**100.0%**	**100.0%**	**$165,093**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	2	2.1%	4.0%	$614	1.4%	3.2%	3.5%
Moderate	26	27.1%	19.5%	$5,956	13.6%	14.6%	21.4%
Middle	20	20.8%	32.4%	$5,680	13.0%	27.3%	35.6%
Upper	48	50.0%	43.9%	$31,435	72.0%	54.8%	39.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.0%
TOTAL	**96**	**100.0%**	**100.0%**	**$43,685**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	5	3.1%	2.4%	$1,135	2.0%	1.9%	3.5%
Moderate	32	19.9%	15.7%	$5,145	9.2%	11.2%	21.4%
Middle	42	26.1%	30.6%	$7,482	13.4%	24.0%	35.6%
Upper	82	50.9%	51.2%	$41,968	75.3%	62.9%	39.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**161**	**100.0%**	**100.0%**	**$55,730**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.6%	$0	0.0%	1.9%	3.5%
Moderate	2	15.4%	13.6%	$143	6.3%	9.5%	21.4%
Middle	2	15.4%	26.0%	$76	3.3%	19.8%	35.6%
Upper	9	69.2%	57.8%	$2,060	90.4%	68.7%	39.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$2,279**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.3%	$0	0.0%	1.3%	3.5%
Moderate	6	17.6%	11.9%	$395	8.9%	7.1%	21.4%
Middle	11	32.4%	25.4%	$816	18.4%	17.2%	35.6%
Upper	17	50.0%	60.3%	$3,221	72.7%	74.4%	39.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.0%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$4,432**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.5%	$0	0.0%	1.8%	3.5%
Moderate	1	20.0%	17.6%	$55	6.2%	8.5%	21.4%
Middle	1	20.0%	30.2%	$39	4.4%	15.6%	35.6%
Upper	3	60.0%	48.8%	$800	89.5%	74.1%	39.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$894**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.1%	$0	0.0%	2.7%	3.5%
Moderate	0	0.0%	32.6%	$0	0.0%	27.1%	21.4%
Middle	0	0.0%	43.7%	$0	0.0%	41.7%	35.6%
Upper	0	0.0%	19.4%	$0	0.0%	28.3%	39.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	20.0%	$0	0.0%	14.1%	14.9%
Moderate	0	0.0%	39.5%	$0	0.0%	32.3%	27.9%
Middle	0	0.0%	22.2%	$0	0.0%	14.4%	23.2%
Upper	0	0.0%	17.3%	$0	0.0%	38.6%	33.8%
Unknown	0	0.0%	1.1%	$0	0.0%	0.5%	0.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	7	2.3%	3.1%	$1,749	1.6%	3.0%	3.5%
Moderate	67	21.7%	17.1%	$11,694	10.9%	13.6%	21.4%
Middle	76	24.6%	31.1%	$14,093	13.2%	24.8%	35.6%
Upper	159	51.5%	48.7%	$79,484	74.3%	58.5%	39.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.0%
TOTAL	**309**	**100.0%**	**100.0%**	**$107,020**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	5	4.0%	3.1%	$1,516	2.4%	2.6%	2.4%
Moderate	28	22.4%	23.7%	$7,048	11.2%	17.1%	25.7%
Middle	32	25.6%	33.2%	$10,975	17.5%	29.1%	33.9%
Upper	60	48.0%	39.0%	$43,195	68.9%	50.5%	37.6%
Unknown	0	0.0%	0.9%	$0	0.0%	0.7%	0.4%
TOTAL	**125**	**100.0%**	**100.0%**	**$62,734**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.1%	$0	0.0%	1.5%	2.4%
Moderate	24	27.0%	24.3%	$3,766	13.4%	17.5%	25.7%
Middle	18	20.2%	34.4%	$3,624	12.9%	29.3%	33.9%
Upper	47	52.8%	38.8%	$20,631	73.6%	51.3%	37.6%
Unknown	0	0.0%	0.4%	$0	0.0%	0.4%	0.4%
TOTAL	**89**	**100.0%**	**100.0%**	**$28,021**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	1.4%	1.7%	$400	4.4%	1.3%	2.4%
Moderate	17	24.3%	17.0%	$1,311	14.5%	11.7%	25.7%
Middle	23	32.9%	28.7%	$2,714	30.0%	22.4%	33.9%
Upper	29	41.4%	52.1%	$4,627	51.1%	64.1%	37.6%
Unknown	0	0.0%	0.5%	$0	0.0%	0.4%	0.4%
TOTAL	**70**	**100.0%**	**100.0%**	**$9,052**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.2%	$0	0.0%	0.9%	2.4%
Moderate	2	8.3%	15.3%	$260	5.4%	9.4%	25.7%
Middle	5	20.8%	29.6%	$677	14.2%	21.8%	33.9%
Upper	17	70.8%	53.4%	$3,841	80.4%	67.5%	37.6%
Unknown	0	0.0%	0.5%	$0	0.0%	0.4%	0.4%
TOTAL	**24**	**100.0%**	**100.0%**	**$4,778**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	16.7%	2.1%	$155	9.9%	1.4%	2.4%
Moderate	3	50.0%	21.1%	$470	30.0%	13.0%	25.7%
Middle	0	0.0%	31.4%	$0	0.0%	18.8%	33.9%
Upper	2	33.3%	45.1%	$940	60.1%	66.6%	37.6%
Unknown	0	0.0%	0.3%	$0	0.0%	0.1%	0.4%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,565**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.2%	$0	0.0%	1.4%	2.4%
Moderate	0	0.0%	34.9%	$0	0.0%	27.3%	25.7%
Middle	0	0.0%	40.6%	$0	0.0%	42.2%	33.9%
Upper	1	100.0%	21.9%	$63	100.0%	28.8%	37.6%
Unknown	0	0.0%	0.4%	$0	0.0%	0.3%	0.4%
TOTAL	**1**	**100.0%**	**100.0%**	**$63**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	50.0%	12.5%	$57,600	97.8%	7.7%	8.4%
Moderate	1	50.0%	42.7%	$1,280	2.2%	25.4%	29.6%
Middle	0	0.0%	24.6%	$0	0.0%	32.8%	24.8%
Upper	0	0.0%	16.9%	$0	0.0%	29.8%	33.6%
Unknown	0	0.0%	3.2%	$0	0.0%	4.3%	3.6%
TOTAL	**2**	**100.0%**	**100.0%**	**$58,880**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	8	2.5%	2.6%	$59,671	36.1%	2.9%	2.4%
Moderate	75	23.7%	22.9%	$14,135	8.6%	18.0%	25.7%
Middle	78	24.6%	33.0%	$17,990	10.9%	29.2%	33.9%
Upper	156	49.2%	40.9%	$73,297	44.4%	48.8%	37.6%
Unknown	0	0.0%	0.7%	$0	0.0%	1.1%	0.4%
TOTAL	**317**	**100.0%**	**100.0%**	**$165,093**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	152	19.5%	46.7%	$10,155	13.8%	30.0%	91.9%
		Over $1 Million/ Unknown	628	80.5%	53.3%	$63,540	86.2%	70.0%	8.1%
		TOTAL	**780**	**100.0%**	**100.0%**	**$73,695**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	615	78.8%	92.2%	$14,800	20.1%	35.3%	
		$100,001–$250,000	75	9.6%	4.3%	$12,351	16.8%	17.6%	
		$250,001–$1 Million	90	11.5%	3.6%	$46,544	63.2%	47.1%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**780**	**100.0%**	**100.0%**	**$73,695**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	133	87.5%		$3,371	33.2%		
		$100,001–$250,000	8	5.3%		$1,118	11.0%		
		$250,001–$1 Million	11	7.2%		$5,666	55.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**152**	**100.0%**		**$10,155**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	94	50.5%	52.1%	$10,575	26.5%	34.7%	92.0%
		Over $1 Million/ Unknown	92	49.5%	47.9%	$29,405	73.5%	65.3%	8.0%
		TOTAL	**186**	**100.0%**	**100.0%**	**$39,980**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	114	61.3%	94.7%	$4,765	11.9%	42.1%	
		$100,001–$250,000	17	9.1%	2.7%	$3,208	8.0%	14.2%	
		$250,001–$1 Million	55	29.6%	2.6%	$32,007	80.1%	43.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**186**	**100.0%**	**100.0%**	**$39,980**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	77	81.9%		$2,730	25.8%		
		$100,001–$250,000	3	3.2%		$523	4.9%		
		$250,001–$1 Million	14	14.9%		$7,322	69.2%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**94**	**100.0%**		**$10,575**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	63	8.1%	7.4%	$10,256	13.9%	10.0%	7.7%
Moderate	198	25.4%	19.5%	$12,193	16.5%	20.7%	20.8%
Middle	244	31.3%	27.6%	$21,049	28.6%	23.9%	28.4%
Upper	266	34.1%	44.4%	$28,404	38.5%	43.6%	42.3%
Unknown	9	1.2%	1.1%	$1,793	2.4%	1.8%	0.8%
TOTAL	**780**	**100.0%**	**100.0%**	**$73,695**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	16	8.6%	4.5%	$4,315	10.8%	6.2%	4.9%
Moderate	65	34.9%	25.1%	$14,143	35.4%	26.0%	26.5%
Middle	45	24.2%	28.2%	$7,789	19.5%	24.9%	27.6%
Upper	56	30.1%	40.1%	$11,838	29.6%	39.7%	38.8%
Unknown	4	2.2%	2.1%	$1,895	4.7%	3.2%	2.2%
TOTAL	**186**	**100.0%**	**100.0%**	**$39,980**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TENNESSEE

Nashville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	54	6.5%	3.7%	$10,512	2.9%	1.9%	20.2%
Moderate	182	21.9%	17.0%	$47,463	13.3%	11.4%	17.2%
Middle	178	21.4%	19.6%	$54,372	15.2%	16.4%	20.1%
Upper	407	49.0%	41.1%	$239,756	66.9%	51.7%	42.5%
Unknown	9	1.1%	18.6%	$6,062	1.7%	18.6%	0.0%
TOTAL	**830**	**100.0%**	**100.0%**	**$358,165**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	71	6.7%	5.4%	$9,260	2.5%	2.7%	20.2%
Moderate	178	16.8%	15.3%	$32,250	8.7%	10.1%	17.2%
Middle	184	17.3%	19.3%	$41,724	11.3%	16.0%	20.1%
Upper	590	55.6%	39.4%	$273,615	74.1%	50.2%	42.5%
Unknown	39	3.7%	20.6%	$12,442	3.4%	21.0%	0.0%
TOTAL	**1,062**	**100.0%**	**100.0%**	**$369,291**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	15	5.8%	4.9%	$1,143	3.0%	2.5%	20.2%
Moderate	25	9.7%	12.0%	$1,797	4.7%	7.8%	17.2%
Middle	46	17.8%	18.3%	$4,025	10.6%	13.9%	20.1%
Upper	169	65.3%	60.8%	$30,467	80.3%	70.4%	42.5%
Unknown	4	1.5%	4.0%	$508	1.3%	5.5%	0.0%
TOTAL	**259**	**100.0%**	**100.0%**	**$37,940**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	9	5.2%	3.4%	$828	2.6%	1.9%	20.2%
Moderate	18	10.5%	9.4%	$2,106	6.5%	5.1%	17.2%
Middle	26	15.1%	16.1%	$3,337	10.3%	10.2%	20.1%
Upper	114	66.3%	68.0%	$25,343	78.1%	79.3%	42.5%
Unknown	5	2.9%	3.1%	$835	2.6%	3.5%	0.0%
TOTAL	**172**	**100.0%**	**100.0%**	**$32,449**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	2	10.5%	7.2%	$245	3.3%	2.5%	20.2%
Moderate	2	10.5%	13.8%	$457	6.1%	5.4%	17.2%
Middle	4	21.1%	16.2%	$692	9.2%	7.5%	20.1%
Upper	8	42.1%	53.0%	$3,888	51.9%	73.0%	42.5%
Unknown	3	15.8%	9.8%	$2,211	29.5%	11.6%	0.0%
TOTAL	**19**	**100.0%**	**100.0%**	**$7,493**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable							
Low	0	0.0%	3.1%	$0	0.0%	1.5%	20.2%
Moderate	0	0.0%	1.9%	$0	0.0%	1.3%	17.2%
Middle	0	0.0%	1.1%	$0	0.0%	1.8%	20.1%
Upper	0	0.0%	0.5%	$0	0.0%	1.3%	42.5%
Unknown	0	0.0%	93.4%	$0	0.0%	94.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.9%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	18.4%	$0	0.0%	2.1%	N/A
Unknown	0	0.0%	80.3%	$0	0.0%	97.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	151	6.4%	4.7%	$21,988	2.7%	2.2%	20.2%
Moderate	405	17.3%	15.6%	$84,073	10.4%	10.1%	17.2%
Middle	438	18.7%	19.2%	$104,150	12.9%	15.3%	20.1%
Upper	1,288	55.0%	41.3%	$573,069	71.2%	49.5%	42.5%
Unknown	60	2.6%	19.3%	$22,058	2.7%	22.9%	0.0%
TOTAL	**2,342**	**100.0%**	**100.0%**	**$805,338**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	37	5.5%	3.8%	$6,971	1.9%	1.8%	20.1%
Moderate	134	20.0%	16.7%	$36,613	9.9%	10.6%	17.2%
Middle	126	18.8%	20.1%	$47,030	12.7%	16.4%	21.2%
Upper	366	54.7%	40.7%	$272,101	73.7%	52.8%	41.5%
Unknown	6	0.9%	18.7%	$6,310	1.7%	18.4%	0.0%
TOTAL	**669**	**100.0%**	**100.0%**	**$369,025**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	68	11.7%	11.3%	$9,733	5.0%	5.8%	20.1%
Moderate	107	18.4%	21.6%	$19,368	9.9%	14.8%	17.2%
Middle	90	15.4%	20.6%	$22,245	11.4%	17.6%	21.2%
Upper	311	53.3%	32.3%	$138,151	70.8%	45.5%	41.5%
Unknown	7	1.2%	14.2%	$5,596	2.9%	16.3%	0.0%
TOTAL	**583**	**100.0%**	**100.0%**	**$195,093**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	29	5.3%	6.1%	$1,767	1.7%	2.9%	20.1%
Moderate	64	11.7%	14.5%	$5,390	5.2%	8.5%	17.2%
Middle	123	22.4%	21.4%	$14,382	14.0%	14.8%	21.2%
Upper	329	59.9%	54.8%	$78,524	76.3%	68.8%	41.5%
Unknown	4	0.7%	3.1%	$2,900	2.8%	5.0%	0.0%
TOTAL	**549**	**100.0%**	**100.0%**	**$102,963**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	6	4.1%	5.0%	$345	0.9%	2.5%	20.1%
Moderate	12	8.1%	12.8%	$715	1.9%	5.7%	17.2%
Middle	24	16.2%	20.4%	$2,310	6.2%	12.1%	21.2%
Upper	106	71.6%	58.9%	$33,784	90.9%	77.5%	41.5%
Unknown	0	0.0%	2.9%	$0	0.0%	2.2%	0.0%
TOTAL	**148**	**100.0%**	**100.0%**	**$37,154**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	3	13.0%	7.8%	$275	1.8%	2.5%	20.1%
Moderate	2	8.7%	15.9%	$325	2.1%	5.7%	17.2%
Middle	0	0.0%	18.4%	$0	0.0%	7.9%	21.2%
Upper	11	47.8%	49.8%	$7,648	50.0%	73.3%	41.5%
Unknown	7	30.4%	8.0%	$7,033	46.0%	10.6%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$15,281**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	5.0%	$0	0.0%	2.3%	20.1%
Moderate	0	0.0%	1.4%	$0	0.0%	1.2%	17.2%
Middle	0	0.0%	0.7%	$0	0.0%	0.5%	21.2%
Upper	0	0.0%	0.2%	$0	0.0%	0.2%	41.5%
Unknown	0	0.0%	92.6%	$0	0.0%	95.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.2%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	14.6%	$0	0.0%	0.9%	N/A
Unknown	0	0.0%	83.7%	$0	0.0%	99.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	143	7.3%	6.5%	$19,091	2.7%	2.7%	20.1%
Moderate	319	16.2%	17.6%	$62,411	8.7%	10.2%	17.2%
Middle	363	18.4%	20.2%	$85,967	11.9%	14.6%	21.2%
Upper	1,123	56.9%	40.4%	$530,208	73.7%	46.7%	41.5%
Unknown	24	1.2%	15.3%	$21,839	3.0%	25.9%	0.0%
TOTAL	**1,972**	**100.0%**	**100.0%**	**$719,516**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	41	4.9%	5.7%	$17,555	4.9%	5.5%	3.5%
Moderate	113	13.6%	15.8%	$29,643	8.3%	11.9%	16.4%
Middle	358	43.1%	41.8%	$116,266	32.5%	35.6%	42.7%
Upper	317	38.2%	36.7%	$194,546	54.3%	46.9%	37.3%
Unknown	1	0.1%	0.1%	$155	0.0%	0.1%	0.1%
TOTAL	**830**	**100.0%**	**100.0%**	**$358,165**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	21	2.0%	3.8%	$6,664	1.8%	3.5%	3.5%
Moderate	123	11.6%	12.5%	$24,112	6.5%	8.8%	16.4%
Middle	377	35.5%	39.7%	$90,465	24.5%	33.0%	42.7%
Upper	540	50.8%	44.0%	$247,949	67.1%	54.6%	37.3%
Unknown	1	0.1%	0.1%	$101	0.0%	0.1%	0.1%
TOTAL	**1,062**	**100.0%**	**100.0%**	**$369,291**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	1.5%	2.9%	$548	1.4%	2.7%	3.5%
Moderate	24	9.3%	10.1%	$2,076	5.5%	7.0%	16.4%
Middle	89	34.4%	35.5%	$9,610	25.3%	28.4%	42.7%
Upper	141	54.4%	51.4%	$25,636	67.6%	61.7%	37.3%
Unknown	1	0.4%	0.1%	$70	0.2%	0.1%	0.1%
TOTAL	**259**	**100.0%**	**100.0%**	**$37,940**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.5%	$0	0.0%	1.7%	3.5%
Moderate	14	8.1%	7.6%	$1,523	4.7%	4.7%	16.4%
Middle	42	24.4%	32.3%	$5,440	16.8%	23.5%	42.7%
Upper	116	67.4%	57.6%	$25,486	78.5%	70.1%	37.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**172**	**100.0%**	**100.0%**	**$32,449**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.4%	$0	0.0%	3.1%	3.5%
Moderate	4	21.1%	11.6%	$481	6.4%	4.6%	16.4%
Middle	8	42.1%	32.6%	$3,712	49.5%	16.1%	42.7%
Upper	7	36.8%	51.2%	$3,300	44.0%	76.1%	37.3%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.1%
TOTAL	**19**	**100.0%**	**100.0%**	**$7,493**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.1%	$0	0.0%	2.7%	3.5%
Moderate	0	0.0%	20.8%	$0	0.0%	14.6%	16.4%
Middle	0	0.0%	53.4%	$0	0.0%	48.4%	42.7%
Upper	0	0.0%	21.6%	$0	0.0%	34.3%	37.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	16.2%	$0	0.0%	17.3%	13.3%
Moderate	0	0.0%	42.3%	$0	0.0%	35.5%	35.4%
Middle	0	0.0%	29.1%	$0	0.0%	36.4%	29.9%
Upper	0	0.0%	12.0%	$0	0.0%	10.5%	21.3%
Unknown	0	0.0%	0.4%	$0	0.0%	0.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	66	2.8%	4.4%	$24,767	3.1%	4.9%	3.5%
Moderate	278	11.9%	13.6%	$57,835	7.2%	11.2%	16.4%
Middle	874	37.3%	40.1%	$225,493	28.0%	34.0%	42.7%
Upper	1,121	47.9%	41.7%	$496,917	61.7%	49.9%	37.3%
Unknown	3	0.1%	0.1%	$326	0.0%	0.1%	0.1%
TOTAL	**2,342**	**100.0%**	**100.0%**	**$805,338**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	15	2.2%	3.3%	$3,699	1.0%	2.6%	2.4%
Moderate	103	15.4%	17.5%	$37,115	10.1%	13.0%	17.0%
Middle	232	34.7%	41.2%	$96,148	26.1%	34.1%	42.4%
Upper	311	46.5%	36.7%	$229,216	62.1%	49.2%	37.7%
Unknown	8	1.2%	1.3%	$2,847	0.8%	1.1%	0.5%
TOTAL	**669**	**100.0%**	**100.0%**	**$369,025**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	7	1.2%	2.9%	$1,607	0.8%	2.2%	2.4%
Moderate	78	13.4%	15.8%	$15,451	7.9%	11.5%	17.0%
Middle	180	30.9%	42.5%	$39,689	20.3%	34.2%	42.4%
Upper	315	54.0%	38.2%	$137,082	70.3%	51.5%	37.7%
Unknown	3	0.5%	0.6%	$1,264	0.6%	0.6%	0.5%
TOTAL	**583**	**100.0%**	**100.0%**	**$195,093**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	3	0.5%	1.6%	$252	0.2%	1.1%	2.4%
Moderate	46	8.4%	11.0%	$5,210	5.1%	8.0%	17.0%
Middle	169	30.8%	35.9%	$21,634	21.0%	26.5%	42.4%
Upper	331	60.3%	50.9%	$75,867	73.7%	63.9%	37.7%
Unknown	0	0.0%	0.6%	$0	0.0%	0.4%	0.5%
TOTAL	**549**	**100.0%**	**100.0%**	**$102,963**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.2%	$0	0.0%	0.7%	2.4%
Moderate	8	5.4%	10.1%	$1,070	2.9%	6.5%	17.0%
Middle	52	35.1%	33.6%	$6,854	18.4%	23.7%	42.4%
Upper	87	58.8%	54.4%	$29,210	78.6%	68.7%	37.7%
Unknown	1	0.7%	0.6%	$20	0.1%	0.4%	0.5%
TOTAL	**148**	**100.0%**	**100.0%**	**$37,154**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.7%	$0	0.0%	0.7%	2.4%
Moderate	3	13.0%	13.4%	$595	3.9%	7.4%	17.0%
Middle	7	30.4%	36.8%	$1,363	8.9%	18.9%	42.4%
Upper	13	56.5%	47.5%	$13,323	87.2%	72.5%	37.7%
Unknown	0	0.0%	0.6%	$0	0.0%	0.5%	0.5%
TOTAL	**23**	**100.0%**	**100.0%**	**$15,281**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.8%	$0	0.0%	2.1%	2.4%
Moderate	0	0.0%	20.9%	$0	0.0%	46.0%	17.0%
Middle	0	0.0%	61.8%	$0	0.0%	37.4%	42.4%
Upper	0	0.0%	13.3%	$0	0.0%	14.6%	37.7%
Unknown	0	0.0%	0.2%	$0	0.0%	0.0%	0.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	11.8%	$0	0.0%	1.8%	9.0%
Moderate	0	0.0%	37.8%	$0	0.0%	22.4%	29.9%
Middle	0	0.0%	35.4%	$0	0.0%	46.4%	32.2%
Upper	0	0.0%	12.6%	$0	0.0%	25.2%	27.4%
Unknown	0	0.0%	2.4%	$0	0.0%	4.2%	1.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	25	1.3%	2.9%	$5,558	0.8%	2.3%	2.4%
Moderate	238	12.1%	16.0%	$59,441	8.3%	13.3%	17.0%
Middle	640	32.5%	40.6%	$165,688	23.0%	34.7%	42.4%
Upper	1,057	53.6%	39.5%	$484,698	67.4%	48.4%	37.7%
Unknown	12	0.6%	1.0%	$4,131	0.6%	1.3%	0.5%
TOTAL	**1,972**	**100.0%**	**100.0%**	**$719,516**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	529	30.5%	48.5%	$27,080	17.1%	34.3%	91.5%
		Over $1 Million/ Unknown	1,203	69.5%	51.5%	$131,406	82.9%	65.7%	8.5%
		TOTAL	**1,732**	**100.0%**	**100.0%**	**$158,486**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	1,371	79.2%	90.2%	$36,151	22.8%	30.8%	
		$100,001–$250,000	186	10.7%	5.1%	$30,447	19.2%	17.6%	
		$250,001–$1 Million	175	10.1%	4.7%	$91,888	58.0%	51.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**1,732**	**100.0%**	**100.0%**	**$158,486**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	486	91.9%		$11,999	44.3%		
		$100,001–$250,000	21	4.0%		$3,483	12.9%		
		$250,001–$1 Million	22	4.2%		$11,598	42.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**529**	**100.0%**		**$27,080**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	149	45.8%	51.2%	$20,468	27.8%	35.9%	91.6%
		Over $1 Million/ Unknown	176	54.2%	48.8%	$53,206	72.2%	64.1%	8.4%
		TOTAL	**325**	**100.0%**	**100.0%**	**$73,674**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	162	49.8%	92.5%	$7,588	10.3%	33.4%	
		$100,001–$250,000	64	19.7%	3.6%	$12,058	16.4%	15.0%	
		$250,001–$1 Million	99	30.5%	3.9%	$54,028	73.3%	51.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**325**	**100.0%**	**100.0%**	**$73,674**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	106	71.1%		$3,920	19.2%		
		$100,001–$250,000	18	12.1%		$3,486	17.0%		
		$250,001–$1 Million	25	16.8%		$13,062	63.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**149**	**100.0%**		**$20,468**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	129	7.4%	7.7%	$24,907	15.7%	11.2%	7.9%
Moderate	302	17.4%	18.4%	$29,316	18.5%	20.5%	20.1%
Middle	529	30.5%	30.8%	$38,059	24.0%	23.7%	30.5%
Upper	764	44.1%	42.0%	$65,429	41.3%	42.6%	40.6%
Unknown	8	0.5%	1.1%	$775	0.5%	1.9%	0.8%
TOTAL	**1,732**	**100.0%**	**100.0%**	**$158,486**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	15	4.6%	3.6%	$3,804	5.2%	4.5%	4.5%
Moderate	82	25.2%	19.7%	$20,967	28.5%	22.3%	21.2%
Middle	102	31.4%	31.7%	$23,270	31.6%	27.1%	31.8%
Upper	120	36.9%	42.3%	$24,366	33.1%	42.4%	40.0%
Unknown	6	1.8%	2.7%	$1,267	1.7%	3.7%	2.5%
TOTAL	**325**	**100.0%**	**100.0%**	**$73,674**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Knoxville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	23	10.0%	4.3%	$3,352	3.4%	2.1%	20.9%
Moderate	36	15.7%	16.1%	$7,224	7.3%	10.2%	16.6%
Middle	25	10.9%	18.3%	$6,208	6.3%	14.7%	20.0%
Upper	142	61.7%	45.4%	$81,470	82.1%	57.5%	42.5%
Unknown	4	1.7%	15.9%	$928	0.9%	15.6%	0.0%
TOTAL	**230**	**100.0%**	**100.0%**	**$99,182**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	24	7.1%	4.9%	$2,448	2.4%	2.5%	20.9%
Moderate	46	13.7%	14.3%	$5,442	5.3%	9.6%	16.6%
Middle	52	15.5%	18.7%	$8,897	8.7%	15.2%	20.0%
Upper	201	59.8%	41.3%	$81,991	80.1%	50.7%	42.5%
Unknown	13	3.9%	20.8%	$3,546	3.5%	22.0%	0.0%
TOTAL	**336**	**100.0%**	**100.0%**	**$102,324**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	9	7.4%	5.6%	$472	2.9%	2.7%	20.9%
Moderate	16	13.1%	13.4%	$1,358	8.4%	10.0%	16.6%
Middle	11	9.0%	17.7%	$581	3.6%	14.9%	20.0%
Upper	85	69.7%	60.5%	$13,705	84.8%	69.1%	42.5%
Unknown	1	0.8%	2.8%	$50	0.3%	3.4%	0.0%
TOTAL	**122**	**100.0%**	**100.0%**	**$16,166**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	4	4.6%	4.6%	$223	1.7%	2.0%	20.9%
Moderate	9	10.3%	12.2%	$536	4.0%	6.1%	16.6%
Middle	15	17.2%	17.7%	$1,949	14.6%	13.6%	20.0%
Upper	56	64.4%	62.2%	$9,314	69.8%	74.6%	42.5%
Unknown	3	3.4%	3.3%	$1,318	9.9%	3.7%	0.0%
TOTAL	**87**	**100.0%**	**100.0%**	**$13,340**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	4	22.2%	7.3%	$362	7.2%	2.8%	20.9%
Moderate	0	0.0%	15.9%	$0	0.0%	7.7%	16.6%
Middle	2	11.1%	16.4%	$512	10.1%	8.8%	20.0%
Upper	9	50.0%	55.0%	$3,335	65.9%	76.4%	42.5%
Unknown	3	16.7%	5.4%	$848	16.8%	4.3%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$5,057**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.6%	$0	0.0%	0.4%	20.9%
Moderate	0	0.0%	1.2%	$0	0.0%	0.8%	16.6%
Middle	0	0.0%	1.6%	$0	0.0%	1.7%	20.0%
Upper	0	0.0%	0.9%	$0	0.0%	1.8%	42.5%
Unknown	0	0.0%	95.7%	$0	0.0%	95.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	10.1%	$0	0.0%	2.0%	N/A
Unknown	1	100.0%	89.9%	$840	100.0%	98.0%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$840**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	64	8.1%	4.6%	$6,857	2.9%	2.2%	20.9%
Moderate	107	13.5%	14.9%	$14,560	6.1%	9.3%	16.6%
Middle	105	13.2%	18.2%	$18,147	7.7%	14.0%	20.0%
Upper	493	62.1%	43.9%	$189,815	80.1%	51.8%	42.5%
Unknown	25	3.1%	18.3%	$7,530	3.2%	22.8%	0.0%
TOTAL	**794**	**100.0%**	**100.0%**	**$236,909**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	14	5.9%	4.8%	$2,232	1.8%	2.1%	19.3%
Moderate	42	17.6%	15.9%	$9,173	7.6%	9.8%	17.4%
Middle	32	13.4%	19.7%	$8,620	7.1%	15.6%	20.6%
Upper	146	61.3%	42.0%	$95,286	78.5%	55.4%	42.7%
Unknown	4	1.7%	17.6%	$6,146	5.1%	17.2%	0.0%
TOTAL	**238**	**100.0%**	**100.0%**	**$121,457**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	42	16.4%	10.2%	$4,026	5.7%	5.5%	19.3%
Moderate	40	15.6%	20.3%	$4,029	5.7%	14.8%	17.4%
Middle	43	16.8%	22.8%	$6,279	8.9%	20.4%	20.6%
Upper	125	48.8%	32.4%	$52,663	74.6%	42.9%	42.7%
Unknown	6	2.3%	14.3%	$3,568	5.1%	16.4%	0.0%
TOTAL	**256**	**100.0%**	**100.0%**	**$70,565**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	17	6.8%	7.4%	$693	2.2%	4.2%	19.3%
Moderate	34	13.5%	15.4%	$2,505	7.9%	11.0%	17.4%
Middle	58	23.1%	22.7%	$4,707	14.8%	18.1%	20.6%
Upper	142	56.6%	51.7%	$23,917	75.2%	63.7%	42.7%
Unknown	0	0.0%	2.8%	$0	0.0%	3.0%	0.0%
TOTAL	**251**	**100.0%**	**100.0%**	**$31,822**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	9	7.4%	6.2%	$632	2.5%	3.3%	19.3%
Moderate	19	15.6%	15.1%	$1,410	5.6%	8.9%	17.4%
Middle	24	19.7%	21.7%	$2,875	11.4%	15.7%	20.6%
Upper	69	56.6%	53.5%	$19,872	78.9%	69.2%	42.7%
Unknown	1	0.8%	3.4%	$400	1.6%	2.9%	0.0%
TOTAL	**122**	**100.0%**	**100.0%**	**$25,189**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	2	18.2%	9.4%	$250	7.8%	4.6%	19.3%
Moderate	1	9.1%	14.4%	$60	1.9%	7.3%	17.4%
Middle	1	9.1%	19.4%	$35	1.1%	11.7%	20.6%
Upper	6	54.5%	50.0%	$2,500	78.0%	66.7%	42.7%
Unknown	1	9.1%	6.8%	$360	11.2%	9.6%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$3,205**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.8%	$0	0.0%	0.8%	19.3%
Moderate	0	0.0%	0.5%	$0	0.0%	0.6%	17.4%
Middle	0	0.0%	0.9%	$0	0.0%	0.9%	20.6%
Upper	0	0.0%	0.5%	$0	0.0%	0.5%	42.7%
Unknown	0	0.0%	96.4%	$0	0.0%	97.2%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.5%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	8.2%	$0	0.0%	1.0%	N/A
Unknown	3	100.0%	91.3%	$8,035	100.0%	98.9%	N/A
TOTAL	**3**	**100.0%**	**100.0%**	**$8,035**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	84	9.5%	6.7%	$7,833	3.0%	2.8%	19.3%
Moderate	136	15.4%	17.0%	$17,177	6.6%	10.0%	17.4%
Middle	158	17.9%	20.8%	$22,516	8.7%	15.3%	20.6%
Upper	488	55.4%	40.2%	$194,238	74.6%	48.0%	42.7%
Unknown	15	1.7%	15.3%	$18,509	7.1%	23.8%	0.0%
TOTAL	**881**	**100.0%**	**100.0%**	**$260,273**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	7	3.0%	2.4%	$2,728	2.8%	1.3%	2.3%
Moderate	33	14.3%	10.7%	$6,763	6.8%	7.0%	12.0%
Middle	84	36.5%	55.6%	$26,819	27.0%	54.8%	55.2%
Upper	106	46.1%	31.3%	$62,872	63.4%	36.8%	30.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**230**	**100.0%**	**100.0%**	**$99,182**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	0.3%	1.3%	$123	0.1%	0.8%	2.3%
Moderate	24	7.1%	7.6%	$4,103	4.0%	5.5%	12.0%
Middle	131	39.0%	52.8%	$28,817	28.2%	49.2%	55.2%
Upper	180	53.6%	38.3%	$69,281	67.7%	44.6%	30.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**336**	**100.0%**	**100.0%**	**$102,324**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	1.6%	1.5%	$130	0.8%	1.0%	2.3%
Moderate	1	0.8%	8.6%	$16	0.1%	6.6%	12.0%
Middle	55	45.1%	46.8%	$5,082	31.4%	43.3%	55.2%
Upper	64	52.5%	43.0%	$10,938	67.7%	49.1%	30.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**122**	**100.0%**	**100.0%**	**$16,166**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.9%	$0	0.0%	0.7%	2.3%
Moderate	6	6.9%	5.2%	$504	3.8%	3.1%	12.0%
Middle	36	41.4%	47.6%	$5,930	44.5%	38.9%	55.2%
Upper	45	51.7%	46.4%	$6,906	51.8%	57.4%	30.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**87**	**100.0%**	**100.0%**	**$13,340**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.9%	$0	0.0%	0.2%	2.3%
Moderate	4	22.2%	9.7%	$788	15.6%	5.0%	12.0%
Middle	9	50.0%	50.4%	$2,265	44.8%	53.6%	55.2%
Upper	5	27.8%	39.0%	$2,004	39.6%	41.1%	30.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$5,057**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.5%	$0	0.0%	1.6%	2.3%
Moderate	0	0.0%	19.6%	$0	0.0%	15.3%	12.0%
Middle	0	0.0%	57.5%	$0	0.0%	55.5%	55.2%
Upper	0	0.0%	20.5%	$0	0.0%	27.6%	30.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	11.7%	$0	0.0%	5.5%	9.9%
Moderate	0	0.0%	26.2%	$0	0.0%	21.2%	27.9%
Middle	0	0.0%	42.7%	$0	0.0%	40.8%	44.5%
Upper	1	100.0%	19.4%	$840	100.0%	32.5%	17.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**1**	**100.0%**	**100.0%**	**$840**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	10	1.3%	1.8%	$2,981	1.3%	1.3%	2.3%
Moderate	68	8.6%	9.1%	$12,174	5.1%	7.1%	12.0%
Middle	315	39.7%	53.7%	$68,913	29.1%	51.3%	55.2%
Upper	401	50.5%	35.4%	$152,841	64.5%	40.3%	30.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**794**	**100.0%**	**100.0%**	**$236,909**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	8	3.4%	2.9%	$2,419	2.0%	1.5%	2.1%
Moderate	33	13.9%	11.6%	$7,726	6.4%	8.6%	11.8%
Middle	89	37.4%	56.2%	$33,887	27.9%	55.8%	55.4%
Upper	106	44.5%	29.2%	$75,654	62.3%	33.9%	30.6%
Unknown	2	0.8%	0.2%	$1,771	1.5%	0.2%	0.0%
TOTAL	**238**	**100.0%**	**100.0%**	**$121,457**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	1.2%	2.4%	$198	0.3%	1.5%	2.1%
Moderate	16	6.3%	10.2%	$1,853	2.6%	7.9%	11.8%
Middle	114	44.5%	57.4%	$20,638	29.2%	55.1%	55.4%
Upper	122	47.7%	30.0%	$47,646	67.5%	35.5%	30.6%
Unknown	1	0.4%	0.1%	$230	0.3%	0.1%	0.0%
TOTAL	**256**	**100.0%**	**100.0%**	**$70,565**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	1.6%	2.1%	$334	1.0%	2.8%	2.1%
Moderate	25	10.0%	9.3%	$1,565	4.9%	6.9%	11.8%
Middle	101	40.2%	48.5%	$10,345	32.5%	45.0%	55.4%
Upper	121	48.2%	40.1%	$19,578	61.5%	45.3%	30.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**251**	**100.0%**	**100.0%**	**$31,822**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	1.6%	0.8%	$155	0.6%	0.3%	2.1%
Moderate	6	4.9%	7.4%	$315	1.3%	4.8%	11.8%
Middle	57	46.7%	48.6%	$9,430	37.4%	43.7%	55.4%
Upper	56	45.9%	43.1%	$15,019	59.6%	50.9%	30.6%
Unknown	1	0.8%	0.1%	$270	1.1%	0.2%	0.0%
TOTAL	**122**	**100.0%**	**100.0%**	**$25,189**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.4%	$0	0.0%	1.5%	2.1%
Moderate	1	9.1%	11.0%	$80	2.5%	8.1%	11.8%
Middle	3	27.3%	51.0%	$676	21.1%	50.1%	55.4%
Upper	7	63.6%	35.3%	$2,449	76.4%	38.5%	30.6%
Unknown	0	0.0%	0.3%	$0	0.0%	1.7%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$3,205**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.6%	$0	0.0%	2.4%	2.1%
Moderate	0	0.0%	13.1%	$0	0.0%	9.4%	11.8%
Middle	0	0.0%	53.6%	$0	0.0%	62.9%	55.4%
Upper	0	0.0%	29.7%	$0	0.0%	25.3%	30.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	33.3%	14.9%	$6,000	74.7%	17.0%	14.2%
Moderate	0	0.0%	20.5%	$0	0.0%	6.6%	17.4%
Middle	1	33.3%	41.0%	$1,875	23.3%	37.7%	39.1%
Upper	1	33.3%	23.1%	$160	2.0%	38.5%	25.7%
Unknown	0	0.0%	0.5%	$0	0.0%	0.2%	3.5%
TOTAL	**3**	**100.0%**	**100.0%**	**$8,035**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	18	2.0%	2.6%	$9,106	3.5%	3.0%	2.1%
Moderate	81	9.2%	10.8%	$11,539	4.4%	8.1%	11.8%
Middle	365	41.4%	55.4%	$76,851	29.5%	53.4%	55.4%
Upper	413	46.9%	31.1%	$160,506	61.7%	35.4%	30.6%
Unknown	4	0.5%	0.1%	$2,271	0.9%	0.2%	0.0%
TOTAL	**881**	**100.0%**	**100.0%**	**$260,273**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	340	29.0%	47.3%	$22,897	18.1%	30.6%	91.2%
	Over $1 Million/ Unknown	832	71.0%	52.7%	$103,596	81.9%	69.4%	8.8%
	TOTAL	**1,172**	**100.0%**	**100.0%**	**$126,493**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	870	74.2%	88.4%	$23,546	18.6%	28.2%	
	$100,001–$250,000	159	13.6%	6.1%	$26,241	20.7%	18.6%	
	$250,001–$1 Million	143	12.2%	5.5%	$76,706	60.6%	53.2%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**1,172**	**100.0%**	**100.0%**	**$126,493**	**100.0%**	**100.0%**	
Loan Size / Revenue $1 Million or Less	$100,000 or Less	296	87.1%		$7,879	34.4%		
	$100,001–$250,000	27	7.9%		$4,316	18.8%		
	$250,001–$1 Million	17	5.0%		$10,702	46.7%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**340**	**100.0%**		**$22,897**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	120	34.4%	49.4%	$17,557	20.8%	33.8%	91.3%
		Over $1 Million/ Unknown	229	65.6%	50.6%	$66,707	79.2%	66.2%	8.7%
		TOTAL	**349**	**100.0%**	**100.0%**	**$84,264**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	165	47.3%	90.9%	$7,862	9.3%	30.9%	
		$100,001–$250,000	71	20.3%	4.8%	$12,229	14.5%	17.7%	
		$250,001–$1 Million	113	32.4%	4.3%	$64,173	76.2%	51.4%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**349**	**100.0%**	**100.0%**	**$84,264**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	81	67.5%		$2,642	15.0%		
		$100,001–$250,000	18	15.0%		$2,999	17.1%		
		$250,001–$1 Million	21	17.5%		$11,916	67.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**120**	**100.0%**		**$17,557**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	75	6.4%	3.3%	$11,001	8.7%	4.1%	4.4%
Moderate	189	16.1%	12.3%	$26,237	20.7%	11.9%	14.4%
Middle	465	39.7%	48.3%	$46,352	36.6%	46.5%	47.8%
Upper	440	37.5%	35.5%	$42,324	33.5%	37.1%	33.2%
Unknown	3	0.3%	0.6%	$579	0.5%	0.4%	0.3%
TOTAL	**1,172**	**100.0%**	**100.0%**	**$126,493**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	20	5.7%	3.3%	$6,484	7.7%	3.7%	4.3%
Moderate	57	16.3%	13.2%	$13,258	15.7%	14.7%	14.1%
Middle	143	41.0%	46.6%	$33,193	39.4%	40.7%	45.5%
Upper	120	34.4%	36.0%	$28,228	33.5%	39.9%	35.2%
Unknown	9	2.6%	0.9%	$3,101	3.7%	1.0%	0.9%
TOTAL	**349**	**100.0%**	**100.0%**	**$84,264**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Johnson City Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	3	5.5%	6.5%	$380	2.0%	3.2%	21.2%
Moderate	12	21.8%	20.2%	$1,748	9.3%	13.9%	17.9%
Middle	4	7.3%	22.2%	$589	3.1%	19.2%	20.7%
Upper	35	63.6%	38.4%	$15,904	84.5%	51.3%	40.2%
Unknown	1	1.8%	12.7%	$200	1.1%	12.4%	0.0%
TOTAL	**55**	**100.0%**	**100.0%**	**$18,821**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	10	9.7%	6.3%	$930	3.8%	3.1%	21.2%
Moderate	12	11.7%	15.2%	$1,281	5.2%	10.1%	17.9%
Middle	22	21.4%	19.9%	$3,262	13.3%	16.6%	20.7%
Upper	55	53.4%	37.6%	$18,469	75.3%	47.5%	40.2%
Unknown	4	3.9%	21.1%	$572	2.3%	22.6%	0.0%
TOTAL	**103**	**100.0%**	**100.0%**	**$24,514**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	10.3%	7.2%	$95	2.0%	3.7%	21.2%
Moderate	7	17.9%	19.5%	$245	5.3%	13.1%	17.9%
Middle	5	12.8%	20.8%	$254	5.5%	15.4%	20.7%
Upper	21	53.8%	49.2%	$3,984	85.7%	62.4%	40.2%
Unknown	2	5.1%	3.3%	$71	1.5%	5.4%	0.0%
TOTAL	**39**	**100.0%**	**100.0%**	**$4,649**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	3	10.0%	8.7%	$348	7.9%	5.5%	21.2%
Moderate	4	13.3%	18.2%	$220	5.0%	12.0%	17.9%
Middle	4	13.3%	19.1%	$325	7.4%	13.9%	20.7%
Upper	19	63.3%	50.4%	$3,503	79.7%	65.3%	40.2%
Unknown	0	0.0%	3.5%	$0	0.0%	3.4%	0.0%
TOTAL	**30**	**100.0%**	**100.0%**	**$4,396**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	14.3%	$0	0.0%	7.6%	21.2%
Moderate	0	0.0%	27.1%	$0	0.0%	18.2%	17.9%
Middle	0	0.0%	20.3%	$0	0.0%	20.7%	20.7%
Upper	3	100.0%	33.8%	$910	100.0%	50.3%	40.2%
Unknown	0	0.0%	4.5%	$0	0.0%	3.1%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$910**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.3%	$0	0.0%	1.8%	21.2%
Moderate	0	0.0%	1.5%	$0	0.0%	1.5%	17.9%
Middle	0	0.0%	2.3%	$0	0.0%	1.6%	20.7%
Upper	0	0.0%	0.8%	$0	0.0%	1.7%	40.2%
Unknown	0	0.0%	93.1%	$0	0.0%	93.4%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.8%	$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.8%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.7%	$0	0.0%	0.8%	N/A
Upper	0	0.0%	13.2%	$0	0.0%	5.2%	N/A
Unknown	1	100.0%	83.5%	$531	100.0%	93.9%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$531**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	20	8.7%	6.5%	$1,753	3.3%	3.1%	21.2%
Moderate	35	15.2%	17.6%	$3,494	6.5%	11.6%	17.9%
Middle	35	15.2%	20.7%	$4,430	8.2%	17.1%	20.7%
Upper	133	57.6%	38.2%	$42,770	79.5%	47.9%	40.2%
Unknown	8	3.5%	17.0%	$1,374	2.6%	20.3%	0.0%
TOTAL	**231**	**100.0%**	**100.0%**	**$53,821**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	6	8.8%	7.0%	$767	2.6%	3.3%	21.7%
Moderate	11	16.2%	19.8%	$1,687	5.8%	13.1%	17.2%
Middle	7	10.3%	21.8%	$1,716	5.9%	19.0%	21.0%
Upper	42	61.8%	37.5%	$23,616	81.4%	49.9%	40.1%
Unknown	2	2.9%	13.9%	$1,228	4.2%	14.7%	0.0%
TOTAL	**68**	**100.0%**	**100.0%**	**$29,014**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	6	7.4%	12.5%	$265	2.0%	6.7%	21.7%
Moderate	15	18.5%	23.3%	$1,546	11.6%	17.8%	17.2%
Middle	16	19.8%	23.3%	$1,836	13.8%	22.6%	21.0%
Upper	44	54.3%	31.1%	$9,703	72.7%	41.2%	40.1%
Unknown	0	0.0%	9.8%	$0	0.0%	11.7%	0.0%
TOTAL	**81**	**100.0%**	**100.0%**	**$13,350**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	10	14.3%	10.8%	$549	6.8%	6.5%	21.7%
Moderate	1	1.4%	19.6%	$25	0.3%	14.1%	17.2%
Middle	16	22.9%	25.0%	$1,109	13.7%	22.0%	21.0%
Upper	43	61.4%	42.4%	$6,419	79.2%	54.5%	40.1%
Unknown	0	0.0%	2.1%	$0	0.0%	2.9%	0.0%
TOTAL	**70**	**100.0%**	**100.0%**	**$8,102**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	3	11.1%	9.7%	$85	2.0%	5.0%	21.7%
Moderate	4	14.8%	17.0%	$304	7.0%	12.0%	17.2%
Middle	6	22.2%	23.5%	$488	11.2%	15.5%	21.0%
Upper	14	51.9%	43.7%	$3,468	79.8%	63.4%	40.1%
Unknown	0	0.0%	6.1%	$0	0.0%	4.1%	0.0%
TOTAL	**27**	**100.0%**	**100.0%**	**$4,345**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	10.7%	$0	0.0%	5.1%	21.7%
Moderate	0	0.0%	19.2%	$0	0.0%	12.7%	17.2%
Middle	0	0.0%	19.9%	$0	0.0%	15.8%	21.0%
Upper	4	80.0%	36.2%	$1,306	72.3%	40.8%	40.1%
Unknown	1	20.0%	14.0%	$500	27.7%	25.6%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,806**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.9%	$0	0.0%	3.9%	21.7%
Moderate	0	0.0%	1.2%	$0	0.0%	1.2%	17.2%
Middle	0	0.0%	4.9%	$0	0.0%	8.8%	21.0%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	40.1%
Unknown	0	0.0%	88.9%	$0	0.0%	86.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	16.5%	$0	0.0%	7.1%	N/A
Unknown	3	100.0%	83.5%	$2,442	100.0%	92.9%	N/A
TOTAL	**3**	**100.0%**	**100.0%**	**$2,442**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	25	9.8%	9.1%	$1,666	2.8%	4.0%	21.7%
Moderate	31	12.2%	20.3%	$3,562	6.0%	13.3%	17.2%
Middle	45	17.7%	22.2%	$5,149	8.7%	18.4%	21.0%
Upper	147	57.9%	36.0%	$44,512	75.4%	45.0%	40.1%
Unknown	6	2.4%	12.4%	$4,170	7.1%	19.2%	0.0%
TOTAL	**254**	**100.0%**	**100.0%**	**$59,059**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	9	16.4%	18.5%	$1,572	8.4%	14.1%	18.4%
Middle	20	36.4%	51.8%	$5,825	30.9%	49.4%	57.3%
Upper	26	47.3%	29.7%	$11,424	60.7%	36.4%	24.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**55**	**100.0%**	**100.0%**	**$18,821**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	6	5.8%	13.6%	$1,265	5.2%	10.5%	18.4%
Middle	56	54.4%	53.3%	$12,111	49.4%	49.9%	57.3%
Upper	41	39.8%	33.1%	$11,138	45.4%	39.6%	24.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**103**	**100.0%**	**100.0%**	**$24,514**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	5.1%	14.4%	$1,065	22.9%	14.0%	18.4%
Middle	20	51.3%	48.3%	$1,409	30.3%	45.2%	57.3%
Upper	17	43.6%	37.3%	$2,175	46.8%	40.8%	24.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**39**	**100.0%**	**100.0%**	**$4,649**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	6.7%	10.9%	$160	3.6%	8.9%	18.4%
Middle	13	43.3%	48.2%	$1,482	33.7%	44.3%	57.3%
Upper	15	50.0%	40.9%	$2,754	62.6%	46.8%	24.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**30**	**100.0%**	**100.0%**	**$4,396**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	15.8%	$0	0.0%	9.4%	18.4%
Middle	2	66.7%	66.2%	$680	74.7%	66.6%	57.3%
Upper	1	33.3%	18.0%	$230	25.3%	24.0%	24.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$910**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	20.8%	$0	0.0%	14.7%	18.4%
Middle	0	0.0%	58.5%	$0	0.0%	61.6%	57.3%
Upper	0	0.0%	20.8%	$0	0.0%	23.6%	24.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	24.8%	$0	0.0%	29.7%	31.4%
Middle	1	100.0%	57.9%	$531	100.0%	48.2%	45.6%
Upper	0	0.0%	17.4%	$0	0.0%	22.0%	23.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$531**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	19	8.2%	16.0%	$4,062	7.5%	13.2%	18.4%
Middle	112	48.5%	52.4%	$22,038	40.9%	49.6%	57.3%
Upper	100	43.3%	31.6%	$27,721	51.5%	37.3%	24.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**231**	**100.0%**	**100.0%**	**$53,821**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	1.5%	1.5%	$157	0.5%	1.0%	1.0%
Moderate	12	17.6%	21.4%	$3,886	13.4%	17.6%	17.9%
Middle	20	29.4%	46.6%	$7,345	25.3%	43.7%	53.8%
Upper	35	51.5%	30.4%	$17,626	60.7%	37.6%	27.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**68**	**100.0%**	**100.0%**	**$29,014**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.9%	$0	0.0%	0.7%	1.0%
Moderate	17	21.0%	18.4%	$2,566	19.2%	15.0%	17.9%
Middle	26	32.1%	50.5%	$3,826	28.7%	49.8%	53.8%
Upper	38	46.9%	30.3%	$6,958	52.1%	34.6%	27.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**81**	**100.0%**	**100.0%**	**$13,350**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.4%	$0	0.0%	0.3%	1.0%
Moderate	8	11.4%	13.4%	$878	10.8%	12.2%	17.9%
Middle	32	45.7%	51.2%	$2,896	35.7%	49.7%	53.8%
Upper	30	42.9%	35.0%	$4,328	53.4%	37.9%	27.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**70**	**100.0%**	**100.0%**	**$8,102**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	3.7%	1.4%	$250	5.8%	3.7%	1.0%
Moderate	3	11.1%	14.3%	$300	6.9%	12.0%	17.9%
Middle	10	37.0%	46.8%	$828	19.1%	39.1%	53.8%
Upper	13	48.1%	37.6%	$2,967	68.3%	45.1%	27.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**27**	**100.0%**	**100.0%**	**$4,345**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.7%	$0	0.0%	2.3%	1.0%
Moderate	0	0.0%	14.7%	$0	0.0%	9.1%	17.9%
Middle	4	80.0%	55.0%	$1,374	76.1%	56.7%	53.8%
Upper	1	20.0%	29.6%	$432	23.9%	31.9%	27.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,806**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	1.0%
Moderate	0	0.0%	21.0%	$0	0.0%	21.6%	17.9%
Middle	0	0.0%	63.0%	$0	0.0%	62.2%	53.8%
Upper	0	0.0%	16.0%	$0	0.0%	16.1%	27.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	7.0%	$0	0.0%	7.1%	7.5%
Moderate	1	33.3%	30.4%	$1,384	56.7%	23.0%	28.7%
Middle	2	66.7%	40.9%	$1,058	43.3%	22.9%	31.0%
Upper	0	0.0%	21.7%	$0	0.0%	46.9%	32.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$2,442**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	2	0.8%	1.3%	$407	0.7%	1.4%	1.0%
Moderate	41	16.1%	19.4%	$9,014	15.3%	17.0%	17.9%
Middle	94	37.0%	48.4%	$17,327	29.3%	44.0%	53.8%
Upper	117	46.1%	31.0%	$32,311	54.7%	37.6%	27.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**254**	**100.0%**	**100.0%**	**$59,059**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	97	25.3%	45.2%	$3,443	9.3%	35.4%	91.6%
		Over $1 Million/ Unknown	287	74.7%	54.8%	$33,754	90.7%	64.6%	8.4%
		TOTAL	**384**	**100.0%**	**100.0%**	**$37,197**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	295	76.8%	90.4%	$8,340	22.4%	32.1%	
		$100,001–$250,000	47	12.2%	5.2%	$8,106	21.8%	18.9%	
		$250,001–$1 Million	42	10.9%	4.5%	$20,751	55.8%	49.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**384**	**100.0%**	**100.0%**	**$37,197**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	92	94.8%		$2,544	73.9%		
		$100,001–$250,000	4	4.1%		$624	18.1%		
		$250,001–$1 Million	1	1.0%		$275	8.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**97**	**100.0%**		**$3,443**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	40	34.8%	50.6%	$5,839	20.5%	41.6%	91.6%
		Over $1 Million/ Unknown	75	65.2%	49.4%	$22,641	79.5%	58.4%	8.4%
		TOTAL	**115**	**100.0%**	**100.0%**	**$28,480**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	53	46.1%	93.0%	$2,920	10.3%	36.6%	
		$100,001–$250,000	23	20.0%	3.7%	$3,871	13.6%	17.1%	
		$250,001–$1 Million	39	33.9%	3.3%	$21,689	76.2%	46.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**115**	**100.0%**	**100.0%**	**$28,480**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	27	67.5%		$1,170	20.0%		
		$100,001–$250,000	6	15.0%		$946	16.2%		
		$250,001–$1 Million	7	17.5%		$3,723	63.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**40**	**100.0%**		**$5,839**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	85	22.1%	20.3%	$5,716	15.4%	23.5%	23.7%
Middle	173	45.1%	48.0%	$18,915	50.9%	44.1%	49.4%
Upper	126	32.8%	31.2%	$12,566	33.8%	32.4%	26.7%
Unknown	0	0.0%	0.6%	$0	0.0%	0.1%	0.2%
TOTAL	**384**	**100.0%**	**100.0%**	**$37,197**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	11	9.6%	2.6%	$2,995	10.5%	4.0%	4.6%
Moderate	16	13.9%	19.0%	$3,013	10.6%	18.2%	22.6%
Middle	45	39.1%	46.4%	$11,841	41.6%	46.4%	43.9%
Upper	43	37.4%	31.2%	$10,631	37.3%	30.9%	28.7%
Unknown	0	0.0%	0.7%	$0	0.0%	0.6%	0.2%
TOTAL	**115**	**100.0%**	**100.0%**	**$28,480**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Jackson Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	2.8%	$0	0.0%	1.4%	20.3%
Moderate	0	0.0%	16.7%	$0	0.0%	12.1%	16.5%
Middle	3	27.3%	19.2%	$564	15.3%	17.5%	17.9%
Upper	8	72.7%	34.1%	$3,121	84.7%	42.5%	45.3%
Unknown	0	0.0%	27.2%	$0	0.0%	26.5%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$3,685**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	3.6%	$0	0.0%	1.5%	20.3%
Moderate	1	10.0%	11.0%	$51	2.5%	7.0%	16.5%
Middle	0	0.0%	18.7%	$0	0.0%	14.6%	17.9%
Upper	9	90.0%	39.1%	$1,987	97.5%	46.4%	45.3%
Unknown	0	0.0%	27.5%	$0	0.0%	30.5%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$2,038**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	14.3%	7.9%	$38	6.4%	5.5%	20.3%
Moderate	0	0.0%	7.9%	$0	0.0%	4.6%	16.5%
Middle	1	14.3%	27.0%	$51	8.5%	20.5%	17.9%
Upper	4	57.1%	50.8%	$388	64.9%	61.0%	45.3%
Unknown	1	14.3%	6.3%	$121	20.2%	8.5%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$598**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	6.1%	$0	0.0%	7.0%	20.3%
Moderate	1	50.0%	9.2%	$50	19.2%	5.0%	16.5%
Middle	0	0.0%	17.3%	$0	0.0%	12.6%	17.9%
Upper	1	50.0%	64.3%	$210	80.8%	73.3%	45.3%
Unknown	0	0.0%	3.1%	$0	0.0%	2.2%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$260**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	10.3%	$0	0.0%	5.7%	20.3%
Moderate	0	0.0%	27.6%	$0	0.0%	17.1%	16.5%
Middle	1	100.0%	20.7%	$200	100.0%	16.8%	17.9%
Upper	0	0.0%	37.9%	$0	0.0%	57.2%	45.3%
Unknown	0	0.0%	3.4%	$0	0.0%	3.2%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$200**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	20.3%
Moderate	0	0.0%	6.7%	$0	0.0%	2.9%	16.5%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	17.9%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	45.3%
Unknown	0	0.0%	93.3%	$0	0.0%	97.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	31.6%	$0	0.0%	6.8%	N/A
Unknown	0	0.0%	68.4%	$0	0.0%	93.2%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	1	3.2%	3.3%	$38	0.6%	1.4%	20.3%
Moderate	2	6.5%	13.6%	$101	1.5%	8.6%	16.5%
Middle	5	16.1%	18.8%	$815	12.0%	14.3%	17.9%
Upper	22	71.0%	37.1%	$5,706	84.1%	40.3%	45.3%
Unknown	1	3.2%	27.1%	$121	1.8%	35.5%	0.0%
TOTAL	**31**	**100.0%**	**100.0%**	**$6,781**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	3.7%	$0	0.0%	1.6%	23.5%
Moderate	4	36.4%	14.2%	$550	14.3%	9.3%	14.6%
Middle	1	9.1%	18.6%	$100	2.6%	16.4%	19.6%
Upper	6	54.5%	38.9%	$3,203	83.1%	48.4%	42.3%
Unknown	0	0.0%	24.6%	$0	0.0%	24.3%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$3,853**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	6.5%	$0	0.0%	3.3%	23.5%
Moderate	1	10.0%	15.1%	$80	4.1%	11.3%	14.6%
Middle	2	20.0%	23.4%	$196	10.1%	21.6%	19.6%
Upper	7	70.0%	37.2%	$1,662	85.8%	44.4%	42.3%
Unknown	0	0.0%	17.8%	$0	0.0%	19.4%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,938**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.7%	$0	0.0%	1.9%	23.5%
Moderate	0	0.0%	12.2%	$0	0.0%	8.0%	14.6%
Middle	1	14.3%	19.8%	$50	5.3%	13.7%	19.6%
Upper	6	85.7%	59.9%	$900	94.7%	69.7%	42.3%
Unknown	0	0.0%	5.4%	$0	0.0%	6.7%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$950**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	8.6%	$0	0.0%	3.7%	23.5%
Moderate	2	28.6%	13.8%	$55	12.4%	8.1%	14.6%
Middle	1	14.3%	12.6%	$60	13.5%	9.5%	19.6%
Upper	4	57.1%	61.5%	$329	74.1%	75.4%	42.3%
Unknown	0	0.0%	3.4%	$0	0.0%	3.3%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$444**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.0%	$0	0.0%	2.5%	23.5%
Moderate	0	0.0%	8.3%	$0	0.0%	2.8%	14.6%
Middle	0	0.0%	20.0%	$0	0.0%	13.7%	19.6%
Upper	0	0.0%	65.0%	$0	0.0%	63.0%	42.3%
Unknown	0	0.0%	1.7%	$0	0.0%	18.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	23.5%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	14.6%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	19.6%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	42.3%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	16.7%	$0	0.0%	3.4%	N/A
Unknown	0	0.0%	83.3%	$0	0.0%	96.6%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	0	0.0%	4.7%	$0	0.0%	1.8%	23.5%
Moderate	7	20.0%	13.9%	$685	9.5%	8.0%	14.6%
Middle	5	14.3%	19.5%	$406	5.7%	14.6%	19.6%
Upper	23	65.7%	41.2%	$6,094	84.8%	41.1%	42.3%
Unknown	0	0.0%	20.7%	$0	0.0%	34.5%	0.0%
TOTAL	**35**	**100.0%**	**100.0%**	**$7,185**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	9.1%	1.0%	$162	4.4%	0.4%	4.0%
Moderate	0	0.0%	16.3%	$0	0.0%	12.7%	16.0%
Middle	2	18.2%	29.8%	$739	20.1%	26.0%	32.1%
Upper	8	72.7%	52.5%	$2,784	75.5%	60.6%	47.5%
Unknown	0	0.0%	0.4%	$0	0.0%	0.2%	0.3%
TOTAL	**11**	**100.0%**	**100.0%**	**$3,685**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.6%	$0	0.0%	0.2%	4.0%
Moderate	0	0.0%	11.0%	$0	0.0%	8.5%	16.0%
Middle	2	20.0%	26.2%	$305	15.0%	22.1%	32.1%
Upper	8	80.0%	62.0%	$1,733	85.0%	69.1%	47.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.3%
TOTAL	**10**	**100.0%**	**100.0%**	**$2,038**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.6%	$0	0.0%	1.0%	4.0%
Moderate	1	14.3%	14.3%	$38	6.4%	15.8%	16.0%
Middle	1	14.3%	33.3%	$80	13.4%	32.9%	32.1%
Upper	5	71.4%	50.8%	$480	80.3%	50.3%	47.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**7**	**100.0%**	**100.0%**	**$598**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.0%	$0	0.0%	0.3%	4.0%
Moderate	0	0.0%	3.1%	$0	0.0%	2.1%	16.0%
Middle	0	0.0%	29.6%	$0	0.0%	25.7%	32.1%
Upper	2	100.0%	65.3%	$260	100.0%	71.4%	47.5%
Unknown	0	0.0%	1.0%	$0	0.0%	0.5%	0.3%
TOTAL	**2**	**100.0%**	**100.0%**	**$260**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.4%	$0	0.0%	3.0%	4.0%
Moderate	0	0.0%	6.9%	$0	0.0%	2.7%	16.0%
Middle	0	0.0%	27.6%	$0	0.0%	13.2%	32.1%
Upper	1	100.0%	62.1%	$200	100.0%	81.1%	47.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**1**	**100.0%**	**100.0%**	**$200**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	4.0%
Moderate	0	0.0%	16.7%	$0	0.0%	8.3%	16.0%
Middle	0	0.0%	46.7%	$0	0.0%	33.0%	32.1%
Upper	0	0.0%	36.7%	$0	0.0%	58.6%	47.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	13.2%	$0	0.0%	2.6%	18.4%
Moderate	0	0.0%	55.3%	$0	0.0%	23.0%	37.5%
Middle	0	0.0%	7.9%	$0	0.0%	1.9%	6.9%
Upper	0	0.0%	21.1%	$0	0.0%	71.0%	29.4%
Unknown	0	0.0%	2.6%	$0	0.0%	1.6%	7.8%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	3.2%	0.9%	$162	2.4%	0.6%	4.0%
Moderate	1	3.2%	13.8%	$38	0.6%	12.1%	16.0%
Middle	5	16.1%	28.1%	$1,124	16.6%	21.7%	32.1%
Upper	24	77.4%	56.8%	$5,457	80.5%	65.2%	47.5%
Unknown	0	0.0%	0.3%	$0	0.0%	0.3%	0.3%
TOTAL	**31**	**100.0%**	**100.0%**	**$6,781**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	9.1%	3.9%	$179	4.6%	2.7%	4.3%
Moderate	0	0.0%	10.2%	$0	0.0%	6.8%	11.7%
Middle	4	36.4%	42.7%	$471	12.2%	39.9%	37.5%
Upper	6	54.5%	42.8%	$3,203	83.1%	50.2%	46.0%
Unknown	0	0.0%	0.5%	$0	0.0%	0.4%	0.5%
TOTAL	**11**	**100.0%**	**100.0%**	**$3,853**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	4.4%	$0	0.0%	3.0%	4.3%
Moderate	0	0.0%	9.9%	$0	0.0%	6.7%	11.7%
Middle	4	40.0%	38.8%	$516	26.6%	34.3%	37.5%
Upper	6	60.0%	46.7%	$1,422	73.4%	55.8%	46.0%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.5%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,938**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	14.3%	4.1%	$250	26.3%	5.6%	4.3%
Moderate	0	0.0%	8.6%	$0	0.0%	6.5%	11.7%
Middle	2	28.6%	42.8%	$200	21.1%	32.8%	37.5%
Upper	4	57.1%	44.6%	$500	52.6%	55.1%	46.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
TOTAL	**7**	**100.0%**	**100.0%**	**$950**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.7%	$0	0.0%	0.3%	4.3%
Moderate	0	0.0%	10.3%	$0	0.0%	10.6%	11.7%
Middle	5	71.4%	35.1%	$359	80.9%	29.1%	37.5%
Upper	2	28.6%	52.9%	$85	19.1%	59.9%	46.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
TOTAL	**7**	**100.0%**	**100.0%**	**$444**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	4.3%
Moderate	0	0.0%	8.3%	$0	0.0%	5.6%	11.7%
Middle	0	0.0%	33.3%	$0	0.0%	45.1%	37.5%
Upper	0	0.0%	58.3%	$0	0.0%	49.3%	46.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	4.3%
Moderate	0	0.0%	9.5%	$0	0.0%	10.1%	11.7%
Middle	0	0.0%	61.9%	$0	0.0%	59.6%	37.5%
Upper	0	0.0%	28.6%	$0	0.0%	30.3%	46.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	19.0%	$0	0.0%	5.8%	27.2%
Moderate	0	0.0%	19.0%	$0	0.0%	13.5%	12.0%
Middle	0	0.0%	50.0%	$0	0.0%	76.7%	48.8%
Upper	0	0.0%	7.1%	$0	0.0%	3.6%	4.4%
Unknown	0	0.0%	4.8%	$0	0.0%	0.4%	7.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	2	5.7%	4.0%	$429	6.0%	3.3%	4.3%
Moderate	0	0.0%	10.1%	$0	0.0%	8.0%	11.7%
Middle	15	42.9%	41.1%	$1,546	21.5%	44.4%	37.5%
Upper	18	51.4%	44.4%	$5,210	72.5%	44.0%	46.0%
Unknown	0	0.0%	0.4%	$0	0.0%	0.3%	0.5%
TOTAL	**35**	**100.0%**	**100.0%**	**$7,185**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	17	32.1%	47.6%	$1,552	24.0%	39.2%	89.6%
		Over $1 Million/ Unknown	36	67.9%	52.4%	$4,922	76.0%	60.8%	10.4%
		TOTAL	**53**	**100.0%**	**100.0%**	**$6,474**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	41	77.4%	86.2%	$1,045	16.1%	28.4%	
		$100,001–$250,000	5	9.4%	7.7%	$836	12.9%	21.6%	
		$250,001–$1 Million	7	13.2%	6.1%	$4,593	70.9%	50.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**53**	**100.0%**	**100.0%**	**$6,474**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	15	88.2%		$352	22.7%		
		$100,001–$250,000	1	5.9%		$200	12.9%		
		$250,001–$1 Million	1	5.9%		$1,000	64.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**17**	**100.0%**		**$1,552**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	2	28.6%	46.4%	$30	1.6%	41.9%	89.7%
		Over $1 Million/ Unknown	5	71.4%	53.6%	$1,831	98.4%	58.1%	10.3%
		TOTAL	**7**	**100.0%**	**100.0%**	**$1,861**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	4	57.1%	87.0%	$186	10.0%	27.1%	
		$100,001–$250,000	0	0.0%	7.6%	$0	0.0%	23.2%	
		$250,001–$1 Million	3	42.9%	5.3%	$1,675	90.0%	49.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**7**	**100.0%**	**100.0%**	**$1,861**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	2	100.0%		$30	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**2**	**100.0%**		**$30**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	2	3.8%	2.4%	$841	13.0%	2.5%	2.6%
Moderate	12	22.6%	21.5%	$1,815	28.0%	22.3%	26.0%
Middle	17	32.1%	27.4%	$2,921	45.1%	26.7%	29.9%
Upper	19	35.8%	39.8%	$794	12.3%	35.8%	33.8%
Unknown	3	5.7%	8.9%	$103	1.6%	12.7%	7.8%
TOTAL	**53**	**100.0%**	**100.0%**	**$6,474**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	4.5%	$0	0.0%	3.3%	4.9%
Moderate	3	42.9%	8.5%	$393	21.1%	6.7%	10.2%
Middle	2	28.6%	40.6%	$513	27.6%	37.0%	46.6%
Upper	2	28.6%	37.3%	$955	51.3%	39.9%	30.5%
Unknown	0	0.0%	9.1%	$0	0.0%	13.0%	7.7%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,861**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Clarksville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	5.9%	1.5%	$120	3.0%	0.9%	18.5%
Moderate	4	23.5%	12.7%	$665	16.5%	9.6%	17.0%
Middle	5	29.4%	27.1%	$1,067	26.5%	25.5%	21.4%
Upper	7	41.2%	34.3%	$2,179	54.1%	39.2%	43.1%
Unknown	0	0.0%	24.4%	$0	0.0%	24.8%	0.0%
TOTAL	**17**	**100.0%**	**100.0%**	**$4,031**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	8.3%	1.9%	$50	2.4%	0.8%	18.5%
Moderate	3	25.0%	8.1%	$332	15.8%	4.8%	17.0%
Middle	1	8.3%	13.4%	$150	7.1%	9.9%	21.4%
Upper	7	58.3%	26.3%	$1,574	74.7%	37.8%	43.1%
Unknown	0	0.0%	50.4%	$0	0.0%	46.6%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,106**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	6.1%	$0	0.0%	3.2%	18.5%
Moderate	1	33.3%	11.7%	$60	28.4%	8.4%	17.0%
Middle	0	0.0%	21.6%	$0	0.0%	20.3%	21.4%
Upper	2	66.7%	53.4%	$151	71.6%	57.3%	43.1%
Unknown	0	0.0%	7.2%	$0	0.0%	10.9%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$211**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.6%	$0	0.0%	2.0%	18.5%
Moderate	0	0.0%	12.0%	$0	0.0%	5.1%	17.0%
Middle	0	0.0%	15.7%	$0	0.0%	10.7%	21.4%
Upper	1	100.0%	66.3%	$35	100.0%	79.0%	43.1%
Unknown	0	0.0%	2.4%	$0	0.0%	3.1%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$35**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.1%	$0	0.0%	5.1%	18.5%
Moderate	0	0.0%	9.8%	$0	0.0%	8.3%	17.0%
Middle	0	0.0%	20.8%	$0	0.0%	12.8%	21.4%
Upper	0	0.0%	56.6%	$0	0.0%	63.0%	43.1%
Unknown	0	0.0%	4.6%	$0	0.0%	10.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.5%	$0	0.0%	0.2%	18.5%
Moderate	0	0.0%	1.0%	$0	0.0%	0.7%	17.0%
Middle	0	0.0%	0.5%	$0	0.0%	0.8%	21.4%
Upper	0	0.0%	1.0%	$0	0.0%	1.5%	43.1%
Unknown	0	0.0%	97.0%	$0	0.0%	96.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	14.1%	$0	0.0%	2.2%	N/A
Unknown	0	0.0%	85.9%	$0	0.0%	97.8%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	2	6.1%	1.8%	$170	2.7%	0.8%	18.5%
Moderate	8	24.2%	10.6%	$1,057	16.6%	7.3%	17.0%
Middle	6	18.2%	20.9%	$1,217	19.1%	18.1%	21.4%
Upper	17	51.5%	31.2%	$3,939	61.7%	36.8%	43.1%
Unknown	0	0.0%	35.5%	$0	0.0%	37.0%	0.0%
TOTAL	**33**	**100.0%**	**100.0%**	**$6,383**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	7.7%	1.0%	$140	2.4%	0.5%	17.6%
Moderate	1	7.7%	12.2%	$195	3.4%	8.9%	17.6%
Middle	4	30.8%	26.8%	$1,252	21.8%	24.8%	21.0%
Upper	7	53.8%	36.4%	$4,143	72.3%	41.6%	43.8%
Unknown	0	0.0%	23.6%	$0	0.0%	24.2%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$5,730**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	14.3%	4.4%	$60	3.1%	2.3%	17.6%
Moderate	0	0.0%	12.6%	$0	0.0%	9.3%	17.6%
Middle	1	14.3%	24.8%	$120	6.2%	23.1%	21.0%
Upper	5	71.4%	37.3%	$1,747	90.7%	44.4%	43.8%
Unknown	0	0.0%	20.9%	$0	0.0%	20.9%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,927**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.9%	$0	0.0%	3.2%	17.6%
Moderate	0	0.0%	14.4%	$0	0.0%	12.7%	17.6%
Middle	1	33.3%	27.8%	$36	7.8%	24.8%	21.0%
Upper	2	66.7%	49.6%	$426	92.2%	55.0%	43.8%
Unknown	0	0.0%	3.4%	$0	0.0%	4.4%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$462**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.9%	$0	0.0%	1.9%	17.6%
Moderate	1	33.3%	13.4%	$100	33.9%	10.3%	17.6%
Middle	1	33.3%	21.9%	$85	28.8%	15.2%	21.0%
Upper	1	33.3%	55.6%	$110	37.3%	66.5%	43.8%
Unknown	0	0.0%	5.2%	$0	0.0%	6.1%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$295**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.0%	$0	0.0%	3.3%	17.6%
Moderate	1	100.0%	14.1%	$95	100.0%	11.3%	17.6%
Middle	0	0.0%	26.3%	$0	0.0%	20.5%	21.0%
Upper	0	0.0%	50.4%	$0	0.0%	58.0%	43.8%
Unknown	0	0.0%	4.2%	$0	0.0%	6.9%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$95**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.8%	$0	0.0%	1.5%	17.6%
Moderate	0	0.0%	1.8%	$0	0.0%	1.5%	17.6%
Middle	0	0.0%	1.8%	$0	0.0%	1.4%	21.0%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.8%
Unknown	0	0.0%	94.7%	$0	0.0%	95.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	1.3%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	7.5%	$0	0.0%	3.8%	N/A
Unknown	0	0.0%	91.3%	$0	0.0%	96.2%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	2	7.4%	2.2%	$200	2.4%	0.9%	17.6%
Moderate	3	11.1%	12.3%	$390	4.6%	7.9%	17.6%
Middle	7	25.9%	25.9%	$1,493	17.5%	21.2%	21.0%
Upper	15	55.6%	37.5%	$6,426	75.5%	37.8%	43.8%
Unknown	0	0.0%	22.1%	$0	0.0%	32.3%	0.0%
TOTAL	**27**	**100.0%**	**100.0%**	**$8,509**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.4%	$0	0.0%	0.3%	0.7%
Moderate	0	0.0%	6.8%	$0	0.0%	5.6%	10.1%
Middle	14	82.4%	62.6%	$3,492	86.6%	59.0%	58.4%
Upper	3	17.6%	30.0%	$539	13.4%	34.8%	30.4%
Unknown	0	0.0%	0.2%	$0	0.0%	0.2%	0.4%
TOTAL	**17**	**100.0%**	**100.0%**	**$4,031**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.2%	$0	0.0%	0.7%	0.7%
Moderate	1	8.3%	5.7%	$138	6.6%	3.8%	10.1%
Middle	4	33.3%	56.2%	$444	21.1%	56.9%	58.4%
Upper	7	58.3%	37.8%	$1,524	72.4%	38.6%	30.4%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.4%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,106**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.4%	$0	0.0%	0.3%	0.7%
Moderate	0	0.0%	10.6%	$0	0.0%	11.0%	10.1%
Middle	1	33.3%	53.4%	$51	24.2%	50.8%	58.4%
Upper	2	66.7%	35.2%	$160	75.8%	37.8%	30.4%
Unknown	0	0.0%	0.4%	$0	0.0%	0.0%	0.4%
TOTAL	**3**	**100.0%**	**100.0%**	**$211**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.7%
Moderate	0	0.0%	10.8%	$0	0.0%	9.7%	10.1%
Middle	1	100.0%	39.8%	$35	100.0%	26.2%	58.4%
Upper	0	0.0%	49.4%	$0	0.0%	64.1%	30.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**1**	**100.0%**	**100.0%**	**$35**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.6%	$0	0.0%	0.1%	0.7%
Moderate	0	0.0%	8.1%	$0	0.0%	6.8%	10.1%
Middle	0	0.0%	50.9%	$0	0.0%	45.7%	58.4%
Upper	0	0.0%	40.5%	$0	0.0%	47.4%	30.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.7%
Moderate	0	0.0%	10.4%	$0	0.0%	8.4%	10.1%
Middle	0	0.0%	65.3%	$0	0.0%	65.0%	58.4%
Upper	0	0.0%	24.3%	$0	0.0%	26.6%	30.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	1.3%	$0	0.0%	0.4%	3.6%
Moderate	0	0.0%	23.1%	$0	0.0%	11.5%	29.1%
Middle	0	0.0%	44.9%	$0	0.0%	56.1%	53.9%
Upper	0	0.0%	28.2%	$0	0.0%	29.3%	9.7%
Unknown	0	0.0%	2.6%	$0	0.0%	2.7%	3.7%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.3%	$0	0.0%	0.5%	0.7%
Moderate	1	3.0%	6.5%	$138	2.2%	5.3%	10.1%
Middle	20	60.6%	59.6%	$4,022	63.0%	58.0%	58.4%
Upper	12	36.4%	33.4%	$2,223	34.8%	36.0%	30.4%
Unknown	0	0.0%	0.2%	$0	0.0%	0.3%	0.4%
TOTAL	**33**	**100.0%**	**100.0%**	**$6,383**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.6%	$0	0.0%	0.4%	0.4%
Moderate	0	0.0%	15.0%	$0	0.0%	12.6%	15.8%
Middle	5	38.5%	49.1%	$1,414	24.7%	46.2%	41.4%
Upper	8	61.5%	35.3%	$4,316	75.3%	40.8%	42.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$5,730**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.4%	$0	0.0%	0.3%	0.4%
Moderate	1	14.3%	13.5%	$120	6.2%	10.2%	15.8%
Middle	0	0.0%	45.9%	$0	0.0%	41.9%	41.4%
Upper	6	85.7%	40.2%	$1,807	93.8%	47.6%	42.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,927**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.4%	$0	0.0%	0.1%	0.4%
Moderate	1	33.3%	15.5%	$36	7.8%	13.3%	15.8%
Middle	0	0.0%	32.2%	$0	0.0%	31.0%	41.4%
Upper	2	66.7%	51.9%	$426	92.2%	55.6%	42.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$462**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.3%	$0	0.0%	0.1%	0.4%
Moderate	0	0.0%	11.4%	$0	0.0%	10.0%	15.8%
Middle	1	33.3%	26.5%	$110	37.3%	17.6%	41.4%
Upper	2	66.7%	61.8%	$185	62.7%	72.3%	42.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$295**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.4%	$0	0.0%	0.2%	0.4%
Moderate	0	0.0%	9.9%	$0	0.0%	9.0%	15.8%
Middle	1	100.0%	44.7%	$95	100.0%	39.0%	41.4%
Upper	0	0.0%	45.0%	$0	0.0%	51.8%	42.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$95**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
Moderate	0	0.0%	24.6%	$0	0.0%	21.8%	15.8%
Middle	0	0.0%	57.9%	$0	0.0%	58.5%	41.4%
Upper	0	0.0%	17.5%	$0	0.0%	19.7%	42.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	3.8%	$0	0.0%	1.5%	2.4%
Moderate	0	0.0%	38.8%	$0	0.0%	32.0%	39.9%
Middle	0	0.0%	37.5%	$0	0.0%	37.7%	40.7%
Upper	0	0.0%	20.0%	$0	0.0%	28.8%	16.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.6%	$0	0.0%	0.5%	0.4%
Moderate	2	7.4%	14.6%	$156	1.8%	14.6%	15.8%
Middle	7	25.9%	47.0%	$1,619	19.0%	43.8%	41.4%
Upper	18	66.7%	37.8%	$6,734	79.1%	41.1%	42.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**27**	**100.0%**	**100.0%**	**$8,509**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	19	43.2%	52.6%	$776	20.3%	44.2%	95.0%
		Over $1 Million/ Unknown	25	56.8%	47.4%	$3,043	79.7%	55.8%	5.0%
		TOTAL	**44**	**100.0%**	**100.0%**	**$3,819**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	36	81.8%	95.5%	$804	21.1%	43.8%	
		$100,001–$250,000	6	13.6%	2.4%	$1,015	26.6%	15.7%	
		$250,001–$1 Million	2	4.5%	2.1%	$2,000	52.4%	40.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**44**	**100.0%**	**100.0%**	**$3,819**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	17	89.5%		$369	47.6%		
		$100,001–$250,000	2	10.5%		$407	52.4%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**19**	**100.0%**		**$776**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	2	28.6%	56.5%	$548	16.0%	36.3%	95.2%
		Over $1 Million/ Unknown	5	71.4%	43.5%	$2,880	84.0%	63.7%	4.8%
		TOTAL	**7**	**100.0%**	**100.0%**	**$3,428**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	0	0.0%	96.8%	$0	0.0%	53.2%	
		$100,001–$250,000	1	14.3%	2.0%	$160	4.7%	15.3%	
		$250,001–$1 Million	6	85.7%	1.2%	$3,268	95.3%	31.5%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**7**	**100.0%**	**100.0%**	**$3,428**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	0	0.0%		$0	0.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	2	100.0%		$548	100.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**2**	**100.0%**		**$548**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	1	2.3%	2.8%	$15	0.4%	2.1%	4.4%
Moderate	3	6.8%	11.6%	$60	1.6%	12.1%	13.6%
Middle	29	65.9%	46.8%	$2,073	54.3%	44.0%	48.5%
Upper	11	25.0%	35.7%	$1,671	43.8%	38.3%	28.8%
Unknown	0	0.0%	3.0%	$0	0.0%	3.4%	4.7%
TOTAL	**44**	**100.0%**	**100.0%**	**$3,819**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.8%	$0	0.0%	1.5%	1.5%
Moderate	3	42.9%	23.4%	$1,705	49.7%	25.8%	31.6%
Middle	1	14.3%	32.1%	$263	7.7%	27.5%	31.5%
Upper	3	42.9%	43.4%	$1,460	42.6%	44.9%	35.4%
Unknown	0	0.0%	0.3%	$0	0.0%	0.2%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$3,428**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NonMSA Tennessee

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	5.6%	2.6%	$64	1.0%	1.2%	21.8%
Moderate	1	5.6%	14.6%	$176	2.9%	9.3%	18.5%
Middle	6	33.3%	22.3%	$1,186	19.4%	18.7%	19.6%
Upper	9	50.0%	43.2%	$4,203	68.8%	52.6%	40.1%
Unknown	1	5.6%	17.2%	$480	7.9%	18.2%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$6,109**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	7.5%	4.1%	$210	2.2%	2.0%	21.8%
Moderate	8	15.1%	12.8%	$822	8.7%	8.5%	18.5%
Middle	10	18.9%	21.6%	$1,484	15.7%	18.0%	19.6%
Upper	30	56.6%	41.4%	$6,842	72.2%	49.8%	40.1%
Unknown	1	1.9%	20.2%	$115	1.2%	21.7%	0.0%
TOTAL	**53**	**100.0%**	**100.0%**	**$9,473**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.8%	$0	0.0%	1.8%	21.8%
Moderate	3	30.0%	16.1%	$228	22.2%	12.9%	18.5%
Middle	3	30.0%	23.2%	$207	20.1%	20.1%	19.6%
Upper	4	40.0%	50.0%	$594	57.7%	58.7%	40.1%
Unknown	0	0.0%	6.0%	$0	0.0%	6.5%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,029**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	6.3%	$0	0.0%	1.9%	21.8%
Moderate	5	26.3%	17.0%	$333	9.7%	8.1%	18.5%
Middle	5	26.3%	14.3%	$685	20.0%	11.6%	19.6%
Upper	8	42.1%	58.0%	$2,353	68.6%	71.5%	40.1%
Unknown	1	5.3%	4.5%	$60	1.7%	6.8%	0.0%
TOTAL	**19**	**100.0%**	**100.0%**	**$3,431**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	11.6%	$0	0.0%	8.9%	21.8%
Moderate	0	0.0%	20.9%	$0	0.0%	12.5%	18.5%
Middle	0	0.0%	30.2%	$0	0.0%	26.0%	19.6%
Upper	0	0.0%	37.2%	$0	0.0%	52.6%	40.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	21.8%
Moderate	0	0.0%	2.5%	$0	0.0%	0.8%	18.5%
Middle	0	0.0%	2.5%	$0	0.0%	1.3%	19.6%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	40.1%
Unknown	0	0.0%	95.0%	$0	0.0%	97.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	4.3%	$0	0.0%	0.3%	N/A
Upper	0	0.0%	21.7%	$0	0.0%	2.6%	N/A
Unknown	0	0.0%	73.9%	$0	0.0%	97.1%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	5	5.0%	3.5%	$274	1.4%	1.5%	21.8%
Moderate	17	17.0%	13.7%	$1,559	7.8%	8.7%	18.5%
Middle	24	24.0%	21.7%	$3,562	17.8%	17.7%	19.6%
Upper	51	51.0%	42.4%	$13,992	69.8%	49.9%	40.1%
Unknown	3	3.0%	18.7%	$655	3.3%	22.1%	0.0%
TOTAL	**100**	**100.0%**	**100.0%**	**$20,042**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	4.0%	3.4%	$95	1.1%	1.5%	19.8%
Moderate	2	8.0%	15.8%	$490	5.9%	10.6%	18.9%
Middle	4	16.0%	21.2%	$896	10.8%	17.8%	19.5%
Upper	17	68.0%	41.3%	$6,402	77.3%	51.4%	41.7%
Unknown	1	4.0%	18.3%	$394	4.8%	18.7%	0.0%
TOTAL	**25**	**100.0%**	**100.0%**	**$8,277**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	6	10.2%	9.3%	$420	4.8%	4.5%	19.8%
Moderate	11	18.6%	21.0%	$1,015	11.6%	15.2%	18.9%
Middle	15	25.4%	24.8%	$2,020	23.0%	23.3%	19.5%
Upper	27	45.8%	34.4%	$5,315	60.6%	45.3%	41.7%
Unknown	0	0.0%	10.5%	$0	0.0%	11.6%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$8,770**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	7.2%	$0	0.0%	3.9%	19.8%
Moderate	4	12.5%	15.1%	$318	8.6%	10.4%	18.9%
Middle	4	12.5%	21.2%	$215	5.8%	14.7%	19.5%
Upper	24	75.0%	54.5%	$3,182	85.7%	68.9%	41.7%
Unknown	0	0.0%	2.0%	$0	0.0%	2.1%	0.0%
TOTAL	**32**	**100.0%**	**100.0%**	**$3,715**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	9.1%	4.8%	$105	4.4%	2.3%	19.8%
Moderate	2	9.1%	9.9%	$37	1.5%	4.9%	18.9%
Middle	2	9.1%	17.2%	$57	2.4%	10.5%	19.5%
Upper	16	72.7%	62.3%	$2,209	91.7%	76.7%	41.7%
Unknown	0	0.0%	5.9%	$0	0.0%	5.6%	0.0%
TOTAL	**22**	**100.0%**	**100.0%**	**$2,408**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.4%	$0	0.0%	6.4%	19.8%
Moderate	0	0.0%	20.5%	$0	0.0%	17.5%	18.9%
Middle	0	0.0%	30.4%	$0	0.0%	19.2%	19.5%
Upper	0	0.0%	38.4%	$0	0.0%	51.6%	41.7%
Unknown	0	0.0%	5.4%	$0	0.0%	5.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.7%	$0	0.0%	4.8%	19.8%
Moderate	0	0.0%	3.8%	$0	0.0%	3.9%	18.9%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	19.5%
Upper	0	0.0%	3.8%	$0	0.0%	10.0%	41.7%
Unknown	0	0.0%	84.6%	$0	0.0%	81.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	3.8%	$0	0.0%	0.5%	N/A
Middle	0	0.0%	3.8%	$0	0.0%	0.4%	N/A
Upper	0	0.0%	15.4%	$0	0.0%	3.8%	N/A
Unknown	0	0.0%	76.9%	$0	0.0%	95.3%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	9	6.5%	5.6%	$620	2.7%	2.4%	19.8%
Moderate	19	13.8%	17.0%	$1,860	8.0%	11.5%	18.9%
Middle	25	18.1%	22.1%	$3,188	13.8%	18.5%	19.5%
Upper	84	60.9%	40.8%	$17,108	73.8%	49.6%	41.7%
Unknown	1	0.7%	14.5%	$394	1.7%	18.0%	0.0%
TOTAL	**138**	**100.0%**	**100.0%**	**$23,170**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	11.1%	11.9%	$964	15.8%	10.2%	11.8%
Middle	12	66.7%	67.9%	$3,448	56.4%	67.1%	69.8%
Upper	4	22.2%	20.2%	$1,697	27.8%	22.7%	18.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$6,109**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	5	9.4%	9.2%	$731	7.7%	7.9%	11.8%
Middle	33	62.3%	68.5%	$5,520	58.3%	67.6%	69.8%
Upper	15	28.3%	22.3%	$3,222	34.0%	24.5%	18.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**53**	**100.0%**	**100.0%**	**$9,473**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	10.0%	11.3%	$50	4.9%	10.2%	11.8%
Middle	5	50.0%	63.7%	$722	70.2%	66.2%	69.8%
Upper	4	40.0%	25.0%	$257	25.0%	23.6%	18.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,029**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	5.3%	5.4%	$38	1.1%	4.4%	11.8%
Middle	10	52.6%	60.7%	$1,724	50.2%	57.9%	69.8%
Upper	8	42.1%	33.9%	$1,669	48.6%	37.8%	18.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**19**	**100.0%**	**100.0%**	**$3,431**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	9.3%	$0	0.0%	10.7%	11.8%
Middle	0	0.0%	67.4%	$0	0.0%	62.6%	69.8%
Upper	0	0.0%	23.3%	$0	0.0%	26.7%	18.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	12.5%	$0	0.0%	13.6%	11.8%
Middle	0	0.0%	75.0%	$0	0.0%	75.9%	69.8%
Upper	0	0.0%	12.5%	$0	0.0%	10.5%	18.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	43.5%	$0	0.0%	66.3%	52.9%
Middle	0	0.0%	47.8%	$0	0.0%	32.7%	32.4%
Upper	0	0.0%	8.7%	$0	0.0%	1.0%	14.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	9	9.0%	10.6%	$1,783	8.9%	10.9%	11.8%
Middle	60	60.0%	67.9%	$11,414	57.0%	66.2%	69.8%
Upper	31	31.0%	21.5%	$6,845	34.2%	22.9%	18.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**100**	**100.0%**	**100.0%**	**$20,042**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	4.0%	10.4%	$138	1.7%	7.8%	11.2%
Middle	20	80.0%	76.2%	$7,336	88.6%	78.4%	74.3%
Upper	4	16.0%	13.4%	$803	9.7%	13.8%	14.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**25**	**100.0%**	**100.0%**	**$8,277**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	1.7%	8.8%	$243	2.8%	7.3%	11.2%
Middle	43	72.9%	75.5%	$5,876	67.0%	77.3%	74.3%
Upper	15	25.4%	15.7%	$2,651	30.2%	15.5%	14.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$8,770**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	6.3%	9.9%	$135	3.6%	7.1%	11.2%
Middle	21	65.6%	73.6%	$2,400	64.6%	77.9%	74.3%
Upper	9	28.1%	16.5%	$1,180	31.8%	14.9%	14.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**32**	**100.0%**	**100.0%**	**$3,715**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	9.1%	5.5%	$220	9.1%	3.8%	11.2%
Middle	16	72.7%	79.5%	$1,891	78.5%	81.3%	74.3%
Upper	4	18.2%	15.0%	$297	12.3%	14.9%	14.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**22**	**100.0%**	**100.0%**	**$2,408**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	8.9%	$0	0.0%	6.5%	11.2%
Middle	0	0.0%	75.0%	$0	0.0%	71.0%	74.3%
Upper	0	0.0%	16.1%	$0	0.0%	22.5%	14.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	11.5%	$0	0.0%	12.3%	11.2%
Middle	0	0.0%	80.8%	$0	0.0%	81.1%	74.3%
Upper	0	0.0%	7.7%	$0	0.0%	6.6%	14.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	26.9%	$0	0.0%	44.1%	26.6%
Middle	0	0.0%	61.5%	$0	0.0%	51.1%	51.8%
Upper	0	0.0%	11.5%	$0	0.0%	4.8%	21.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	6	4.3%	9.7%	$736	3.2%	8.5%	11.2%
Middle	100	72.5%	75.9%	$17,503	75.5%	77.4%	74.3%
Upper	32	23.2%	14.4%	$4,931	21.3%	14.1%	14.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**138**	**100.0%**	**100.0%**	**$23,170**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	32	23.4%	51.7%	$3,045	24.4%	37.2%	91.6%
		Over $1 Million/ Unknown	105	76.6%	48.3%	$9,439	75.6%	62.8%	8.4%
		TOTAL	**137**	**100.0%**	**100.0%**	**$12,484**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	105	76.6%	93.0%	$3,143	25.2%	36.0%	
		$100,001–$250,000	19	13.9%	3.6%	$2,801	22.4%	15.9%	
		$250,001–$1 Million	13	9.5%	3.4%	$6,540	52.4%	48.2%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**137**	**100.0%**	**100.0%**	**$12,484**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	26	81.3%		$785	25.8%		
		$100,001–$250,000	3	9.4%		$362	11.9%		
		$250,001–$1 Million	3	9.4%		$1,898	62.3%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**32**	**100.0%**		**$3,045**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	15	33.3%	57.6%	$770	9.7%	43.9%	91.5%
		Over $1 Million/ Unknown	30	66.7%	42.4%	$7,152	90.3%	56.1%	8.5%
		TOTAL	**45**	**100.0%**	**100.0%**	**$7,922**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	26	57.8%	93.8%	$1,456	18.4%	36.0%	
		$100,001–$250,000	9	20.0%	3.3%	$1,313	16.6%	16.1%	
		$250,001–$1 Million	10	22.2%	3.0%	$5,153	65.0%	47.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**45**	**100.0%**	**100.0%**	**$7,922**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	15	100.0%		$770	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**15**	**100.0%**		**$770**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	28	20.4%	17.5%	$3,800	30.4%	24.9%	20.7%
Middle	77	56.2%	56.7%	$4,579	36.7%	48.4%	53.5%
Upper	32	23.4%	25.2%	$4,105	32.9%	26.6%	25.8%
Unknown	0	0.0%	0.7%	$0	0.0%	0.1%	0.0%
TOTAL	**137**	**100.0%**	**100.0%**	**$12,484**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	16	35.6%	11.8%	$2,124	26.8%	16.3%	14.7%
Middle	25	55.6%	69.9%	$5,588	70.5%	66.5%	66.4%
Upper	4	8.9%	17.5%	$210	2.7%	16.9%	18.9%
Unknown	0	0.0%	0.8%	$0	0.0%	0.2%	0.0%
TOTAL	**45**	**100.0%**	**100.0%**	**$7,922**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

FLORIDA

Miami Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	20	2.6%	1.9%	$3,167	0.5%	0.7%	23.0%
Moderate	78	10.0%	9.5%	$14,311	2.4%	4.7%	16.9%
Middle	56	7.2%	18.2%	$14,615	2.5%	12.2%	17.7%
Upper	565	72.3%	53.1%	$456,031	77.2%	64.4%	42.4%
Unknown	62	7.9%	17.3%	$102,360	17.3%	18.1%	0.0%
TOTAL	**781**	**100.0%**	**100.0%**	**$590,484**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	14	2.1%	2.4%	$2,133	0.5%	1.1%	23.0%
Moderate	29	4.3%	9.6%	$5,339	1.1%	5.3%	16.9%
Middle	28	4.2%	17.8%	$5,289	1.1%	12.7%	17.7%
Upper	533	79.7%	51.6%	$386,817	82.8%	61.6%	42.4%
Unknown	65	9.7%	18.6%	$67,786	14.5%	19.2%	0.0%
TOTAL	**669**	**100.0%**	**100.0%**	**$467,364**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	3	1.7%	2.7%	$710	1.3%	1.6%	23.0%
Moderate	4	2.3%	6.8%	$322	0.6%	3.6%	16.9%
Middle	12	6.8%	14.3%	$2,225	4.2%	9.1%	17.7%
Upper	153	86.9%	72.0%	$49,696	92.9%	79.7%	42.4%
Unknown	4	2.3%	4.2%	$554	1.0%	6.0%	0.0%
TOTAL	**176**	**100.0%**	**100.0%**	**$53,507**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	4.0%	3.1%	$105	0.8%	2.1%	23.0%
Moderate	3	6.0%	7.9%	$374	2.9%	3.7%	16.9%
Middle	4	8.0%	14.1%	$171	1.3%	7.3%	17.7%
Upper	40	80.0%	70.6%	$11,997	91.4%	83.6%	42.4%
Unknown	1	2.0%	4.2%	$472	3.6%	3.3%	0.0%
TOTAL	**50**	**100.0%**	**100.0%**	**$13,119**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.6%	$0	0.0%	0.8%	23.0%
Moderate	0	0.0%	6.8%	$0	0.0%	0.9%	16.9%
Middle	4	8.3%	11.2%	$631	1.5%	1.9%	17.7%
Upper	27	56.3%	66.3%	$19,334	47.3%	69.4%	42.4%
Unknown	17	35.4%	12.0%	$20,880	51.1%	26.9%	0.0%
TOTAL	**48**	**100.0%**	**100.0%**	**$40,845**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.9%	$0	0.0%	0.3%	23.0%
Moderate	0	0.0%	1.0%	$0	0.0%	0.5%	16.9%
Middle	0	0.0%	1.4%	$0	0.0%	1.2%	17.7%
Upper	0	0.0%	0.8%	$0	0.0%	0.8%	42.4%
Unknown	0	0.0%	95.9%	$0	0.0%	97.2%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.2%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Unknown	12	100.0%	99.4%	$20,606	100.0%	100.0%	N/A
TOTAL	**12**	**100.0%**	**100.0%**	**$20,606**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	39	2.2%	2.2%	$6,115	0.5%	0.8%	23.0%
Moderate	114	6.6%	9.3%	$20,346	1.7%	4.5%	16.9%
Middle	104	6.0%	17.6%	$22,931	1.9%	11.3%	17.7%
Upper	1,318	75.9%	52.8%	$923,875	77.9%	60.1%	42.4%
Unknown	161	9.3%	18.0%	$212,658	17.9%	23.2%	0.0%
TOTAL	**1,736**	**100.0%**	**100.0%**	**$1,185,925**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	14	2.6%	1.9%	$2,517	0.5%	0.6%	22.3%
Moderate	63	11.5%	7.8%	$12,300	2.6%	3.4%	17.6%
Middle	34	6.2%	15.8%	$7,305	1.5%	9.9%	18.0%
Upper	386	70.7%	54.7%	$382,227	79.8%	65.7%	42.2%
Unknown	49	9.0%	19.9%	$74,785	15.6%	20.4%	0.0%
TOTAL	**546**	**100.0%**	**100.0%**	**$479,134**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	9	2.7%	5.2%	$1,385	0.5%	2.6%	22.3%
Moderate	31	9.3%	12.4%	$6,298	2.5%	6.3%	17.6%
Middle	17	5.1%	19.1%	$4,247	1.7%	12.4%	18.0%
Upper	255	76.3%	47.2%	$213,404	83.5%	58.4%	42.2%
Unknown	22	6.6%	16.1%	$30,238	11.8%	20.4%	0.0%
TOTAL	**334**	**100.0%**	**100.0%**	**$255,572**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.1%	$0	0.0%	1.5%	22.3%
Moderate	3	1.4%	7.2%	$294	0.4%	3.4%	17.6%
Middle	10	4.5%	15.5%	$786	0.9%	8.4%	18.0%
Upper	204	92.3%	70.6%	$78,358	94.3%	79.6%	42.2%
Unknown	4	1.8%	3.6%	$3,675	4.4%	7.2%	0.0%
TOTAL	**221**	**100.0%**	**100.0%**	**$83,113**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.1%	$0	0.0%	2.3%	22.3%
Moderate	0	0.0%	7.2%	$0	0.0%	3.4%	17.6%
Middle	1	1.7%	14.5%	$100	0.3%	7.1%	18.0%
Upper	58	98.3%	69.4%	$30,793	99.7%	80.7%	42.2%
Unknown	0	0.0%	5.8%	$0	0.0%	6.5%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$30,893**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	2.6%	3.9%	$161	0.6%	1.0%	22.3%
Moderate	1	2.6%	7.8%	$119	0.4%	2.0%	17.6%
Middle	2	5.3%	12.1%	$439	1.6%	2.0%	18.0%
Upper	24	63.2%	60.7%	$13,440	50.0%	67.6%	42.2%
Unknown	10	26.3%	15.5%	$12,717	47.3%	27.4%	0.0%
TOTAL	**38**	**100.0%**	**100.0%**	**$26,876**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	1	50.0%	2.2%	$115	29.5%	1.4%	22.3%
Moderate	0	0.0%	1.3%	$0	0.0%	1.0%	17.6%
Middle	1	50.0%	1.0%	$275	70.5%	1.2%	18.0%
Upper	0	0.0%	0.8%	$0	0.0%	1.1%	42.2%
Unknown	0	0.0%	94.7%	$0	0.0%	95.3%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$390**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Unknown	2	100.0%	99.6%	$3,600	100.0%	100.0%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$3,600**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	25	2.1%	3.0%	$4,178	0.5%	1.2%	22.3%
Moderate	98	8.2%	9.0%	$19,011	2.2%	3.8%	17.6%
Middle	65	5.4%	16.5%	$13,152	1.5%	9.3%	18.0%
Upper	927	77.1%	53.8%	$718,222	81.7%	60.0%	42.2%
Unknown	87	7.2%	17.6%	$125,015	14.2%	25.7%	0.0%
TOTAL	**1,202**	**100.0%**	**100.0%**	**$879,578**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	17	2.2%	2.7%	$3,029	0.5%	1.7%	2.6%
Moderate	109	14.0%	21.4%	$25,574	4.3%	14.1%	22.9%
Middle	129	16.5%	32.3%	$67,271	11.4%	25.3%	32.6%
Upper	522	66.8%	43.1%	$476,360	80.7%	57.8%	41.8%
Unknown	4	0.5%	0.6%	$18,250	3.1%	1.1%	0.2%
TOTAL	**781**	**100.0%**	**100.0%**	**$590,484**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	0.6%	1.5%	$734	0.2%	1.0%	2.6%
Moderate	56	8.4%	16.8%	$13,838	3.0%	11.9%	22.9%
Middle	91	13.6%	32.4%	$39,086	8.4%	26.2%	32.6%
Upper	515	77.0%	49.1%	$406,463	87.0%	60.4%	41.8%
Unknown	3	0.4%	0.2%	$7,243	1.5%	0.5%	0.2%
TOTAL	**669**	**100.0%**	**100.0%**	**$467,364**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	1.1%	1.4%	$150	0.3%	1.0%	2.6%
Moderate	9	5.1%	11.6%	$1,855	3.5%	8.0%	22.9%
Middle	28	15.9%	27.7%	$8,095	15.1%	21.1%	32.6%
Upper	136	77.3%	59.2%	$42,907	80.2%	69.3%	41.8%
Unknown	1	0.6%	0.2%	$500	0.9%	0.6%	0.2%
TOTAL	**176**	**100.0%**	**100.0%**	**$53,507**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	2.0%	1.0%	$50	0.4%	0.5%	2.6%
Moderate	3	6.0%	9.8%	$780	5.9%	5.9%	22.9%
Middle	4	8.0%	26.9%	$385	2.9%	17.7%	32.6%
Upper	42	84.0%	62.2%	$11,904	90.7%	75.9%	41.8%
Unknown	0	0.0%	0.1%	$0	0.0%	0.0%	0.2%
TOTAL	**50**	**100.0%**	**100.0%**	**$13,119**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	2.1%	1.2%	$408	1.0%	0.5%	2.6%
Moderate	4	8.3%	12.6%	$4,619	11.3%	3.8%	22.9%
Middle	5	10.4%	21.7%	$1,276	3.1%	7.2%	32.6%
Upper	38	79.2%	64.0%	$34,542	84.6%	83.6%	41.8%
Unknown	0	0.0%	0.5%	$0	0.0%	4.9%	0.2%
TOTAL	**48**	**100.0%**	**100.0%**	**$40,845**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.2%	$0	0.0%	2.0%	2.6%
Moderate	0	0.0%	28.8%	$0	0.0%	17.9%	22.9%
Middle	0	0.0%	39.9%	$0	0.0%	46.5%	32.6%
Upper	0	0.0%	27.9%	$0	0.0%	33.3%	41.8%
Unknown	0	0.0%	0.3%	$0	0.0%	0.3%	0.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	6	50.0%	15.8%	$12,558	60.9%	5.9%	6.6%
Moderate	3	25.0%	46.1%	$3,973	19.3%	41.8%	31.0%
Middle	0	0.0%	20.8%	$0	0.0%	26.7%	29.6%
Upper	2	16.7%	17.1%	$3,150	15.3%	25.5%	32.1%
Unknown	1	8.3%	0.2%	$925	4.5%	0.0%	0.6%
TOTAL	**12**	**100.0%**	**100.0%**	**$20,606**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	31	1.8%	2.1%	$16,929	1.4%	1.6%	2.6%
Moderate	184	10.6%	18.7%	$50,639	4.3%	14.2%	22.9%
Middle	257	14.8%	32.0%	$116,113	9.8%	25.1%	32.6%
Upper	1,255	72.3%	46.8%	$975,326	82.2%	58.2%	41.8%
Unknown	9	0.5%	0.4%	$26,918	2.3%	0.9%	0.2%
TOTAL	**1,736**	**100.0%**	**100.0%**	**$1,185,925**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	11	2.0%	2.9%	$2,229	0.5%	1.7%	2.9%
Moderate	86	15.8%	22.2%	$21,287	4.4%	14.0%	21.5%
Middle	84	15.4%	32.6%	$56,205	11.7%	26.8%	31.9%
Upper	356	65.2%	41.1%	$392,291	81.9%	55.9%	42.7%
Unknown	9	1.6%	1.2%	$7,122	1.5%	1.6%	1.0%
TOTAL	**546**	**100.0%**	**100.0%**	**$479,134**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	0.9%	2.0%	$671	0.3%	1.1%	2.9%
Moderate	35	10.5%	19.0%	$11,073	4.3%	11.5%	21.5%
Middle	62	18.6%	31.9%	$33,255	13.0%	23.8%	31.9%
Upper	230	68.9%	46.3%	$208,308	81.5%	62.0%	42.7%
Unknown	4	1.2%	0.9%	$2,265	0.9%	1.7%	1.0%
TOTAL	**334**	**100.0%**	**100.0%**	**$255,572**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	0.9%	1.1%	$170	0.2%	0.7%	2.9%
Moderate	11	5.0%	12.9%	$1,383	1.7%	7.9%	21.5%
Middle	37	16.7%	28.7%	$9,292	11.2%	21.2%	31.9%
Upper	170	76.9%	56.5%	$71,268	85.7%	67.7%	42.7%
Unknown	1	0.5%	0.8%	$1,000	1.2%	2.6%	1.0%
TOTAL	**221**	**100.0%**	**100.0%**	**$83,113**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.1%	$0	0.0%	0.5%	2.9%
Moderate	1	1.7%	11.8%	$100	0.3%	6.0%	21.5%
Middle	7	11.9%	28.5%	$1,350	4.4%	19.2%	31.9%
Upper	51	86.4%	57.7%	$29,443	95.3%	73.2%	42.7%
Unknown	0	0.0%	1.0%	$0	0.0%	1.1%	1.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$30,893**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	2.6%	1.4%	$100	0.4%	0.2%	2.9%
Moderate	4	10.5%	13.4%	$737	2.7%	2.6%	21.5%
Middle	4	10.5%	25.0%	$2,139	8.0%	12.2%	31.9%
Upper	28	73.7%	58.8%	$23,384	87.0%	79.0%	42.7%
Unknown	1	2.6%	1.4%	$516	1.9%	6.0%	1.0%
TOTAL	**38**	**100.0%**	**100.0%**	**$26,876**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.7%	$0	0.0%	0.8%	2.9%
Moderate	1	50.0%	28.2%	$115	29.5%	19.8%	21.5%
Middle	0	0.0%	35.8%	$0	0.0%	34.7%	31.9%
Upper	1	50.0%	33.3%	$275	70.5%	43.6%	42.7%
Unknown	0	0.0%	0.9%	$0	0.0%	1.1%	1.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$390**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	9.0%	$0	0.0%	5.9%	6.9%
Moderate	2	100.0%	45.6%	$3,600	100.0%	39.3%	30.7%
Middle	0	0.0%	24.2%	$0	0.0%	30.1%	29.0%
Upper	0	0.0%	18.5%	$0	0.0%	18.2%	31.2%
Unknown	0	0.0%	2.7%	$0	0.0%	6.5%	2.2%
TOTAL	**2**	**100.0%**	**100.0%**	**$3,600**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	17	1.4%	2.4%	$3,170	0.4%	1.7%	2.9%
Moderate	140	11.6%	20.1%	$38,295	4.4%	14.1%	21.5%
Middle	194	16.1%	31.8%	$102,241	11.6%	25.2%	31.9%
Upper	836	69.6%	44.7%	$724,969	82.4%	56.8%	42.7%
Unknown	15	1.2%	1.1%	$10,903	1.2%	2.2%	1.0%
TOTAL	**1,202**	**100.0%**	**100.0%**	**$879,578**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	679	26.5%	42.9%	$65,960	18.9%	24.2%	93.6%
		Over $1 Million/ Unknown	1,885	73.5%	57.1%	$283,315	81.1%	75.8%	6.4%
		TOTAL	**2,564**	**100.0%**	**100.0%**	**$349,275**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	1,707	66.6%	94.6%	$58,546	16.8%	47.4%	
		$100,001–$250,000	446	17.4%	3.4%	$75,915	21.7%	18.4%	
		$250,001–$1 Million	411	16.0%	2.0%	$214,814	61.5%	34.2%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**2,564**	**100.0%**	**100.0%**	**$349,275**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	543	80.0%		$19,256	29.2%		
		$100,001–$250,000	63	9.3%		$11,162	16.9%		
		$250,001–$1 Million	73	10.8%		$35,542	53.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**679**	**100.0%**		**$65,960**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	281	43.3%	52.0%	$55,531	27.4%	37.0%	93.5%
		Over $1 Million/ Unknown	368	56.7%	48.0%	$146,999	72.6%	63.0%	6.5%
		TOTAL	**649**	**100.0%**	**100.0%**	**$202,530**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	235	36.2%	96.1%	$14,152	7.0%	53.0%	
		$100,001–$250,000	152	23.4%	2.4%	$30,015	14.8%	15.6%	
		$250,001–$1 Million	262	40.4%	1.5%	$158,363	78.2%	31.4%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**649**	**100.0%**	**100.0%**	**$202,530**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	159	56.6%		$8,855	15.9%		
		$100,001–$250,000	54	19.2%		$10,222	18.4%		
		$250,001–$1 Million	68	24.2%		$36,454	65.6%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**281**	**100.0%**		**$55,531**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	136	5.3%	4.4%	$30,989	8.9%	5.6%	4.5%
Moderate	402	15.7%	23.2%	$62,657	17.9%	23.4%	22.6%
Middle	577	22.5%	28.3%	$70,593	20.2%	25.5%	28.6%
Upper	1,392	54.3%	42.8%	$173,679	49.7%	43.4%	43.2%
Unknown	57	2.2%	1.4%	$11,357	3.3%	2.0%	1.2%
TOTAL	**2,564**	**100.0%**	**100.0%**	**$349,275**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	26	4.0%	2.8%	$5,627	2.8%	3.3%	3.0%
Moderate	106	16.3%	21.8%	$39,051	19.3%	22.6%	22.4%
Middle	163	25.1%	29.4%	$48,227	23.8%	26.8%	29.3%
Upper	337	51.9%	43.3%	$104,705	51.7%	43.4%	42.9%
Unknown	17	2.6%	2.7%	$4,920	2.4%	3.8%	2.4%
TOTAL	**649**	**100.0%**	**100.0%**	**$202,530**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Fort Myers Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	27	15.0%	2.8%	$3,763	4.6%	1.4%	20.8%
Moderate	44	24.4%	14.0%	$9,012	11.0%	8.7%	18.2%
Middle	38	21.1%	18.2%	$9,317	11.4%	13.4%	19.5%
Upper	66	36.7%	51.0%	$49,575	60.6%	62.5%	41.5%
Unknown	5	2.8%	14.1%	$10,113	12.4%	14.0%	0.0%
TOTAL	**180**	**100.0%**	**100.0%**	**$81,780**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	9	6.3%	4.1%	$1,202	2.3%	2.3%	20.8%
Moderate	22	15.4%	15.1%	$3,383	6.6%	9.7%	18.2%
Middle	20	14.0%	20.5%	$3,837	7.4%	16.2%	19.5%
Upper	85	59.4%	41.9%	$38,883	75.4%	54.0%	41.5%
Unknown	7	4.9%	18.3%	$4,245	8.2%	17.7%	0.0%
TOTAL	**143**	**100.0%**	**100.0%**	**$51,550**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	3.5%	5.3%	$230	2.5%	3.1%	20.8%
Moderate	7	12.3%	15.0%	$412	4.5%	9.0%	18.2%
Middle	9	15.8%	21.7%	$744	8.1%	16.1%	19.5%
Upper	37	64.9%	55.3%	$7,650	82.9%	66.5%	41.5%
Unknown	2	3.5%	2.7%	$195	2.1%	5.3%	0.0%
TOTAL	**57**	**100.0%**	**100.0%**	**$9,231**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	5.6%	4.9%	$51	1.6%	2.8%	20.8%
Moderate	4	22.2%	15.4%	$450	14.3%	8.4%	18.2%
Middle	2	11.1%	21.2%	$156	5.0%	13.7%	19.5%
Upper	11	61.1%	55.2%	$2,493	79.1%	72.2%	41.5%
Unknown	0	0.0%	3.4%	$0	0.0%	2.9%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$3,150**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.1%	$0	0.0%	1.7%	20.8%
Moderate	2	40.0%	10.9%	$510	13.5%	2.8%	18.2%
Middle	0	0.0%	10.4%	$0	0.0%	3.0%	19.5%
Upper	1	20.0%	67.1%	$100	2.6%	81.5%	41.5%
Unknown	2	40.0%	6.5%	$3,175	83.9%	10.9%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$3,785**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	1	100.0%	1.2%	$74	100.0%	0.5%	20.8%
Moderate	0	0.0%	1.2%	$0	0.0%	1.1%	18.2%
Middle	0	0.0%	1.2%	$0	0.0%	1.5%	19.5%
Upper	0	0.0%	0.3%	$0	0.0%	0.5%	41.5%
Unknown	0	0.0%	96.2%	$0	0.0%	96.3%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$74**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	2	100.0%	100.0%	$53,800	100.0%	100.0%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$53,800**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	40	9.9%	3.5%	$5,320	2.6%	1.7%	20.8%
Moderate	79	19.5%	14.4%	$13,767	6.8%	8.6%	18.2%
Middle	69	17.0%	19.1%	$14,054	6.9%	13.7%	19.5%
Upper	200	49.3%	47.4%	$98,701	48.5%	57.8%	41.5%
Unknown	18	4.4%	15.7%	$71,528	35.2%	18.3%	0.0%
TOTAL	**406**	**100.0%**	**100.0%**	**$203,370**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	13	13.5%	2.5%	$1,758	4.3%	1.2%	20.2%
Moderate	22	22.9%	12.2%	$4,816	11.7%	7.0%	18.6%
Middle	16	16.7%	20.0%	$5,211	12.7%	14.5%	20.4%
Upper	43	44.8%	49.0%	$28,136	68.3%	60.7%	40.8%
Unknown	2	2.1%	16.3%	$1,259	3.1%	16.6%	0.0%
TOTAL	**96**	**100.0%**	**100.0%**	**$41,180**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	6	7.7%	8.4%	$922	2.2%	4.7%	20.2%
Moderate	16	20.5%	20.3%	$2,968	7.2%	13.1%	18.6%
Middle	6	7.7%	22.6%	$842	2.0%	17.9%	20.4%
Upper	46	59.0%	35.0%	$32,495	78.8%	48.5%	40.8%
Unknown	4	5.1%	13.7%	$3,998	9.7%	15.9%	0.0%
TOTAL	**78**	**100.0%**	**100.0%**	**$41,225**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	1.7%	4.4%	$78	0.6%	2.4%	20.2%
Moderate	3	5.2%	16.4%	$182	1.3%	8.8%	18.6%
Middle	9	15.5%	21.9%	$857	6.2%	14.0%	20.4%
Upper	45	77.6%	54.4%	$12,602	91.9%	71.9%	40.8%
Unknown	0	0.0%	3.0%	$0	0.0%	2.9%	0.0%
TOTAL	**58**	**100.0%**	**100.0%**	**$13,719**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	5.3%	6.8%	$30	0.4%	4.2%	20.2%
Moderate	1	5.3%	16.0%	$75	1.0%	7.7%	18.6%
Middle	0	0.0%	21.9%	$0	0.0%	13.1%	20.4%
Upper	17	89.5%	51.4%	$7,618	98.6%	71.0%	40.8%
Unknown	0	0.0%	3.8%	$0	0.0%	4.0%	0.0%
TOTAL	**19**	**100.0%**	**100.0%**	**$7,723**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.6%	$0	0.0%	1.3%	20.2%
Moderate	2	16.7%	12.4%	$224	2.4%	3.6%	18.6%
Middle	0	0.0%	15.7%	$0	0.0%	4.9%	20.4%
Upper	7	58.3%	56.7%	$3,179	34.0%	74.0%	40.8%
Unknown	3	25.0%	9.6%	$5,940	63.6%	16.2%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$9,343**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.4%	$0	0.0%	1.6%	20.2%
Moderate	0	0.0%	1.2%	$0	0.0%	1.0%	18.6%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	20.4%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	40.8%
Unknown	0	0.0%	96.4%	$0	0.0%	97.4%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	1	100.0%	100.0%	$686	100.0%	100.0%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$686**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	21	8.0%	4.5%	$2,788	2.4%	2.0%	20.2%
Moderate	44	16.7%	14.8%	$8,265	7.3%	8.1%	18.6%
Middle	31	11.7%	20.7%	$6,910	6.1%	14.3%	20.4%
Upper	158	59.8%	45.7%	$84,030	73.8%	56.7%	40.8%
Unknown	10	3.8%	14.3%	$11,883	10.4%	19.0%	0.0%
TOTAL	**264**	**100.0%**	**100.0%**	**$113,876**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	10	5.6%	1.8%	$1,338	1.6%	1.3%	2.1%
Moderate	61	33.9%	19.7%	$13,271	16.2%	15.7%	17.8%
Middle	65	36.1%	42.4%	$19,627	24.0%	37.7%	43.2%
Upper	44	24.4%	36.1%	$47,544	58.1%	45.2%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**180**	**100.0%**	**100.0%**	**$81,780**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.9%	$0	0.0%	0.6%	2.1%
Moderate	19	13.3%	16.1%	$3,078	6.0%	12.2%	17.8%
Middle	64	44.8%	45.8%	$15,595	30.3%	40.8%	43.2%
Upper	60	42.0%	37.2%	$32,877	63.8%	46.4%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**143**	**100.0%**	**100.0%**	**$51,550**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.1%	$0	0.0%	0.6%	2.1%
Moderate	4	7.0%	13.8%	$352	3.8%	9.9%	17.8%
Middle	23	40.4%	47.6%	$2,937	31.8%	40.7%	43.2%
Upper	30	52.6%	37.5%	$5,942	64.4%	48.8%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**57**	**100.0%**	**100.0%**	**$9,231**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.4%	$0	0.0%	0.3%	2.1%
Moderate	3	16.7%	13.1%	$230	7.3%	12.0%	17.8%
Middle	8	44.4%	44.1%	$1,249	39.7%	35.3%	43.2%
Upper	7	38.9%	42.3%	$1,671	53.0%	52.4%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$3,150**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.7%	$0	0.0%	0.3%	2.1%
Moderate	0	0.0%	11.9%	$0	0.0%	5.8%	17.8%
Middle	4	80.0%	32.7%	$1,070	28.3%	21.8%	43.2%
Upper	1	20.0%	54.6%	$2,715	71.7%	72.1%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$3,785**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.7%	$0	0.0%	1.6%	2.1%
Moderate	1	100.0%	31.9%	$74	100.0%	26.0%	17.8%
Middle	0	0.0%	42.2%	$0	0.0%	42.3%	43.2%
Upper	0	0.0%	23.3%	$0	0.0%	30.2%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$74**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	7.1%	$0	0.0%	1.9%	2.5%
Moderate	1	50.0%	34.3%	$500	0.9%	8.8%	17.5%
Middle	0	0.0%	37.1%	$0	0.0%	63.0%	31.8%
Upper	1	50.0%	21.4%	$53,300	99.1%	26.2%	48.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$53,800**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	10	2.5%	1.4%	$1,338	0.7%	1.0%	2.1%
Moderate	89	21.9%	17.9%	$17,505	8.6%	13.9%	17.8%
Middle	164	40.4%	43.9%	$40,478	19.9%	39.3%	43.2%
Upper	143	35.2%	36.9%	$144,049	70.8%	45.8%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**406**	**100.0%**	**100.0%**	**$203,370**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	1.1%	$0	0.0%	0.9%	1.4%
Moderate	30	31.3%	20.0%	$6,985	17.0%	14.1%	17.2%
Middle	37	38.5%	48.1%	$16,047	39.0%	43.1%	46.5%
Upper	29	30.2%	30.0%	$18,148	44.1%	40.6%	34.3%
Unknown	0	0.0%	0.7%	$0	0.0%	1.3%	0.6%
TOTAL	**96**	**100.0%**	**100.0%**	**$41,180**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	2.6%	0.8%	$361	0.9%	0.5%	1.4%
Moderate	10	12.8%	17.8%	$1,845	4.5%	12.1%	17.2%
Middle	27	34.6%	50.0%	$10,002	24.3%	42.9%	46.5%
Upper	38	48.7%	30.6%	$28,740	69.7%	43.3%	34.3%
Unknown	1	1.3%	0.8%	$277	0.7%	1.2%	0.6%
TOTAL	**78**	**100.0%**	**100.0%**	**$41,225**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.3%	$0	0.0%	0.2%	1.4%
Moderate	4	6.9%	12.6%	$359	2.6%	8.5%	17.2%
Middle	26	44.8%	48.9%	$6,723	49.0%	42.9%	46.5%
Upper	27	46.6%	37.4%	$6,612	48.2%	47.7%	34.3%
Unknown	1	1.7%	0.8%	$25	0.2%	0.7%	0.6%
TOTAL	**58**	**100.0%**	**100.0%**	**$13,719**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.5%	$0	0.0%	0.3%	1.4%
Moderate	1	5.3%	10.7%	$350	4.5%	5.9%	17.2%
Middle	7	36.8%	48.4%	$1,680	21.8%	37.4%	46.5%
Upper	11	57.9%	39.4%	$5,693	73.7%	54.3%	34.3%
Unknown	0	0.0%	0.9%	$0	0.0%	2.2%	0.6%
TOTAL	**19**	**100.0%**	**100.0%**	**$7,723**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.8%	$0	0.0%	0.5%	1.4%
Moderate	2	16.7%	9.9%	$99	1.1%	3.0%	17.2%
Middle	3	25.0%	39.0%	$3,618	38.7%	21.0%	46.5%
Upper	7	58.3%	49.4%	$5,626	60.2%	74.4%	34.3%
Unknown	0	0.0%	0.9%	$0	0.0%	1.0%	0.6%
TOTAL	**12**	**100.0%**	**100.0%**	**$9,343**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.2%	$0	0.0%	0.7%	1.4%
Moderate	0	0.0%	24.3%	$0	0.0%	18.6%	17.2%
Middle	0	0.0%	52.1%	$0	0.0%	49.6%	46.5%
Upper	0	0.0%	21.3%	$0	0.0%	30.0%	34.3%
Unknown	0	0.0%	1.2%	$0	0.0%	1.2%	0.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	2.7%	$0	0.0%	0.5%	2.5%
Moderate	1	100.0%	41.3%	$686	100.0%	37.4%	15.5%
Middle	0	0.0%	37.3%	$0	0.0%	30.1%	38.6%
Upper	0	0.0%	18.7%	$0	0.0%	31.9%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.2%
TOTAL	**1**	**100.0%**	**100.0%**	**$686**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	2	0.8%	1.0%	$361	0.3%	0.7%	1.4%
Moderate	48	18.2%	18.3%	$10,324	9.1%	13.7%	17.2%
Middle	100	37.9%	48.4%	$38,070	33.4%	41.6%	46.5%
Upper	112	42.4%	31.5%	$64,819	56.9%	42.8%	34.3%
Unknown	2	0.8%	0.8%	$302	0.3%	1.2%	0.6%
TOTAL	**264**	**100.0%**	**100.0%**	**$113,876**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	250	22.6%	46.3%	$19,188	17.3%	30.1%	94.6%
		Over $1 Million/ Unknown	856	77.4%	53.7%	$91,792	82.7%	69.9%	5.4%
		TOTAL	**1,106**	**100.0%**	**100.0%**	**$110,980**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	849	76.8%	94.2%	$24,935	22.5%	42.7%	
		$100,001–$250,000	141	12.7%	3.3%	$23,755	21.4%	16.4%	
		$250,001–$1 Million	116	10.5%	2.5%	$62,290	56.1%	40.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**1,106**	**100.0%**	**100.0%**	**$110,980**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	215	86.0%		$6,991	36.4%		
		$100,001–$250,000	19	7.6%		$3,194	16.6%		
		$250,001–$1 Million	16	6.4%		$9,003	46.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**250**	**100.0%**		**$19,188**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	119	45.6%	51.8%	$14,486	26.4%	34.5%	94.5%
		Over $1 Million/ Unknown	142	54.4%	48.2%	$40,322	73.6%	65.5%	5.5%
		TOTAL	**261**	**100.0%**	**100.0%**	**$54,808**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	145	55.6%	95.8%	$7,494	13.7%	51.5%	
		$100,001–$250,000	47	18.0%	2.4%	$9,268	16.9%	14.4%	
		$250,001–$1 Million	69	26.4%	1.7%	$38,046	69.4%	34.1%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**261**	**100.0%**	**100.0%**	**$54,808**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	93	78.2%		$4,140	28.6%		
		$100,001–$250,000	6	5.0%		$1,161	8.0%		
		$250,001–$1 Million	20	16.8%		$9,185	63.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**119**	**100.0%**		**$14,486**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	29	2.6%	2.7%	$4,278	3.9%	2.8%	2.9%
Moderate	163	14.7%	19.4%	$14,125	12.7%	18.2%	19.2%
Middle	459	41.5%	40.2%	$34,835	31.4%	35.0%	40.4%
Upper	454	41.0%	37.3%	$57,608	51.9%	43.8%	37.4%
Unknown	1	0.1%	0.5%	$134	0.1%	0.1%	0.0%
TOTAL	**1,106**	**100.0%**	**100.0%**	**$110,980**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	4	1.5%	2.0%	$1,279	2.3%	2.8%	2.4%
Moderate	47	18.0%	19.7%	$11,594	21.2%	20.2%	18.9%
Middle	121	46.4%	46.3%	$21,194	38.7%	42.3%	45.5%
Upper	89	34.1%	31.0%	$20,741	37.8%	34.2%	32.4%
Unknown	0	0.0%	0.9%	$0	0.0%	0.6%	0.9%
TOTAL	**261**	**100.0%**	**100.0%**	**$54,808**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Orlando Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	12	6.4%	2.9%	$1,847	3.9%	1.4%	20.8%
Moderate	58	31.0%	14.0%	$9,678	20.5%	9.3%	17.5%
Middle	50	26.7%	20.2%	$10,975	23.3%	17.1%	19.1%
Upper	67	35.8%	46.6%	$24,618	52.2%	56.9%	42.6%
Unknown	0	0.0%	16.3%	$0	0.0%	15.3%	0.0%
TOTAL	**187**	**100.0%**	**100.0%**	**$47,118**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	12	8.0%	4.7%	$1,724	4.1%	2.4%	20.8%
Moderate	20	13.3%	13.5%	$3,493	8.2%	9.2%	17.5%
Middle	26	17.3%	19.2%	$4,533	10.7%	16.0%	19.1%
Upper	88	58.7%	42.8%	$31,259	73.4%	52.1%	42.6%
Unknown	4	2.7%	19.7%	$1,552	3.6%	20.2%	0.0%
TOTAL	**150**	**100.0%**	**100.0%**	**$42,561**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.7%	$0	0.0%	2.6%	20.8%
Moderate	2	3.2%	11.7%	$160	1.2%	8.7%	17.5%
Middle	5	8.1%	18.2%	$613	4.4%	14.5%	19.1%
Upper	54	87.1%	62.5%	$12,921	93.1%	70.9%	42.6%
Unknown	1	1.6%	2.9%	$185	1.3%	3.3%	0.0%
TOTAL	**62**	**100.0%**	**100.0%**	**$13,879**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	4.8%	4.4%	$23	0.5%	2.5%	20.8%
Moderate	1	4.8%	11.2%	$280	6.1%	7.4%	17.5%
Middle	5	23.8%	18.9%	$560	12.1%	13.6%	19.1%
Upper	14	66.7%	61.9%	$3,752	81.3%	74.1%	42.6%
Unknown	0	0.0%	3.5%	$0	0.0%	2.5%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$4,615**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.0%	$0	0.0%	3.8%	20.8%
Moderate	1	33.3%	13.1%	$139	25.0%	5.9%	17.5%
Middle	1	33.3%	17.2%	$206	37.1%	10.7%	19.1%
Upper	1	33.3%	54.6%	$210	37.8%	72.8%	42.6%
Unknown	0	0.0%	7.2%	$0	0.0%	6.9%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$555**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.9%	$0	0.0%	0.5%	20.8%
Moderate	1	100.0%	1.3%	$110	100.0%	1.0%	17.5%
Middle	0	0.0%	0.6%	$0	0.0%	0.8%	19.1%
Upper	0	0.0%	0.2%	$0	0.0%	0.5%	42.6%
Unknown	0	0.0%	97.0%	$0	0.0%	97.2%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$110**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	25	5.9%	3.9%	$3,594	3.3%	1.8%	20.8%
Moderate	83	19.6%	13.6%	$13,860	12.7%	8.7%	17.5%
Middle	87	20.5%	19.5%	$16,887	15.5%	15.6%	19.1%
Upper	224	52.8%	45.1%	$72,760	66.9%	51.9%	42.6%
Unknown	5	1.2%	18.0%	$1,737	1.6%	22.0%	0.0%
TOTAL	**424**	**100.0%**	**100.0%**	**$108,838**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	4	2.7%	2.3%	$710	1.1%	1.0%	20.1%
Moderate	38	26.0%	11.7%	$6,069	9.7%	7.2%	17.5%
Middle	32	21.9%	21.0%	$7,555	12.1%	17.1%	19.3%
Upper	72	49.3%	46.9%	$48,265	77.1%	57.6%	43.1%
Unknown	0	0.0%	18.1%	$0	0.0%	17.1%	0.0%
TOTAL	**146**	**100.0%**	**100.0%**	**$62,599**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	11	14.3%	7.9%	$1,513	6.2%	4.3%	20.1%
Moderate	11	14.3%	19.1%	$1,456	6.0%	13.8%	17.5%
Middle	4	5.2%	23.0%	$859	3.5%	20.8%	19.3%
Upper	51	66.2%	37.3%	$20,559	84.3%	47.8%	43.1%
Unknown	0	0.0%	12.6%	$0	0.0%	13.4%	0.0%
TOTAL	**77**	**100.0%**	**100.0%**	**$24,387**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.7%	$0	0.0%	2.6%	20.1%
Moderate	3	4.7%	12.5%	$240	1.8%	7.9%	17.5%
Middle	2	3.1%	20.4%	$29	0.2%	15.2%	19.3%
Upper	59	92.2%	59.4%	$13,265	98.0%	71.6%	43.1%
Unknown	0	0.0%	2.9%	$0	0.0%	2.8%	0.0%
TOTAL	**64**	**100.0%**	**100.0%**	**$13,534**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.1%	$0	0.0%	2.6%	20.1%
Moderate	0	0.0%	10.6%	$0	0.0%	6.3%	17.5%
Middle	1	4.3%	20.8%	$50	0.6%	13.3%	19.3%
Upper	22	95.7%	60.1%	$8,200	99.4%	73.7%	43.1%
Unknown	0	0.0%	4.3%	$0	0.0%	4.1%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$8,250**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.8%	$0	0.0%	2.9%	20.1%
Moderate	0	0.0%	13.8%	$0	0.0%	7.0%	17.5%
Middle	5	71.4%	20.9%	$355	8.6%	11.7%	19.3%
Upper	2	28.6%	50.8%	$3,770	91.4%	66.4%	43.1%
Unknown	0	0.0%	8.7%	$0	0.0%	12.1%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$4,125**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	4	100.0%	2.6%	$252	100.0%	1.3%	20.1%
Moderate	0	0.0%	1.7%	$0	0.0%	1.3%	17.5%
Middle	0	0.0%	0.7%	$0	0.0%	0.7%	19.3%
Upper	0	0.0%	0.7%	$0	0.0%	0.8%	43.1%
Unknown	0	0.0%	94.3%	$0	0.0%	96.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$252**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.5%	$0	0.0%	0.2%	N/A
Unknown	0	0.0%	98.5%	$0	0.0%	99.8%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	19	5.9%	4.3%	$2,475	2.2%	1.7%	20.1%
Moderate	52	16.2%	13.9%	$7,765	6.9%	7.8%	17.5%
Middle	44	13.7%	21.4%	$8,848	7.8%	15.6%	19.3%
Upper	206	64.2%	45.2%	$94,059	83.1%	48.7%	43.1%
Unknown	0	0.0%	15.2%	$0	0.0%	26.2%	0.0%
TOTAL	**321**	**100.0%**	**100.0%**	**$113,147**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	0.5%	0.8%	$311	0.7%	0.5%	1.0%
Moderate	34	18.2%	15.1%	$6,587	14.0%	11.2%	17.1%
Middle	100	53.5%	40.9%	$22,676	48.1%	36.4%	41.3%
Upper	52	27.8%	43.2%	$17,544	37.2%	51.9%	40.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**187**	**100.0%**	**100.0%**	**$47,118**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	0.7%	0.5%	$153	0.4%	0.3%	1.0%
Moderate	19	12.7%	12.1%	$3,615	8.5%	8.7%	17.1%
Middle	49	32.7%	40.3%	$10,880	25.6%	35.5%	41.3%
Upper	81	54.0%	47.2%	$27,913	65.6%	55.6%	40.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**150**	**100.0%**	**100.0%**	**$42,561**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.5%	$0	0.0%	0.3%	1.0%
Moderate	4	6.5%	8.7%	$750	5.4%	7.0%	17.1%
Middle	11	17.7%	34.7%	$4,354	31.4%	29.7%	41.3%
Upper	47	75.8%	56.1%	$8,775	63.2%	63.0%	40.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**62**	**100.0%**	**100.0%**	**$13,879**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.4%	$0	0.0%	0.2%	1.0%
Moderate	3	14.3%	10.0%	$323	7.0%	7.4%	17.1%
Middle	2	9.5%	34.0%	$149	3.2%	26.7%	41.3%
Upper	16	76.2%	55.6%	$4,143	89.8%	65.6%	40.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$4,615**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.5%	$0	0.0%	0.2%	1.0%
Moderate	0	0.0%	11.8%	$0	0.0%	5.8%	17.1%
Middle	3	100.0%	37.8%	$555	100.0%	29.3%	41.3%
Upper	0	0.0%	49.9%	$0	0.0%	64.8%	40.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$555**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	1	100.0%	1.7%	$110	100.0%	1.2%	1.0%
Moderate	0	0.0%	24.8%	$0	0.0%	19.4%	17.1%
Middle	0	0.0%	48.2%	$0	0.0%	44.0%	41.3%
Upper	0	0.0%	25.2%	$0	0.0%	35.5%	40.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$110**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	8.3%	$0	0.0%	4.1%	5.6%
Moderate	0	0.0%	54.9%	$0	0.0%	45.8%	35.4%
Middle	0	0.0%	22.2%	$0	0.0%	22.9%	36.1%
Upper	0	0.0%	14.6%	$0	0.0%	27.1%	22.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	3	0.7%	0.6%	$574	0.5%	0.6%	1.0%
Moderate	60	14.2%	13.4%	$11,275	10.4%	11.8%	17.1%
Middle	165	38.9%	40.3%	$38,614	35.5%	35.1%	41.3%
Upper	196	46.2%	45.7%	$58,375	53.6%	52.5%	40.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**424**	**100.0%**	**100.0%**	**$108,838**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	0.7%	1.6%	$278	0.4%	1.0%	1.5%
Moderate	24	16.4%	14.8%	$5,540	8.8%	10.7%	17.0%
Middle	67	45.9%	39.6%	$18,546	29.6%	34.1%	39.2%
Upper	54	37.0%	43.7%	$38,235	61.1%	53.9%	42.1%
Unknown	0	0.0%	0.3%	$0	0.0%	0.3%	0.3%
TOTAL	**146**	**100.0%**	**100.0%**	**$62,599**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.1%	$0	0.0%	0.8%	1.5%
Moderate	8	10.4%	14.7%	$1,172	4.8%	11.0%	17.0%
Middle	21	27.3%	39.9%	$3,233	13.3%	34.2%	39.2%
Upper	48	62.3%	44.1%	$19,982	81.9%	53.7%	42.1%
Unknown	0	0.0%	0.2%	$0	0.0%	0.2%	0.3%
TOTAL	**77**	**100.0%**	**100.0%**	**$24,387**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.5%	$0	0.0%	0.4%	1.5%
Moderate	2	3.1%	9.5%	$375	2.8%	7.7%	17.0%
Middle	8	12.5%	33.2%	$1,618	12.0%	26.2%	39.2%
Upper	54	84.4%	56.5%	$11,541	85.3%	65.5%	42.1%
Unknown	0	0.0%	0.2%	$0	0.0%	0.3%	0.3%
TOTAL	**64**	**100.0%**	**100.0%**	**$13,534**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.6%	$0	0.0%	0.6%	1.5%
Moderate	2	8.7%	8.4%	$994	12.0%	5.7%	17.0%
Middle	2	8.7%	31.8%	$1,080	13.1%	25.2%	39.2%
Upper	19	82.6%	58.9%	$6,176	74.9%	68.3%	42.1%
Unknown	0	0.0%	0.3%	$0	0.0%	0.2%	0.3%
TOTAL	**23**	**100.0%**	**100.0%**	**$8,250**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.1%	$0	0.0%	0.7%	1.5%
Moderate	0	0.0%	9.3%	$0	0.0%	5.3%	17.0%
Middle	2	28.6%	35.9%	$180	4.4%	24.6%	39.2%
Upper	5	71.4%	53.5%	$3,945	95.6%	68.6%	42.1%
Unknown	0	0.0%	0.3%	$0	0.0%	0.7%	0.3%
TOTAL	**7**	**100.0%**	**100.0%**	**$4,125**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	2	50.0%	2.6%	$140	55.6%	0.9%	1.5%
Moderate	2	50.0%	23.5%	$112	44.4%	13.9%	17.0%
Middle	0	0.0%	43.7%	$0	0.0%	53.8%	39.2%
Upper	0	0.0%	30.2%	$0	0.0%	31.4%	42.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**4**	**100.0%**	**100.0%**	**$252**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	8.3%	$0	0.0%	5.8%	6.6%
Moderate	0	0.0%	39.4%	$0	0.0%	39.5%	32.6%
Middle	0	0.0%	35.6%	$0	0.0%	36.4%	34.5%
Upper	0	0.0%	15.9%	$0	0.0%	18.0%	23.7%
Unknown	0	0.0%	0.8%	$0	0.0%	0.3%	2.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	3	0.9%	1.3%	$418	0.4%	1.5%	1.5%
Moderate	38	11.8%	14.1%	$8,193	7.2%	14.2%	17.0%
Middle	100	31.2%	38.8%	$24,657	21.8%	34.0%	39.2%
Upper	180	56.1%	45.5%	$79,879	70.6%	50.0%	42.1%
Unknown	0	0.0%	0.2%	$0	0.0%	0.3%	0.3%
TOTAL	**321**	**100.0%**	**100.0%**	**$113,147**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	213	32.2%	45.8%	$19,015	26.3%	26.6%	94.3%
		Over $1 Million/ Unknown	448	67.8%	54.2%	$53,392	73.7%	73.4%	5.7%
		TOTAL	**661**	**100.0%**	**100.0%**	**$72,407**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	476	72.0%	94.5%	$15,183	21.0%	44.6%	
		$100,001–$250,000	108	16.3%	3.3%	$18,893	26.1%	18.1%	
		$250,001–$1 Million	77	11.6%	2.2%	$38,331	52.9%	37.4%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**661**	**100.0%**	**100.0%**	**$72,407**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	168	78.9%		$5,522	29.0%		
		$100,001–$250,000	27	12.7%		$4,879	25.7%		
		$250,001–$1 Million	18	8.5%		$8,614	45.3%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**213**	**100.0%**		**$19,015**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	57	41.3%	51.9%	$8,461	26.3%	35.0%	94.2%
		Over $1 Million/ Unknown	81	58.7%	48.1%	$23,756	73.7%	65.0%	5.8%
		TOTAL	**138**	**100.0%**	**100.0%**	**$32,217**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	68	49.3%	96.3%	$3,482	10.8%	52.8%	
		$100,001–$250,000	28	20.3%	2.2%	$5,318	16.5%	14.9%	
		$250,001–$1 Million	42	30.4%	1.5%	$23,417	72.7%	32.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**138**	**100.0%**	**100.0%**	**$32,217**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	39	68.4%		$1,709	20.2%		
		$100,001–$250,000	7	12.3%		$1,266	15.0%		
		$250,001–$1 Million	11	19.3%		$5,486	64.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**57**	**100.0%**		**$8,461**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	11	1.7%	1.7%	$2,167	3.0%	1.8%	1.7%
Moderate	138	20.9%	22.0%	$15,694	21.7%	25.2%	23.0%
Middle	201	30.4%	36.0%	$28,639	39.6%	35.2%	36.5%
Upper	311	47.0%	39.9%	$25,907	35.8%	37.7%	38.8%
Unknown	0	0.0%	0.4%	$0	0.0%	0.1%	0.0%
TOTAL	**661**	**100.0%**	**100.0%**	**$72,407**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	3	2.2%	1.9%	$1,244	3.9%	2.1%	2.3%
Moderate	22	15.9%	22.3%	$4,219	13.1%	25.2%	22.5%
Middle	45	32.6%	32.3%	$11,905	37.0%	30.8%	34.9%
Upper	65	47.1%	42.0%	$13,549	42.1%	40.4%	39.3%
Unknown	3	2.2%	1.5%	$1,300	4.0%	1.4%	1.1%
TOTAL	**138**	**100.0%**	**100.0%**	**$32,217**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Tampa Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	8	4.7%	3.0%	$1,169	1.4%	1.4%	21.2%
Moderate	13	7.6%	14.9%	$2,507	2.9%	9.6%	17.0%
Middle	15	8.7%	20.4%	$3,911	4.6%	16.6%	18.4%
Upper	131	76.2%	45.9%	$72,282	84.9%	57.1%	43.4%
Unknown	5	2.9%	15.7%	$5,307	6.2%	15.3%	0.0%
TOTAL	**172**	**100.0%**	**100.0%**	**$85,176**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	1.3%	4.3%	$212	0.3%	2.1%	21.2%
Moderate	17	11.0%	13.9%	$2,629	3.8%	9.1%	17.0%
Middle	22	14.3%	18.9%	$4,418	6.4%	15.2%	18.4%
Upper	107	69.5%	41.8%	$56,944	83.0%	51.3%	43.4%
Unknown	6	3.9%	21.3%	$4,396	6.4%	22.2%	0.0%
TOTAL	**154**	**100.0%**	**100.0%**	**$68,599**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	5.5%	$0	0.0%	2.8%	21.2%
Moderate	3	9.4%	13.6%	$260	4.7%	8.5%	17.0%
Middle	1	3.1%	19.7%	$75	1.3%	15.4%	18.4%
Upper	28	87.5%	58.5%	$5,222	94.0%	69.6%	43.4%
Unknown	0	0.0%	2.7%	$0	0.0%	3.8%	0.0%
TOTAL	**32**	**100.0%**	**100.0%**	**$5,557**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.7%	$0	0.0%	3.8%	21.2%
Moderate	2	25.0%	12.2%	$85	9.3%	7.0%	17.0%
Middle	2	25.0%	18.9%	$125	13.7%	12.2%	18.4%
Upper	4	50.0%	59.7%	$700	76.9%	72.9%	43.4%
Unknown	0	0.0%	3.5%	$0	0.0%	4.1%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$910**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	6.8%	$0	0.0%	2.4%	21.2%
Moderate	0	0.0%	10.9%	$0	0.0%	4.3%	17.0%
Middle	0	0.0%	15.8%	$0	0.0%	6.8%	18.4%
Upper	4	66.7%	59.2%	$2,800	43.8%	77.7%	43.4%
Unknown	2	33.3%	7.3%	$3,600	56.3%	8.8%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$6,400**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.4%	$0	0.0%	0.2%	21.2%
Moderate	0	0.0%	2.3%	$0	0.0%	1.9%	17.0%
Middle	0	0.0%	1.6%	$0	0.0%	1.9%	18.4%
Upper	0	0.0%	0.4%	$0	0.0%	0.6%	43.4%
Unknown	0	0.0%	95.4%	$0	0.0%	95.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	3	100.0%	100.0%	$13,422	100.0%	100.0%	N/A
TOTAL	**3**	**100.0%**	**100.0%**	**$13,422**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	10	2.7%	3.8%	$1,381	0.8%	1.7%	21.2%
Moderate	35	9.3%	14.2%	$5,481	3.0%	8.6%	17.0%
Middle	40	10.7%	19.4%	$8,529	4.7%	14.7%	18.4%
Upper	274	73.1%	44.3%	$137,948	76.6%	50.8%	43.4%
Unknown	16	4.3%	18.4%	$26,725	14.8%	24.2%	0.0%
TOTAL	**375**	**100.0%**	**100.0%**	**$180,064**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	3	2.3%	2.1%	$618	0.7%	0.9%	20.3%
Moderate	15	11.3%	11.7%	$3,763	4.2%	6.9%	17.4%
Middle	12	9.0%	20.0%	$3,365	3.8%	16.0%	18.9%
Upper	97	72.9%	47.7%	$72,245	80.5%	58.9%	43.4%
Unknown	6	4.5%	18.6%	$9,704	10.8%	17.3%	0.0%
TOTAL	**133**	**100.0%**	**100.0%**	**$89,695**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	5	8.6%	8.6%	$478	2.4%	4.6%	20.3%
Moderate	8	13.8%	18.9%	$1,322	6.7%	13.4%	17.4%
Middle	4	6.9%	22.8%	$1,129	5.7%	19.9%	18.9%
Upper	39	67.2%	37.4%	$15,886	80.3%	48.7%	43.4%
Unknown	2	3.4%	12.4%	$975	4.9%	13.5%	0.0%
TOTAL	**58**	**100.0%**	**100.0%**	**$19,790**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	1.9%	5.2%	$112	1.0%	2.5%	20.3%
Moderate	2	3.8%	12.4%	$145	1.3%	7.3%	17.4%
Middle	7	13.5%	20.9%	$490	4.2%	14.7%	18.9%
Upper	41	78.8%	58.7%	$10,310	89.2%	71.2%	43.4%
Unknown	1	1.9%	2.7%	$500	4.3%	4.3%	0.0%
TOTAL	**52**	**100.0%**	**100.0%**	**$11,557**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.5%	$0	0.0%	3.6%	20.3%
Moderate	0	0.0%	11.5%	$0	0.0%	6.0%	17.4%
Middle	0	0.0%	21.8%	$0	0.0%	13.8%	18.9%
Upper	7	87.5%	56.3%	$1,040	72.2%	72.1%	43.4%
Unknown	1	12.5%	5.0%	$400	27.8%	4.4%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$1,440**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.7%	$0	0.0%	2.1%	20.3%
Moderate	1	14.3%	13.1%	$175	6.1%	5.3%	17.4%
Middle	0	0.0%	17.4%	$0	0.0%	7.8%	18.9%
Upper	4	57.1%	54.6%	$1,789	62.6%	70.3%	43.4%
Unknown	2	28.6%	9.2%	$896	31.3%	14.5%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$2,860**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.3%	$0	0.0%	0.9%	20.3%
Moderate	0	0.0%	2.3%	$0	0.0%	2.7%	17.4%
Middle	0	0.0%	1.3%	$0	0.0%	1.5%	18.9%
Upper	0	0.0%	0.9%	$0	0.0%	1.8%	43.4%
Unknown	0	0.0%	94.1%	$0	0.0%	93.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.5%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.5%	$0	0.0%	0.0%	N/A
Unknown	1	100.0%	98.9%	$590	100.0%	100.0%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$590**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	9	3.5%	4.7%	$1,208	1.0%	1.9%	20.3%
Moderate	26	10.0%	14.0%	$5,405	4.3%	8.0%	17.4%
Middle	23	8.9%	20.8%	$4,984	4.0%	15.4%	18.9%
Upper	188	72.6%	45.5%	$101,270	80.4%	51.9%	43.4%
Unknown	13	5.0%	15.1%	$13,065	10.4%	22.9%	0.0%
TOTAL	**259**	**100.0%**	**100.0%**	**$125,932**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	5	2.9%	3.3%	$1,005	1.2%	2.4%	2.5%
Moderate	16	9.3%	16.0%	$4,489	5.3%	12.5%	16.0%
Middle	54	31.4%	37.3%	$23,722	27.9%	31.8%	39.5%
Upper	96	55.8%	43.3%	$55,663	65.4%	53.2%	42.0%
Unknown	1	0.6%	0.1%	$297	0.3%	0.1%	0.1%
TOTAL	**172**	**100.0%**	**100.0%**	**$85,176**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	1.3%	1.9%	$772	1.1%	1.4%	2.5%
Moderate	8	5.2%	12.0%	$2,027	3.0%	9.1%	16.0%
Middle	38	24.7%	35.8%	$8,497	12.4%	30.4%	39.5%
Upper	106	68.8%	50.2%	$57,303	83.5%	59.0%	42.0%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.1%
TOTAL	**154**	**100.0%**	**100.0%**	**$68,599**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.4%	$0	0.0%	1.1%	2.5%
Moderate	2	6.3%	11.1%	$105	1.9%	8.6%	16.0%
Middle	9	28.1%	34.6%	$773	13.9%	29.2%	39.5%
Upper	21	65.6%	52.7%	$4,679	84.2%	61.1%	42.0%
Unknown	0	0.0%	0.1%	$0	0.0%	0.0%	0.1%
TOTAL	**32**	**100.0%**	**100.0%**	**$5,557**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.0%	$0	0.0%	0.8%	2.5%
Moderate	0	0.0%	9.4%	$0	0.0%	6.3%	16.0%
Middle	1	12.5%	32.3%	$75	8.2%	22.9%	39.5%
Upper	7	87.5%	57.3%	$835	91.8%	69.9%	42.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.1%	0.1%
TOTAL	**8**	**100.0%**	**100.0%**	**$910**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.0%	$0	0.0%	0.9%	2.5%
Moderate	0	0.0%	10.3%	$0	0.0%	4.5%	16.0%
Middle	3	50.0%	33.7%	$2,400	37.5%	19.9%	39.5%
Upper	3	50.0%	53.8%	$4,000	62.5%	74.5%	42.0%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.1%
TOTAL	**6**	**100.0%**	**100.0%**	**$6,400**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.5%	$0	0.0%	3.1%	2.5%
Moderate	0	0.0%	21.5%	$0	0.0%	17.8%	16.0%
Middle	0	0.0%	40.7%	$0	0.0%	36.1%	39.5%
Upper	0	0.0%	34.4%	$0	0.0%	43.0%	42.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	19.3%	$0	0.0%	11.1%	7.3%
Moderate	2	66.7%	31.2%	$10,619	79.1%	12.5%	20.7%
Middle	1	33.3%	31.2%	$2,803	20.9%	14.9%	41.3%
Upper	0	0.0%	18.3%	$0	0.0%	61.4%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
TOTAL	**3**	**100.0%**	**100.0%**	**$13,422**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	7	1.9%	2.5%	$1,777	1.0%	2.5%	2.5%
Moderate	28	7.5%	13.7%	$17,240	9.6%	10.8%	16.0%
Middle	106	28.3%	36.3%	$38,270	21.3%	29.8%	39.5%
Upper	233	62.1%	47.5%	$122,480	68.0%	56.8%	42.0%
Unknown	1	0.3%	0.1%	$297	0.2%	0.1%	0.1%
TOTAL	**375**	**100.0%**	**100.0%**	**$180,064**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	3	2.3%	1.8%	$807	0.9%	1.2%	1.4%
Moderate	9	6.8%	19.8%	$4,293	4.8%	15.2%	18.8%
Middle	38	28.6%	40.0%	$17,617	19.6%	34.4%	40.4%
Upper	83	62.4%	37.8%	$66,978	74.7%	48.2%	38.8%
Unknown	0	0.0%	0.7%	$0	0.0%	0.9%	0.6%
TOTAL	**133**	**100.0%**	**100.0%**	**$89,695**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.6%	$0	0.0%	1.1%	1.4%
Moderate	7	12.1%	17.0%	$1,209	6.1%	13.0%	18.8%
Middle	21	36.2%	40.1%	$4,965	25.1%	34.8%	40.4%
Upper	30	51.7%	40.8%	$13,616	68.8%	50.3%	38.8%
Unknown	0	0.0%	0.5%	$0	0.0%	0.8%	0.6%
TOTAL	**58**	**100.0%**	**100.0%**	**$19,790**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.9%	$0	0.0%	0.6%	1.4%
Moderate	7	13.5%	11.7%	$926	8.0%	8.7%	18.8%
Middle	10	19.2%	36.9%	$2,327	20.1%	31.2%	40.4%
Upper	35	67.3%	49.9%	$8,304	71.9%	58.7%	38.8%
Unknown	0	0.0%	0.6%	$0	0.0%	0.8%	0.6%
TOTAL	**52**	**100.0%**	**100.0%**	**$11,557**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.5%	$0	0.0%	0.3%	1.4%
Moderate	0	0.0%	12.1%	$0	0.0%	7.8%	18.8%
Middle	2	25.0%	36.4%	$286	19.9%	28.9%	40.4%
Upper	6	75.0%	50.2%	$1,154	80.1%	61.5%	38.8%
Unknown	0	0.0%	0.9%	$0	0.0%	1.4%	0.6%
TOTAL	**8**	**100.0%**	**100.0%**	**$1,440**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.2%	$0	0.0%	0.6%	1.4%
Moderate	1	14.3%	13.4%	$228	8.0%	6.2%	18.8%
Middle	2	28.6%	34.5%	$825	28.8%	21.0%	40.4%
Upper	3	42.9%	49.9%	$1,307	45.7%	70.2%	38.8%
Unknown	1	14.3%	1.1%	$500	17.5%	2.0%	0.6%
TOTAL	**7**	**100.0%**	**100.0%**	**$2,860**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.9%	$0	0.0%	0.9%	1.4%
Moderate	0	0.0%	26.7%	$0	0.0%	19.2%	18.8%
Middle	0	0.0%	45.1%	$0	0.0%	41.7%	40.4%
Upper	0	0.0%	25.9%	$0	0.0%	37.5%	38.8%
Unknown	0	0.0%	0.4%	$0	0.0%	0.6%	0.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	14.6%	$0	0.0%	9.6%	6.7%
Moderate	0	0.0%	31.4%	$0	0.0%	30.1%	19.6%
Middle	0	0.0%	26.5%	$0	0.0%	23.3%	40.0%
Upper	1	100.0%	24.3%	$590	100.0%	35.1%	30.0%
Unknown	0	0.0%	3.2%	$0	0.0%	1.9%	3.6%
TOTAL	**1**	**100.0%**	**100.0%**	**$590**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	3	1.2%	1.6%	$807	0.6%	1.9%	1.4%
Moderate	24	9.3%	17.8%	$6,656	5.3%	15.4%	18.8%
Middle	73	28.2%	39.5%	$26,020	20.7%	33.1%	40.4%
Upper	158	61.0%	40.5%	$91,949	73.0%	48.5%	38.8%
Unknown	1	0.4%	0.6%	$500	0.4%	1.0%	0.6%
TOTAL	**259**	**100.0%**	**100.0%**	**$125,932**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level

Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	112	30.2%	45.8%	$7,209	15.0%	27.7%	93.5%
	Over $1 Million/ Unknown	259	69.8%	54.2%	$40,956	85.0%	72.3%	6.5%
	TOTAL	**371**	**100.0%**	**100.0%**	**$48,165**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	257	69.3%	93.9%	$7,781	16.2%	40.8%	
	$100,001–$250,000	53	14.3%	3.5%	$8,599	17.9%	17.1%	
	$250,001–$1 Million	61	16.4%	2.6%	$31,785	66.0%	42.1%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**371**	**100.0%**	**100.0%**	**$48,165**	**100.0%**	**100.0%**	
Loan Size / Revenue $1 Million or Less	$100,000 or Less	102	91.1%		$3,046	42.3%		
	$100,001–$250,000	4	3.6%		$842	11.7%		
	$250,001–$1 Million	6	5.4%		$3,321	46.1%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**112**	**100.0%**		**$7,209**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	28	32.6%	51.4%	$8,480	32.2%	34.0%	93.5%
		Over $1 Million/ Unknown	58	67.4%	48.6%	$17,817	67.8%	66.0%	6.5%
		TOTAL	**86**	**100.0%**	**100.0%**	**$26,297**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	31	36.0%	95.8%	$1,824	6.9%	48.2%	
		$100,001–$250,000	19	22.1%	2.4%	$3,352	12.7%	14.9%	
		$250,001–$1 Million	36	41.9%	1.8%	$21,121	80.3%	36.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**86**	**100.0%**	**100.0%**	**$26,297**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	13	46.4%		$580	6.8%		
		$100,001–$250,000	3	10.7%		$566	6.7%		
		$250,001–$1 Million	12	42.9%		$7,334	86.5%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**28**	**100.0%**		**$8,480**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	26	7.0%	5.4%	$4,119	8.6%	7.7%	5.1%
Moderate	80	21.6%	18.4%	$13,484	28.0%	19.5%	18.2%
Middle	136	36.7%	34.1%	$16,689	34.6%	35.7%	35.1%
Upper	127	34.2%	41.4%	$13,767	28.6%	36.6%	41.3%
Unknown	2	0.5%	0.7%	$106	0.2%	0.5%	0.3%
TOTAL	**371**	**100.0%**	**100.0%**	**$48,165**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	6	7.0%	3.4%	$2,312	8.8%	5.2%	3.4%
Moderate	18	20.9%	19.6%	$6,093	23.2%	20.9%	19.8%
Middle	28	32.6%	34.3%	$6,920	26.3%	33.3%	35.6%
Upper	34	39.5%	40.2%	$10,972	41.7%	36.8%	39.0%
Unknown	0	0.0%	2.5%	$0	0.0%	3.8%	2.1%
TOTAL	**86**	**100.0%**	**100.0%**	**$26,297**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Sarasota Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	2	4.7%	3.1%	$275	1.2%	1.6%	19.4%
Moderate	7	16.3%	13.2%	$1,331	5.8%	8.3%	19.1%
Middle	4	9.3%	19.3%	$726	3.2%	14.9%	21.0%
Upper	26	60.5%	51.5%	$17,060	74.6%	62.7%	40.5%
Unknown	4	9.3%	12.9%	$3,477	15.2%	12.5%	0.0%
TOTAL	**43**	**100.0%**	**100.0%**	**$22,869**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	5	6.5%	6.0%	$691	2.7%	3.2%	19.4%
Moderate	17	22.1%	16.6%	$2,580	9.9%	11.1%	19.1%
Middle	11	14.3%	21.0%	$2,003	7.7%	17.5%	21.0%
Upper	40	51.9%	39.5%	$14,443	55.5%	50.8%	40.5%
Unknown	4	5.2%	16.9%	$6,324	24.3%	17.4%	0.0%
TOTAL	**77**	**100.0%**	**100.0%**	**$26,041**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	13.8%	6.6%	$189	4.1%	3.4%	19.4%
Moderate	2	6.9%	15.0%	$343	7.5%	11.5%	19.1%
Middle	5	17.2%	23.2%	$531	11.5%	16.1%	21.0%
Upper	18	62.1%	53.2%	$3,539	76.9%	66.6%	40.5%
Unknown	0	0.0%	2.0%	$0	0.0%	2.4%	0.0%
TOTAL	**29**	**100.0%**	**100.0%**	**$4,602**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	7.7%	6.1%	$55	3.5%	3.6%	19.4%
Moderate	0	0.0%	15.5%	$0	0.0%	8.8%	19.1%
Middle	2	15.4%	20.9%	$301	19.0%	13.7%	21.0%
Upper	10	76.9%	54.4%	$1,227	77.5%	66.9%	40.5%
Unknown	0	0.0%	3.1%	$0	0.0%	7.0%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$1,583**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.4%	$0	0.0%	1.4%	19.4%
Moderate	0	0.0%	13.6%	$0	0.0%	7.0%	19.1%
Middle	0	0.0%	15.0%	$0	0.0%	5.9%	21.0%
Upper	0	0.0%	58.7%	$0	0.0%	73.6%	40.5%
Unknown	0	0.0%	7.2%	$0	0.0%	12.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.7%	$0	0.0%	0.9%	19.4%
Moderate	0	0.0%	3.4%	$0	0.0%	3.0%	19.1%
Middle	0	0.0%	1.1%	$0	0.0%	1.6%	21.0%
Upper	0	0.0%	1.1%	$0	0.0%	0.6%	40.5%
Unknown	0	0.0%	92.6%	$0	0.0%	93.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	3	100.0%	100.0%	$4,643	100.0%	100.0%	N/A
TOTAL	**3**	**100.0%**	**100.0%**	**$4,643**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	12	7.3%	4.6%	$1,210	2.0%	2.2%	19.4%
Moderate	26	15.8%	14.8%	$4,254	7.1%	9.1%	19.1%
Middle	22	13.3%	20.1%	$3,561	6.0%	15.2%	21.0%
Upper	94	57.0%	46.0%	$36,269	60.7%	55.8%	40.5%
Unknown	11	6.7%	14.4%	$14,444	24.2%	17.7%	0.0%
TOTAL	**165**	**100.0%**	**100.0%**	**$59,738**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	2.6%	$0	0.0%	1.2%	18.8%
Moderate	3	8.8%	11.9%	$481	2.2%	7.3%	19.6%
Middle	2	5.9%	19.5%	$581	2.7%	15.3%	20.4%
Upper	28	82.4%	50.4%	$19,531	89.6%	60.9%	41.2%
Unknown	1	2.9%	15.6%	$1,200	5.5%	15.4%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$21,793**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	8.3%	11.6%	$188	2.0%	6.5%	18.8%
Moderate	5	13.9%	22.1%	$929	9.8%	15.9%	19.6%
Middle	11	30.6%	22.9%	$2,244	23.6%	20.0%	20.4%
Upper	17	47.2%	31.4%	$6,128	64.6%	43.3%	41.2%
Unknown	0	0.0%	12.0%	$0	0.0%	14.3%	0.0%
TOTAL	**36**	**100.0%**	**100.0%**	**$9,489**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	4.0%	6.4%	$25	0.8%	3.2%	18.8%
Moderate	3	12.0%	16.1%	$165	5.5%	9.0%	19.6%
Middle	8	32.0%	24.2%	$580	19.3%	16.7%	20.4%
Upper	13	52.0%	50.3%	$2,232	74.4%	68.0%	41.2%
Unknown	0	0.0%	3.0%	$0	0.0%	3.2%	0.0%
TOTAL	**25**	**100.0%**	**100.0%**	**$3,002**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	7.5%	$0	0.0%	4.0%	18.8%
Moderate	2	22.2%	16.1%	$150	6.6%	8.5%	19.6%
Middle	2	22.2%	23.7%	$204	8.9%	15.3%	20.4%
Upper	5	55.6%	48.0%	$1,933	84.5%	66.6%	41.2%
Unknown	0	0.0%	4.7%	$0	0.0%	5.6%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,287**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	9.3%	$0	0.0%	3.6%	18.8%
Moderate	0	0.0%	12.5%	$0	0.0%	7.2%	19.6%
Middle	0	0.0%	16.3%	$0	0.0%	6.8%	20.4%
Upper	1	100.0%	51.5%	$1,136	100.0%	68.8%	41.2%
Unknown	0	0.0%	10.5%	$0	0.0%	13.6%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$1,136**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.0%	$0	0.0%	0.7%	18.8%
Moderate	0	0.0%	1.9%	$0	0.0%	1.5%	19.6%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	20.4%
Upper	0	0.0%	1.0%	$0	0.0%	1.4%	41.2%
Unknown	0	0.0%	96.2%	$0	0.0%	96.4%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	3.4%	$0	0.0%	0.2%	N/A
Unknown	0	0.0%	96.6%	$0	0.0%	99.8%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	4	3.8%	5.7%	$213	0.6%	2.4%	18.8%
Moderate	13	12.4%	15.1%	$1,725	4.6%	8.7%	19.6%
Middle	23	21.9%	20.8%	$3,609	9.6%	15.0%	20.4%
Upper	64	61.0%	45.0%	$30,960	82.1%	53.2%	41.2%
Unknown	1	1.0%	13.4%	$1,200	3.2%	20.7%	0.0%
TOTAL	**105**	**100.0%**	**100.0%**	**$37,707**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.5%	$0	0.0%	0.3%	1.0%
Moderate	3	7.0%	13.6%	$479	2.1%	9.8%	18.3%
Middle	15	34.9%	40.8%	$5,170	22.6%	35.6%	50.7%
Upper	25	58.1%	45.1%	$17,220	75.3%	54.3%	29.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**43**	**100.0%**	**100.0%**	**$22,869**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.3%	$0	0.0%	0.2%	1.0%
Moderate	8	10.4%	11.9%	$1,111	4.3%	8.7%	18.3%
Middle	37	48.1%	47.5%	$7,905	30.4%	40.6%	50.7%
Upper	32	41.6%	40.4%	$17,025	65.4%	50.5%	29.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**77**	**100.0%**	**100.0%**	**$26,041**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.4%	$0	0.0%	0.2%	1.0%
Moderate	1	3.4%	11.7%	$10	0.2%	10.3%	18.3%
Middle	13	44.8%	47.9%	$1,771	38.5%	41.6%	50.7%
Upper	15	51.7%	40.0%	$2,821	61.3%	47.9%	29.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**29**	**100.0%**	**100.0%**	**$4,602**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.2%	$0	0.0%	0.0%	1.0%
Moderate	0	0.0%	9.1%	$0	0.0%	6.6%	18.3%
Middle	7	53.8%	45.1%	$1,065	67.3%	36.4%	50.7%
Upper	6	46.2%	45.6%	$518	32.7%	57.0%	29.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$1,583**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.3%	$0	0.0%	0.0%	1.0%
Moderate	0	0.0%	9.1%	$0	0.0%	3.4%	18.3%
Middle	0	0.0%	38.2%	$0	0.0%	20.3%	50.7%
Upper	0	0.0%	52.3%	$0	0.0%	76.3%	29.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.7%	$0	0.0%	0.5%	1.0%
Moderate	0	0.0%	23.4%	$0	0.0%	23.7%	18.3%
Middle	0	0.0%	54.3%	$0	0.0%	47.7%	50.7%
Upper	0	0.0%	20.6%	$0	0.0%	28.1%	29.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	33.3%	6.0%	$630	13.6%	2.7%	1.5%
Moderate	2	66.7%	44.0%	$4,013	86.4%	31.0%	22.8%
Middle	0	0.0%	30.0%	$0	0.0%	48.4%	39.5%
Upper	0	0.0%	20.0%	$0	0.0%	17.9%	36.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$4,643**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	0.6%	0.4%	$630	1.1%	0.3%	1.0%
Moderate	14	8.5%	12.7%	$5,613	9.4%	10.1%	18.3%
Middle	72	43.6%	44.2%	$15,911	26.6%	37.9%	50.7%
Upper	78	47.3%	42.7%	$37,584	62.9%	51.7%	29.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**165**	**100.0%**	**100.0%**	**$59,738**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.5%	$0	0.0%	0.3%	1.2%
Moderate	1	2.9%	14.3%	$245	1.1%	10.8%	18.1%
Middle	13	38.2%	40.7%	$4,984	22.9%	37.2%	46.7%
Upper	19	55.9%	43.5%	$14,964	68.7%	50.5%	33.8%
Unknown	1	2.9%	1.0%	$1,600	7.3%	1.2%	0.2%
TOTAL	**34**	**100.0%**	**100.0%**	**$21,793**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.6%	$0	0.0%	0.3%	1.2%
Moderate	10	27.8%	17.6%	$3,679	38.8%	13.2%	18.1%
Middle	13	36.1%	44.5%	$2,845	30.0%	38.8%	46.7%
Upper	13	36.1%	37.1%	$2,965	31.2%	47.3%	33.8%
Unknown	0	0.0%	0.3%	$0	0.0%	0.4%	0.2%
TOTAL	**36**	**100.0%**	**100.0%**	**$9,489**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.3%	$0	0.0%	0.1%	1.2%
Moderate	1	4.0%	11.6%	$150	5.0%	8.8%	18.1%
Middle	12	48.0%	44.8%	$1,512	50.4%	36.3%	46.7%
Upper	12	48.0%	42.7%	$1,340	44.6%	54.2%	33.8%
Unknown	0	0.0%	0.6%	$0	0.0%	0.6%	0.2%
TOTAL	**25**	**100.0%**	**100.0%**	**$3,002**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.2%	$0	0.0%	0.1%	1.2%
Moderate	2	22.2%	11.6%	$150	6.6%	7.1%	18.1%
Middle	3	33.3%	40.9%	$504	22.0%	34.8%	46.7%
Upper	4	44.4%	46.7%	$1,633	71.4%	57.2%	33.8%
Unknown	0	0.0%	0.7%	$0	0.0%	0.8%	0.2%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,287**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.2%	$0	0.0%	0.1%	1.2%
Moderate	0	0.0%	12.2%	$0	0.0%	4.6%	18.1%
Middle	0	0.0%	35.5%	$0	0.0%	22.7%	46.7%
Upper	1	100.0%	51.5%	$1,136	100.0%	72.2%	33.8%
Unknown	0	0.0%	0.6%	$0	0.0%	0.4%	0.2%
TOTAL	**1**	**100.0%**	**100.0%**	**$1,136**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	1.2%
Moderate	0	0.0%	30.5%	$0	0.0%	27.6%	18.1%
Middle	0	0.0%	46.7%	$0	0.0%	40.4%	46.7%
Upper	0	0.0%	22.9%	$0	0.0%	31.9%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	8.6%	$0	0.0%	2.6%	1.6%
Moderate	0	0.0%	31.0%	$0	0.0%	22.1%	21.4%
Middle	0	0.0%	34.5%	$0	0.0%	22.0%	41.3%
Upper	0	0.0%	25.9%	$0	0.0%	53.3%	35.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.5%	$0	0.0%	0.4%	1.2%
Moderate	14	13.3%	14.9%	$4,224	11.2%	11.9%	18.1%
Middle	41	39.0%	41.9%	$9,845	26.1%	36.0%	46.7%
Upper	49	46.7%	42.0%	$22,038	58.4%	50.8%	33.8%
Unknown	1	1.0%	0.7%	$1,600	4.2%	0.9%	0.2%
TOTAL	**105**	**100.0%**	**100.0%**	**$37,707**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	100	34.7%	50.1%	$6,453	26.4%	31.3%	94.4%
		Over $1 Million/ Unknown	188	65.3%	49.9%	$18,003	73.6%	68.7%	5.6%
		TOTAL	**288**	**100.0%**	**100.0%**	**$24,456**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	236	81.9%	94.1%	$7,311	29.9%	41.7%	
		$100,001–$250,000	30	10.4%	3.3%	$4,746	19.4%	16.6%	
		$250,001–$1 Million	22	7.6%	2.7%	$12,399	50.7%	41.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**288**	**100.0%**	**100.0%**	**$24,456**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	84	84.0%		$2,315	35.9%		
		$100,001–$250,000	10	10.0%		$1,590	24.6%		
		$250,001–$1 Million	6	6.0%		$2,548	39.5%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**100**	**100.0%**		**$6,453**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	38	54.3%	53.9%	$3,711	30.2%	36.1%	94.3%
		Over $1 Million/ Unknown	32	45.7%	46.1%	$8,580	69.8%	63.9%	5.7%
		TOTAL	**70**	**100.0%**	**100.0%**	**$12,291**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	47	67.1%	95.7%	$2,051	16.7%	48.7%	
		$100,001–$250,000	9	12.9%	2.3%	$1,569	12.8%	13.6%	
		$250,001–$1 Million	14	20.0%	2.0%	$8,671	70.5%	37.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**70**	**100.0%**	**100.0%**	**$12,291**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	30	78.9%		$1,176	31.7%		
		$100,001–$250,000	4	10.5%		$592	16.0%		
		$250,001–$1 Million	4	10.5%		$1,943	52.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**38**	**100.0%**		**$3,711**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	5	1.7%	1.2%	$474	1.9%	1.3%	1.4%
Moderate	59	20.5%	17.5%	$4,064	16.6%	18.5%	19.6%
Middle	125	43.4%	42.6%	$11,573	47.3%	41.0%	45.7%
Upper	99	34.4%	38.2%	$8,345	34.1%	39.1%	33.4%
Unknown	0	0.0%	0.4%	$0	0.0%	0.1%	0.0%
TOTAL	**288**	**100.0%**	**100.0%**	**$24,456**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	1	1.4%	1.0%	$998	8.1%	1.3%	1.2%
Moderate	7	10.0%	14.7%	$1,561	12.7%	12.9%	15.4%
Middle	42	60.0%	44.9%	$7,232	58.8%	46.3%	48.1%
Upper	20	28.6%	38.8%	$2,500	20.3%	38.9%	35.0%
Unknown	0	0.0%	0.6%	$0	0.0%	0.5%	0.3%
TOTAL	**70**	**100.0%**	**100.0%**	**$12,291**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Jacksonville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	4.5%	$0	0.0%	2.0%	22.7%
Moderate	0	0.0%	15.7%	$0	0.0%	10.4%	17.0%
Middle	9	26.5%	19.9%	$1,956	11.0%	17.3%	19.5%
Upper	25	73.5%	39.9%	$15,834	89.0%	52.0%	40.7%
Unknown	0	0.0%	20.0%	$0	0.0%	18.3%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$17,790**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	4.2%	$0	0.0%	2.1%	22.7%
Moderate	1	4.8%	12.3%	$96	1.5%	8.1%	17.0%
Middle	3	14.3%	18.5%	$489	7.5%	15.1%	19.5%
Upper	17	81.0%	40.9%	$5,923	91.0%	50.3%	40.7%
Unknown	0	0.0%	24.0%	$0	0.0%	24.4%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$6,508**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	5.0%	$0	0.0%	2.9%	22.7%
Moderate	0	0.0%	10.9%	$0	0.0%	7.6%	17.0%
Middle	0	0.0%	19.1%	$0	0.0%	14.6%	19.5%
Upper	10	100.0%	61.5%	$1,739	100.0%	70.4%	40.7%
Unknown	0	0.0%	3.5%	$0	0.0%	4.6%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,739**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.8%	$0	0.0%	1.3%	22.7%
Moderate	1	11.1%	9.3%	$100	5.0%	5.2%	17.0%
Middle	2	22.2%	15.2%	$292	14.7%	9.8%	19.5%
Upper	6	66.7%	68.4%	$1,595	80.3%	80.1%	40.7%
Unknown	0	0.0%	4.3%	$0	0.0%	3.5%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,987**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.0%	$0	0.0%	1.6%	22.7%
Moderate	0	0.0%	10.1%	$0	0.0%	4.3%	17.0%
Middle	0	0.0%	18.8%	$0	0.0%	11.0%	19.5%
Upper	2	100.0%	58.4%	$554	100.0%	76.9%	40.7%
Unknown	0	0.0%	7.7%	$0	0.0%	6.2%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$554**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.4%	$0	0.0%	1.3%	22.7%
Moderate	0	0.0%	1.4%	$0	0.0%	1.4%	17.0%
Middle	0	0.0%	1.1%	$0	0.0%	1.4%	19.5%
Upper	0	0.0%	0.3%	$0	0.0%	0.6%	40.7%
Unknown	0	0.0%	94.8%	$0	0.0%	95.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.3%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	98.7%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	0	0.0%	4.3%	$0	0.0%	1.9%	22.7%
Moderate	2	2.6%	13.7%	$196	0.7%	8.4%	17.0%
Middle	14	18.4%	19.0%	$2,737	9.6%	14.7%	19.5%
Upper	60	78.9%	40.9%	$25,645	89.7%	47.0%	40.7%
Unknown	0	0.0%	22.1%	$0	0.0%	27.9%	0.0%
TOTAL	**76**	**100.0%**	**100.0%**	**$28,578**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	4.2%	$0	0.0%	1.8%	21.9%
Moderate	6	18.2%	15.2%	$1,106	3.6%	9.8%	18.5%
Middle	3	9.1%	19.8%	$543	1.8%	17.2%	19.2%
Upper	23	69.7%	38.4%	$28,269	92.9%	51.1%	40.4%
Unknown	1	3.0%	22.4%	$520	1.7%	20.1%	0.0%
TOTAL	**33**	**100.0%**	**100.0%**	**$30,438**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	12.5%	9.5%	$151	2.0%	5.2%	21.9%
Moderate	1	6.3%	18.5%	$500	6.6%	13.5%	18.5%
Middle	0	0.0%	23.2%	$0	0.0%	20.9%	19.2%
Upper	13	81.3%	36.1%	$6,879	91.4%	46.4%	40.4%
Unknown	0	0.0%	12.7%	$0	0.0%	14.0%	0.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$7,530**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	5.5%	$0	0.0%	3.1%	21.9%
Moderate	1	11.1%	12.7%	$50	3.6%	7.2%	18.5%
Middle	1	11.1%	20.7%	$245	17.7%	14.6%	19.2%
Upper	7	77.8%	56.7%	$1,086	78.6%	71.4%	40.4%
Unknown	0	0.0%	4.4%	$0	0.0%	3.8%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,381**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.4%	$0	0.0%	2.5%	21.9%
Moderate	0	0.0%	9.6%	$0	0.0%	5.1%	18.5%
Middle	0	0.0%	17.7%	$0	0.0%	12.0%	19.2%
Upper	5	100.0%	61.6%	$1,494	100.0%	74.9%	40.4%
Unknown	0	0.0%	6.6%	$0	0.0%	5.4%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,494**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	7.2%	$0	0.0%	3.2%	21.9%
Moderate	0	0.0%	12.4%	$0	0.0%	5.7%	18.5%
Middle	0	0.0%	22.7%	$0	0.0%	12.0%	19.2%
Upper	0	0.0%	48.5%	$0	0.0%	65.3%	40.4%
Unknown	1	100.0%	9.2%	$1,500	100.0%	13.9%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$1,500**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.3%	$0	0.0%	2.4%	21.9%
Moderate	0	0.0%	1.2%	$0	0.0%	1.3%	18.5%
Middle	0	0.0%	0.2%	$0	0.0%	0.3%	19.2%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	40.4%
Unknown	0	0.0%	95.3%	$0	0.0%	96.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	2	3.1%	5.8%	$151	0.4%	2.5%	21.9%
Moderate	8	12.5%	15.7%	$1,656	3.9%	9.8%	18.5%
Middle	4	6.3%	20.6%	$788	1.9%	16.6%	19.2%
Upper	48	75.0%	39.1%	$37,728	89.1%	47.0%	40.4%
Unknown	2	3.1%	18.7%	$2,020	4.8%	24.2%	0.0%
TOTAL	**64**	**100.0%**	**100.0%**	**$42,343**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	3.1%	$0	0.0%	1.5%	4.5%
Moderate	5	14.7%	17.5%	$1,081	6.1%	11.6%	20.4%
Middle	7	20.6%	33.7%	$2,281	12.8%	29.3%	35.5%
Upper	22	64.7%	45.7%	$14,428	81.1%	57.7%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$17,790**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.1%	$0	0.0%	0.5%	4.5%
Moderate	0	0.0%	12.2%	$0	0.0%	7.9%	20.4%
Middle	4	19.0%	32.5%	$1,519	23.3%	27.1%	35.5%
Upper	17	81.0%	54.2%	$4,989	76.7%	64.5%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$6,508**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.5%	$0	0.0%	1.4%	4.5%
Moderate	1	10.0%	9.8%	$200	11.5%	7.2%	20.4%
Middle	0	0.0%	26.2%	$0	0.0%	20.8%	35.5%
Upper	9	90.0%	62.6%	$1,539	88.5%	70.7%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,739**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.3%	$0	0.0%	0.2%	4.5%
Moderate	0	0.0%	7.5%	$0	0.0%	5.4%	20.4%
Middle	0	0.0%	23.1%	$0	0.0%	17.4%	35.5%
Upper	9	100.0%	69.1%	$1,987	100.0%	77.0%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,987**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.4%	$0	0.0%	0.4%	4.5%
Moderate	0	0.0%	9.5%	$0	0.0%	4.3%	20.4%
Middle	0	0.0%	28.2%	$0	0.0%	19.7%	35.5%
Upper	2	100.0%	60.9%	$554	100.0%	75.6%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$554**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.6%	$0	0.0%	1.7%	4.5%
Moderate	0	0.0%	27.7%	$0	0.0%	20.8%	20.4%
Middle	0	0.0%	44.9%	$0	0.0%	42.6%	35.5%
Upper	0	0.0%	23.8%	$0	0.0%	34.9%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	6.6%	$0	0.0%	0.3%	6.9%
Moderate	0	0.0%	36.8%	$0	0.0%	15.1%	30.3%
Middle	0	0.0%	30.3%	$0	0.0%	60.0%	35.5%
Upper	0	0.0%	26.3%	$0	0.0%	24.6%	27.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	2.1%	$0	0.0%	1.0%	4.5%
Moderate	6	7.9%	14.7%	$1,281	4.5%	10.2%	20.4%
Middle	11	14.5%	32.9%	$3,800	13.3%	30.9%	35.5%
Upper	59	77.6%	50.3%	$23,497	82.2%	57.9%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**76**	**100.0%**	**100.0%**	**$28,578**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	3.4%	$0	0.0%	1.6%	4.3%
Moderate	3	9.1%	21.4%	$771	2.5%	14.4%	21.6%
Middle	10	30.3%	41.4%	$4,213	13.8%	39.4%	36.0%
Upper	20	60.6%	33.2%	$25,454	83.6%	44.1%	37.6%
Unknown	0	0.0%	0.6%	$0	0.0%	0.6%	0.5%
TOTAL	**33**	**100.0%**	**100.0%**	**$30,438**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.7%	$0	0.0%	1.3%	4.3%
Moderate	0	0.0%	20.2%	$0	0.0%	14.0%	21.6%
Middle	4	25.0%	38.5%	$1,072	14.2%	36.0%	36.0%
Upper	12	75.0%	38.1%	$6,458	85.8%	48.3%	37.6%
Unknown	0	0.0%	0.5%	$0	0.0%	0.5%	0.5%
TOTAL	**16**	**100.0%**	**100.0%**	**$7,530**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.4%	$0	0.0%	0.9%	4.3%
Moderate	0	0.0%	13.0%	$0	0.0%	8.3%	21.6%
Middle	2	22.2%	33.9%	$385	27.9%	28.2%	36.0%
Upper	7	77.8%	51.2%	$996	72.1%	62.3%	37.6%
Unknown	0	0.0%	0.4%	$0	0.0%	0.4%	0.5%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,381**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.6%	$0	0.0%	0.2%	4.3%
Moderate	1	20.0%	8.7%	$119	8.0%	4.6%	21.6%
Middle	1	20.0%	32.9%	$500	33.5%	28.3%	36.0%
Upper	3	60.0%	57.2%	$875	58.6%	66.5%	37.6%
Unknown	0	0.0%	0.5%	$0	0.0%	0.3%	0.5%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,494**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.0%	$0	0.0%	0.7%	4.3%
Moderate	0	0.0%	16.1%	$0	0.0%	6.9%	21.6%
Middle	0	0.0%	35.0%	$0	0.0%	25.5%	36.0%
Upper	1	100.0%	46.3%	$1,500	100.0%	66.4%	37.6%
Unknown	0	0.0%	0.6%	$0	0.0%	0.4%	0.5%
TOTAL	**1**	**100.0%**	**100.0%**	**$1,500**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	5.5%	$0	0.0%	3.5%	4.3%
Moderate	0	0.0%	33.5%	$0	0.0%	26.9%	21.6%
Middle	0	0.0%	46.6%	$0	0.0%	43.2%	36.0%
Upper	0	0.0%	13.9%	$0	0.0%	25.9%	37.6%
Unknown	0	0.0%	0.4%	$0	0.0%	0.5%	0.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	9.1%	$0	0.0%	0.9%	4.1%
Moderate	0	0.0%	37.3%	$0	0.0%	44.0%	37.5%
Middle	0	0.0%	33.6%	$0	0.0%	30.3%	31.8%
Upper	0	0.0%	13.6%	$0	0.0%	23.3%	24.9%
Unknown	0	0.0%	6.4%	$0	0.0%	1.5%	1.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	3.0%	$0	0.0%	1.4%	4.3%
Moderate	4	6.3%	20.3%	$890	2.1%	16.2%	21.6%
Middle	17	26.6%	39.8%	$6,170	14.6%	37.4%	36.0%
Upper	43	67.2%	36.3%	$35,283	83.3%	44.4%	37.6%
Unknown	0	0.0%	0.5%	$0	0.0%	0.6%	0.5%
TOTAL	**64**	**100.0%**	**100.0%**	**$42,343**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	30	29.4%	43.1%	$2,550	14.6%	27.0%	93.9%
		Over $1 Million/ Unknown	72	70.6%	56.9%	$14,944	85.4%	73.0%	6.1%
		TOTAL	**102**	**100.0%**	**100.0%**	**$17,494**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	61	59.8%	93.8%	$2,130	12.2%	40.9%	
		$100,001–$250,000	23	22.5%	3.5%	$3,604	20.6%	16.9%	
		$250,001–$1 Million	18	17.6%	2.7%	$11,760	67.2%	42.2%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**102**	**100.0%**	**100.0%**	**$17,494**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	26	86.7%		$807	31.6%		
		$100,001–$250,000	1	3.3%		$125	4.9%		
		$250,001–$1 Million	3	10.0%		$1,618	63.5%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**30**	**100.0%**		**$2,550**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	22	36.7%	50.1%	$4,195	19.7%	32.4%	93.9%
		Over $1 Million/ Unknown	38	63.3%	49.9%	$17,085	80.3%	67.6%	6.1%
		TOTAL	**60**	**100.0%**	**100.0%**	**$21,280**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	21	35.0%	95.1%	$1,123	5.3%	44.1%	
		$100,001–$250,000	16	26.7%	2.6%	$3,336	15.7%	14.4%	
		$250,001–$1 Million	23	38.3%	2.3%	$16,821	79.0%	41.5%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**60**	**100.0%**	**100.0%**	**$21,280**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	13	59.1%		$625	14.9%		
		$100,001–$250,000	4	18.2%		$941	22.4%		
		$250,001–$1 Million	5	22.7%		$2,629	62.7%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**22**	**100.0%**		**$4,195**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	7	6.9%	5.0%	$714	4.1%	6.5%	5.2%
Moderate	25	24.5%	21.4%	$3,343	19.1%	20.8%	22.9%
Middle	31	30.4%	29.1%	$8,164	46.7%	29.3%	31.3%
Upper	39	38.2%	44.2%	$5,273	30.1%	43.3%	40.6%
Unknown	0	0.0%	0.3%	$0	0.0%	0.1%	0.0%
TOTAL	**102**	**100.0%**	**100.0%**	**$17,494**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	1	1.7%	5.3%	$40	0.2%	6.9%	5.5%
Moderate	10	16.7%	20.0%	$5,133	24.1%	17.6%	23.6%
Middle	30	50.0%	35.9%	$10,769	50.6%	37.1%	36.6%
Upper	15	25.0%	36.8%	$4,398	20.7%	35.7%	32.1%
Unknown	4	6.7%	2.1%	$940	4.4%	2.7%	2.1%
TOTAL	**60**	**100.0%**	**100.0%**	**$21,280**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

LOUISIANA

New Orleans Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	38	5.1%	3.9%	$4,879	1.7%	1.9%	25.1%
Moderate	103	13.8%	16.5%	$19,574	6.9%	10.8%	15.5%
Middle	104	13.9%	18.8%	$25,848	9.1%	15.5%	17.2%
Upper	483	64.5%	39.3%	$222,686	78.6%	51.3%	42.2%
Unknown	21	2.8%	21.5%	$10,298	3.6%	20.6%	0.0%
TOTAL	**749**	**100.0%**	**100.0%**	**$283,285**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	16	3.0%	3.9%	$1,821	0.9%	1.8%	25.1%
Moderate	49	9.1%	11.4%	$8,310	4.3%	7.0%	15.5%
Middle	67	12.4%	17.5%	$14,478	7.5%	13.3%	17.2%
Upper	393	72.8%	44.7%	$162,723	83.8%	55.1%	42.2%
Unknown	15	2.8%	22.5%	$6,925	3.6%	22.8%	0.0%
TOTAL	**540**	**100.0%**	**100.0%**	**$194,257**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	8	4.3%	4.7%	$283	1.0%	1.9%	25.1%
Moderate	13	7.0%	9.3%	$1,027	3.5%	5.7%	15.5%
Middle	15	8.1%	12.8%	$1,513	5.1%	8.4%	17.2%
Upper	145	78.4%	66.1%	$24,267	82.1%	72.6%	42.2%
Unknown	4	2.2%	7.0%	$2,455	8.3%	11.4%	0.0%
TOTAL	**185**	**100.0%**	**100.0%**	**$29,545**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	3.0%	3.7%	$89	0.8%	1.6%	25.1%
Moderate	2	3.0%	6.8%	$60	0.5%	4.0%	15.5%
Middle	5	7.6%	14.1%	$557	4.8%	10.9%	17.2%
Upper	57	86.4%	72.2%	$10,780	93.9%	80.5%	42.2%
Unknown	0	0.0%	3.1%	$0	0.0%	3.0%	0.0%
TOTAL	**66**	**100.0%**	**100.0%**	**$11,486**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	4.3%	15.4%	$215	3.0%	6.0%	25.1%
Moderate	2	8.7%	14.1%	$267	3.8%	8.0%	15.5%
Middle	6	26.1%	21.0%	$1,231	17.4%	13.6%	17.2%
Upper	13	56.5%	40.4%	$4,433	62.6%	60.3%	42.2%
Unknown	1	4.3%	9.1%	$938	13.2%	12.1%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$7,084**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.7%	$0	0.0%	0.4%	25.1%
Moderate	0	0.0%	1.7%	$0	0.0%	1.6%	15.5%
Middle	0	0.0%	1.7%	$0	0.0%	1.6%	17.2%
Upper	0	0.0%	1.0%	$0	0.0%	1.6%	42.2%
Unknown	0	0.0%	95.0%	$0	0.0%	94.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.5%	$0	0.0%	0.2%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.0%	$0	0.0%	0.3%	N/A
Unknown	6	100.0%	97.5%	$24,978	100.0%	99.5%	N/A
TOTAL	**6**	**100.0%**	**100.0%**	**$24,978**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	65	4.1%	3.9%	$7,287	1.3%	1.8%	25.1%
Moderate	169	10.8%	13.5%	$29,238	5.3%	8.5%	15.5%
Middle	197	12.6%	17.7%	$43,627	7.9%	13.7%	17.2%
Upper	1,091	69.5%	42.3%	$424,889	77.2%	51.5%	42.2%
Unknown	47	3.0%	22.7%	$45,594	8.3%	24.4%	0.0%
TOTAL	**1,569**	**100.0%**	**100.0%**	**$550,635**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	41	8.8%	3.8%	$5,608	2.7%	1.7%	24.8%
Moderate	73	15.7%	16.6%	$15,095	7.4%	10.7%	15.1%
Middle	40	8.6%	19.7%	$10,384	5.1%	16.5%	18.2%
Upper	306	65.8%	38.3%	$170,109	83.1%	51.0%	41.9%
Unknown	5	1.1%	21.5%	$3,478	1.7%	20.2%	0.0%
TOTAL	**465**	**100.0%**	**100.0%**	**$204,674**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	7	4.6%	8.7%	$1,199	2.1%	4.3%	24.8%
Moderate	19	12.5%	18.0%	$2,845	5.0%	11.4%	15.1%
Middle	22	14.5%	20.2%	$2,904	5.1%	16.5%	18.2%
Upper	100	65.8%	36.0%	$45,790	81.1%	48.8%	41.9%
Unknown	4	2.6%	17.1%	$3,707	6.6%	19.1%	0.0%
TOTAL	**152**	**100.0%**	**100.0%**	**$56,445**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	3	2.3%	5.5%	$145	0.7%	2.8%	24.8%
Moderate	10	7.5%	10.6%	$1,070	5.1%	6.2%	15.1%
Middle	16	12.0%	17.1%	$1,308	6.3%	10.2%	18.2%
Upper	104	78.2%	60.9%	$18,374	87.9%	71.7%	41.9%
Unknown	0	0.0%	5.9%	$0	0.0%	9.0%	0.0%
TOTAL	**133**	**100.0%**	**100.0%**	**$20,897**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	3.6%	5.3%	$50	1.1%	4.8%	24.8%
Moderate	1	3.6%	12.1%	$50	1.1%	5.9%	15.1%
Middle	1	3.6%	19.2%	$34	0.8%	13.3%	18.2%
Upper	25	89.3%	58.0%	$4,382	97.0%	72.3%	41.9%
Unknown	0	0.0%	5.4%	$0	0.0%	3.7%	0.0%
TOTAL	**28**	**100.0%**	**100.0%**	**$4,516**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	4.3%	11.1%	$105	1.1%	4.9%	24.8%
Moderate	1	4.3%	14.3%	$85	0.9%	7.6%	15.1%
Middle	4	17.4%	17.2%	$970	9.8%	10.7%	18.2%
Upper	11	47.8%	45.1%	$4,493	45.6%	64.0%	41.9%
Unknown	6	26.1%	12.4%	$4,210	42.7%	12.9%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$9,863**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.9%	$0	0.0%	1.1%	24.8%
Moderate	0	0.0%	1.6%	$0	0.0%	1.9%	15.1%
Middle	0	0.0%	0.3%	$0	0.0%	0.5%	18.2%
Upper	0	0.0%	0.3%	$0	0.0%	0.8%	41.9%
Unknown	0	0.0%	94.8%	$0	0.0%	95.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.4%	$0	0.0%	0.1%	N/A
Unknown	0	0.0%	99.1%	$0	0.0%	99.8%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	53	6.6%	5.3%	$7,107	2.4%	2.3%	24.8%
Moderate	104	13.0%	16.2%	$19,145	6.5%	10.0%	15.1%
Middle	83	10.4%	19.3%	$15,600	5.3%	15.2%	18.2%
Upper	546	68.2%	38.6%	$243,148	82.0%	48.2%	41.9%
Unknown	15	1.9%	20.5%	$11,395	3.8%	24.3%	0.0%
TOTAL	**801**	**100.0%**	**100.0%**	**$296,395**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	59	7.9%	7.1%	$15,504	5.5%	6.4%	6.4%
Moderate	116	15.5%	16.7%	$30,764	10.9%	13.6%	18.6%
Middle	164	21.9%	37.6%	$45,220	16.0%	30.6%	37.9%
Upper	404	53.9%	37.7%	$189,794	67.0%	48.6%	36.4%
Unknown	6	0.8%	0.8%	$2,003	0.7%	0.9%	0.6%
TOTAL	**749**	**100.0%**	**100.0%**	**$283,285**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	17	3.1%	4.8%	$4,184	2.2%	4.0%	6.4%
Moderate	57	10.6%	13.5%	$13,820	7.1%	10.5%	18.6%
Middle	87	16.1%	34.4%	$21,544	11.1%	27.1%	37.9%
Upper	372	68.9%	46.5%	$152,204	78.4%	57.5%	36.4%
Unknown	7	1.3%	0.8%	$2,505	1.3%	0.9%	0.6%
TOTAL	**540**	**100.0%**	**100.0%**	**$194,257**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	3	1.6%	3.8%	$309	1.0%	4.9%	6.4%
Moderate	12	6.5%	9.6%	$1,020	3.5%	6.1%	18.6%
Middle	40	21.6%	28.2%	$4,868	16.5%	21.1%	37.9%
Upper	128	69.2%	57.2%	$23,223	78.6%	65.8%	36.4%
Unknown	2	1.1%	1.2%	$125	0.4%	2.1%	0.6%
TOTAL	**185**	**100.0%**	**100.0%**	**$29,545**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	1.5%	2.2%	$201	1.7%	2.1%	6.4%
Moderate	2	3.0%	10.6%	$79	0.7%	9.5%	18.6%
Middle	15	22.7%	32.6%	$1,461	12.7%	24.8%	37.9%
Upper	48	72.7%	54.0%	$9,745	84.8%	63.0%	36.4%
Unknown	0	0.0%	0.7%	$0	0.0%	0.6%	0.6%
TOTAL	**66**	**100.0%**	**100.0%**	**$11,486**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	4.3%	7.3%	$123	1.7%	4.3%	6.4%
Moderate	1	4.3%	13.9%	$120	1.7%	7.4%	18.6%
Middle	7	30.4%	31.1%	$1,308	18.5%	17.8%	37.9%
Upper	14	60.9%	47.2%	$5,533	78.1%	70.0%	36.4%
Unknown	0	0.0%	0.5%	$0	0.0%	0.5%	0.6%
TOTAL	**23**	**100.0%**	**100.0%**	**$7,084**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	8.6%	$0	0.0%	8.2%	6.4%
Moderate	0	0.0%	25.7%	$0	0.0%	20.3%	18.6%
Middle	0	0.0%	46.0%	$0	0.0%	42.4%	37.9%
Upper	0	0.0%	19.0%	$0	0.0%	27.3%	36.4%
Unknown	0	0.0%	0.8%	$0	0.0%	1.8%	0.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	22.1%	$0	0.0%	21.7%	19.7%
Moderate	0	0.0%	22.1%	$0	0.0%	12.5%	27.8%
Middle	0	0.0%	20.1%	$0	0.0%	24.2%	22.6%
Upper	6	100.0%	32.2%	$24,978	100.0%	40.8%	28.0%
Unknown	0	0.0%	3.5%	$0	0.0%	0.8%	1.9%
TOTAL	**6**	**100.0%**	**100.0%**	**$24,978**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	81	5.2%	6.0%	$20,321	3.7%	5.8%	6.4%
Moderate	188	12.0%	15.0%	$45,803	8.3%	12.0%	18.6%
Middle	313	19.9%	35.8%	$74,401	13.5%	28.6%	37.9%
Upper	972	62.0%	42.4%	$405,477	73.6%	52.7%	36.4%
Unknown	15	1.0%	0.8%	$4,633	0.8%	0.9%	0.6%
TOTAL	**1,569**	**100.0%**	**100.0%**	**$550,635**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	31	6.7%	5.8%	$6,386	3.1%	4.1%	5.9%
Moderate	87	18.7%	18.0%	$23,809	11.6%	13.8%	20.9%
Middle	89	19.1%	33.2%	$26,791	13.1%	28.8%	33.2%
Upper	253	54.4%	41.9%	$145,829	71.2%	52.1%	39.0%
Unknown	5	1.1%	1.2%	$1,859	0.9%	1.2%	1.0%
TOTAL	**465**	**100.0%**	**100.0%**	**$204,674**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	0.7%	5.1%	$99	0.2%	3.7%	5.9%
Moderate	20	13.2%	18.4%	$3,662	6.5%	13.8%	20.9%
Middle	30	19.7%	30.4%	$4,965	8.8%	23.9%	33.2%
Upper	101	66.4%	45.3%	$47,719	84.5%	57.7%	39.0%
Unknown	0	0.0%	0.8%	$0	0.0%	0.9%	1.0%
TOTAL	**152**	**100.0%**	**100.0%**	**$56,445**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	1.5%	2.9%	$143	0.7%	2.0%	5.9%
Moderate	16	12.0%	12.4%	$2,020	9.7%	10.6%	20.9%
Middle	22	16.5%	24.0%	$2,558	12.2%	17.5%	33.2%
Upper	91	68.4%	59.5%	$16,003	76.6%	68.2%	39.0%
Unknown	2	1.5%	1.2%	$173	0.8%	1.7%	1.0%
TOTAL	**133**	**100.0%**	**100.0%**	**$20,897**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	3.6%	2.4%	$53	1.2%	1.5%	5.9%
Moderate	4	14.3%	12.9%	$690	15.3%	11.0%	20.9%
Middle	2	7.1%	28.3%	$175	3.9%	21.6%	33.2%
Upper	21	75.0%	55.2%	$3,598	79.7%	64.7%	39.0%
Unknown	0	0.0%	1.2%	$0	0.0%	1.2%	1.0%
TOTAL	**28**	**100.0%**	**100.0%**	**$4,516**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	4.3%	3.8%	$140	1.4%	2.0%	5.9%
Moderate	5	21.7%	15.9%	$2,814	28.5%	11.5%	20.9%
Middle	4	17.4%	28.1%	$605	6.1%	18.3%	33.2%
Upper	13	56.5%	50.5%	$6,304	63.9%	65.5%	39.0%
Unknown	0	0.0%	1.7%	$0	0.0%	2.7%	1.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$9,863**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.1%	$0	0.0%	4.9%	5.9%
Moderate	0	0.0%	30.2%	$0	0.0%	23.9%	20.9%
Middle	0	0.0%	36.4%	$0	0.0%	38.1%	33.2%
Upper	0	0.0%	25.6%	$0	0.0%	32.4%	39.0%
Unknown	0	0.0%	0.6%	$0	0.0%	0.7%	1.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	11.2%	$0	0.0%	4.6%	12.2%
Moderate	0	0.0%	34.5%	$0	0.0%	29.9%	35.5%
Middle	0	0.0%	16.1%	$0	0.0%	17.2%	23.0%
Upper	0	0.0%	32.3%	$0	0.0%	44.1%	26.6%
Unknown	0	0.0%	5.8%	$0	0.0%	4.1%	2.7%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	36	4.5%	5.4%	$6,821	2.3%	3.9%	5.9%
Moderate	132	16.5%	17.9%	$32,995	11.1%	14.6%	20.9%
Middle	147	18.4%	31.7%	$35,094	11.8%	26.6%	33.2%
Upper	479	59.8%	43.8%	$219,453	74.0%	53.5%	39.0%
Unknown	7	0.9%	1.1%	$2,032	0.7%	1.4%	1.0%
TOTAL	**801**	**100.0%**	**100.0%**	**$296,395**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	571	33.0%	37.2%	$43,928	25.0%	29.2%	92.6%
		Over $1 Million/ Unknown	1,158	67.0%	62.8%	$131,721	75.0%	70.8%	7.4%
		TOTAL	**1,729**	**100.0%**	**100.0%**	**$175,649**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	1,314	76.0%	90.7%	$39,270	22.4%	31.1%	
		$100,001–$250,000	233	13.5%	5.0%	$39,688	22.6%	18.6%	
		$250,001–$1 Million	182	10.5%	4.3%	$96,691	55.0%	50.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**1,729**	**100.0%**	**100.0%**	**$175,649**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	489	85.6%		$15,026	34.2%		
		$100,001–$250,000	44	7.7%		$7,903	18.0%		
		$250,001–$1 Million	38	6.7%		$20,999	47.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**571**	**100.0%**		**$43,928**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	217	47.8%	50.8%	$27,770	31.2%	39.6%	92.6%
		Over $1 Million/ Unknown	237	52.2%	49.2%	$61,276	68.8%	60.4%	7.4%
		TOTAL	**454**	**100.0%**	**100.0%**	**$89,046**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	263	57.9%	93.0%	$13,558	15.2%	33.5%	
		$100,001–$250,000	89	19.6%	3.5%	$16,579	18.6%	16.2%	
		$250,001–$1 Million	102	22.5%	3.5%	$58,909	66.2%	50.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**454**	**100.0%**	**100.0%**	**$89,046**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	159	73.3%		$7,472	26.9%		
		$100,001–$250,000	33	15.2%		$6,223	22.4%		
		$250,001–$1 Million	25	11.5%		$14,075	50.7%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**217**	**100.0%**		**$27,770**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	146	8.4%	10.0%	$22,832	13.0%	9.1%	9.0%
Moderate	238	13.8%	18.9%	$22,006	12.5%	16.7%	18.5%
Middle	377	21.8%	27.0%	$33,559	19.1%	23.1%	28.7%
Upper	928	53.7%	42.5%	$92,903	52.9%	49.6%	42.5%
Unknown	40	2.3%	1.6%	$4,349	2.5%	1.4%	1.4%
TOTAL	**1,729**	**100.0%**	**100.0%**	**$175,649**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	25	5.5%	6.1%	$3,651	4.1%	5.6%	6.4%
Moderate	80	17.6%	21.2%	$16,103	18.1%	20.0%	21.0%
Middle	135	29.7%	29.9%	$23,367	26.2%	29.3%	30.1%
Upper	205	45.2%	40.6%	$43,275	48.6%	42.7%	40.6%
Unknown	9	2.0%	2.2%	$2,650	3.0%	2.3%	1.9%
TOTAL	**454**	**100.0%**	**100.0%**	**$89,046**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lafayette Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	34	10.0%	7.3%	$3,730	4.9%	4.2%	25.2%
Moderate	75	22.1%	19.4%	$10,634	14.0%	14.7%	15.8%
Middle	63	18.6%	21.6%	$11,140	14.7%	19.8%	16.9%
Upper	163	48.1%	33.6%	$48,099	63.5%	44.3%	42.1%
Unknown	4	1.2%	18.1%	$2,107	2.8%	16.9%	0.0%
TOTAL	**339**	**100.0%**	**100.0%**	**$75,710**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	28	8.9%	4.3%	$2,148	3.7%	1.9%	25.2%
Moderate	43	13.7%	11.8%	$5,097	8.8%	7.8%	15.8%
Middle	58	18.4%	16.9%	$7,283	12.6%	13.9%	16.9%
Upper	183	58.1%	43.8%	$42,767	73.9%	53.1%	42.1%
Unknown	3	1.0%	23.2%	$604	1.0%	23.4%	0.0%
TOTAL	**315**	**100.0%**	**100.0%**	**$57,899**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	12	8.4%	7.6%	$341	3.2%	3.5%	25.2%
Moderate	18	12.6%	12.1%	$1,010	9.4%	8.9%	15.8%
Middle	26	18.2%	16.5%	$1,753	16.4%	12.1%	16.9%
Upper	85	59.4%	58.4%	$7,445	69.6%	71.5%	42.1%
Unknown	2	1.4%	5.4%	$145	1.4%	3.9%	0.0%
TOTAL	**143**	**100.0%**	**100.0%**	**$10,694**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	5	10.9%	4.4%	$139	2.7%	1.4%	25.2%
Moderate	12	26.1%	12.7%	$448	8.6%	5.7%	15.8%
Middle	7	15.2%	11.2%	$740	14.2%	7.9%	16.9%
Upper	22	47.8%	70.7%	$3,894	74.6%	82.4%	42.1%
Unknown	0	0.0%	1.0%	$0	0.0%	2.6%	0.0%
TOTAL	**46**	**100.0%**	**100.0%**	**$5,221**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	12.7%	$0	0.0%	7.2%	25.2%
Moderate	0	0.0%	15.3%	$0	0.0%	12.3%	15.8%
Middle	1	16.7%	18.6%	$62	7.5%	16.3%	16.9%
Upper	5	83.3%	48.3%	$765	92.5%	60.6%	42.1%
Unknown	0	0.0%	5.1%	$0	0.0%	3.7%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$827**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.8%	$0	0.0%	0.6%	25.2%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	15.8%
Middle	0	0.0%	0.8%	$0	0.0%	1.3%	16.9%
Upper	0	0.0%	1.2%	$0	0.0%	0.9%	42.1%
Unknown	0	0.0%	97.2%	$0	0.0%	97.2%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	2.2%	$0	0.0%	0.2%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	7.2%	$0	0.0%	1.1%	N/A
Unknown	2	100.0%	90.6%	$904	100.0%	98.7%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$904**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	79	9.3%	5.9%	$6,358	4.2%	3.0%	25.2%
Moderate	148	17.4%	15.5%	$17,189	11.4%	11.0%	15.8%
Middle	155	18.2%	19.0%	$20,978	13.9%	16.2%	16.9%
Upper	458	53.8%	38.3%	$102,970	68.1%	46.1%	42.1%
Unknown	11	1.3%	21.3%	$3,760	2.5%	23.6%	0.0%
TOTAL	**851**	**100.0%**	**100.0%**	**$151,255**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	26	10.6%	5.7%	$3,268	5.6%	3.1%	25.5%
Moderate	59	24.0%	19.6%	$9,592	16.4%	14.7%	15.3%
Middle	51	20.7%	21.6%	$8,838	15.1%	20.0%	18.0%
Upper	105	42.7%	33.0%	$34,131	58.3%	43.2%	41.2%
Unknown	5	2.0%	20.0%	$2,738	4.7%	19.0%	0.0%
TOTAL	**246**	**100.0%**	**100.0%**	**$58,567**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	8	5.6%	7.6%	$607	2.8%	3.9%	25.5%
Moderate	27	18.8%	14.4%	$2,384	11.1%	10.0%	15.3%
Middle	40	27.8%	19.5%	$4,334	20.3%	15.8%	18.0%
Upper	68	47.2%	37.7%	$13,881	64.9%	50.3%	41.2%
Unknown	1	0.7%	20.7%	$185	0.9%	20.0%	0.0%
TOTAL	**144**	**100.0%**	**100.0%**	**$21,391**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	11	8.8%	9.2%	$832	7.3%	6.0%	25.5%
Moderate	13	10.4%	11.3%	$858	7.5%	7.1%	15.3%
Middle	26	20.8%	19.4%	$1,733	15.2%	14.6%	18.0%
Upper	75	60.0%	55.5%	$7,943	69.9%	65.7%	41.2%
Unknown	0	0.0%	4.6%	$0	0.0%	6.6%	0.0%
TOTAL	**125**	**100.0%**	**100.0%**	**$11,366**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	4.3%	4.8%	$54	1.6%	3.7%	25.5%
Moderate	7	15.2%	12.8%	$399	11.9%	9.1%	15.3%
Middle	8	17.4%	15.5%	$575	17.1%	15.8%	18.0%
Upper	29	63.0%	61.5%	$2,332	69.4%	68.8%	41.2%
Unknown	0	0.0%	5.3%	$0	0.0%	2.6%	0.0%
TOTAL	**46**	**100.0%**	**100.0%**	**$3,360**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	11.1%	13.3%	$55	2.7%	9.8%	25.5%
Moderate	1	11.1%	18.8%	$110	5.5%	11.5%	15.3%
Middle	2	22.2%	19.9%	$224	11.2%	15.9%	18.0%
Upper	5	55.6%	42.0%	$1,614	80.6%	59.1%	41.2%
Unknown	0	0.0%	6.1%	$0	0.0%	3.7%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,003**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	25.5%
Moderate	0	0.0%	2.1%	$0	0.0%	1.8%	15.3%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.0%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.2%
Unknown	0	0.0%	97.9%	$0	0.0%	98.2%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.7%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.7%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.5%	$0	0.0%	0.2%	N/A
Upper	0	0.0%	5.8%	$0	0.0%	0.6%	N/A
Unknown	0	0.0%	91.2%	$0	0.0%	99.1%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	48	8.4%	6.3%	$4,816	5.0%	3.1%	25.5%
Moderate	107	18.8%	17.6%	$13,343	13.8%	12.4%	15.3%
Middle	127	22.3%	20.5%	$15,704	16.2%	17.4%	18.0%
Upper	282	49.5%	34.7%	$59,901	62.0%	41.6%	41.2%
Unknown	6	1.1%	20.9%	$2,923	3.0%	25.6%	0.0%
TOTAL	**570**	**100.0%**	**100.0%**	**$96,687**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	7	2.1%	1.5%	$743	1.0%	0.9%	3.5%
Moderate	37	10.9%	13.0%	$5,454	7.2%	9.8%	20.3%
Middle	138	40.7%	43.0%	$26,304	34.7%	39.1%	49.0%
Upper	157	46.3%	42.5%	$43,209	57.1%	50.3%	27.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**339**	**100.0%**	**100.0%**	**$75,710**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	1.3%	1.5%	$603	1.0%	0.9%	3.5%
Moderate	43	13.7%	12.2%	$5,351	9.2%	9.2%	20.3%
Middle	124	39.4%	43.7%	$17,545	30.3%	39.0%	49.0%
Upper	144	45.7%	42.7%	$34,400	59.4%	50.9%	27.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**315**	**100.0%**	**100.0%**	**$57,899**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	0.7%	3.2%	$30	0.3%	2.3%	3.5%
Moderate	17	11.9%	13.7%	$836	7.8%	10.6%	20.3%
Middle	57	39.9%	37.5%	$4,275	40.0%	33.5%	49.0%
Upper	68	47.6%	45.7%	$5,553	51.9%	53.6%	27.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**143**	**100.0%**	**100.0%**	**$10,694**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	4.3%	1.5%	$65	1.2%	0.7%	3.5%
Moderate	6	13.0%	10.7%	$501	9.6%	9.4%	20.3%
Middle	15	32.6%	33.2%	$1,567	30.0%	34.9%	49.0%
Upper	23	50.0%	54.6%	$3,088	59.1%	55.0%	27.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**46**	**100.0%**	**100.0%**	**$5,221**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	3.5%
Moderate	2	33.3%	21.2%	$430	52.0%	16.2%	20.3%
Middle	1	16.7%	39.0%	$34	4.1%	30.1%	49.0%
Upper	3	50.0%	39.8%	$363	43.9%	53.6%	27.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$827**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.0%	$0	0.0%	2.1%	3.5%
Moderate	0	0.0%	16.9%	$0	0.0%	15.0%	20.3%
Middle	0	0.0%	48.6%	$0	0.0%	48.7%	49.0%
Upper	0	0.0%	30.5%	$0	0.0%	34.3%	27.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	17.3%	$0	0.0%	12.6%	5.7%
Moderate	1	50.0%	30.9%	$544	60.2%	13.0%	27.2%
Middle	1	50.0%	30.2%	$360	39.8%	30.1%	35.2%
Upper	0	0.0%	21.6%	$0	0.0%	44.3%	31.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$904**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	14	1.6%	1.7%	$1,441	1.0%	1.4%	3.5%
Moderate	106	12.5%	12.8%	$13,116	8.7%	9.7%	20.3%
Middle	336	39.5%	43.1%	$50,085	33.1%	38.6%	49.0%
Upper	395	46.4%	42.4%	$86,613	57.3%	50.2%	27.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**851**	**100.0%**	**100.0%**	**$151,255**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	5	2.0%	2.3%	$631	1.1%	1.5%	4.2%
Moderate	42	17.1%	18.8%	$7,258	12.4%	14.9%	22.4%
Middle	83	33.7%	33.7%	$15,137	25.8%	30.0%	36.5%
Upper	112	45.5%	44.9%	$34,451	58.8%	53.4%	36.5%
Unknown	4	1.6%	0.3%	$1,090	1.9%	0.2%	0.4%
TOTAL	**246**	**100.0%**	**100.0%**	**$58,567**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	2.1%	3.5%	$330	1.5%	3.9%	4.2%
Moderate	23	16.0%	20.4%	$2,876	13.4%	15.8%	22.4%
Middle	51	35.4%	33.4%	$6,175	28.9%	28.8%	36.5%
Upper	66	45.8%	42.5%	$11,940	55.8%	51.4%	36.5%
Unknown	1	0.7%	0.3%	$70	0.3%	0.2%	0.4%
TOTAL	**144**	**100.0%**	**100.0%**	**$21,391**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	1.6%	1.3%	$114	1.0%	0.8%	4.2%
Moderate	15	12.0%	16.2%	$1,482	13.0%	14.5%	22.4%
Middle	35	28.0%	31.5%	$2,848	25.1%	28.6%	36.5%
Upper	72	57.6%	49.6%	$6,907	60.8%	55.3%	36.5%
Unknown	1	0.8%	1.3%	$15	0.1%	0.8%	0.4%
TOTAL	**125**	**100.0%**	**100.0%**	**$11,366**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	2.2%	1.1%	$26	0.8%	0.8%	4.2%
Moderate	9	19.6%	12.8%	$755	22.5%	10.2%	22.4%
Middle	10	21.7%	20.9%	$717	21.3%	15.8%	36.5%
Upper	26	56.5%	64.2%	$1,862	55.4%	72.8%	36.5%
Unknown	0	0.0%	1.1%	$0	0.0%	0.3%	0.4%
TOTAL	**46**	**100.0%**	**100.0%**	**$3,360**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	11.1%	3.3%	$74	3.7%	4.1%	4.2%
Moderate	1	11.1%	12.7%	$40	2.0%	7.5%	22.4%
Middle	4	44.4%	44.8%	$477	23.8%	39.8%	36.5%
Upper	3	33.3%	38.7%	$1,412	70.5%	48.3%	36.5%
Unknown	0	0.0%	0.6%	$0	0.0%	0.2%	0.4%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,003**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.7%	$0	0.0%	0.2%	4.2%
Moderate	0	0.0%	25.7%	$0	0.0%	24.2%	22.4%
Middle	0	0.0%	35.7%	$0	0.0%	34.4%	36.5%
Upper	0	0.0%	37.9%	$0	0.0%	41.2%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	13.9%	$0	0.0%	11.5%	6.2%
Moderate	0	0.0%	38.0%	$0	0.0%	12.8%	24.6%
Middle	0	0.0%	25.5%	$0	0.0%	14.9%	36.3%
Upper	0	0.0%	21.9%	$0	0.0%	60.6%	32.1%
Unknown	0	0.0%	0.7%	$0	0.0%	0.1%	0.8%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	12	2.1%	2.6%	$1,175	1.2%	2.8%	4.2%
Moderate	90	15.8%	19.2%	$12,411	12.8%	14.8%	22.4%
Middle	183	32.1%	33.5%	$25,354	26.2%	28.6%	36.5%
Upper	279	48.9%	44.3%	$56,572	58.5%	53.6%	36.5%
Unknown	6	1.1%	0.4%	$1,175	1.2%	0.2%	0.4%
TOTAL	**570**	**100.0%**	**100.0%**	**$96,687**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	437	36.1%	33.1%	$31,306	31.1%	24.0%	90.8%
		Over $1 Million/ Unknown	774	63.9%	66.9%	$69,418	68.9%	76.0%	9.2%
		TOTAL	**1,211**	**100.0%**	**100.0%**	**$100,724**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	990	81.8%	91.3%	$29,258	29.0%	33.9%	
		$100,001–$250,000	120	9.9%	4.8%	$19,111	19.0%	18.3%	
		$250,001–$1 Million	101	8.3%	3.9%	$52,355	52.0%	47.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**1,211**	**100.0%**	**100.0%**	**$100,724**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	381	87.2%		$11,589	37.0%		
		$100,001–$250,000	27	6.2%		$4,350	13.9%		
		$250,001–$1 Million	29	6.6%		$15,367	49.1%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**437**	**100.0%**		**$31,306**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	169	55.0%	49.1%	$16,750	33.8%	33.5%	90.6%
		Over $1 Million/ Unknown	138	45.0%	50.9%	$32,829	66.2%	66.5%	9.4%
		TOTAL	**307**	**100.0%**	**100.0%**	**$49,579**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	200	65.1%	92.7%	$9,471	19.1%	37.5%	
		$100,001–$250,000	50	16.3%	4.4%	$8,446	17.0%	19.9%	
		$250,001–$1 Million	57	18.6%	2.9%	$31,662	63.9%	42.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**307**	**100.0%**	**100.0%**	**$49,579**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	130	76.9%		$5,653	33.7%		
		$100,001–$250,000	22	13.0%		$3,604	21.5%		
		$250,001–$1 Million	17	10.1%		$7,493	44.7%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**169**	**100.0%**		**$16,750**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	76	6.3%	5.5%	$9,733	9.7%	7.2%	6.0%
Moderate	186	15.4%	18.2%	$11,588	11.5%	15.3%	20.5%
Middle	449	37.1%	43.5%	$43,337	43.0%	46.3%	42.9%
Upper	500	41.3%	31.8%	$36,066	35.8%	31.1%	30.5%
Unknown	0	0.0%	0.9%	$0	0.0%	0.2%	0.1%
TOTAL	**1,211**	**100.0%**	**100.0%**	**$100,724**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	24	7.8%	5.0%	$3,414	6.9%	5.9%	6.4%
Moderate	61	19.9%	18.6%	$8,355	16.9%	18.9%	21.5%
Middle	81	26.4%	32.8%	$14,105	28.4%	35.1%	34.1%
Upper	135	44.0%	41.8%	$23,306	47.0%	39.2%	36.8%
Unknown	6	2.0%	1.8%	$399	0.8%	0.9%	1.3%
TOTAL	**307**	**100.0%**	**100.0%**	**$49,579**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lake Charles Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	6	9.1%	6.0%	$536	4.2%	3.4%	23.4%
Moderate	17	25.8%	18.0%	$2,438	19.2%	13.9%	16.7%
Middle	8	12.1%	20.9%	$1,637	12.9%	19.8%	17.8%
Upper	29	43.9%	29.5%	$7,248	57.0%	37.8%	42.1%
Unknown	6	9.1%	25.6%	$866	6.8%	25.1%	0.0%
TOTAL	**66**	**100.0%**	**100.0%**	**$12,725**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	4.9%	2.9%	$442	3.7%	1.5%	23.4%
Moderate	6	9.8%	9.0%	$630	5.3%	6.0%	16.7%
Middle	13	21.3%	13.7%	$1,751	14.7%	11.0%	17.8%
Upper	37	60.7%	44.2%	$8,556	71.9%	52.8%	42.1%
Unknown	2	3.3%	30.2%	$514	4.3%	28.7%	0.0%
TOTAL	**61**	**100.0%**	**100.0%**	**$11,893**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	3.6%	3.4%	$50	2.0%	2.3%	23.4%
Moderate	3	10.7%	4.5%	$276	10.8%	3.4%	16.7%
Middle	9	32.1%	20.2%	$847	33.1%	19.1%	17.8%
Upper	15	53.6%	56.2%	$1,384	54.1%	57.4%	42.1%
Unknown	0	0.0%	15.7%	$0	0.0%	17.8%	0.0%
TOTAL	**28**	**100.0%**	**100.0%**	**$2,557**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	14.3%	9.1%	$26	4.5%	4.9%	23.4%
Moderate	0	0.0%	13.6%	$0	0.0%	8.5%	16.7%
Middle	1	14.3%	9.1%	$63	10.8%	4.3%	17.8%
Upper	5	71.4%	68.2%	$494	84.7%	82.3%	42.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$583**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.2%	$0	0.0%	3.8%	23.4%
Moderate	0	0.0%	14.3%	$0	0.0%	6.5%	16.7%
Middle	1	100.0%	24.5%	$52	100.0%	17.6%	17.8%
Upper	0	0.0%	46.9%	$0	0.0%	69.1%	42.1%
Unknown	0	0.0%	6.1%	$0	0.0%	3.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$52**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	23.4%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	16.7%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	17.8%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	42.1%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	8.0%	$0	0.0%	1.4%	N/A
Unknown	1	100.0%	92.0%	$276	100.0%	98.6%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$276**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	11	6.7%	4.7%	$1,054	3.8%	2.4%	23.4%
Moderate	26	15.9%	14.1%	$3,344	11.9%	9.6%	16.7%
Middle	32	19.5%	17.7%	$4,350	15.5%	14.7%	17.8%
Upper	86	52.4%	34.9%	$17,682	63.0%	39.8%	42.1%
Unknown	9	5.5%	28.6%	$1,656	5.9%	33.5%	0.0%
TOTAL	**164**	**100.0%**	**100.0%**	**$28,086**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	2	5.4%	5.2%	$235	1.9%	2.8%	23.3%
Moderate	9	24.3%	17.3%	$1,268	10.5%	12.8%	17.1%
Middle	3	8.1%	19.3%	$500	4.1%	18.0%	17.9%
Upper	22	59.5%	30.7%	$10,045	82.9%	40.9%	41.8%
Unknown	1	2.7%	27.4%	$65	0.5%	25.4%	0.0%
TOTAL	**37**	**100.0%**	**100.0%**	**$12,113**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	3.4%	5.3%	$181	1.3%	2.6%	23.3%
Moderate	3	5.1%	12.3%	$167	1.2%	8.3%	17.1%
Middle	7	11.9%	16.9%	$1,113	8.1%	14.4%	17.9%
Upper	45	76.3%	45.2%	$10,525	76.2%	54.6%	41.8%
Unknown	2	3.4%	20.2%	$1,820	13.2%	20.2%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$13,806**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.5%	$0	0.0%	3.1%	23.3%
Moderate	2	6.5%	7.0%	$147	5.0%	4.2%	17.1%
Middle	8	25.8%	21.9%	$800	27.0%	16.7%	17.9%
Upper	18	58.1%	50.9%	$1,700	57.4%	52.2%	41.8%
Unknown	3	9.7%	16.7%	$313	10.6%	23.8%	0.0%
TOTAL	**31**	**100.0%**	**100.0%**	**$2,960**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.8%	$0	0.0%	2.7%	23.3%
Moderate	0	0.0%	11.3%	$0	0.0%	11.8%	17.1%
Middle	2	28.6%	13.2%	$200	18.9%	12.3%	17.9%
Upper	5	71.4%	69.8%	$858	81.1%	72.1%	41.8%
Unknown	0	0.0%	1.9%	$0	0.0%	1.1%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,058**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	12.1%	$0	0.0%	4.9%	23.3%
Moderate	0	0.0%	15.4%	$0	0.0%	7.1%	17.1%
Middle	0	0.0%	17.6%	$0	0.0%	9.0%	17.9%
Upper	2	100.0%	48.4%	$321	100.0%	57.1%	41.8%
Unknown	0	0.0%	6.6%	$0	0.0%	21.9%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$321**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	23.3%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	17.1%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	17.9%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.8%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.3%	$0	0.0%	0.8%	N/A
Upper	0	0.0%	2.5%	$0	0.0%	1.0%	N/A
Unknown	0	0.0%	96.2%	$0	0.0%	98.1%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	4	2.9%	5.2%	$416	1.4%	2.6%	23.3%
Moderate	14	10.3%	15.2%	$1,582	5.2%	10.7%	17.1%
Middle	20	14.7%	18.2%	$2,613	8.6%	15.8%	17.9%
Upper	92	67.6%	35.0%	$23,449	77.5%	42.0%	41.8%
Unknown	6	4.4%	26.4%	$2,198	7.3%	28.8%	0.0%
TOTAL	**136**	**100.0%**	**100.0%**	**$30,258**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	2	3.0%	1.3%	$160	1.3%	0.8%	2.8%
Moderate	11	16.7%	15.8%	$1,642	12.9%	12.4%	17.9%
Middle	22	33.3%	41.9%	$3,840	30.2%	38.9%	39.7%
Upper	31	47.0%	41.0%	$7,083	55.7%	47.9%	39.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**66**	**100.0%**	**100.0%**	**$12,725**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.2%	$0	0.0%	0.6%	2.8%
Moderate	6	9.8%	12.4%	$708	6.0%	9.5%	17.9%
Middle	14	23.0%	34.7%	$1,997	16.8%	31.9%	39.7%
Upper	41	67.2%	51.7%	$9,188	77.3%	58.0%	39.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**61**	**100.0%**	**100.0%**	**$11,893**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.2%	$0	0.0%	2.2%	2.8%
Moderate	5	17.9%	14.6%	$264	10.3%	9.1%	17.9%
Middle	6	21.4%	25.8%	$722	28.2%	23.3%	39.7%
Upper	17	60.7%	57.3%	$1,571	61.4%	65.4%	39.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**28**	**100.0%**	**100.0%**	**$2,557**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.5%	$0	0.0%	2.3%	2.8%
Moderate	0	0.0%	4.5%	$0	0.0%	1.8%	17.9%
Middle	5	71.4%	40.9%	$474	81.3%	45.7%	39.7%
Upper	2	28.6%	50.0%	$109	18.7%	50.2%	39.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$583**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.0%	$0	0.0%	1.3%	2.8%
Moderate	1	100.0%	8.2%	$52	100.0%	3.7%	17.9%
Middle	0	0.0%	34.7%	$0	0.0%	24.7%	39.7%
Upper	0	0.0%	55.1%	$0	0.0%	70.3%	39.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$52**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.2%	$0	0.0%	3.9%	2.8%
Moderate	0	0.0%	23.7%	$0	0.0%	17.0%	17.9%
Middle	0	0.0%	48.5%	$0	0.0%	51.8%	39.7%
Upper	0	0.0%	20.6%	$0	0.0%	27.4%	39.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	2.7%	$0	0.0%	3.5%	11.1%
Moderate	0	0.0%	34.7%	$0	0.0%	9.0%	40.1%
Middle	0	0.0%	33.3%	$0	0.0%	37.8%	8.7%
Upper	1	100.0%	29.3%	$276	100.0%	49.7%	40.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$276**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	2	1.2%	1.4%	$160	0.6%	1.0%	2.8%
Moderate	23	14.0%	14.7%	$2,666	9.5%	11.0%	17.9%
Middle	47	28.7%	39.0%	$7,033	25.0%	36.2%	39.7%
Upper	92	56.1%	44.8%	$18,227	64.9%	51.7%	39.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**164**	**100.0%**	**100.0%**	**$28,086**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	2	5.4%	3.2%	$255	2.1%	2.3%	6.0%
Moderate	1	2.7%	13.2%	$263	2.2%	10.7%	15.4%
Middle	15	40.5%	46.9%	$3,716	30.7%	42.7%	41.4%
Upper	19	51.4%	36.3%	$7,879	65.0%	43.9%	36.9%
Unknown	0	0.0%	0.3%	$0	0.0%	0.4%	0.3%
TOTAL	**37**	**100.0%**	**100.0%**	**$12,113**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	1.7%	4.0%	$63	0.5%	2.3%	6.0%
Moderate	6	10.2%	12.8%	$974	7.1%	9.6%	15.4%
Middle	18	30.5%	43.6%	$3,763	27.3%	39.2%	41.4%
Upper	34	57.6%	39.6%	$9,006	65.2%	48.8%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**59**	**100.0%**	**100.0%**	**$13,806**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.4%	$0	0.0%	4.0%	6.0%
Moderate	0	0.0%	8.8%	$0	0.0%	10.1%	15.4%
Middle	12	38.7%	39.5%	$1,075	36.3%	35.3%	41.4%
Upper	19	61.3%	47.4%	$1,885	63.7%	50.6%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**31**	**100.0%**	**100.0%**	**$2,960**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.9%	$0	0.0%	2.1%	6.0%
Moderate	0	0.0%	13.2%	$0	0.0%	9.3%	15.4%
Middle	3	42.9%	39.6%	$450	42.5%	33.9%	41.4%
Upper	4	57.1%	45.3%	$608	57.5%	54.7%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,058**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.3%	$0	0.0%	3.4%	6.0%
Moderate	0	0.0%	13.2%	$0	0.0%	9.2%	15.4%
Middle	2	100.0%	44.0%	$321	100.0%	28.5%	41.4%
Upper	0	0.0%	38.5%	$0	0.0%	58.7%	36.9%
Unknown	0	0.0%	1.1%	$0	0.0%	0.2%	0.3%
TOTAL	**2**	**100.0%**	**100.0%**	**$321**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.2%	$0	0.0%	2.7%	6.0%
Moderate	0	0.0%	20.8%	$0	0.0%	16.4%	15.4%
Middle	0	0.0%	43.8%	$0	0.0%	41.0%	41.4%
Upper	0	0.0%	31.3%	$0	0.0%	39.9%	36.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	6.3%	$0	0.0%	4.2%	18.3%
Moderate	0	0.0%	27.8%	$0	0.0%	16.1%	16.3%
Middle	0	0.0%	35.4%	$0	0.0%	56.6%	38.2%
Upper	0	0.0%	30.4%	$0	0.0%	23.1%	27.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	3	2.2%	3.5%	$318	1.1%	2.4%	6.0%
Moderate	7	5.1%	13.3%	$1,237	4.1%	10.8%	15.4%
Middle	50	36.8%	45.5%	$9,325	30.8%	42.4%	41.4%
Upper	76	55.9%	37.4%	$19,378	64.0%	44.1%	36.9%
Unknown	0	0.0%	0.2%	$0	0.0%	0.3%	0.3%
TOTAL	**136**	**100.0%**	**100.0%**	**$30,258**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	200	49.1%	32.0%	$15,263	36.3%	30.2%	92.2%
		Over $1 Million/ Unknown	207	50.9%	68.0%	$26,746	63.7%	69.8%	7.8%
		TOTAL	**407**	**100.0%**	**100.0%**	**$42,009**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	313	76.9%	90.7%	$11,796	28.1%	33.3%	
		$100,001–$250,000	52	12.8%	5.1%	$9,006	21.4%	19.6%	
		$250,001–$1 Million	42	10.3%	4.1%	$21,207	50.5%	47.1%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**407**	**100.0%**	**100.0%**	**$42,009**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	169	84.5%		$6,620	43.4%		
		$100,001–$250,000	23	11.5%		$4,250	27.8%		
		$250,001–$1 Million	8	4.0%		$4,393	28.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**200**	**100.0%**		**$15,263**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	108	56.8%	52.2%	$9,206	38.5%	40.3%	92.1%
		Over $1 Million/ Unknown	82	43.2%	47.8%	$14,685	61.5%	59.7%	7.9%
		TOTAL	**190**	**100.0%**	**100.0%**	**$23,891**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	138	72.6%	93.0%	$6,347	26.6%	37.0%	
		$100,001–$250,000	26	13.7%	3.7%	$4,936	20.7%	17.1%	
		$250,001–$1 Million	26	13.7%	3.4%	$12,608	52.8%	45.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**190**	**100.0%**	**100.0%**	**$23,891**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	90	83.3%		$4,103	44.6%		
		$100,001–$250,000	10	9.3%		$1,963	21.3%		
		$250,001–$1 Million	8	7.4%		$3,140	34.1%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**108**	**100.0%**		**$9,206**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	25	6.1%	5.5%	$1,239	2.9%	6.5%	4.9%
Moderate	86	21.1%	24.8%	$12,675	30.2%	28.0%	25.9%
Middle	92	22.6%	28.9%	$9,189	21.9%	27.2%	30.0%
Upper	204	50.1%	39.7%	$18,906	45.0%	37.2%	39.1%
Unknown	0	0.0%	1.0%	$0	0.0%	1.1%	0.2%
TOTAL	**407**	**100.0%**	**100.0%**	**$42,009**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	14	7.4%	8.1%	$2,086	8.7%	9.9%	7.8%
Moderate	31	16.3%	16.8%	$3,059	12.8%	17.5%	16.4%
Middle	71	37.4%	39.1%	$9,732	40.7%	42.1%	41.0%
Upper	72	37.9%	34.6%	$8,954	37.5%	29.7%	34.0%
Unknown	2	1.1%	1.3%	$60	0.3%	0.8%	0.8%
TOTAL	**190**	**100.0%**	**100.0%**	**$23,891**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Baton Rouge Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	8	6.6%	9.3%	$850	2.2%	4.7%	25.3%
Moderate	17	14.0%	23.0%	$2,869	7.3%	16.7%	16.5%
Middle	20	16.5%	18.5%	$4,458	11.4%	17.1%	17.1%
Upper	71	58.7%	32.7%	$29,920	76.4%	46.2%	41.0%
Unknown	5	4.1%	16.5%	$1,061	2.7%	15.3%	0.0%
TOTAL	**121**	**100.0%**	**100.0%**	**$39,158**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	6	3.4%	4.9%	$748	1.3%	2.4%	25.3%
Moderate	13	7.4%	13.4%	$2,269	3.8%	8.7%	16.5%
Middle	20	11.4%	17.3%	$3,607	6.1%	13.6%	17.1%
Upper	131	74.9%	43.1%	$49,784	83.7%	55.1%	41.0%
Unknown	5	2.9%	21.4%	$3,106	5.2%	20.1%	0.0%
TOTAL	**175**	**100.0%**	**100.0%**	**$59,514**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	5.6%	$0	0.0%	3.3%	25.3%
Moderate	2	2.9%	10.1%	$130	1.2%	4.5%	16.5%
Middle	6	8.6%	11.5%	$568	5.4%	8.9%	17.1%
Upper	62	88.6%	65.7%	$9,792	93.3%	75.1%	41.0%
Unknown	0	0.0%	7.0%	$0	0.0%	8.2%	0.0%
TOTAL	**70**	**100.0%**	**100.0%**	**$10,490**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.5%	$0	0.0%	1.3%	25.3%
Moderate	0	0.0%	7.6%	$0	0.0%	4.4%	16.5%
Middle	2	8.3%	15.7%	$400	9.3%	10.5%	17.1%
Upper	22	91.7%	69.2%	$3,886	90.7%	80.7%	41.0%
Unknown	0	0.0%	4.0%	$0	0.0%	3.1%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$4,286**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.4%	$0	0.0%	1.5%	25.3%
Moderate	0	0.0%	12.2%	$0	0.0%	4.8%	16.5%
Middle	0	0.0%	10.0%	$0	0.0%	5.6%	17.1%
Upper	3	60.0%	62.2%	$596	33.2%	64.6%	41.0%
Unknown	2	40.0%	11.1%	$1,201	66.8%	23.5%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,797**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.3%	$0	0.0%	1.0%	25.3%
Moderate	0	0.0%	0.7%	$0	0.0%	0.6%	16.5%
Middle	0	0.0%	0.7%	$0	0.0%	0.8%	17.1%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.0%
Unknown	0	0.0%	97.4%	$0	0.0%	97.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	1.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	4.0%	$0	0.0%	0.7%	N/A
Unknown	5	100.0%	95.0%	$5,530	100.0%	99.3%	N/A
TOTAL	**5**	**100.0%**	**100.0%**	**$5,530**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	14	3.5%	7.1%	$1,598	1.3%	3.4%	25.3%
Moderate	32	8.0%	17.9%	$5,268	4.4%	11.8%	16.5%
Middle	48	12.0%	17.4%	$9,033	7.5%	14.1%	17.1%
Upper	289	72.3%	37.6%	$93,978	77.8%	46.5%	41.0%
Unknown	17	4.3%	20.1%	$10,898	9.0%	24.3%	0.0%
TOTAL	**400**	**100.0%**	**100.0%**	**$120,775**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	5	5.7%	9.1%	$550	1.6%	4.7%	24.7%
Moderate	12	13.8%	21.7%	$2,378	7.0%	15.6%	16.4%
Middle	11	12.6%	18.2%	$3,194	9.3%	17.1%	17.2%
Upper	56	64.4%	31.3%	$26,931	78.8%	44.3%	41.8%
Unknown	3	3.4%	19.8%	$1,143	3.3%	18.3%	0.0%
TOTAL	**87**	**100.0%**	**100.0%**	**$34,196**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	5.8%	12.3%	$398	1.9%	6.2%	24.7%
Moderate	5	9.6%	19.8%	$841	4.1%	13.2%	16.4%
Middle	3	5.8%	18.9%	$680	3.3%	16.1%	17.2%
Upper	41	78.8%	32.3%	$18,527	90.6%	47.8%	41.8%
Unknown	0	0.0%	16.7%	$0	0.0%	16.8%	0.0%
TOTAL	**52**	**100.0%**	**100.0%**	**$20,446**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	1.6%	6.3%	$30	0.3%	3.8%	24.7%
Moderate	4	6.5%	12.4%	$236	2.2%	7.6%	16.4%
Middle	10	16.1%	16.7%	$1,001	9.3%	11.0%	17.2%
Upper	47	75.8%	57.6%	$9,441	88.2%	70.8%	41.8%
Unknown	0	0.0%	6.9%	$0	0.0%	6.9%	0.0%
TOTAL	**62**	**100.0%**	**100.0%**	**$10,708**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	8.7%	$0	0.0%	3.8%	24.7%
Moderate	1	6.7%	13.5%	$120	3.2%	9.6%	16.4%
Middle	1	6.7%	13.9%	$200	5.3%	10.5%	17.2%
Upper	13	86.7%	59.5%	$3,455	91.5%	73.5%	41.8%
Unknown	0	0.0%	4.4%	$0	0.0%	2.6%	0.0%
TOTAL	**15**	**100.0%**	**100.0%**	**$3,775**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	9.1%	$0	0.0%	4.1%	24.7%
Moderate	0	0.0%	14.1%	$0	0.0%	6.4%	16.4%
Middle	0	0.0%	22.0%	$0	0.0%	11.6%	17.2%
Upper	4	80.0%	46.9%	$3,239	92.6%	67.9%	41.8%
Unknown	1	20.0%	7.9%	$257	7.4%	9.9%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$3,496**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.2%	$0	0.0%	3.0%	24.7%
Moderate	0	0.0%	2.1%	$0	0.0%	2.3%	16.4%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	17.2%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.8%
Unknown	0	0.0%	93.7%	$0	0.0%	94.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.9%	$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.7%	$0	0.0%	0.1%	N/A
Unknown	2	100.0%	96.4%	$1,085	100.0%	99.9%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$1,085**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	9	4.0%	9.5%	$978	1.3%	4.2%	24.7%
Moderate	22	9.9%	20.0%	$3,575	4.9%	12.5%	16.4%
Middle	25	11.2%	17.8%	$5,075	6.9%	14.0%	17.2%
Upper	161	72.2%	32.6%	$61,593	83.6%	39.0%	41.8%
Unknown	6	2.7%	20.0%	$2,485	3.4%	30.4%	0.0%
TOTAL	**223**	**100.0%**	**100.0%**	**$73,706**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	0.8%	2.6%	$197	0.5%	1.4%	7.4%
Moderate	19	15.7%	20.9%	$2,927	7.5%	14.2%	22.6%
Middle	14	11.6%	25.4%	$2,965	7.6%	23.3%	26.2%
Upper	87	71.9%	51.1%	$33,069	84.5%	61.1%	43.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**121**	**100.0%**	**100.0%**	**$39,158**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	1.1%	1.8%	$334	0.6%	0.9%	7.4%
Moderate	9	5.1%	14.0%	$2,380	4.0%	9.2%	22.6%
Middle	25	14.3%	26.0%	$6,810	11.4%	22.2%	26.2%
Upper	139	79.4%	58.1%	$49,990	84.0%	67.7%	43.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**175**	**100.0%**	**100.0%**	**$59,514**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.4%	$0	0.0%	2.3%	7.4%
Moderate	5	7.1%	12.2%	$523	5.0%	6.7%	22.6%
Middle	8	11.4%	15.7%	$921	8.8%	12.7%	26.2%
Upper	57	81.4%	69.6%	$9,046	86.2%	78.3%	43.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**70**	**100.0%**	**100.0%**	**$10,490**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.5%	$0	0.0%	0.9%	7.4%
Moderate	0	0.0%	5.6%	$0	0.0%	3.5%	22.6%
Middle	8	33.3%	25.8%	$1,548	36.1%	22.3%	26.2%
Upper	16	66.7%	67.2%	$2,738	63.9%	73.2%	43.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$4,286**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	20.0%	5.6%	$52	2.9%	3.2%	7.4%
Moderate	0	0.0%	14.4%	$0	0.0%	6.8%	22.6%
Middle	0	0.0%	25.6%	$0	0.0%	22.8%	26.2%
Upper	4	80.0%	54.4%	$1,745	97.1%	67.2%	43.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,797**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.3%	$0	0.0%	4.3%	7.4%
Moderate	0	0.0%	35.1%	$0	0.0%	24.9%	22.6%
Middle	0	0.0%	31.8%	$0	0.0%	32.9%	26.2%
Upper	0	0.0%	25.8%	$0	0.0%	37.9%	43.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	24.0%	$0	0.0%	6.9%	19.3%
Moderate	1	20.0%	33.0%	$1,642	29.7%	16.5%	26.6%
Middle	3	60.0%	17.0%	$1,263	22.8%	14.2%	12.0%
Upper	1	20.0%	26.0%	$2,625	47.5%	62.4%	42.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$5,530**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	4	1.0%	2.4%	$583	0.5%	1.7%	7.4%
Moderate	34	8.5%	17.9%	$7,472	6.2%	12.3%	22.6%
Middle	58	14.5%	25.6%	$13,507	11.2%	22.1%	26.2%
Upper	304	76.0%	54.1%	$99,213	82.1%	64.0%	43.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**400**	**100.0%**	**100.0%**	**$120,775**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	5	5.7%	4.9%	$524	1.5%	2.5%	8.6%
Moderate	3	3.4%	12.2%	$499	1.5%	8.2%	14.4%
Middle	16	18.4%	37.1%	$5,620	16.4%	33.2%	34.2%
Upper	61	70.1%	43.1%	$27,201	79.5%	54.3%	42.0%
Unknown	2	2.3%	2.8%	$352	1.0%	1.8%	0.8%
TOTAL	**87**	**100.0%**	**100.0%**	**$34,196**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	3.8%	6.0%	$946	4.6%	3.1%	8.6%
Moderate	3	5.8%	14.3%	$494	2.4%	8.6%	14.4%
Middle	8	15.4%	35.0%	$2,018	9.9%	29.8%	34.2%
Upper	39	75.0%	43.1%	$16,988	83.1%	57.5%	42.0%
Unknown	0	0.0%	1.6%	$0	0.0%	1.1%	0.8%
TOTAL	**52**	**100.0%**	**100.0%**	**$20,446**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.3%	$0	0.0%	1.6%	8.6%
Moderate	5	8.1%	10.1%	$275	2.6%	5.5%	14.4%
Middle	7	11.3%	25.1%	$861	8.0%	18.2%	34.2%
Upper	50	80.6%	62.2%	$9,572	89.4%	74.5%	42.0%
Unknown	0	0.0%	0.3%	$0	0.0%	0.3%	0.8%
TOTAL	**62**	**100.0%**	**100.0%**	**$10,708**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.6%	$0	0.0%	1.8%	8.6%
Moderate	1	6.7%	9.5%	$264	7.0%	5.5%	14.4%
Middle	3	20.0%	25.8%	$1,598	42.3%	24.5%	34.2%
Upper	11	73.3%	60.3%	$1,913	50.7%	66.8%	42.0%
Unknown	0	0.0%	0.8%	$0	0.0%	1.4%	0.8%
TOTAL	**15**	**100.0%**	**100.0%**	**$3,775**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	20.0%	5.3%	$157	4.5%	3.0%	8.6%
Moderate	0	0.0%	10.3%	$0	0.0%	5.3%	14.4%
Middle	1	20.0%	35.5%	$2,485	71.1%	36.3%	34.2%
Upper	3	60.0%	47.5%	$854	24.4%	54.7%	42.0%
Unknown	0	0.0%	1.5%	$0	0.0%	0.7%	0.8%
TOTAL	**5**	**100.0%**	**100.0%**	**$3,496**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	12.6%	$0	0.0%	6.6%	8.6%
Moderate	0	0.0%	28.3%	$0	0.0%	24.5%	14.4%
Middle	0	0.0%	39.8%	$0	0.0%	44.7%	34.2%
Upper	0	0.0%	18.3%	$0	0.0%	23.3%	42.0%
Unknown	0	0.0%	1.0%	$0	0.0%	0.9%	0.8%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	33.0%	$0	0.0%	25.3%	23.7%
Moderate	1	50.0%	25.0%	$600	55.3%	13.4%	14.6%
Middle	1	50.0%	21.4%	$485	44.7%	30.3%	25.7%
Upper	0	0.0%	17.0%	$0	0.0%	23.1%	26.2%
Unknown	0	0.0%	3.6%	$0	0.0%	7.9%	9.8%
TOTAL	**2**	**100.0%**	**100.0%**	**$1,085**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	8	3.6%	5.4%	$1,627	2.2%	6.1%	8.6%
Moderate	13	5.8%	12.9%	$2,132	2.9%	9.0%	14.4%
Middle	36	16.1%	35.9%	$13,067	17.7%	32.0%	34.2%
Upper	164	73.5%	43.5%	$56,528	76.7%	50.3%	42.0%
Unknown	2	0.9%	2.3%	$352	0.5%	2.6%	0.8%
TOTAL	**223**	**100.0%**	**100.0%**	**$73,706**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	217	32.5%	34.0%	$25,563	24.3%	26.1%	91.1%
		Over $1 Million/ Unknown	450	67.5%	66.0%	$79,833	75.7%	73.9%	8.9%
		TOTAL	**667**	**100.0%**	**100.0%**	**$105,396**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	398	59.7%	89.3%	$14,207	13.5%	28.5%	
		$100,001–$250,000	141	21.1%	5.7%	$24,118	22.9%	18.9%	
		$250,001–$1 Million	128	19.2%	5.0%	$67,071	63.6%	52.5%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**667**	**100.0%**	**100.0%**	**$105,396**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	153	70.5%		$5,859	22.9%		
		$100,001–$250,000	33	15.2%		$5,774	22.6%		
		$250,001–$1 Million	31	14.3%		$13,930	54.5%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**217**	**100.0%**		**$25,563**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	104	45.2%	49.4%	$17,823	29.4%	36.0%	91.1%
		Over $1 Million/ Unknown	126	54.8%	50.6%	$42,785	70.6%	64.0%	8.9%
		TOTAL	**230**	**100.0%**	**100.0%**	**$60,608**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	100	43.5%	91.5%	$4,880	8.1%	30.2%	
		$100,001–$250,000	54	23.5%	4.4%	$10,356	17.1%	18.3%	
		$250,001–$1 Million	76	33.0%	4.1%	$45,372	74.9%	51.5%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**230**	**100.0%**	**100.0%**	**$60,608**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	66	63.5%		$2,843	16.0%		
		$100,001–$250,000	18	17.3%		$3,500	19.6%		
		$250,001–$1 Million	20	19.2%		$11,480	64.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**104**	**100.0%**		**$17,823**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	35	5.2%	7.3%	$6,295	6.0%	6.5%	8.0%
Moderate	125	18.7%	23.9%	$20,876	19.8%	23.1%	24.1%
Middle	93	13.9%	20.8%	$19,313	18.3%	19.4%	20.3%
Upper	413	61.9%	47.5%	$58,762	55.8%	50.9%	47.4%
Unknown	1	0.1%	0.5%	$150	0.1%	0.2%	0.1%
TOTAL	**667**	**100.0%**	**100.0%**	**$105,396**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	17	7.4%	10.0%	$5,844	9.6%	9.5%	11.2%
Moderate	31	13.5%	16.6%	$11,885	19.6%	18.9%	17.3%
Middle	60	26.1%	31.4%	$15,135	25.0%	27.8%	32.3%
Upper	119	51.7%	40.1%	$27,424	45.2%	42.7%	38.0%
Unknown	3	1.3%	1.9%	$320	0.5%	1.1%	1.2%
TOTAL	**230**	**100.0%**	**100.0%**	**$60,608**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Monroe Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	2	3.0%	2.6%	$248	1.7%	1.3%	24.2%
Moderate	9	13.6%	12.0%	$1,189	8.0%	8.4%	15.3%
Middle	14	21.2%	18.5%	$2,258	15.2%	16.0%	15.0%
Upper	39	59.1%	40.7%	$10,891	73.2%	49.9%	45.5%
Unknown	2	3.0%	26.1%	$297	2.0%	24.4%	0.0%
TOTAL	**66**	**100.0%**	**100.0%**	**$14,883**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	4.7%	1.9%	$232	1.9%	0.8%	24.2%
Moderate	5	7.8%	6.8%	$512	4.1%	3.9%	15.3%
Middle	19	29.7%	14.3%	$2,429	19.4%	11.0%	15.0%
Upper	34	53.1%	47.5%	$9,136	73.0%	55.3%	45.5%
Unknown	3	4.7%	29.5%	$202	1.6%	28.9%	0.0%
TOTAL	**64**	**100.0%**	**100.0%**	**$12,511**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	9.6%	$0	0.0%	4.4%	24.2%
Moderate	0	0.0%	6.8%	$0	0.0%	4.6%	15.3%
Middle	0	0.0%	16.4%	$0	0.0%	15.1%	15.0%
Upper	4	100.0%	56.2%	$271	100.0%	60.6%	45.5%
Unknown	0	0.0%	11.0%	$0	0.0%	15.2%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$271**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.5%	$0	0.0%	1.3%	24.2%
Moderate	0	0.0%	11.4%	$0	0.0%	7.2%	15.3%
Middle	2	28.6%	13.6%	$190	20.4%	9.1%	15.0%
Upper	5	71.4%	70.5%	$741	79.6%	82.4%	45.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$931**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.5%	$0	0.0%	2.3%	24.2%
Moderate	0	0.0%	25.0%	$0	0.0%	14.9%	15.3%
Middle	0	0.0%	10.0%	$0	0.0%	2.7%	15.0%
Upper	0	0.0%	50.0%	$0	0.0%	67.3%	45.5%
Unknown	0	0.0%	12.5%	$0	0.0%	12.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	24.2%
Moderate	0	0.0%	3.2%	$0	0.0%	1.5%	15.3%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	15.0%
Upper	0	0.0%	1.6%	$0	0.0%	1.2%	45.5%
Unknown	0	0.0%	95.2%	$0	0.0%	97.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.7%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	6.0%	$0	0.0%	3.3%	N/A
Unknown	1	100.0%	93.3%	$2,000	100.0%	96.7%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$2,000**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	5	3.5%	2.3%	$480	1.6%	1.0%	24.2%
Moderate	14	9.9%	9.3%	$1,701	5.6%	5.6%	15.3%
Middle	35	24.6%	15.9%	$4,877	15.9%	12.1%	15.0%
Upper	82	57.7%	43.2%	$21,039	68.8%	47.4%	45.5%
Unknown	6	4.2%	29.3%	$2,499	8.2%	33.9%	0.0%
TOTAL	**142**	**100.0%**	**100.0%**	**$30,596**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	1.3%	$0	0.0%	0.6%	24.3%
Moderate	8	19.0%	9.9%	$1,193	12.4%	6.3%	15.3%
Middle	9	21.4%	17.3%	$1,636	17.0%	13.8%	16.2%
Upper	25	59.5%	42.8%	$6,810	70.7%	53.5%	44.2%
Unknown	0	0.0%	28.7%	$0	0.0%	25.8%	0.0%
TOTAL	**42**	**100.0%**	**100.0%**	**$9,639**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	14.3%	3.3%	$135	4.6%	1.2%	24.3%
Moderate	4	19.0%	9.2%	$494	16.9%	5.0%	15.3%
Middle	5	23.8%	15.1%	$536	18.3%	10.3%	16.2%
Upper	9	42.9%	45.1%	$1,764	60.2%	56.8%	44.2%
Unknown	0	0.0%	27.3%	$0	0.0%	26.6%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$2,929**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.9%	$0	0.0%	1.5%	24.3%
Moderate	1	14.3%	14.6%	$100	17.6%	11.9%	15.3%
Middle	0	0.0%	14.6%	$0	0.0%	10.7%	16.2%
Upper	6	85.7%	43.7%	$467	82.4%	47.5%	44.2%
Unknown	0	0.0%	24.3%	$0	0.0%	28.3%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$567**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	8.7%	$0	0.0%	26.8%	24.3%
Moderate	0	0.0%	4.3%	$0	0.0%	2.1%	15.3%
Middle	0	0.0%	13.0%	$0	0.0%	14.3%	16.2%
Upper	0	0.0%	73.9%	$0	0.0%	56.7%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.0%	$0	0.0%	3.6%	24.3%
Moderate	0	0.0%	10.0%	$0	0.0%	6.5%	15.3%
Middle	0	0.0%	12.0%	$0	0.0%	7.9%	16.2%
Upper	0	0.0%	62.0%	$0	0.0%	78.6%	44.2%
Unknown	0	0.0%	8.0%	$0	0.0%	3.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	24.3%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	15.3%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	16.2%
Upper	0	0.0%	2.4%	$0	0.0%	1.3%	44.2%
Unknown	0	0.0%	97.6%	$0	0.0%	98.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.7%	$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.7%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.9%	$0	0.0%	1.9%	N/A
Unknown	0	0.0%	95.7%	$0	0.0%	97.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	3	4.3%	2.0%	$135	1.0%	0.8%	24.3%
Moderate	13	18.6%	9.4%	$1,787	13.6%	5.1%	15.3%
Middle	14	20.0%	15.8%	$2,172	16.5%	11.0%	16.2%
Upper	40	57.1%	42.3%	$9,041	68.8%	47.4%	44.2%
Unknown	0	0.0%	30.5%	$0	0.0%	35.7%	0.0%
TOTAL	**70**	**100.0%**	**100.0%**	**$13,135**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	3.1%	$0	0.0%	1.9%	8.5%
Moderate	4	6.1%	4.6%	$595	4.0%	3.5%	11.5%
Middle	11	16.7%	24.0%	$2,379	16.0%	22.2%	21.9%
Upper	51	77.3%	68.3%	$11,909	80.0%	72.4%	58.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**66**	**100.0%**	**100.0%**	**$14,883**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	6.3%	2.4%	$312	2.5%	1.2%	8.5%
Moderate	3	4.7%	5.8%	$223	1.8%	4.7%	11.5%
Middle	11	17.2%	21.7%	$1,375	11.0%	18.6%	21.9%
Upper	46	71.9%	70.1%	$10,601	84.7%	75.5%	58.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**64**	**100.0%**	**100.0%**	**$12,511**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.7%	$0	0.0%	0.9%	8.5%
Moderate	0	0.0%	13.7%	$0	0.0%	7.1%	11.5%
Middle	0	0.0%	15.1%	$0	0.0%	14.7%	21.9%
Upper	4	100.0%	68.5%	$271	100.0%	77.3%	58.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$271**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	8.5%
Moderate	0	0.0%	2.3%	$0	0.0%	0.6%	11.5%
Middle	0	0.0%	9.1%	$0	0.0%	5.7%	21.9%
Upper	7	100.0%	88.6%	$931	100.0%	93.7%	58.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$931**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.0%	$0	0.0%	1.7%	8.5%
Moderate	0	0.0%	2.5%	$0	0.0%	0.5%	11.5%
Middle	0	0.0%	35.0%	$0	0.0%	33.9%	21.9%
Upper	0	0.0%	57.5%	$0	0.0%	64.0%	58.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.2%	$0	0.0%	0.7%	8.5%
Moderate	0	0.0%	14.5%	$0	0.0%	10.5%	11.5%
Middle	0	0.0%	22.6%	$0	0.0%	17.1%	21.9%
Upper	0	0.0%	59.7%	$0	0.0%	71.6%	58.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	26.7%	$0	0.0%	15.1%	15.0%
Moderate	0	0.0%	12.0%	$0	0.0%	5.9%	9.2%
Middle	0	0.0%	26.0%	$0	0.0%	40.1%	24.4%
Upper	1	100.0%	35.3%	$2,000	100.0%	39.0%	51.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$2,000**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	4	2.8%	3.3%	$312	1.0%	2.9%	8.5%
Moderate	7	4.9%	5.4%	$818	2.7%	4.3%	11.5%
Middle	22	15.5%	22.8%	$3,754	12.3%	22.4%	21.9%
Upper	109	76.8%	68.5%	$25,712	84.0%	70.3%	58.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**142**	**100.0%**	**100.0%**	**$30,596**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	4.7%	$0	0.0%	3.3%	9.7%
Moderate	2	4.8%	5.9%	$223	2.3%	3.2%	9.3%
Middle	12	28.6%	31.4%	$2,672	27.7%	29.0%	26.5%
Upper	28	66.7%	57.2%	$6,744	70.0%	63.8%	53.9%
Unknown	0	0.0%	0.7%	$0	0.0%	0.6%	0.6%
TOTAL	**42**	**100.0%**	**100.0%**	**$9,639**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	9.5%	6.9%	$56	1.9%	4.8%	9.7%
Moderate	2	9.5%	7.1%	$64	2.2%	3.6%	9.3%
Middle	7	33.3%	31.4%	$1,082	36.9%	30.8%	26.5%
Upper	10	47.6%	53.6%	$1,727	59.0%	60.2%	53.9%
Unknown	0	0.0%	1.0%	$0	0.0%	0.6%	0.6%
TOTAL	**21**	**100.0%**	**100.0%**	**$2,929**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	12.6%	$0	0.0%	11.3%	9.7%
Moderate	0	0.0%	1.9%	$0	0.0%	1.3%	9.3%
Middle	1	14.3%	33.0%	$100	17.6%	29.1%	26.5%
Upper	6	85.7%	49.5%	$467	82.4%	56.5%	53.9%
Unknown	0	0.0%	2.9%	$0	0.0%	1.8%	0.6%
TOTAL	**7**	**100.0%**	**100.0%**	**$567**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.3%	$0	0.0%	4.2%	9.7%
Moderate	0	0.0%	4.3%	$0	0.0%	21.3%	9.3%
Middle	0	0.0%	21.7%	$0	0.0%	24.4%	26.5%
Upper	0	0.0%	69.6%	$0	0.0%	50.1%	53.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.0%	$0	0.0%	4.0%	9.7%
Moderate	0	0.0%	6.0%	$0	0.0%	2.7%	9.3%
Middle	0	0.0%	18.0%	$0	0.0%	27.9%	26.5%
Upper	0	0.0%	68.0%	$0	0.0%	65.4%	53.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	9.5%	$0	0.0%	3.6%	9.7%
Moderate	0	0.0%	19.0%	$0	0.0%	11.8%	9.3%
Middle	0	0.0%	31.0%	$0	0.0%	24.9%	26.5%
Upper	0	0.0%	38.1%	$0	0.0%	57.7%	53.9%
Unknown	0	0.0%	2.4%	$0	0.0%	2.0%	0.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	11.5%	$0	0.0%	6.7%	18.1%
Moderate	0	0.0%	28.8%	$0	0.0%	20.1%	17.2%
Middle	0	0.0%	23.0%	$0	0.0%	36.3%	28.0%
Upper	0	0.0%	33.1%	$0	0.0%	32.0%	30.8%
Unknown	0	0.0%	3.6%	$0	0.0%	4.8%	5.9%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	2	2.9%	5.9%	$56	0.4%	4.2%	9.7%
Moderate	4	5.7%	7.0%	$287	2.2%	5.6%	9.3%
Middle	20	28.6%	31.0%	$3,854	29.3%	30.4%	26.5%
Upper	44	62.9%	55.2%	$8,938	68.0%	58.6%	53.9%
Unknown	0	0.0%	0.9%	$0	0.0%	1.2%	0.6%
TOTAL	**70**	**100.0%**	**100.0%**	**$13,135**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	105	36.7%	26.7%	$7,721	31.1%	26.9%	91.0%
		Over $1 Million/ Unknown	181	63.3%	73.3%	$17,107	68.9%	73.1%	9.0%
		TOTAL	**286**	**100.0%**	**100.0%**	**$24,828**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	231	80.8%	89.6%	$7,856	31.6%	32.0%	
		$100,001–$250,000	28	9.8%	5.8%	$4,426	17.8%	19.8%	
		$250,001–$1 Million	27	9.4%	4.6%	$12,546	50.5%	48.1%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**286**	**100.0%**	**100.0%**	**$24,828**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	95	90.5%		$3,547	45.9%		
		$100,001–$250,000	3	2.9%		$552	7.1%		
		$250,001–$1 Million	7	6.7%		$3,622	46.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**105**	**100.0%**		**$7,721**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	46	45.5%	42.5%	$2,946	27.4%	33.4%	90.8%
		Over $1 Million/ Unknown	55	54.5%	57.5%	$7,806	72.6%	66.6%	9.2%
		TOTAL	**101**	**100.0%**	**100.0%**	**$10,752**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	73	72.3%	90.7%	$3,599	33.5%	31.3%	
		$100,001–$250,000	18	17.8%	4.8%	$2,586	24.1%	17.7%	
		$250,001–$1 Million	10	9.9%	4.5%	$4,567	42.5%	51.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**101**	**100.0%**	**100.0%**	**$10,752**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	42	91.3%		$1,856	63.0%		
		$100,001–$250,000	3	6.5%		$450	15.3%		
		$250,001–$1 Million	1	2.2%		$640	21.7%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**46**	**100.0%**		**$2,946**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	49	17.1%	15.5%	$6,349	25.6%	21.2%	15.7%
Moderate	28	9.8%	10.3%	$3,582	14.4%	10.1%	10.9%
Middle	51	17.8%	18.6%	$3,394	13.7%	15.6%	20.7%
Upper	158	55.2%	54.8%	$11,503	46.3%	52.9%	52.5%
Unknown	0	0.0%	0.8%	$0	0.0%	0.2%	0.2%
TOTAL	**286**	**100.0%**	**100.0%**	**$24,828**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	15	14.9%	8.2%	$1,617	15.0%	15.0%	9.4%
Moderate	22	21.8%	17.0%	$3,392	31.5%	16.6%	18.7%
Middle	17	16.8%	27.1%	$1,335	12.4%	25.1%	25.8%
Upper	45	44.6%	44.3%	$4,248	39.5%	39.6%	43.1%
Unknown	2	2.0%	3.5%	$160	1.5%	3.8%	3.0%
TOTAL	**101**	**100.0%**	**100.0%**	**$10,752**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Shreveport Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	4.5%	$0	0.0%	2.2%	25.1%
Moderate	1	6.7%	16.3%	$96	2.4%	10.2%	15.6%
Middle	2	13.3%	20.3%	$434	11.0%	17.2%	17.0%
Upper	12	80.0%	32.8%	$3,409	86.5%	43.6%	42.3%
Unknown	0	0.0%	26.2%	$0	0.0%	26.7%	0.0%
TOTAL	**15**	**100.0%**	**100.0%**	**$3,939**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.7%	$0	0.0%	1.2%	25.1%
Moderate	0	0.0%	7.6%	$0	0.0%	4.6%	15.6%
Middle	0	0.0%	12.4%	$0	0.0%	9.2%	17.0%
Upper	6	100.0%	35.8%	$1,235	100.0%	42.2%	42.3%
Unknown	0	0.0%	41.5%	$0	0.0%	42.7%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,235**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.6%	$0	0.0%	2.6%	25.1%
Moderate	0	0.0%	12.8%	$0	0.0%	8.1%	15.6%
Middle	0	0.0%	16.4%	$0	0.0%	13.4%	17.0%
Upper	2	100.0%	58.0%	$1,168	100.0%	59.5%	42.3%
Unknown	0	0.0%	8.2%	$0	0.0%	16.4%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$1,168**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.7%	$0	0.0%	0.9%	25.1%
Moderate	1	33.3%	6.3%	$91	52.3%	2.5%	15.6%
Middle	0	0.0%	17.1%	$0	0.0%	12.5%	17.0%
Upper	2	66.7%	71.2%	$83	47.7%	80.0%	42.3%
Unknown	0	0.0%	2.7%	$0	0.0%	4.1%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$174**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.4%	$0	0.0%	1.1%	25.1%
Moderate	0	0.0%	14.8%	$0	0.0%	10.3%	15.6%
Middle	0	0.0%	19.3%	$0	0.0%	14.2%	17.0%
Upper	1	100.0%	56.8%	$75	100.0%	67.5%	42.3%
Unknown	0	0.0%	5.7%	$0	0.0%	7.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$75**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.8%	$0	0.0%	0.4%	25.1%
Moderate	0	0.0%	0.4%	$0	0.0%	0.7%	15.6%
Middle	0	0.0%	1.6%	$0	0.0%	2.1%	17.0%
Upper	0	0.0%	0.8%	$0	0.0%	1.2%	42.3%
Unknown	0	0.0%	96.3%	$0	0.0%	95.6%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.4%	$0	0.0%	0.7%	N/A
Unknown	0	0.0%	97.6%	$0	0.0%	99.3%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	0	0.0%	3.7%	$0	0.0%	1.7%	25.1%
Moderate	2	7.4%	12.3%	$187	2.8%	7.5%	15.6%
Middle	2	7.4%	16.6%	$434	6.6%	13.2%	17.0%
Upper	23	85.2%	34.1%	$5,970	90.6%	41.4%	42.3%
Unknown	0	0.0%	33.3%	$0	0.0%	36.2%	0.0%
TOTAL	**27**	**100.0%**	**100.0%**	**$6,591**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	3.3%	$0	0.0%	1.4%	24.6%
Moderate	0	0.0%	14.2%	$0	0.0%	8.9%	14.7%
Middle	3	37.5%	19.9%	$564	15.1%	16.9%	17.7%
Upper	5	62.5%	34.4%	$3,172	84.9%	45.4%	42.9%
Unknown	0	0.0%	28.2%	$0	0.0%	27.4%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$3,736**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	4.7%	$0	0.0%	2.2%	24.6%
Moderate	1	8.3%	12.7%	$200	6.7%	7.8%	14.7%
Middle	0	0.0%	16.8%	$0	0.0%	12.5%	17.7%
Upper	10	83.3%	40.4%	$2,636	88.9%	52.8%	42.9%
Unknown	1	8.3%	25.4%	$129	4.4%	24.7%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,965**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	8.4%	$0	0.0%	6.2%	24.6%
Moderate	0	0.0%	14.1%	$0	0.0%	9.2%	14.7%
Middle	2	40.0%	17.9%	$188	22.4%	14.2%	17.7%
Upper	3	60.0%	52.9%	$653	77.6%	61.8%	42.9%
Unknown	0	0.0%	6.8%	$0	0.0%	8.6%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$841**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.7%	$0	0.0%	2.4%	24.6%
Moderate	0	0.0%	9.4%	$0	0.0%	5.5%	14.7%
Middle	0	0.0%	16.0%	$0	0.0%	8.1%	17.7%
Upper	2	100.0%	67.0%	$74	100.0%	81.2%	42.9%
Unknown	0	0.0%	2.8%	$0	0.0%	2.8%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$74**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.7%	$0	0.0%	6.9%	24.6%
Moderate	0	0.0%	12.5%	$0	0.0%	6.6%	14.7%
Middle	0	0.0%	13.5%	$0	0.0%	9.4%	17.7%
Upper	0	0.0%	58.7%	$0	0.0%	70.6%	42.9%
Unknown	0	0.0%	6.7%	$0	0.0%	6.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.8%	$0	0.0%	0.2%	24.6%
Moderate	0	0.0%	0.8%	$0	0.0%	0.7%	14.7%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	17.7%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	42.9%
Unknown	0	0.0%	98.4%	$0	0.0%	99.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	1.3%	$0	0.0%	0.1%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	6.3%	$0	0.0%	1.0%	N/A
Unknown	0	0.0%	92.5%	$0	0.0%	98.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	0	0.0%	3.7%	$0	0.0%	1.5%	24.6%
Moderate	1	3.7%	13.5%	$200	2.6%	8.0%	14.7%
Middle	5	18.5%	18.7%	$752	9.9%	14.7%	17.7%
Upper	20	74.1%	36.1%	$6,535	85.8%	43.7%	42.9%
Unknown	1	3.7%	28.0%	$129	1.7%	32.1%	0.0%
TOTAL	**27**	**100.0%**	**100.0%**	**$7,616**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	1.7%	$0	0.0%	1.2%	7.8%
Moderate	0	0.0%	7.8%	$0	0.0%	4.4%	14.4%
Middle	3	20.0%	30.1%	$764	19.4%	26.0%	33.6%
Upper	12	80.0%	60.4%	$3,175	80.6%	68.4%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**15**	**100.0%**	**100.0%**	**$3,939**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.3%	$0	0.0%	1.0%	7.8%
Moderate	0	0.0%	6.0%	$0	0.0%	3.7%	14.4%
Middle	2	33.3%	28.7%	$578	46.8%	24.8%	33.6%
Upper	4	66.7%	64.0%	$657	53.2%	70.6%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,235**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.2%	$0	0.0%	2.2%	7.8%
Moderate	0	0.0%	11.9%	$0	0.0%	8.8%	14.4%
Middle	0	0.0%	32.4%	$0	0.0%	28.8%	33.6%
Upper	2	100.0%	52.5%	$1,168	100.0%	60.3%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$1,168**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.6%	$0	0.0%	1.9%	7.8%
Moderate	0	0.0%	7.2%	$0	0.0%	2.5%	14.4%
Middle	0	0.0%	31.5%	$0	0.0%	28.9%	33.6%
Upper	3	100.0%	57.7%	$174	100.0%	66.7%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$174**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.3%	$0	0.0%	0.8%	7.8%
Moderate	0	0.0%	13.6%	$0	0.0%	8.0%	14.4%
Middle	0	0.0%	23.9%	$0	0.0%	13.5%	33.6%
Upper	1	100.0%	60.2%	$75	100.0%	77.6%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$75**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.5%	$0	0.0%	2.3%	7.8%
Moderate	0	0.0%	16.0%	$0	0.0%	10.3%	14.4%
Middle	0	0.0%	38.7%	$0	0.0%	36.5%	33.6%
Upper	0	0.0%	40.7%	$0	0.0%	51.0%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	30.5%	$0	0.0%	22.4%	13.9%
Moderate	0	0.0%	26.8%	$0	0.0%	30.4%	30.6%
Middle	0	0.0%	25.6%	$0	0.0%	21.2%	27.0%
Upper	0	0.0%	17.1%	$0	0.0%	26.0%	28.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	1.8%	$0	0.0%	1.9%	7.8%
Moderate	0	0.0%	7.4%	$0	0.0%	5.2%	14.4%
Middle	5	18.5%	29.6%	$1,342	20.4%	25.4%	33.6%
Upper	22	81.5%	61.3%	$5,249	79.6%	67.5%	44.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**27**	**100.0%**	**100.0%**	**$6,591**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	1.4%	$0	0.0%	0.8%	3.5%
Moderate	0	0.0%	12.5%	$0	0.0%	7.6%	18.5%
Middle	2	25.0%	32.3%	$923	24.7%	27.9%	33.2%
Upper	6	75.0%	53.1%	$2,813	75.3%	62.9%	42.7%
Unknown	0	0.0%	0.8%	$0	0.0%	0.7%	2.1%
TOTAL	**8**	**100.0%**	**100.0%**	**$3,736**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.3%	$0	0.0%	1.0%	3.5%
Moderate	0	0.0%	14.2%	$0	0.0%	9.5%	18.5%
Middle	7	58.3%	32.8%	$1,543	52.0%	29.0%	33.2%
Upper	5	41.7%	48.9%	$1,422	48.0%	58.6%	42.7%
Unknown	0	0.0%	1.7%	$0	0.0%	1.9%	2.1%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,965**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.3%	$0	0.0%	0.9%	3.5%
Moderate	0	0.0%	11.0%	$0	0.0%	7.2%	18.5%
Middle	3	60.0%	35.4%	$122	14.5%	31.2%	33.2%
Upper	2	40.0%	51.3%	$719	85.5%	60.6%	42.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	2.1%
TOTAL	**5**	**100.0%**	**100.0%**	**$841**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.9%	$0	0.0%	0.9%	3.5%
Moderate	0	0.0%	8.5%	$0	0.0%	3.2%	18.5%
Middle	0	0.0%	28.3%	$0	0.0%	28.8%	33.2%
Upper	2	100.0%	60.4%	$74	100.0%	66.2%	42.7%
Unknown	0	0.0%	0.9%	$0	0.0%	0.9%	2.1%
TOTAL	**2**	**100.0%**	**100.0%**	**$74**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.8%	$0	0.0%	2.3%	3.5%
Moderate	0	0.0%	15.4%	$0	0.0%	10.5%	18.5%
Middle	0	0.0%	21.2%	$0	0.0%	19.0%	33.2%
Upper	0	0.0%	59.6%	$0	0.0%	68.2%	42.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	2.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	3.5%
Moderate	0	0.0%	24.8%	$0	0.0%	16.4%	18.5%
Middle	0	0.0%	40.0%	$0	0.0%	39.4%	33.2%
Upper	0	0.0%	34.4%	$0	0.0%	41.6%	42.7%
Unknown	0	0.0%	0.8%	$0	0.0%	2.6%	2.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	23.8%	$0	0.0%	23.7%	4.8%
Moderate	0	0.0%	40.0%	$0	0.0%	30.1%	38.5%
Middle	0	0.0%	17.5%	$0	0.0%	14.8%	17.9%
Upper	0	0.0%	13.8%	$0	0.0%	30.6%	34.5%
Unknown	0	0.0%	5.0%	$0	0.0%	0.8%	4.3%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	1.8%	$0	0.0%	2.5%	3.5%
Moderate	0	0.0%	13.2%	$0	0.0%	9.7%	18.5%
Middle	12	44.4%	32.3%	$2,588	34.0%	27.2%	33.2%
Upper	15	55.6%	51.8%	$5,028	66.0%	59.7%	42.7%
Unknown	0	0.0%	1.0%	$0	0.0%	0.9%	2.1%
TOTAL	**27**	**100.0%**	**100.0%**	**$7,616**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level

Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	45	30.4%	33.7%	$4,175	22.2%	29.1%	92.5%
	Over $1 Million/ Unknown	103	69.6%	66.3%	$14,638	77.8%	70.9%	7.5%
	TOTAL	**148**	**100.0%**	**100.0%**	**$18,813**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	108	73.0%	91.9%	$4,649	24.7%	36.1%	
	$100,001–$250,000	20	13.5%	4.5%	$3,592	19.1%	17.9%	
	$250,001–$1 Million	20	13.5%	3.7%	$10,572	56.2%	45.9%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**148**	**100.0%**	**100.0%**	**$18,813**	**100.0%**	**100.0%**	
Loan Size / Revenue $1 Million or Less	$100,000 or Less	36	80.0%		$1,800	43.1%		
	$100,001–$250,000	7	15.6%		$1,375	32.9%		
	$250,001–$1 Million	2	4.4%		$1,000	24.0%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**45**	**100.0%**		**$4,175**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	25	34.7%	47.5%	$3,308	24.2%	34.1%	92.4%
		Over $1 Million/ Unknown	47	65.3%	52.5%	$10,335	75.8%	65.9%	7.6%
		TOTAL	**72**	**100.0%**	**100.0%**	**$13,643**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	42	58.3%	93.7%	$2,396	17.6%	38.9%	
		$100,001–$250,000	13	18.1%	3.5%	$2,460	18.0%	16.7%	
		$250,001–$1 Million	17	23.6%	2.8%	$8,787	64.4%	44.4%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**72**	**100.0%**	**100.0%**	**$13,643**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	17	68.0%		$1,041	31.5%		
		$100,001–$250,000	5	20.0%		$905	27.4%		
		$250,001–$1 Million	3	12.0%		$1,362	41.2%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**25**	**100.0%**		**$3,308**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	23	15.5%	16.0%	$4,865	25.9%	21.1%	16.0%
Moderate	31	20.9%	19.1%	$2,678	14.2%	20.7%	20.7%
Middle	50	33.8%	28.2%	$5,899	31.4%	25.9%	27.7%
Upper	44	29.7%	36.2%	$5,371	28.5%	32.2%	35.6%
Unknown	0	0.0%	0.6%	$0	0.0%	0.2%	0.0%
TOTAL	**148**	**100.0%**	**100.0%**	**$18,813**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	3	4.2%	6.6%	$1,174	8.6%	9.1%	6.4%
Moderate	17	23.6%	22.7%	$2,430	17.8%	24.7%	25.7%
Middle	11	15.3%	26.3%	$2,376	17.4%	22.5%	25.2%
Upper	29	40.3%	37.2%	$5,338	39.1%	34.2%	35.8%
Unknown	12	16.7%	7.1%	$2,325	17.0%	9.5%	6.9%
TOTAL	**72**	**100.0%**	**100.0%**	**$13,643**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Houma Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	7	14.0%	6.7%	$796	7.8%	4.0%	22.7%
Moderate	11	22.0%	22.1%	$1,583	15.5%	17.1%	16.2%
Middle	8	16.0%	23.1%	$1,506	14.8%	22.4%	18.7%
Upper	24	48.0%	27.5%	$6,314	61.9%	36.6%	42.4%
Unknown	0	0.0%	20.7%	$0	0.0%	19.9%	0.0%
TOTAL	**50**	**100.0%**	**100.0%**	**$10,199**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	4.3%	$0	0.0%	2.0%	22.7%
Moderate	7	17.9%	11.5%	$813	9.9%	8.0%	16.2%
Middle	2	5.1%	17.3%	$298	3.6%	14.4%	18.7%
Upper	27	69.2%	40.9%	$6,701	81.6%	48.5%	42.4%
Unknown	3	7.7%	26.0%	$404	4.9%	27.1%	0.0%
TOTAL	**39**	**100.0%**	**100.0%**	**$8,216**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	7.3%	$0	0.0%	3.1%	22.7%
Moderate	1	11.1%	14.6%	$22	2.7%	7.2%	16.2%
Middle	1	11.1%	18.3%	$268	33.2%	15.1%	18.7%
Upper	7	77.8%	57.3%	$518	64.1%	71.4%	42.4%
Unknown	0	0.0%	2.4%	$0	0.0%	3.2%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$808**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.1%	$0	0.0%	0.7%	22.7%
Moderate	1	16.7%	10.6%	$96	18.1%	9.8%	16.2%
Middle	2	33.3%	19.1%	$105	19.8%	17.3%	18.7%
Upper	3	50.0%	66.0%	$328	62.0%	70.9%	42.4%
Unknown	0	0.0%	2.1%	$0	0.0%	1.4%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$529**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	15.0%	$0	0.0%	3.1%	22.7%
Moderate	0	0.0%	7.5%	$0	0.0%	1.6%	16.2%
Middle	1	100.0%	15.0%	$78	100.0%	6.4%	18.7%
Upper	0	0.0%	55.0%	$0	0.0%	71.0%	42.4%
Unknown	0	0.0%	7.5%	$0	0.0%	17.8%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$78**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.7%	$0	0.0%	0.4%	22.7%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	16.2%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.7%
Upper	0	0.0%	1.4%	$0	0.0%	0.7%	42.4%
Unknown	0	0.0%	97.9%	$0	0.0%	98.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	9.8%	$0	0.0%	2.1%	N/A
Unknown	0	0.0%	90.2%	$0	0.0%	97.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	7	6.7%	5.4%	$796	4.0%	2.9%	22.7%
Moderate	20	19.0%	16.2%	$2,514	12.7%	12.0%	16.2%
Middle	14	13.3%	19.6%	$2,255	11.4%	17.5%	18.7%
Upper	61	58.1%	33.9%	$13,861	69.9%	40.9%	42.4%
Unknown	3	2.9%	25.0%	$404	2.0%	26.8%	0.0%
TOTAL	**105**	**100.0%**	**100.0%**	**$19,830**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	3.0%	3.8%	$82	1.2%	2.0%	23.9%
Moderate	7	21.2%	18.6%	$1,286	18.1%	13.8%	17.1%
Middle	9	27.3%	24.5%	$2,191	30.8%	23.0%	17.8%
Upper	14	42.4%	30.2%	$3,247	45.6%	39.0%	41.3%
Unknown	2	6.1%	22.9%	$307	4.3%	22.2%	0.0%
TOTAL	**33**	**100.0%**	**100.0%**	**$7,113**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	6.3%	8.1%	$78	3.3%	4.4%	23.9%
Moderate	2	12.5%	15.6%	$214	9.1%	11.8%	17.1%
Middle	4	25.0%	18.9%	$395	16.9%	16.9%	17.8%
Upper	8	50.0%	39.5%	$1,563	66.7%	48.8%	41.3%
Unknown	1	6.3%	17.9%	$92	3.9%	18.1%	0.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$2,342**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.2%	$0	0.0%	2.2%	23.9%
Moderate	2	20.0%	9.4%	$90	8.1%	6.3%	17.1%
Middle	1	10.0%	15.6%	$150	13.4%	14.6%	17.8%
Upper	7	70.0%	62.5%	$877	78.5%	67.2%	41.3%
Unknown	0	0.0%	8.3%	$0	0.0%	9.7%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,117**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.5%	$0	0.0%	2.5%	23.9%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	17.1%
Middle	0	0.0%	25.0%	$0	0.0%	25.0%	17.8%
Upper	1	100.0%	65.0%	$210	100.0%	69.4%	41.3%
Unknown	0	0.0%	7.5%	$0	0.0%	3.2%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$210**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.5%	$0	0.0%	4.4%	23.9%
Moderate	0	0.0%	13.6%	$0	0.0%	11.2%	17.1%
Middle	0	0.0%	23.7%	$0	0.0%	26.8%	17.8%
Upper	0	0.0%	44.1%	$0	0.0%	46.3%	41.3%
Unknown	0	0.0%	10.2%	$0	0.0%	11.4%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	23.9%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	17.1%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	17.8%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.3%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	2.2%	$0	0.0%	0.1%	N/A
Upper	0	0.0%	23.9%	$0	0.0%	4.6%	N/A
Unknown	0	0.0%	73.9%	$0	0.0%	95.2%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	2	3.3%	4.8%	$160	1.5%	2.3%	23.9%
Moderate	11	18.3%	16.9%	$1,590	14.7%	12.4%	17.1%
Middle	14	23.3%	22.3%	$2,736	25.4%	20.4%	17.8%
Upper	30	50.0%	33.2%	$5,897	54.7%	39.0%	41.3%
Unknown	3	5.0%	22.8%	$399	3.7%	25.9%	0.0%
TOTAL	**60**	**100.0%**	**100.0%**	**$10,782**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	6	12.0%	11.4%	$1,151	11.3%	9.1%	14.0%
Middle	32	64.0%	62.8%	$5,179	50.8%	57.2%	64.5%
Upper	12	24.0%	25.7%	$3,869	37.9%	33.8%	21.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**50**	**100.0%**	**100.0%**	**$10,199**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	5.1%	9.7%	$385	4.7%	8.5%	14.0%
Middle	17	43.6%	57.9%	$3,055	37.2%	52.5%	64.5%
Upper	20	51.3%	32.4%	$4,776	58.1%	39.0%	21.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**39**	**100.0%**	**100.0%**	**$8,216**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	22.2%	7.3%	$100	12.4%	7.5%	14.0%
Middle	2	22.2%	54.9%	$68	8.4%	42.4%	64.5%
Upper	5	55.6%	37.8%	$640	79.2%	50.0%	21.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$808**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	16.7%	2.1%	$96	18.1%	2.7%	14.0%
Middle	2	33.3%	44.7%	$110	20.8%	43.8%	64.5%
Upper	3	50.0%	53.2%	$323	61.1%	53.5%	21.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$529**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	2.5%	$0	0.0%	0.3%	14.0%
Middle	0	0.0%	60.0%	$0	0.0%	26.1%	64.5%
Upper	1	100.0%	37.5%	$78	100.0%	73.7%	21.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$78**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	21.1%	$0	0.0%	11.1%	14.0%
Middle	0	0.0%	61.3%	$0	0.0%	63.9%	64.5%
Upper	0	0.0%	17.6%	$0	0.0%	25.0%	21.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	19.5%	$0	0.0%	10.9%	19.0%
Middle	0	0.0%	68.3%	$0	0.0%	67.6%	53.4%
Upper	0	0.0%	12.2%	$0	0.0%	21.5%	27.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	11	10.5%	10.7%	$1,732	8.7%	8.8%	14.0%
Middle	53	50.5%	60.3%	$8,412	42.4%	55.1%	64.5%
Upper	41	39.0%	29.0%	$9,686	48.8%	36.1%	21.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**105**	**100.0%**	**100.0%**	**$19,830**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	3.0%	2.3%	$96	1.3%	1.6%	2.3%
Moderate	1	3.0%	12.9%	$211	3.0%	10.5%	15.3%
Middle	15	45.5%	46.8%	$3,248	45.7%	42.2%	48.3%
Upper	16	48.5%	35.4%	$3,558	50.0%	43.4%	32.6%
Unknown	0	0.0%	2.6%	$0	0.0%	2.3%	1.5%
TOTAL	**33**	**100.0%**	**100.0%**	**$7,113**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	3.6%	$0	0.0%	2.6%	2.3%
Moderate	1	6.3%	10.4%	$78	3.3%	8.8%	15.3%
Middle	9	56.3%	49.7%	$1,271	54.3%	41.8%	48.3%
Upper	5	31.3%	33.9%	$901	38.5%	45.6%	32.6%
Unknown	1	6.3%	2.4%	$92	3.9%	1.3%	1.5%
TOTAL	**16**	**100.0%**	**100.0%**	**$2,342**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.1%	$0	0.0%	1.7%	2.3%
Moderate	0	0.0%	9.4%	$0	0.0%	6.9%	15.3%
Middle	2	20.0%	43.8%	$113	10.1%	41.0%	48.3%
Upper	8	80.0%	44.8%	$1,004	89.9%	50.4%	32.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.5%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,117**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.5%	$0	0.0%	0.8%	2.3%
Moderate	0	0.0%	15.0%	$0	0.0%	15.3%	15.3%
Middle	0	0.0%	35.0%	$0	0.0%	23.4%	48.3%
Upper	1	100.0%	47.5%	$210	100.0%	60.6%	32.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.5%
TOTAL	**1**	**100.0%**	**100.0%**	**$210**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.7%	$0	0.0%	0.5%	2.3%
Moderate	0	0.0%	3.4%	$0	0.0%	3.6%	15.3%
Middle	0	0.0%	50.8%	$0	0.0%	40.2%	48.3%
Upper	0	0.0%	44.1%	$0	0.0%	55.7%	32.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.3%	$0	0.0%	2.7%	2.3%
Moderate	0	0.0%	16.4%	$0	0.0%	13.1%	15.3%
Middle	0	0.0%	54.1%	$0	0.0%	54.5%	48.3%
Upper	0	0.0%	21.3%	$0	0.0%	26.1%	32.6%
Unknown	0	0.0%	4.9%	$0	0.0%	3.6%	1.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	13.0%	$0	0.0%	3.6%	3.2%
Moderate	0	0.0%	23.9%	$0	0.0%	5.4%	7.6%
Middle	0	0.0%	47.8%	$0	0.0%	19.2%	44.8%
Upper	0	0.0%	13.0%	$0	0.0%	71.2%	42.8%
Unknown	0	0.0%	2.2%	$0	0.0%	0.5%	1.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	1.7%	2.7%	$96	0.9%	1.9%	2.3%
Moderate	2	3.3%	12.3%	$289	2.7%	9.9%	15.3%
Middle	26	43.3%	47.5%	$4,632	43.0%	40.8%	48.3%
Upper	30	50.0%	35.0%	$5,673	52.6%	45.5%	32.6%
Unknown	1	1.7%	2.5%	$92	0.9%	2.0%	1.5%
TOTAL	**60**	**100.0%**	**100.0%**	**$10,782**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	26	49.1%	27.4%	$919	17.0%	17.3%	89.5%
		Over $1 Million/ Unknown	27	50.9%	72.6%	$4,490	83.0%	82.7%	10.5%
		TOTAL	**53**	**100.0%**	**100.0%**	**$5,409**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	44	83.0%	90.5%	$1,270	23.5%	30.3%	
		$100,001–$250,000	3	5.7%	5.0%	$454	8.4%	17.5%	
		$250,001–$1 Million	6	11.3%	4.6%	$3,685	68.1%	52.2%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**53**	**100.0%**	**100.0%**	**$5,409**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	25	96.2%		$801	87.2%		
		$100,001–$250,000	1	3.8%		$118	12.8%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**26**	**100.0%**		**$919**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	7	46.7%	49.9%	$893	34.3%	24.8%	89.4%
		Over $1 Million/ Unknown	8	53.3%	50.1%	$1,713	65.7%	75.2%	10.6%
		TOTAL	**15**	**100.0%**	**100.0%**	**$2,606**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	10	66.7%	92.8%	$418	16.0%	36.2%	
		$100,001–$250,000	2	13.3%	3.6%	$258	9.9%	15.7%	
		$250,001–$1 Million	3	20.0%	3.6%	$1,930	74.1%	48.1%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**15**	**100.0%**	**100.0%**	**$2,606**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	6	85.7%		$193	21.6%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	1	14.3%		$700	78.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**7**	**100.0%**		**$893**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	11	20.8%	20.8%	$298	5.5%	26.9%	18.7%
Middle	27	50.9%	53.6%	$3,918	72.4%	45.0%	55.5%
Upper	15	28.3%	24.9%	$1,193	22.1%	27.9%	25.8%
Unknown	0	0.0%	0.7%	$0	0.0%	0.2%	0.0%
TOTAL	**53**	**100.0%**	**100.0%**	**$5,409**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	3	20.0%	3.8%	$747	28.7%	3.1%	3.0%
Moderate	1	6.7%	15.0%	$37	1.4%	12.3%	16.4%
Middle	6	40.0%	44.8%	$837	32.1%	48.2%	43.6%
Upper	5	33.3%	33.6%	$985	37.8%	33.9%	35.0%
Unknown	0	0.0%	2.8%	$0	0.0%	2.5%	2.0%
TOTAL	**15**	**100.0%**	**100.0%**	**$2,606**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NonMSA Louisiana

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	3.2%	$0	0.0%	2.1%	17.3%
Moderate	0	0.0%	15.9%	$0	0.0%	11.5%	15.3%
Middle	0	0.0%	23.2%	$0	0.0%	18.4%	21.6%
Upper	1	100.0%	41.8%	$157	100.0%	53.2%	45.8%
Unknown	0	0.0%	15.9%	$0	0.0%	14.7%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$157**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.7%	$0	0.0%	0.1%	17.3%
Moderate	0	0.0%	6.0%	$0	0.0%	4.3%	15.3%
Middle	1	33.3%	14.6%	$184	46.0%	9.6%	21.6%
Upper	2	66.7%	58.3%	$216	54.0%	58.7%	45.8%
Unknown	0	0.0%	20.5%	$0	0.0%	27.3%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$400**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	17.3%
Moderate	1	33.3%	10.0%	$15	9.4%	2.4%	15.3%
Middle	0	0.0%	10.0%	$0	0.0%	8.1%	21.6%
Upper	2	66.7%	80.0%	$145	90.6%	89.5%	45.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$160**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	17.3%
Moderate	0	0.0%	100.0%	$0	0.0%	100.0%	15.3%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	21.6%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	45.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	17.3%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	15.3%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	21.6%
Upper	0	0.0%	100.0%	$0	0.0%	100.0%	45.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	17.3%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	15.3%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	21.6%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	45.8%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	0	0.0%	2.0%	$0	0.0%	1.1%	17.3%
Moderate	1	14.3%	11.7%	$15	2.1%	7.8%	15.3%
Middle	1	14.3%	18.8%	$184	25.7%	13.6%	21.6%
Upper	5	71.4%	48.6%	$518	72.2%	53.6%	45.8%
Unknown	0	0.0%	18.8%	$0	0.0%	23.9%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$717**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	2.1%	$0	0.0%	0.6%	19.9%
Moderate	0	0.0%	9.7%	$0	0.0%	6.0%	10.9%
Middle	0	0.0%	16.9%	$0	0.0%	14.5%	18.2%
Upper	0	0.0%	55.4%	$0	0.0%	63.3%	51.0%
Unknown	0	0.0%	15.9%	$0	0.0%	15.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	5.1%	$0	0.0%	2.0%	19.9%
Moderate	0	0.0%	5.1%	$0	0.0%	3.0%	10.9%
Middle	0	0.0%	20.3%	$0	0.0%	14.2%	18.2%
Upper	2	100.0%	60.8%	$150	100.0%	59.4%	51.0%
Unknown	0	0.0%	8.9%	$0	0.0%	21.4%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$150**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	19.9%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	10.9%
Middle	1	100.0%	37.5%	$69	100.0%	31.8%	18.2%
Upper	0	0.0%	50.0%	$0	0.0%	66.2%	51.0%
Unknown	0	0.0%	12.5%	$0	0.0%	1.9%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$69**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	19.9%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	10.9%
Middle	0	0.0%	50.0%	$0	0.0%	23.8%	18.2%
Upper	1	100.0%	50.0%	$80	100.0%	76.2%	51.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$80**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	19.9%
Moderate	0	0.0%	33.3%	$0	0.0%	24.6%	10.9%
Middle	0	0.0%	33.3%	$0	0.0%	64.5%	18.2%
Upper	0	0.0%	33.3%	$0	0.0%	10.9%	51.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	19.9%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	10.9%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.2%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	51.0%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	0	0.0%	2.7%	$0	0.0%	0.9%	19.9%
Moderate	0	0.0%	8.2%	$0	0.0%	4.7%	10.9%
Middle	1	25.0%	18.4%	$69	23.1%	13.6%	18.2%
Upper	3	75.0%	55.3%	$230	76.9%	57.0%	51.0%
Unknown	0	0.0%	15.4%	$0	0.0%	23.8%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$299**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	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%
Middle	1	100.0%	65.9%	$157	100.0%	62.6%	72.0%
Upper	0	0.0%	34.1%	$0	0.0%	37.4%	28.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$157**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	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%
Middle	0	0.0%	60.3%	$0	0.0%	59.4%	72.0%
Upper	3	100.0%	39.7%	$400	100.0%	40.6%	28.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$400**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	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%
Middle	2	66.7%	60.0%	$135	84.4%	75.8%	72.0%
Upper	1	33.3%	40.0%	$25	15.6%	24.2%	28.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$160**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	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%
Middle	0	0.0%	100.0%	$0	0.0%	100.0%	72.0%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	28.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	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%
Middle	0	0.0%	66.7%	$0	0.0%	77.2%	72.0%
Upper	0	0.0%	33.3%	$0	0.0%	22.8%	28.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	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%
Middle	0	0.0%	40.0%	$0	0.0%	28.3%	72.0%
Upper	0	0.0%	60.0%	$0	0.0%	71.7%	28.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	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%
Middle	0	0.0%	33.3%	$0	0.0%	1.6%	70.8%
Upper	0	0.0%	66.7%	$0	0.0%	98.4%	29.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	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%
Middle	3	42.9%	63.1%	$292	40.7%	58.7%	72.0%
Upper	4	57.1%	36.9%	$425	59.3%	41.3%	28.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$717**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	9.2%	$0	0.0%	7.4%	10.0%
Middle	0	0.0%	20.5%	$0	0.0%	18.3%	31.0%
Upper	0	0.0%	69.2%	$0	0.0%	73.3%	58.2%
Unknown	0	0.0%	1.0%	$0	0.0%	1.1%	0.9%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	7.6%	$0	0.0%	6.3%	10.0%
Middle	0	0.0%	21.5%	$0	0.0%	15.5%	31.0%
Upper	2	100.0%	68.4%	$150	100.0%	76.7%	58.2%
Unknown	0	0.0%	2.5%	$0	0.0%	1.5%	0.9%
TOTAL	**2**	**100.0%**	**100.0%**	**$150**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	12.5%	$0	0.0%	4.9%	10.0%
Middle	0	0.0%	25.0%	$0	0.0%	31.1%	31.0%
Upper	1	100.0%	62.5%	$69	100.0%	64.1%	58.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.9%
TOTAL	**1**	**100.0%**	**100.0%**	**$69**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	10.0%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	31.0%
Upper	1	100.0%	100.0%	$80	100.0%	100.0%	58.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.9%
TOTAL	**1**	**100.0%**	**100.0%**	**$80**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	10.0%
Middle	0	0.0%	66.7%	$0	0.0%	89.1%	31.0%
Upper	0	0.0%	33.3%	$0	0.0%	10.9%	58.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.9%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	10.0%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	31.0%
Upper	0	0.0%	100.0%	$0	0.0%	100.0%	58.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.9%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	25.0%	$0	0.0%	1.0%	62.5%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.3%
Upper	0	0.0%	75.0%	$0	0.0%	99.0%	19.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	8.9%	$0	0.0%	6.5%	10.0%
Middle	0	0.0%	20.8%	$0	0.0%	16.4%	31.0%
Upper	4	100.0%	68.9%	$299	100.0%	76.0%	58.2%
Unknown	0	0.0%	1.4%	$0	0.0%	1.1%	0.9%
TOTAL	**4**	**100.0%**	**100.0%**	**$299**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	15	62.5%	38.6%	$415	35.0%	47.1%	92.1%
		Over $1 Million/ Unknown	9	37.5%	61.4%	$770	65.0%	52.9%	7.9%
		TOTAL	**24**	**100.0%**	**100.0%**	**$1,185**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	21	87.5%	94.1%	$501	42.3%	42.5%	
		$100,001–$250,000	2	8.3%	4.5%	$302	25.5%	28.1%	
		$250,001–$1 Million	1	4.2%	1.4%	$382	32.2%	29.4%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**24**	**100.0%**	**100.0%**	**$1,185**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	15	100.0%		$415	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**15**	**100.0%**		**$415**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	6	50.0%	53.9%	$216	56.7%	35.0%	91.7%
		Over $1 Million/ Unknown	6	50.0%	46.1%	$165	43.3%	65.0%	8.3%
		TOTAL	**12**	**100.0%**	**100.0%**	**$381**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	12	100.0%	96.1%	$381	100.0%	49.2%	
		$100,001–$250,000	0	0.0%	1.6%	$0	0.0%	10.1%	
		$250,001–$1 Million	0	0.0%	2.3%	$0	0.0%	40.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**12**	**100.0%**	**100.0%**	**$381**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	6	100.0%		$216	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**6**	**100.0%**		**$216**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	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%
Middle	16	66.7%	63.8%	$561	47.3%	56.9%	70.9%
Upper	8	33.3%	33.8%	$624	52.7%	42.4%	29.1%
Unknown	0	0.0%	2.4%	$0	0.0%	0.7%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$1,185**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	12.1%	$0	0.0%	17.5%	19.6%
Middle	4	33.3%	28.5%	$146	38.3%	22.5%	38.5%
Upper	8	66.7%	54.7%	$235	61.7%	57.8%	39.6%
Unknown	0	0.0%	4.7%	$0	0.0%	2.2%	2.2%
TOTAL	**12**	**100.0%**	**100.0%**	**$381**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NORTH CAROLINA

Greensboro-Winston Salem Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	11	12.5%	6.2%	$1,296	5.5%	3.2%	21.7%
Moderate	24	27.3%	21.0%	$3,936	16.7%	14.5%	17.6%
Middle	19	21.6%	22.6%	$3,938	16.7%	20.2%	18.4%
Upper	34	38.6%	38.3%	$14,445	61.2%	50.1%	42.4%
Unknown	0	0.0%	11.8%	$0	0.0%	12.0%	0.0%
TOTAL	**88**	**100.0%**	**100.0%**	**$23,615**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	22	12.5%	4.8%	$1,763	4.5%	2.5%	21.7%
Moderate	30	17.0%	14.5%	$2,919	7.4%	9.8%	17.6%
Middle	32	18.2%	20.0%	$4,106	10.4%	16.5%	18.4%
Upper	86	48.9%	43.5%	$27,444	69.7%	53.0%	42.4%
Unknown	6	3.4%	17.1%	$3,122	7.9%	18.2%	0.0%
TOTAL	**176**	**100.0%**	**100.0%**	**$39,354**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	3	11.5%	5.2%	$192	7.1%	3.2%	21.7%
Moderate	3	11.5%	13.8%	$188	6.9%	9.3%	17.6%
Middle	4	15.4%	20.2%	$177	6.5%	15.2%	18.4%
Upper	16	61.5%	58.1%	$2,164	79.5%	69.3%	42.4%
Unknown	0	0.0%	2.6%	$0	0.0%	3.0%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$2,721**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	4	13.3%	4.0%	$170	4.7%	2.1%	21.7%
Moderate	5	16.7%	12.1%	$426	11.9%	7.4%	17.6%
Middle	4	13.3%	21.5%	$506	14.1%	15.5%	18.4%
Upper	16	53.3%	59.0%	$2,174	60.6%	71.1%	42.4%
Unknown	1	3.3%	3.3%	$310	8.6%	3.9%	0.0%
TOTAL	**30**	**100.0%**	**100.0%**	**$3,586**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	7.7%	$0	0.0%	4.3%	21.7%
Moderate	2	33.3%	20.1%	$260	22.4%	14.7%	17.6%
Middle	2	33.3%	21.1%	$167	14.4%	15.2%	18.4%
Upper	2	33.3%	44.9%	$735	63.3%	58.8%	42.4%
Unknown	0	0.0%	6.2%	$0	0.0%	6.9%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,162**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.5%	$0	0.0%	1.8%	21.7%
Moderate	0	0.0%	3.4%	$0	0.0%	3.3%	17.6%
Middle	0	0.0%	1.8%	$0	0.0%	3.0%	18.4%
Upper	0	0.0%	1.0%	$0	0.0%	1.5%	42.4%
Unknown	1	100.0%	91.2%	$54	100.0%	90.4%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$54**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.4%	$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.2%	$0	0.0%	0.2%	N/A
Unknown	3	100.0%	97.5%	$5,405	100.0%	99.7%	N/A
TOTAL	**3**	**100.0%**	**100.0%**	**$5,405**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	40	12.1%	5.3%	$3,421	4.5%	2.6%	21.7%
Moderate	64	19.4%	16.8%	$7,729	10.2%	11.2%	17.6%
Middle	61	18.5%	20.9%	$8,894	11.7%	17.0%	18.4%
Upper	154	46.7%	42.1%	$46,962	61.9%	48.7%	42.4%
Unknown	11	3.3%	14.9%	$8,891	11.7%	20.5%	0.0%
TOTAL	**330**	**100.0%**	**100.0%**	**$75,897**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	17	18.5%	6.1%	$2,262	7.9%	2.9%	21.4%
Moderate	23	25.0%	18.6%	$3,739	13.1%	12.7%	17.2%
Middle	11	12.0%	22.4%	$2,305	8.1%	20.0%	19.2%
Upper	38	41.3%	39.4%	$18,006	63.0%	51.7%	42.2%
Unknown	3	3.3%	13.5%	$2,285	8.0%	12.7%	0.0%
TOTAL	**92**	**100.0%**	**100.0%**	**$28,597**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	14	14.1%	8.8%	$1,156	7.2%	5.0%	21.4%
Moderate	18	18.2%	20.7%	$1,203	7.5%	15.9%	17.2%
Middle	29	29.3%	23.9%	$3,151	19.6%	21.9%	19.2%
Upper	38	38.4%	36.7%	$10,552	65.7%	46.1%	42.2%
Unknown	0	0.0%	9.8%	$0	0.0%	11.1%	0.0%
TOTAL	**99**	**100.0%**	**100.0%**	**$16,062**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	5	8.3%	5.5%	$188	3.2%	3.5%	21.4%
Moderate	8	13.3%	15.6%	$502	8.6%	10.4%	17.2%
Middle	15	25.0%	24.1%	$1,028	17.5%	19.7%	19.2%
Upper	32	53.3%	52.6%	$4,142	70.7%	63.6%	42.2%
Unknown	0	0.0%	2.2%	$0	0.0%	2.7%	0.0%
TOTAL	**60**	**100.0%**	**100.0%**	**$5,860**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	5.6%	5.8%	$91	2.2%	3.3%	21.4%
Moderate	6	16.7%	14.1%	$215	5.3%	9.3%	17.2%
Middle	9	25.0%	21.8%	$624	15.3%	16.9%	19.2%
Upper	19	52.8%	55.1%	$3,141	77.2%	67.3%	42.2%
Unknown	0	0.0%	3.3%	$0	0.0%	3.2%	0.0%
TOTAL	**36**	**100.0%**	**100.0%**	**$4,071**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	10.2%	$0	0.0%	6.7%	21.4%
Moderate	0	0.0%	18.7%	$0	0.0%	14.2%	17.2%
Middle	1	50.0%	22.1%	$250	85.0%	15.1%	19.2%
Upper	1	50.0%	44.2%	$44	15.0%	57.5%	42.2%
Unknown	0	0.0%	4.8%	$0	0.0%	6.5%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$294**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.2%	$0	0.0%	3.9%	21.4%
Moderate	0	0.0%	2.7%	$0	0.0%	2.9%	17.2%
Middle	0	0.0%	0.6%	$0	0.0%	0.8%	19.2%
Upper	0	0.0%	0.4%	$0	0.0%	0.6%	42.2%
Unknown	0	0.0%	92.0%	$0	0.0%	91.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.2%	$0	0.0%	0.1%	N/A
Unknown	1	100.0%	98.4%	$1,068	100.0%	99.9%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$1,068**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	38	13.1%	6.9%	$3,697	6.6%	3.1%	21.4%
Moderate	55	19.0%	18.4%	$5,659	10.1%	11.6%	17.2%
Middle	65	22.4%	22.6%	$7,358	13.2%	17.7%	19.2%
Upper	128	44.1%	40.3%	$35,885	64.1%	44.3%	42.2%
Unknown	4	1.4%	11.8%	$3,353	6.0%	23.2%	0.0%
TOTAL	**290**	**100.0%**	**100.0%**	**$55,952**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	4	4.5%	2.1%	$458	1.9%	1.2%	2.3%
Moderate	14	15.9%	15.9%	$1,934	8.2%	11.0%	17.9%
Middle	35	39.8%	41.6%	$7,623	32.3%	37.4%	43.2%
Upper	35	39.8%	40.4%	$13,600	57.6%	50.3%	36.6%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.0%
TOTAL	**88**	**100.0%**	**100.0%**	**$23,615**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.8%	$0	0.0%	0.4%	2.3%
Moderate	16	9.1%	11.4%	$1,652	4.2%	8.1%	17.9%
Middle	73	41.5%	39.9%	$10,236	26.0%	34.9%	43.2%
Upper	87	49.4%	47.8%	$27,466	69.8%	56.5%	36.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.1%	0.0%
TOTAL	**176**	**100.0%**	**100.0%**	**$39,354**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	3.8%	1.1%	$50	1.8%	0.6%	2.3%
Moderate	3	11.5%	11.9%	$222	8.2%	8.8%	17.9%
Middle	10	38.5%	40.7%	$1,152	42.3%	36.4%	43.2%
Upper	12	46.2%	46.3%	$1,297	47.7%	54.2%	36.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$2,721**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	3.3%	1.2%	$75	2.1%	0.7%	2.3%
Moderate	3	10.0%	9.6%	$245	6.8%	6.5%	17.9%
Middle	8	26.7%	39.0%	$656	18.3%	33.6%	43.2%
Upper	18	60.0%	50.1%	$2,610	72.8%	59.2%	36.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**30**	**100.0%**	**100.0%**	**$3,586**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.5%	$0	0.0%	1.8%	2.3%
Moderate	2	33.3%	16.4%	$260	22.4%	11.8%	17.9%
Middle	2	33.3%	39.7%	$167	14.4%	33.6%	43.2%
Upper	2	33.3%	42.4%	$735	63.3%	52.8%	36.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,162**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.2%	$0	0.0%	3.0%	2.3%
Moderate	1	100.0%	24.8%	$54	100.0%	21.8%	17.9%
Middle	0	0.0%	44.2%	$0	0.0%	42.3%	43.2%
Upper	0	0.0%	26.9%	$0	0.0%	33.0%	36.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$54**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	14.0%	$0	0.0%	2.7%	10.9%
Moderate	3	100.0%	36.8%	$5,405	100.0%	25.4%	29.5%
Middle	0	0.0%	28.9%	$0	0.0%	37.4%	36.2%
Upper	0	0.0%	19.0%	$0	0.0%	32.8%	23.0%
Unknown	0	0.0%	1.2%	$0	0.0%	1.8%	0.5%
TOTAL	**3**	**100.0%**	**100.0%**	**$5,405**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	6	1.8%	1.4%	$583	0.8%	0.9%	2.3%
Moderate	42	12.7%	13.4%	$9,772	12.9%	10.5%	17.9%
Middle	128	38.8%	40.6%	$19,834	26.1%	36.1%	43.2%
Upper	154	46.7%	44.6%	$45,708	60.2%	52.3%	36.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.2%	0.0%
TOTAL	**330**	**100.0%**	**100.0%**	**$75,897**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	5	5.4%	4.0%	$752	2.6%	2.2%	3.3%
Moderate	15	16.3%	16.5%	$2,441	8.5%	12.1%	15.3%
Middle	33	35.9%	44.8%	$8,246	28.8%	42.4%	46.9%
Upper	38	41.3%	34.5%	$17,020	59.5%	43.2%	34.2%
Unknown	1	1.1%	0.2%	$138	0.5%	0.1%	0.2%
TOTAL	**92**	**100.0%**	**100.0%**	**$28,597**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	1.0%	3.0%	$43	0.3%	2.0%	3.3%
Moderate	16	16.2%	13.9%	$1,660	10.3%	10.5%	15.3%
Middle	53	53.5%	46.3%	$7,355	45.8%	43.5%	46.9%
Upper	29	29.3%	36.7%	$7,004	43.6%	43.9%	34.2%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.2%
TOTAL	**99**	**100.0%**	**100.0%**	**$16,062**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.4%	$0	0.0%	1.7%	3.3%
Moderate	6	10.0%	12.0%	$426	7.3%	9.5%	15.3%
Middle	28	46.7%	43.8%	$2,616	44.6%	40.0%	46.9%
Upper	26	43.3%	41.7%	$2,818	48.1%	48.6%	34.2%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.2%
TOTAL	**60**	**100.0%**	**100.0%**	**$5,860**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.3%	$0	0.0%	0.8%	3.3%
Moderate	8	22.2%	9.8%	$358	8.8%	7.2%	15.3%
Middle	11	30.6%	44.5%	$707	17.4%	38.8%	46.9%
Upper	17	47.2%	44.2%	$3,006	73.8%	53.2%	34.2%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.2%
TOTAL	**36**	**100.0%**	**100.0%**	**$4,071**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.1%	$0	0.0%	2.0%	3.3%
Moderate	1	50.0%	14.3%	$250	85.0%	9.7%	15.3%
Middle	0	0.0%	46.5%	$0	0.0%	42.2%	46.9%
Upper	1	50.0%	35.6%	$44	15.0%	45.8%	34.2%
Unknown	0	0.0%	0.5%	$0	0.0%	0.2%	0.2%
TOTAL	**2**	**100.0%**	**100.0%**	**$294**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.0%	$0	0.0%	2.5%	3.3%
Moderate	0	0.0%	20.9%	$0	0.0%	16.2%	15.3%
Middle	0	0.0%	48.0%	$0	0.0%	46.8%	46.9%
Upper	0	0.0%	26.6%	$0	0.0%	34.4%	34.2%
Unknown	0	0.0%	0.4%	$0	0.0%	0.1%	0.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	100.0%	16.5%	$1,068	100.0%	5.7%	11.4%
Moderate	0	0.0%	29.8%	$0	0.0%	21.6%	26.8%
Middle	0	0.0%	32.7%	$0	0.0%	36.4%	37.3%
Upper	0	0.0%	19.0%	$0	0.0%	36.1%	23.7%
Unknown	0	0.0%	2.0%	$0	0.0%	0.2%	0.8%
TOTAL	**1**	**100.0%**	**100.0%**	**$1,068**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	7	2.4%	3.4%	$1,863	3.3%	2.5%	3.3%
Moderate	46	15.9%	14.9%	$5,135	9.2%	12.7%	15.3%
Middle	125	43.1%	45.1%	$18,924	33.8%	41.8%	46.9%
Upper	111	38.3%	36.3%	$29,892	53.4%	42.9%	34.2%
Unknown	1	0.3%	0.2%	$138	0.2%	0.1%	0.2%
TOTAL	**290**	**100.0%**	**100.0%**	**$55,952**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	326	33.2%	48.5%	$13,234	18.3%	32.9%	91.7%
		Over $1 Million/ Unknown	656	66.8%	51.5%	$58,914	81.7%	67.1%	8.3%
		TOTAL	**982**	**100.0%**	**100.0%**	**$72,148**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	823	83.8%	90.1%	$19,326	26.8%	31.4%	
		$100,001–$250,000	88	9.0%	5.3%	$13,564	18.8%	18.8%	
		$250,001–$1 Million	71	7.2%	4.5%	$39,258	54.4%	49.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**982**	**100.0%**	**100.0%**	**$72,148**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	305	93.6%		$6,580	49.7%		
		$100,001–$250,000	15	4.6%		$2,342	17.7%		
		$250,001–$1 Million	6	1.8%		$4,312	32.6%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**326**	**100.0%**		**$13,234**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	109	55.9%	53.4%	$9,529	26.7%	34.5%	91.8%
		Over $1 Million/ Unknown	86	44.1%	46.6%	$26,212	73.3%	65.5%	8.2%
		TOTAL	**195**	**100.0%**	**100.0%**	**$35,741**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	128	65.6%	92.9%	$5,595	15.7%	34.8%	
		$100,001–$250,000	23	11.8%	3.6%	$4,294	12.0%	15.5%	
		$250,001–$1 Million	44	22.6%	3.5%	$25,852	72.3%	49.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**195**	**100.0%**	**100.0%**	**$35,741**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	92	84.4%		$3,141	33.0%		
		$100,001–$250,000	7	6.4%		$1,283	13.5%		
		$250,001–$1 Million	10	9.2%		$5,105	53.6%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**109**	**100.0%**		**$9,529**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	42	4.3%	3.7%	$4,384	6.1%	4.3%	4.1%
Moderate	232	23.6%	20.4%	$11,308	15.7%	21.1%	20.9%
Middle	416	42.4%	38.0%	$33,308	46.2%	39.0%	37.9%
Upper	290	29.5%	36.8%	$22,998	31.9%	34.9%	36.8%
Unknown	2	0.2%	0.9%	$150	0.2%	0.7%	0.3%
TOTAL	**982**	**100.0%**	**100.0%**	**$72,148**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	12	6.2%	6.7%	$1,848	5.2%	7.6%	6.9%
Moderate	41	21.0%	17.5%	$10,467	29.3%	18.8%	18.1%
Middle	91	46.7%	41.3%	$14,209	39.8%	39.5%	40.1%
Upper	49	25.1%	33.9%	$9,107	25.5%	33.8%	34.5%
Unknown	2	1.0%	0.7%	$110	0.3%	0.3%	0.3%
TOTAL	**195**	**100.0%**	**100.0%**	**$35,741**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Raleigh Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	11	13.4%	4.7%	$1,924	6.2%	2.5%	21.1%
Moderate	21	25.6%	15.9%	$4,809	15.6%	11.6%	16.3%
Middle	10	12.2%	20.2%	$2,508	8.1%	18.3%	18.5%
Upper	38	46.3%	46.0%	$20,843	67.7%	54.7%	44.1%
Unknown	2	2.4%	13.1%	$710	2.3%	12.9%	0.0%
TOTAL	**82**	**100.0%**	**100.0%**	**$30,794**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	23	15.3%	5.5%	$3,342	8.2%	3.0%	21.1%
Moderate	25	16.7%	14.8%	$3,744	9.1%	10.5%	16.3%
Middle	28	18.7%	20.2%	$3,985	9.7%	17.9%	18.5%
Upper	65	43.3%	44.2%	$27,374	66.8%	52.6%	44.1%
Unknown	9	6.0%	15.3%	$2,527	6.2%	15.9%	0.0%
TOTAL	**150**	**100.0%**	**100.0%**	**$40,972**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	8.9%	4.3%	$303	5.1%	2.3%	21.1%
Moderate	4	8.9%	12.3%	$395	6.6%	7.4%	16.3%
Middle	8	17.8%	18.2%	$980	16.4%	13.6%	18.5%
Upper	25	55.6%	62.7%	$3,812	63.9%	73.7%	44.1%
Unknown	4	8.9%	2.5%	$480	8.0%	3.1%	0.0%
TOTAL	**45**	**100.0%**	**100.0%**	**$5,970**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	3	12.5%	4.0%	$511	11.7%	2.1%	21.1%
Moderate	1	4.2%	12.0%	$50	1.1%	6.9%	16.3%
Middle	4	16.7%	19.0%	$246	5.6%	13.9%	18.5%
Upper	16	66.7%	62.3%	$3,553	81.5%	74.3%	44.1%
Unknown	0	0.0%	2.7%	$0	0.0%	2.8%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$4,360**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	6.3%	$0	0.0%	3.4%	21.1%
Moderate	1	20.0%	12.4%	$66	5.5%	7.5%	16.3%
Middle	1	20.0%	18.3%	$175	14.6%	13.0%	18.5%
Upper	3	60.0%	55.9%	$954	79.8%	68.8%	44.1%
Unknown	0	0.0%	7.2%	$0	0.0%	7.2%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,195**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.2%	$0	0.0%	3.1%	21.1%
Moderate	0	0.0%	2.3%	$0	0.0%	2.1%	16.3%
Middle	0	0.0%	1.7%	$0	0.0%	2.6%	18.5%
Upper	0	0.0%	0.4%	$0	0.0%	0.7%	44.1%
Unknown	0	0.0%	91.4%	$0	0.0%	91.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.1%	$0	0.0%	0.2%	N/A
Unknown	1	100.0%	97.9%	$350	100.0%	99.8%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$350**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	41	13.4%	5.2%	$6,080	7.3%	2.6%	21.1%
Moderate	52	16.9%	14.9%	$9,064	10.8%	10.3%	16.3%
Middle	51	16.6%	20.0%	$7,894	9.4%	17.0%	18.5%
Upper	147	47.9%	45.9%	$56,536	67.6%	51.2%	44.1%
Unknown	16	5.2%	14.0%	$4,067	4.9%	18.8%	0.0%
TOTAL	**307**	**100.0%**	**100.0%**	**$83,641**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	13	14.6%	4.3%	$2,222	5.1%	2.1%	20.8%
Moderate	14	15.7%	14.6%	$3,253	7.5%	10.2%	15.9%
Middle	10	11.2%	23.2%	$3,586	8.2%	20.8%	19.9%
Upper	51	57.3%	45.8%	$34,028	78.0%	55.3%	43.3%
Unknown	1	1.1%	12.2%	$548	1.3%	11.6%	0.0%
TOTAL	**89**	**100.0%**	**100.0%**	**$43,637**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	25	18.2%	11.4%	$2,500	7.1%	6.7%	20.8%
Moderate	28	20.4%	21.1%	$3,873	11.0%	16.3%	15.9%
Middle	20	14.6%	22.5%	$3,586	10.2%	21.4%	19.9%
Upper	60	43.8%	35.5%	$22,906	65.3%	45.2%	43.3%
Unknown	4	2.9%	9.4%	$2,220	6.3%	10.3%	0.0%
TOTAL	**137**	**100.0%**	**100.0%**	**$35,085**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	4.5%	5.7%	$204	1.3%	2.8%	20.8%
Moderate	17	19.3%	14.5%	$1,331	8.7%	8.6%	15.9%
Middle	15	17.0%	23.4%	$1,760	11.5%	17.9%	19.9%
Upper	52	59.1%	53.6%	$12,007	78.5%	67.6%	43.3%
Unknown	0	0.0%	2.8%	$0	0.0%	3.1%	0.0%
TOTAL	**88**	**100.0%**	**100.0%**	**$15,302**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	7.1%	5.1%	$100	1.8%	2.3%	20.8%
Moderate	4	14.3%	14.4%	$525	9.6%	7.8%	15.9%
Middle	5	17.9%	22.0%	$650	11.9%	16.0%	19.9%
Upper	17	60.7%	54.9%	$4,182	76.6%	70.6%	43.3%
Unknown	0	0.0%	3.5%	$0	0.0%	3.2%	0.0%
TOTAL	**28**	**100.0%**	**100.0%**	**$5,457**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	7.5%	$0	0.0%	4.3%	20.8%
Moderate	0	0.0%	15.1%	$0	0.0%	8.9%	15.9%
Middle	0	0.0%	23.4%	$0	0.0%	14.4%	19.9%
Upper	5	100.0%	48.2%	$2,741	100.0%	67.1%	43.3%
Unknown	0	0.0%	5.8%	$0	0.0%	5.4%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$2,741**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.8%	$0	0.0%	3.0%	20.8%
Moderate	0	0.0%	1.4%	$0	0.0%	1.4%	15.9%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	19.9%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.3%
Unknown	0	0.0%	95.7%	$0	0.0%	95.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.8%	$0	0.0%	0.2%	N/A
Unknown	2	100.0%	97.2%	$50,251	100.0%	99.8%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$50,251**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	44	12.6%	6.6%	$5,026	3.3%	2.9%	20.8%
Moderate	63	18.1%	16.4%	$8,982	5.9%	10.1%	15.9%
Middle	50	14.3%	22.7%	$9,582	6.3%	17.8%	19.9%
Upper	185	53.0%	44.0%	$75,864	49.8%	46.5%	43.3%
Unknown	7	2.0%	10.3%	$53,019	34.8%	22.7%	0.0%
TOTAL	**349**	**100.0%**	**100.0%**	**$152,473**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	8	9.8%	3.4%	$1,805	5.9%	2.6%	2.4%
Moderate	17	20.7%	17.8%	$3,724	12.1%	13.6%	19.3%
Middle	31	37.8%	35.0%	$11,135	36.2%	31.8%	35.9%
Upper	26	31.7%	43.8%	$14,130	45.9%	52.0%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**82**	**100.0%**	**100.0%**	**$30,794**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	1.3%	1.9%	$272	0.7%	1.4%	2.4%
Moderate	33	22.0%	14.3%	$5,189	12.7%	10.8%	19.3%
Middle	51	34.0%	34.5%	$10,965	26.8%	30.7%	35.9%
Upper	64	42.7%	49.3%	$24,546	59.9%	57.1%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**150**	**100.0%**	**100.0%**	**$40,972**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	2.2%	1.6%	$300	5.0%	1.2%	2.4%
Moderate	6	13.3%	13.9%	$490	8.2%	10.0%	19.3%
Middle	13	28.9%	31.4%	$1,303	21.8%	26.4%	35.9%
Upper	25	55.6%	53.2%	$3,877	64.9%	62.4%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**45**	**100.0%**	**100.0%**	**$5,970**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.5%	$0	0.0%	1.2%	2.4%
Moderate	1	4.2%	12.7%	$53	1.2%	8.9%	19.3%
Middle	11	45.8%	32.9%	$1,588	36.4%	27.0%	35.9%
Upper	12	50.0%	52.9%	$2,719	62.4%	62.9%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$4,360**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	20.0%	2.9%	$66	5.5%	2.2%	2.4%
Moderate	0	0.0%	18.0%	$0	0.0%	14.3%	19.3%
Middle	2	40.0%	32.8%	$406	34.0%	24.6%	35.9%
Upper	2	40.0%	46.3%	$723	60.5%	59.0%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,195**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.0%	$0	0.0%	2.3%	2.4%
Moderate	0	0.0%	37.5%	$0	0.0%	29.7%	19.3%
Middle	0	0.0%	39.4%	$0	0.0%	38.8%	35.9%
Upper	0	0.0%	20.0%	$0	0.0%	29.2%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	20.2%	$0	0.0%	12.3%	13.6%
Moderate	0	0.0%	30.6%	$0	0.0%	19.2%	25.7%
Middle	1	100.0%	28.0%	$350	100.0%	32.8%	28.1%
Upper	0	0.0%	20.7%	$0	0.0%	35.7%	32.6%
Unknown	0	0.0%	0.5%	$0	0.0%	0.0%	0.1%
TOTAL	**1**	**100.0%**	**100.0%**	**$350**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	12	3.9%	2.4%	$2,443	2.9%	2.4%	2.4%
Moderate	57	18.6%	15.5%	$9,456	11.3%	12.3%	19.3%
Middle	109	35.5%	34.5%	$25,747	30.8%	31.1%	35.9%
Upper	129	42.0%	47.6%	$45,995	55.0%	54.1%	42.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**307**	**100.0%**	**100.0%**	**$83,641**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	3	3.4%	3.9%	$503	1.2%	2.8%	3.2%
Moderate	17	19.1%	18.5%	$4,364	10.0%	14.1%	17.8%
Middle	26	29.2%	38.4%	$11,164	25.6%	35.0%	35.7%
Upper	41	46.1%	38.3%	$26,786	61.4%	47.0%	42.6%
Unknown	2	2.2%	1.0%	$820	1.9%	1.1%	0.8%
TOTAL	**89**	**100.0%**	**100.0%**	**$43,637**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	5	3.6%	3.4%	$557	1.6%	2.4%	3.2%
Moderate	26	19.0%	17.7%	$4,323	12.3%	13.2%	17.8%
Middle	50	36.5%	38.1%	$9,841	28.0%	34.7%	35.7%
Upper	55	40.1%	40.1%	$20,164	57.5%	48.9%	42.6%
Unknown	1	0.7%	0.7%	$200	0.6%	0.8%	0.8%
TOTAL	**137**	**100.0%**	**100.0%**	**$35,085**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	2.3%	2.3%	$112	0.7%	1.6%	3.2%
Moderate	11	12.5%	13.6%	$870	5.7%	9.6%	17.8%
Middle	20	22.7%	34.3%	$2,820	18.4%	29.0%	35.7%
Upper	50	56.8%	48.8%	$10,084	65.9%	58.3%	42.6%
Unknown	5	5.7%	1.0%	$1,416	9.3%	1.5%	0.8%
TOTAL	**88**	**100.0%**	**100.0%**	**$15,302**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.5%	$0	0.0%	0.9%	3.2%
Moderate	6	21.4%	11.9%	$664	12.2%	8.3%	17.8%
Middle	6	21.4%	36.0%	$970	17.8%	28.6%	35.7%
Upper	16	57.1%	49.3%	$3,823	70.1%	60.5%	42.6%
Unknown	0	0.0%	1.3%	$0	0.0%	1.8%	0.8%
TOTAL	**28**	**100.0%**	**100.0%**	**$5,457**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.9%	$0	0.0%	2.1%	3.2%
Moderate	1	20.0%	12.5%	$491	17.9%	8.1%	17.8%
Middle	1	20.0%	36.0%	$200	7.3%	24.6%	35.7%
Upper	3	60.0%	47.2%	$2,050	74.8%	63.9%	42.6%
Unknown	0	0.0%	1.3%	$0	0.0%	1.3%	0.8%
TOTAL	**5**	**100.0%**	**100.0%**	**$2,741**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.8%	$0	0.0%	4.0%	3.2%
Moderate	0	0.0%	34.8%	$0	0.0%	28.0%	17.8%
Middle	0	0.0%	39.6%	$0	0.0%	44.5%	35.7%
Upper	0	0.0%	20.5%	$0	0.0%	23.4%	42.6%
Unknown	0	0.0%	0.3%	$0	0.0%	0.1%	0.8%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	17.0%	$0	0.0%	5.6%	12.1%
Moderate	0	0.0%	25.0%	$0	0.0%	11.9%	19.3%
Middle	0	0.0%	30.7%	$0	0.0%	52.5%	34.4%
Upper	2	100.0%	24.1%	$50,251	100.0%	26.8%	31.8%
Unknown	0	0.0%	3.3%	$0	0.0%	3.1%	2.4%
TOTAL	**2**	**100.0%**	**100.0%**	**$50,251**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	10	2.9%	3.4%	$1,172	0.8%	3.0%	3.2%
Moderate	61	17.5%	17.2%	$10,712	7.0%	13.3%	17.8%
Middle	103	29.5%	37.6%	$24,995	16.4%	36.8%	35.7%
Upper	167	47.9%	40.8%	$113,158	74.2%	45.6%	42.6%
Unknown	8	2.3%	0.9%	$2,436	1.6%	1.4%	0.8%
TOTAL	**349**	**100.0%**	**100.0%**	**$152,473**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	255	33.6%	47.4%	$15,492	17.9%	32.3%	93.0%
		Over $1 Million/ Unknown	504	66.4%	52.6%	$71,236	82.1%	67.7%	7.0%
		TOTAL	**759**	**100.0%**	**100.0%**	**$86,728**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	546	71.9%	91.6%	$14,368	16.6%	34.2%	
		$100,001–$250,000	114	15.0%	4.6%	$18,420	21.2%	18.5%	
		$250,001–$1 Million	99	13.0%	3.8%	$53,940	62.2%	47.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**759**	**100.0%**	**100.0%**	**$86,728**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	226	88.6%		$5,196	33.5%		
		$100,001–$250,000	17	6.7%		$2,448	15.8%		
		$250,001–$1 Million	12	4.7%		$7,848	50.7%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**255**	**100.0%**		**$15,492**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	59	45.0%	52.1%	$6,875	23.7%	36.5%	93.0%
		Over $1 Million/ Unknown	72	55.0%	47.9%	$22,185	76.3%	63.5%	7.0%
		TOTAL	**131**	**100.0%**	**100.0%**	**$29,060**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	75	57.3%	94.5%	$2,889	9.9%	41.5%	
		$100,001–$250,000	16	12.2%	2.8%	$3,249	11.2%	14.6%	
		$250,001–$1 Million	40	30.5%	2.7%	$22,922	78.9%	43.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**131**	**100.0%**	**100.0%**	**$29,060**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	46	78.0%		$1,256	18.3%		
		$100,001–$250,000	4	6.8%		$850	12.4%		
		$250,001–$1 Million	9	15.3%		$4,769	69.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**59**	**100.0%**		**$6,875**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	24	3.2%	4.4%	$1,995	2.3%	5.6%	4.9%
Moderate	139	18.3%	18.9%	$13,798	15.9%	18.8%	19.9%
Middle	285	37.5%	33.6%	$27,173	31.3%	33.2%	33.2%
Upper	307	40.4%	42.3%	$42,594	49.1%	41.8%	41.4%
Unknown	4	0.5%	0.8%	$1,168	1.3%	0.7%	0.6%
TOTAL	**759**	**100.0%**	**100.0%**	**$86,728**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	8	6.1%	4.8%	$1,180	4.1%	5.8%	5.2%
Moderate	25	19.1%	17.4%	$4,090	14.1%	15.1%	17.3%
Middle	53	40.5%	34.4%	$11,647	40.1%	34.7%	34.5%
Upper	43	32.8%	41.7%	$11,783	40.5%	42.5%	41.7%
Unknown	2	1.5%	1.7%	$360	1.2%	1.8%	1.2%
TOTAL	**131**	**100.0%**	**100.0%**	**$29,060**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Hickory Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	3	18.8%	5.4%	$233	5.1%	2.7%	20.8%
Moderate	2	12.5%	21.4%	$137	3.0%	14.0%	17.8%
Middle	3	18.8%	21.1%	$961	20.9%	17.8%	21.2%
Upper	8	50.0%	37.3%	$3,275	71.1%	51.9%	40.2%
Unknown	0	0.0%	14.8%	$0	0.0%	13.6%	0.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$4,606**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	6	10.7%	5.1%	$386	3.5%	2.5%	20.8%
Moderate	8	14.3%	15.5%	$545	5.0%	10.2%	17.8%
Middle	10	17.9%	20.0%	$1,135	10.4%	15.8%	21.2%
Upper	29	51.8%	41.6%	$7,254	66.6%	52.8%	40.2%
Unknown	3	5.4%	17.7%	$1,568	14.4%	18.7%	0.0%
TOTAL	**56**	**100.0%**	**100.0%**	**$10,888**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	15.4%	4.5%	$120	10.2%	3.1%	20.8%
Moderate	3	23.1%	11.7%	$230	19.6%	8.6%	17.8%
Middle	4	30.8%	20.0%	$334	28.4%	15.9%	21.2%
Upper	4	30.8%	62.1%	$490	41.7%	68.5%	40.2%
Unknown	0	0.0%	1.6%	$0	0.0%	3.9%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$1,174**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	8.3%	5.2%	$55	3.5%	2.3%	20.8%
Moderate	2	16.7%	11.7%	$65	4.1%	6.3%	17.8%
Middle	2	16.7%	20.5%	$123	7.8%	15.1%	21.2%
Upper	6	50.0%	60.2%	$1,084	68.7%	71.1%	40.2%
Unknown	1	8.3%	2.5%	$250	15.9%	5.2%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$1,577**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.2%	$0	0.0%	3.5%	20.8%
Moderate	0	0.0%	22.1%	$0	0.0%	9.6%	17.8%
Middle	0	0.0%	14.8%	$0	0.0%	8.1%	21.2%
Upper	0	0.0%	45.1%	$0	0.0%	68.8%	40.2%
Unknown	0	0.0%	9.8%	$0	0.0%	10.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.7%	$0	0.0%	5.2%	20.8%
Moderate	0	0.0%	6.7%	$0	0.0%	6.3%	17.8%
Middle	0	0.0%	1.0%	$0	0.0%	1.2%	21.2%
Upper	0	0.0%	1.0%	$0	0.0%	1.3%	40.2%
Unknown	0	0.0%	83.7%	$0	0.0%	86.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	2	100.0%	100.0%	$3,323	100.0%	100.0%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$3,323**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	12	12.1%	5.2%	$794	3.7%	2.5%	20.8%
Moderate	15	15.2%	17.5%	$977	4.5%	11.4%	17.8%
Middle	19	19.2%	20.2%	$2,553	11.8%	16.0%	21.2%
Upper	47	47.5%	40.9%	$12,103	56.1%	50.8%	40.2%
Unknown	6	6.1%	16.1%	$5,141	23.8%	19.3%	0.0%
TOTAL	**99**	**100.0%**	**100.0%**	**$21,568**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	5.0%	5.3%	$81	1.4%	2.4%	19.6%
Moderate	3	15.0%	20.4%	$565	9.9%	13.4%	19.5%
Middle	8	40.0%	23.1%	$1,272	22.2%	19.2%	20.5%
Upper	8	40.0%	36.9%	$3,818	66.6%	51.5%	40.4%
Unknown	0	0.0%	14.3%	$0	0.0%	13.5%	0.0%
TOTAL	**20**	**100.0%**	**100.0%**	**$5,736**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	7	17.9%	9.4%	$420	6.3%	5.0%	19.6%
Moderate	5	12.8%	21.0%	$401	6.0%	15.6%	19.5%
Middle	8	20.5%	24.3%	$755	11.4%	21.1%	20.5%
Upper	18	46.2%	36.2%	$4,517	68.0%	47.5%	40.4%
Unknown	1	2.6%	9.0%	$552	8.3%	10.9%	0.0%
TOTAL	**39**	**100.0%**	**100.0%**	**$6,645**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	6	17.6%	5.3%	$216	8.6%	2.9%	19.6%
Moderate	10	29.4%	16.7%	$597	23.8%	9.9%	19.5%
Middle	0	0.0%	20.0%	$0	0.0%	14.7%	20.5%
Upper	18	52.9%	56.1%	$1,698	67.6%	70.9%	40.4%
Unknown	0	0.0%	1.8%	$0	0.0%	1.5%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$2,511**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	15.4%	5.6%	$46	2.6%	2.3%	19.6%
Moderate	1	7.7%	14.6%	$30	1.7%	7.2%	19.5%
Middle	2	15.4%	23.2%	$220	12.4%	15.4%	20.5%
Upper	8	61.5%	55.5%	$1,484	83.4%	74.0%	40.4%
Unknown	0	0.0%	1.1%	$0	0.0%	1.0%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$1,780**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	10.4%	$0	0.0%	5.7%	19.6%
Moderate	0	0.0%	18.2%	$0	0.0%	21.8%	19.5%
Middle	1	100.0%	23.4%	$20	100.0%	20.2%	20.5%
Upper	0	0.0%	37.7%	$0	0.0%	46.3%	40.4%
Unknown	0	0.0%	10.4%	$0	0.0%	6.1%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$20**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.9%	$0	0.0%	6.6%	19.6%
Moderate	0	0.0%	4.5%	$0	0.0%	4.5%	19.5%
Middle	0	0.0%	1.1%	$0	0.0%	1.5%	20.5%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	40.4%
Unknown	0	0.0%	86.5%	$0	0.0%	87.4%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	4.0%	$0	0.0%	0.5%	N/A
Unknown	0	0.0%	96.0%	$0	0.0%	99.5%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	16	15.0%	6.7%	$763	4.6%	3.0%	19.6%
Moderate	19	17.8%	19.6%	$1,593	9.5%	12.6%	19.5%
Middle	19	17.8%	23.0%	$2,267	13.6%	17.8%	20.5%
Upper	52	48.6%	39.3%	$11,517	69.0%	47.5%	40.4%
Unknown	1	0.9%	11.5%	$552	3.3%	19.2%	0.0%
TOTAL	**107**	**100.0%**	**100.0%**	**$16,692**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	12.5%	12.5%	$209	4.5%	9.6%	11.7%
Middle	7	43.8%	60.4%	$1,929	41.9%	53.6%	66.1%
Upper	7	43.8%	27.1%	$2,468	53.6%	36.7%	22.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$4,606**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	6	10.7%	8.5%	$578	5.3%	6.8%	11.7%
Middle	30	53.6%	61.0%	$5,439	50.0%	53.0%	66.1%
Upper	20	35.7%	30.5%	$4,871	44.7%	40.2%	22.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**56**	**100.0%**	**100.0%**	**$10,888**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	15.4%	9.6%	$90	7.7%	7.1%	11.7%
Middle	7	53.8%	56.5%	$594	50.6%	49.4%	66.1%
Upper	4	30.8%	33.9%	$490	41.7%	43.5%	22.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$1,174**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	8.3%	9.2%	$15	1.0%	7.0%	11.7%
Middle	7	58.3%	60.5%	$864	54.8%	54.2%	66.1%
Upper	4	33.3%	30.3%	$698	44.3%	38.7%	22.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$1,577**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	10.7%	$0	0.0%	4.4%	11.7%
Middle	0	0.0%	54.9%	$0	0.0%	40.3%	66.1%
Upper	0	0.0%	34.4%	$0	0.0%	55.4%	22.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	16.3%	$0	0.0%	15.7%	11.7%
Middle	0	0.0%	70.2%	$0	0.0%	71.0%	66.1%
Upper	0	0.0%	13.5%	$0	0.0%	13.3%	22.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	23.4%	$0	0.0%	6.0%	22.3%
Middle	1	50.0%	51.1%	$2,250	67.7%	81.5%	56.9%
Upper	1	50.0%	25.5%	$1,073	32.3%	12.5%	20.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$3,323**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	11	11.1%	10.3%	$892	4.1%	8.0%	11.7%
Middle	52	52.5%	60.6%	$11,076	51.4%	54.3%	66.1%
Upper	36	36.4%	29.2%	$9,600	44.5%	37.6%	22.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**99**	**100.0%**	**100.0%**	**$21,568**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	5.0%	0.7%	$120	2.1%	0.4%	0.6%
Moderate	6	30.0%	15.3%	$766	13.4%	11.5%	14.8%
Middle	7	35.0%	54.5%	$2,047	35.7%	49.8%	60.9%
Upper	6	30.0%	29.5%	$2,803	48.9%	38.2%	23.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**20**	**100.0%**	**100.0%**	**$5,736**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	2.6%	0.5%	$50	0.8%	0.4%	0.6%
Moderate	6	15.4%	13.4%	$458	6.9%	10.6%	14.8%
Middle	21	53.8%	58.6%	$3,955	59.5%	52.0%	60.9%
Upper	11	28.2%	27.5%	$2,182	32.8%	37.1%	23.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**39**	**100.0%**	**100.0%**	**$6,645**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	2.9%	0.8%	$125	5.0%	0.5%	0.6%
Moderate	9	26.5%	10.7%	$366	14.6%	7.2%	14.8%
Middle	15	44.1%	55.6%	$932	37.1%	50.4%	60.9%
Upper	9	26.5%	33.0%	$1,088	43.3%	41.9%	23.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$2,511**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.1%	$0	0.0%	0.1%	0.6%
Moderate	1	7.7%	11.9%	$15	0.8%	7.8%	14.8%
Middle	6	46.2%	57.2%	$496	27.9%	46.9%	60.9%
Upper	6	46.2%	30.8%	$1,269	71.3%	45.3%	23.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$1,780**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.6%
Moderate	0	0.0%	11.7%	$0	0.0%	6.7%	14.8%
Middle	1	100.0%	64.9%	$20	100.0%	57.7%	60.9%
Upper	0	0.0%	23.4%	$0	0.0%	35.6%	23.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$20**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.6%
Moderate	0	0.0%	22.5%	$0	0.0%	18.3%	14.8%
Middle	0	0.0%	62.9%	$0	0.0%	65.7%	60.9%
Upper	0	0.0%	14.6%	$0	0.0%	16.0%	23.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	1.1%
Moderate	0	0.0%	12.0%	$0	0.0%	9.0%	22.0%
Middle	0	0.0%	74.0%	$0	0.0%	80.1%	58.1%
Upper	0	0.0%	14.0%	$0	0.0%	11.0%	18.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	3	2.8%	0.5%	$295	1.8%	0.4%	0.6%
Moderate	22	20.6%	14.1%	$1,605	9.6%	10.8%	14.8%
Middle	50	46.7%	56.4%	$7,450	44.6%	52.9%	60.9%
Upper	32	29.9%	29.0%	$7,342	44.0%	36.0%	23.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**107**	**100.0%**	**100.0%**	**$16,692**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	52	20.8%	48.4%	$3,772	13.9%	28.5%	90.0%
		Over $1 Million/ Unknown	198	79.2%	51.6%	$23,398	86.1%	71.5%	10.0%
		TOTAL	**250**	**100.0%**	**100.0%**	**$27,170**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	188	75.2%	90.3%	$5,757	21.2%	32.2%	
		$100,001–$250,000	33	13.2%	5.5%	$5,589	20.6%	19.9%	
		$250,001–$1 Million	29	11.6%	4.3%	$15,824	58.2%	47.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**250**	**100.0%**	**100.0%**	**$27,170**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	43	82.7%		$1,050	27.8%		
		$100,001–$250,000	5	9.6%		$918	24.3%		
		$250,001–$1 Million	4	7.7%		$1,804	47.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**52**	**100.0%**		**$3,772**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	37	49.3%	55.5%	$3,833	26.8%	38.6%	90.1%
		Over $1 Million/ Unknown	38	50.7%	44.5%	$10,456	73.2%	61.4%	9.9%
		TOTAL	**75**	**100.0%**	**100.0%**	**$14,289**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	43	57.3%	91.5%	$1,823	12.8%	32.5%	
		$100,001–$250,000	14	18.7%	4.1%	$2,508	17.6%	16.0%	
		$250,001–$1 Million	18	24.0%	4.4%	$9,958	69.7%	51.5%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**75**	**100.0%**	**100.0%**	**$14,289**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	27	73.0%		$909	23.7%		
		$100,001–$250,000	6	16.2%		$1,136	29.6%		
		$250,001–$1 Million	4	10.8%		$1,788	46.6%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**37**	**100.0%**		**$3,833**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	53	21.2%	16.1%	$4,662	17.2%	23.9%	16.9%
Middle	132	52.8%	55.4%	$16,146	59.4%	48.6%	57.6%
Upper	65	26.0%	27.1%	$6,362	23.4%	27.3%	25.6%
Unknown	0	0.0%	1.4%	$0	0.0%	0.3%	0.0%
TOTAL	**250**	**100.0%**	**100.0%**	**$27,170**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	2	2.7%	0.8%	$644	4.5%	0.9%	0.9%
Moderate	24	32.0%	20.7%	$5,289	37.0%	28.2%	22.0%
Middle	37	49.3%	50.7%	$6,404	44.8%	47.2%	51.8%
Upper	12	16.0%	27.0%	$1,952	13.7%	23.4%	25.3%
Unknown	0	0.0%	0.8%	$0	0.0%	0.2%	0.0%
TOTAL	**75**	**100.0%**	**100.0%**	**$14,289**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Asheville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	4.0%	$0	0.0%	1.9%	19.9%
Moderate	1	5.6%	15.3%	$225	2.3%	10.3%	19.1%
Middle	4	22.2%	19.0%	$940	9.7%	15.7%	19.9%
Upper	11	61.1%	49.2%	$7,962	81.8%	61.0%	41.2%
Unknown	2	11.1%	12.5%	$605	6.2%	11.1%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$9,732**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	11.1%	6.1%	$363	5.2%	3.5%	19.9%
Moderate	1	5.6%	17.1%	$213	3.0%	12.3%	19.1%
Middle	2	11.1%	22.7%	$240	3.4%	19.6%	19.9%
Upper	9	50.0%	40.0%	$3,698	52.7%	50.1%	41.2%
Unknown	4	22.2%	14.1%	$2,498	35.6%	14.5%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$7,012**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	9.1%	5.8%	$25	1.7%	2.8%	19.9%
Moderate	2	18.2%	13.3%	$150	10.4%	7.7%	19.1%
Middle	3	27.3%	21.3%	$585	40.6%	15.6%	19.9%
Upper	5	45.5%	57.3%	$682	47.3%	70.1%	41.2%
Unknown	0	0.0%	2.4%	$0	0.0%	3.8%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$1,442**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.5%	$0	0.0%	4.7%	19.9%
Moderate	0	0.0%	10.5%	$0	0.0%	5.7%	19.1%
Middle	1	16.7%	20.0%	$150	12.1%	10.9%	19.9%
Upper	5	83.3%	62.1%	$1,086	87.9%	75.6%	41.2%
Unknown	0	0.0%	3.0%	$0	0.0%	3.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,236**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	11.0%	$0	0.0%	4.5%	19.9%
Moderate	1	100.0%	13.6%	$150	100.0%	6.5%	19.1%
Middle	0	0.0%	13.0%	$0	0.0%	6.5%	19.9%
Upper	0	0.0%	51.3%	$0	0.0%	65.7%	41.2%
Unknown	0	0.0%	11.0%	$0	0.0%	16.8%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$150**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	19.9%
Moderate	0	0.0%	1.9%	$0	0.0%	3.0%	19.1%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	19.9%
Upper	0	0.0%	1.0%	$0	0.0%	2.6%	41.2%
Unknown	0	0.0%	97.1%	$0	0.0%	94.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	4.0%	$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	96.0%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	3	5.6%	5.3%	$388	2.0%	2.7%	19.9%
Moderate	5	9.3%	15.9%	$738	3.8%	10.6%	19.1%
Middle	10	18.5%	21.0%	$1,915	9.8%	16.7%	19.9%
Upper	30	55.6%	44.6%	$13,428	68.6%	53.3%	41.2%
Unknown	6	11.1%	13.3%	$3,103	15.9%	16.7%	0.0%
TOTAL	**54**	**100.0%**	**100.0%**	**$19,572**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	3.5%	$0	0.0%	1.5%	19.4%
Moderate	2	9.5%	13.0%	$528	3.8%	7.6%	18.3%
Middle	0	0.0%	19.9%	$0	0.0%	15.0%	20.8%
Upper	17	81.0%	53.6%	$11,848	85.9%	66.1%	41.5%
Unknown	2	9.5%	10.1%	$1,411	10.2%	9.8%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$13,787**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	9.0%	$0	0.0%	4.9%	19.4%
Moderate	3	33.3%	20.9%	$332	8.4%	15.2%	18.3%
Middle	1	11.1%	21.7%	$350	8.8%	19.3%	20.8%
Upper	5	55.6%	38.3%	$3,289	82.8%	48.6%	41.5%
Unknown	0	0.0%	10.1%	$0	0.0%	12.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$3,971**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	3	20.0%	4.9%	$288	12.9%	2.2%	19.4%
Moderate	2	13.3%	14.6%	$65	2.9%	8.1%	18.3%
Middle	5	33.3%	20.4%	$557	24.9%	14.0%	20.8%
Upper	5	33.3%	57.1%	$1,330	59.4%	72.1%	41.5%
Unknown	0	0.0%	3.0%	$0	0.0%	3.6%	0.0%
TOTAL	**15**	**100.0%**	**100.0%**	**$2,240**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.8%	$0	0.0%	2.6%	19.4%
Moderate	0	0.0%	11.7%	$0	0.0%	4.6%	18.3%
Middle	1	33.3%	21.6%	$50	15.9%	11.7%	20.8%
Upper	2	66.7%	58.2%	$265	84.1%	77.9%	41.5%
Unknown	0	0.0%	3.7%	$0	0.0%	3.3%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$315**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	6.7%	$0	0.0%	4.3%	19.4%
Moderate	0	0.0%	15.0%	$0	0.0%	6.2%	18.3%
Middle	1	33.3%	17.8%	$225	10.1%	8.5%	20.8%
Upper	1	33.3%	53.9%	$1,313	58.7%	64.8%	41.5%
Unknown	1	33.3%	6.7%	$700	31.3%	16.3%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$2,238**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.6%	$0	0.0%	2.7%	19.4%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	18.3%
Middle	0	0.0%	2.6%	$0	0.0%	2.7%	20.8%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.5%
Unknown	0	0.0%	94.7%	$0	0.0%	94.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	3	5.9%	5.5%	$288	1.3%	2.3%	19.4%
Moderate	7	13.7%	15.5%	$925	4.1%	8.5%	18.3%
Middle	8	15.7%	20.4%	$1,182	5.2%	14.1%	20.8%
Upper	30	58.8%	49.0%	$18,045	80.0%	54.6%	41.5%
Unknown	3	5.9%	9.6%	$2,111	9.4%	20.6%	0.0%
TOTAL	**51**	**100.0%**	**100.0%**	**$22,551**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.8%	$0	0.0%	0.9%	0.7%
Moderate	0	0.0%	12.7%	$0	0.0%	9.1%	11.8%
Middle	9	50.0%	63.3%	$3,999	41.1%	59.9%	66.1%
Upper	9	50.0%	23.2%	$5,733	58.9%	30.2%	21.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$9,732**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.7%	$0	0.0%	0.7%	0.7%
Moderate	0	0.0%	9.6%	$0	0.0%	7.6%	11.8%
Middle	12	66.7%	65.6%	$4,587	65.4%	62.1%	66.1%
Upper	6	33.3%	24.0%	$2,425	34.6%	29.6%	21.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$7,012**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.5%	$0	0.0%	1.0%	0.7%
Moderate	1	9.1%	9.1%	$100	6.9%	6.7%	11.8%
Middle	6	54.5%	63.6%	$818	56.7%	60.9%	66.1%
Upper	4	36.4%	26.7%	$524	36.3%	31.2%	21.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.2%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$1,442**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.6%	$0	0.0%	0.6%	0.7%
Moderate	0	0.0%	5.5%	$0	0.0%	3.5%	11.8%
Middle	3	50.0%	61.5%	$478	38.7%	55.6%	66.1%
Upper	3	50.0%	32.4%	$758	61.3%	40.3%	21.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,236**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.6%	$0	0.0%	0.5%	0.7%
Moderate	0	0.0%	10.4%	$0	0.0%	8.2%	11.8%
Middle	0	0.0%	57.8%	$0	0.0%	38.6%	66.1%
Upper	1	100.0%	31.2%	$150	100.0%	52.6%	21.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$150**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.7%
Moderate	0	0.0%	64.1%	$0	0.0%	37.4%	11.8%
Middle	0	0.0%	29.1%	$0	0.0%	45.1%	66.1%
Upper	0	0.0%	6.8%	$0	0.0%	17.4%	21.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	4.4%
Moderate	0	0.0%	12.0%	$0	0.0%	6.5%	14.6%
Middle	0	0.0%	56.0%	$0	0.0%	23.7%	45.6%
Upper	0	0.0%	32.0%	$0	0.0%	69.9%	35.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.8%	$0	0.0%	0.7%	0.7%
Moderate	1	1.9%	10.9%	$100	0.5%	8.2%	11.8%
Middle	30	55.6%	64.3%	$9,882	50.5%	59.0%	66.1%
Upper	23	42.6%	24.1%	$9,590	49.0%	32.1%	21.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**54**	**100.0%**	**100.0%**	**$19,572**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	2.3%	$0	0.0%	1.8%	1.3%
Moderate	1	4.8%	15.5%	$361	2.6%	13.1%	15.2%
Middle	8	38.1%	51.4%	$4,914	35.6%	48.4%	51.4%
Upper	12	57.1%	30.8%	$8,512	61.7%	36.6%	32.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$13,787**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.7%	$0	0.0%	1.4%	1.3%
Moderate	2	22.2%	14.5%	$742	18.7%	12.4%	15.2%
Middle	2	22.2%	52.4%	$435	11.0%	50.1%	51.4%
Upper	5	55.6%	31.4%	$2,794	70.4%	36.0%	32.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$3,971**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	6.7%	1.7%	$80	3.6%	0.8%	1.3%
Moderate	0	0.0%	12.8%	$0	0.0%	11.3%	15.2%
Middle	7	46.7%	49.4%	$732	32.7%	45.2%	51.4%
Upper	7	46.7%	36.2%	$1,428	63.8%	42.7%	32.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**15**	**100.0%**	**100.0%**	**$2,240**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.9%	$0	0.0%	0.3%	1.3%
Moderate	0	0.0%	10.6%	$0	0.0%	7.1%	15.2%
Middle	1	33.3%	51.0%	$50	15.9%	45.5%	51.4%
Upper	2	66.7%	37.5%	$265	84.1%	47.1%	32.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$315**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.6%	$0	0.0%	0.5%	1.3%
Moderate	0	0.0%	11.7%	$0	0.0%	7.0%	15.2%
Middle	2	66.7%	58.9%	$1,538	68.7%	43.6%	51.4%
Upper	1	33.3%	28.9%	$700	31.3%	48.8%	32.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$2,238**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	1.3%
Moderate	0	0.0%	31.6%	$0	0.0%	29.0%	15.2%
Middle	0	0.0%	50.0%	$0	0.0%	45.2%	51.4%
Upper	0	0.0%	18.4%	$0	0.0%	25.8%	32.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.7%
Moderate	0	0.0%	14.7%	$0	0.0%	26.1%	17.3%
Middle	0	0.0%	58.8%	$0	0.0%	51.2%	58.1%
Upper	0	0.0%	26.5%	$0	0.0%	22.7%	23.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	2.0%	1.9%	$80	0.4%	1.4%	1.3%
Moderate	3	5.9%	14.6%	$1,103	4.9%	14.2%	15.2%
Middle	20	39.2%	51.6%	$7,669	34.0%	48.9%	51.4%
Upper	27	52.9%	31.8%	$13,699	60.7%	35.6%	32.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**51**	**100.0%**	**100.0%**	**$22,551**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	31	19.1%	48.2%	$5,703	22.1%	33.0%	93.8%
		Over $1 Million/ Unknown	131	80.9%	51.8%	$20,062	77.9%	67.0%	6.2%
		TOTAL	**162**	**100.0%**	**100.0%**	**$25,765**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	102	63.0%	90.8%	$2,432	9.4%	32.8%	
		$100,001–$250,000	24	14.8%	4.7%	$4,046	15.7%	17.5%	
		$250,001–$1 Million	36	22.2%	4.4%	$19,287	74.9%	49.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**162**	**100.0%**	**100.0%**	**$25,765**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	19	61.3%		$344	6.0%		
		$100,001–$250,000	2	6.5%		$337	5.9%		
		$250,001–$1 Million	10	32.3%		$5,022	88.1%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**31**	**100.0%**		**$5,703**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	20	47.6%	52.7%	$4,168	56.5%	40.9%	93.8%
		Over $1 Million/ Unknown	22	52.4%	47.3%	$3,207	43.5%	59.1%	6.2%
		TOTAL	**42**	**100.0%**	**100.0%**	**$7,375**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	27	64.3%	93.9%	$1,253	17.0%	38.4%	
		$100,001–$250,000	6	14.3%	3.1%	$1,191	16.1%	15.3%	
		$250,001–$1 Million	9	21.4%	3.0%	$4,931	66.9%	46.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**42**	**100.0%**	**100.0%**	**$7,375**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	13	65.0%		$458	11.0%		
		$100,001–$250,000	1	5.0%		$229	5.5%		
		$250,001–$1 Million	6	30.0%		$3,481	83.5%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**20**	**100.0%**		**$4,168**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	6	3.7%	3.1%	$1,522	5.9%	4.8%	3.6%
Moderate	19	11.7%	15.4%	$3,112	12.1%	17.4%	13.6%
Middle	78	48.1%	51.7%	$9,479	36.8%	41.9%	51.7%
Upper	59	36.4%	29.1%	$11,652	45.2%	35.8%	31.2%
Unknown	0	0.0%	0.8%	$0	0.0%	0.1%	0.0%
TOTAL	**162**	**100.0%**	**100.0%**	**$25,765**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	1.2%	$0	0.0%	1.4%	1.1%
Moderate	11	26.2%	20.5%	$1,463	19.8%	21.6%	19.8%
Middle	19	45.2%	49.2%	$3,888	52.7%	49.6%	50.3%
Upper	12	28.6%	28.5%	$2,024	27.4%	27.3%	28.7%
Unknown	0	0.0%	0.6%	$0	0.0%	0.1%	0.0%
TOTAL	**42**	**100.0%**	**100.0%**	**$7,375**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Fayetteville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	3.1%	$0	0.0%	1.5%	21.7%
Moderate	5	21.7%	13.9%	$616	12.9%	9.8%	17.8%
Middle	4	17.4%	22.8%	$660	13.8%	20.9%	19.8%
Upper	12	52.2%	34.4%	$2,981	62.3%	41.0%	40.6%
Unknown	2	8.7%	25.8%	$527	11.0%	26.8%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$4,784**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.7%	$0	0.0%	0.9%	21.7%
Moderate	0	0.0%	5.8%	$0	0.0%	3.5%	17.8%
Middle	0	0.0%	9.3%	$0	0.0%	7.3%	19.8%
Upper	7	87.5%	24.7%	$2,624	91.3%	26.4%	40.6%
Unknown	1	12.5%	58.4%	$250	8.7%	62.0%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$2,874**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.5%	$0	0.0%	3.2%	21.7%
Moderate	0	0.0%	10.6%	$0	0.0%	5.7%	17.8%
Middle	1	100.0%	18.1%	$78	100.0%	15.8%	19.8%
Upper	0	0.0%	64.3%	$0	0.0%	73.0%	40.6%
Unknown	0	0.0%	2.5%	$0	0.0%	2.3%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$78**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.4%	$0	0.0%	1.5%	21.7%
Moderate	0	0.0%	8.5%	$0	0.0%	3.9%	17.8%
Middle	0	0.0%	19.8%	$0	0.0%	12.5%	19.8%
Upper	0	0.0%	65.0%	$0	0.0%	80.3%	40.6%
Unknown	0	0.0%	3.4%	$0	0.0%	1.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	6.9%	$0	0.0%	4.1%	21.7%
Moderate	0	0.0%	15.3%	$0	0.0%	13.2%	17.8%
Middle	0	0.0%	20.8%	$0	0.0%	22.8%	19.8%
Upper	0	0.0%	34.7%	$0	0.0%	32.9%	40.6%
Unknown	0	0.0%	22.2%	$0	0.0%	26.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.8%	$0	0.0%	1.2%	21.7%
Moderate	0	0.0%	2.5%	$0	0.0%	2.1%	17.8%
Middle	0	0.0%	1.5%	$0	0.0%	1.3%	19.8%
Upper	0	0.0%	2.2%	$0	0.0%	3.2%	40.6%
Unknown	0	0.0%	92.0%	$0	0.0%	92.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.5%	$0	0.0%	0.1%	N/A
Upper	0	0.0%	1.5%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	97.0%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	0	0.0%	2.5%	$0	0.0%	1.1%	21.7%
Moderate	5	15.6%	10.1%	$616	8.0%	6.3%	17.8%
Middle	5	15.6%	16.6%	$738	9.5%	13.4%	19.8%
Upper	19	59.4%	30.3%	$5,605	72.5%	31.2%	40.6%
Unknown	3	9.4%	40.6%	$777	10.0%	47.9%	0.0%
TOTAL	**32**	**100.0%**	**100.0%**	**$7,736**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	2.9%	$0	0.0%	1.4%	23.4%
Moderate	1	7.7%	13.4%	$154	4.0%	9.4%	18.2%
Middle	3	23.1%	24.0%	$565	14.7%	22.3%	20.0%
Upper	8	61.5%	32.3%	$2,999	77.9%	38.5%	38.4%
Unknown	1	7.7%	27.3%	$131	3.4%	28.4%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$3,849**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	5.2%	$0	0.0%	3.0%	23.4%
Moderate	1	14.3%	13.7%	$93	3.1%	9.9%	18.2%
Middle	1	14.3%	20.4%	$70	2.4%	18.2%	20.0%
Upper	4	57.1%	38.8%	$2,137	72.3%	45.4%	38.4%
Unknown	1	14.3%	21.9%	$654	22.1%	23.5%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$2,954**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.3%	$0	0.0%	3.7%	23.4%
Moderate	1	20.0%	12.5%	$50	17.5%	9.0%	18.2%
Middle	2	40.0%	20.8%	$94	33.0%	16.8%	20.0%
Upper	2	40.0%	58.7%	$141	49.5%	66.9%	38.4%
Unknown	0	0.0%	3.7%	$0	0.0%	3.6%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$285**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	6.5%	$0	0.0%	3.5%	23.4%
Moderate	0	0.0%	12.6%	$0	0.0%	9.5%	18.2%
Middle	0	0.0%	20.5%	$0	0.0%	14.1%	20.0%
Upper	0	0.0%	56.7%	$0	0.0%	70.1%	38.4%
Unknown	0	0.0%	3.8%	$0	0.0%	2.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.4%	$0	0.0%	4.2%	23.4%
Moderate	0	0.0%	13.2%	$0	0.0%	12.6%	18.2%
Middle	0	0.0%	17.8%	$0	0.0%	15.5%	20.0%
Upper	1	100.0%	56.6%	$102	100.0%	59.4%	38.4%
Unknown	0	0.0%	7.0%	$0	0.0%	8.3%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$102**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.7%	$0	0.0%	0.4%	23.4%
Moderate	0	0.0%	6.7%	$0	0.0%	7.5%	18.2%
Middle	0	0.0%	2.7%	$0	0.0%	3.4%	20.0%
Upper	0	0.0%	2.7%	$0	0.0%	3.8%	38.4%
Unknown	0	0.0%	87.2%	$0	0.0%	84.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	0	0.0%	3.6%	$0	0.0%	1.6%	23.4%
Moderate	3	11.5%	13.3%	$297	4.1%	8.6%	18.2%
Middle	6	23.1%	22.5%	$729	10.1%	19.2%	20.0%
Upper	15	57.7%	34.9%	$5,379	74.8%	36.7%	38.4%
Unknown	2	7.7%	25.7%	$785	10.9%	33.8%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$7,190**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.2%	$0	0.0%	0.1%	0.8%
Moderate	2	8.7%	9.6%	$223	4.7%	6.7%	11.1%
Middle	16	69.6%	66.2%	$2,974	62.2%	60.1%	65.7%
Upper	5	21.7%	24.0%	$1,587	33.2%	33.0%	22.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$4,784**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.1%	$0	0.0%	0.1%	0.8%
Moderate	0	0.0%	6.9%	$0	0.0%	4.4%	11.1%
Middle	5	62.5%	60.8%	$1,336	46.5%	54.7%	65.7%
Upper	3	37.5%	32.3%	$1,538	53.5%	40.8%	22.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$2,874**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.5%	$0	0.0%	0.3%	0.8%
Moderate	0	0.0%	8.5%	$0	0.0%	4.9%	11.1%
Middle	0	0.0%	60.3%	$0	0.0%	61.0%	65.7%
Upper	1	100.0%	30.7%	$78	100.0%	33.8%	22.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$78**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.8%
Moderate	0	0.0%	7.3%	$0	0.0%	3.2%	11.1%
Middle	0	0.0%	58.2%	$0	0.0%	51.1%	65.7%
Upper	0	0.0%	34.5%	$0	0.0%	45.7%	22.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.8%
Moderate	0	0.0%	5.6%	$0	0.0%	4.5%	11.1%
Middle	0	0.0%	84.7%	$0	0.0%	83.5%	65.7%
Upper	0	0.0%	9.7%	$0	0.0%	12.1%	22.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.8%
Moderate	0	0.0%	12.3%	$0	0.0%	7.7%	11.1%
Middle	0	0.0%	67.7%	$0	0.0%	63.8%	65.7%
Upper	0	0.0%	20.0%	$0	0.0%	28.5%	22.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	3.0%	$0	0.0%	4.8%	3.2%
Moderate	0	0.0%	28.4%	$0	0.0%	40.3%	15.3%
Middle	0	0.0%	65.7%	$0	0.0%	49.6%	80.1%
Upper	0	0.0%	3.0%	$0	0.0%	5.3%	1.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.2%	$0	0.0%	0.6%	0.8%
Moderate	2	6.3%	8.5%	$223	2.9%	9.5%	11.1%
Middle	21	65.6%	63.9%	$4,310	55.7%	57.1%	65.7%
Upper	9	28.1%	27.5%	$3,203	41.4%	32.8%	22.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**32**	**100.0%**	**100.0%**	**$7,736**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.3%	$0	0.0%	0.2%	0.5%
Moderate	2	15.4%	17.1%	$251	6.5%	12.4%	17.0%
Middle	4	30.8%	51.0%	$1,615	42.0%	46.1%	52.4%
Upper	7	53.8%	31.5%	$1,983	51.5%	41.3%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.1%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$3,849**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
Moderate	0	0.0%	13.6%	$0	0.0%	9.9%	17.0%
Middle	4	57.1%	54.3%	$1,067	36.1%	48.6%	52.4%
Upper	3	42.9%	32.1%	$1,887	63.9%	41.5%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$2,954**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	20.0%	0.3%	$40	14.0%	0.2%	0.5%
Moderate	1	20.0%	13.5%	$63	22.1%	12.8%	17.0%
Middle	1	20.0%	52.9%	$50	17.5%	48.8%	52.4%
Upper	2	40.0%	33.3%	$132	46.3%	38.3%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$285**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.3%	$0	0.0%	0.2%	0.5%
Moderate	0	0.0%	14.0%	$0	0.0%	9.9%	17.0%
Middle	0	0.0%	48.5%	$0	0.0%	43.4%	52.4%
Upper	0	0.0%	37.2%	$0	0.0%	46.6%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
Moderate	0	0.0%	18.6%	$0	0.0%	17.7%	17.0%
Middle	1	100.0%	51.2%	$102	100.0%	48.0%	52.4%
Upper	0	0.0%	30.2%	$0	0.0%	34.3%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$102**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
Moderate	0	0.0%	24.2%	$0	0.0%	16.3%	17.0%
Middle	0	0.0%	57.7%	$0	0.0%	52.8%	52.4%
Upper	0	0.0%	18.1%	$0	0.0%	30.9%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	1.9%
Moderate	0	0.0%	26.5%	$0	0.0%	14.0%	33.3%
Middle	0	0.0%	57.1%	$0	0.0%	66.6%	57.3%
Upper	0	0.0%	16.3%	$0	0.0%	19.4%	7.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	3.8%	0.2%	$40	0.6%	0.1%	0.5%
Moderate	3	11.5%	16.2%	$314	4.4%	12.1%	17.0%
Middle	10	38.5%	51.9%	$2,834	39.4%	48.5%	52.4%
Upper	12	46.2%	31.6%	$4,002	55.7%	39.2%	30.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.1%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$7,190**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	42	33.3%	47.7%	$1,804	16.5%	36.5%	93.9%
		Over $1 Million/ Unknown	84	66.7%	52.3%	$9,115	83.5%	63.5%	6.1%
		TOTAL	**126**	**100.0%**	**100.0%**	**$10,919**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	105	83.3%	92.9%	$3,113	28.5%	37.6%	
		$100,001–$250,000	11	8.7%	3.7%	$1,846	16.9%	15.7%	
		$250,001–$1 Million	10	7.9%	3.4%	$5,960	54.6%	46.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**126**	**100.0%**	**100.0%**	**$10,919**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	39	92.9%		$1,155	64.0%		
		$100,001–$250,000	2	4.8%		$378	21.0%		
		$250,001–$1 Million	1	2.4%		$271	15.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**42**	**100.0%**		**$1,804**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	13	50.0%	52.8%	$1,274	32.6%	40.3%	94.1%
		Over $1 Million/ Unknown	13	50.0%	47.2%	$2,638	67.4%	59.7%	5.9%
		TOTAL	**26**	**100.0%**	**100.0%**	**$3,912**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	14	53.8%	93.7%	$768	19.6%	38.2%	
		$100,001–$250,000	8	30.8%	3.3%	$1,460	37.3%	15.5%	
		$250,001–$1 Million	4	15.4%	3.0%	$1,684	43.0%	46.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**26**	**100.0%**	**100.0%**	**$3,912**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	8	61.5%		$315	24.7%		
		$100,001–$250,000	4	30.8%		$634	49.8%		
		$250,001–$1 Million	1	7.7%		$325	25.5%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**13**	**100.0%**		**$1,274**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	7	5.6%	2.4%	$34	0.3%	3.7%	2.5%
Moderate	22	17.5%	15.8%	$2,848	26.1%	20.0%	18.9%
Middle	76	60.3%	59.0%	$6,241	57.2%	55.3%	59.6%
Upper	21	16.7%	22.2%	$1,796	16.4%	20.9%	18.9%
Unknown	0	0.0%	0.6%	$0	0.0%	0.1%	0.1%
TOTAL	**126**	**100.0%**	**100.0%**	**$10,919**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	3	11.5%	2.1%	$1,225	31.3%	4.1%	2.0%
Moderate	8	30.8%	21.0%	$899	23.0%	22.3%	24.1%
Middle	9	34.6%	46.9%	$1,189	30.4%	45.1%	49.8%
Upper	6	23.1%	29.7%	$599	15.3%	28.5%	23.9%
Unknown	0	0.0%	0.3%	$0	0.0%	0.1%	0.1%
TOTAL	**26**	**100.0%**	**100.0%**	**$3,912**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NonMSA North Carolina

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	4.5%	1.4%	$110	1.4%	0.4%	19.5%
Moderate	3	13.6%	8.8%	$254	3.2%	4.4%	16.2%
Middle	3	13.6%	15.3%	$556	7.1%	10.8%	18.2%
Upper	13	59.1%	58.0%	$5,343	68.2%	67.4%	46.0%
Unknown	2	9.1%	16.4%	$1,575	20.1%	16.9%	0.0%
TOTAL	**22**	**100.0%**	**100.0%**	**$7,838**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	6.5%	1.8%	$161	1.9%	0.7%	19.5%
Moderate	4	12.9%	7.5%	$330	4.0%	4.2%	16.2%
Middle	2	6.5%	14.0%	$386	4.6%	9.9%	18.2%
Upper	20	64.5%	48.7%	$6,172	74.1%	53.7%	46.0%
Unknown	3	9.7%	28.2%	$1,278	15.3%	31.5%	0.0%
TOTAL	**31**	**100.0%**	**100.0%**	**$8,327**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.3%	$0	0.0%	0.7%	19.5%
Moderate	0	0.0%	7.2%	$0	0.0%	3.0%	16.2%
Middle	0	0.0%	15.9%	$0	0.0%	10.1%	18.2%
Upper	4	100.0%	73.6%	$344	100.0%	83.1%	46.0%
Unknown	0	0.0%	2.0%	$0	0.0%	3.1%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$344**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.4%	$0	0.0%	1.6%	19.5%
Moderate	1	25.0%	6.7%	$25	2.9%	3.8%	16.2%
Middle	0	0.0%	15.7%	$0	0.0%	9.9%	18.2%
Upper	3	75.0%	73.1%	$830	97.1%	82.9%	46.0%
Unknown	0	0.0%	2.0%	$0	0.0%	1.7%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$855**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.4%	$0	0.0%	0.3%	19.5%
Moderate	0	0.0%	11.8%	$0	0.0%	4.9%	16.2%
Middle	0	0.0%	16.7%	$0	0.0%	7.0%	18.2%
Upper	0	0.0%	62.5%	$0	0.0%	79.5%	46.0%
Unknown	0	0.0%	7.6%	$0	0.0%	8.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.5%	$0	0.0%	1.0%	19.5%
Moderate	0	0.0%	7.6%	$0	0.0%	3.6%	16.2%
Middle	0	0.0%	3.8%	$0	0.0%	4.4%	18.2%
Upper	0	0.0%	1.3%	$0	0.0%	2.7%	46.0%
Unknown	0	0.0%	84.8%	$0	0.0%	88.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	4.5%	$0	0.0%	0.1%	N/A
Unknown	1	100.0%	95.5%	$515	100.0%	99.9%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$515**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	3	4.8%	1.6%	$271	1.5%	0.6%	19.5%
Moderate	8	12.9%	8.0%	$609	3.4%	4.1%	16.2%
Middle	5	8.1%	14.6%	$942	5.3%	9.8%	18.2%
Upper	40	64.5%	54.1%	$12,689	71.0%	58.6%	46.0%
Unknown	6	9.7%	21.7%	$3,368	18.8%	26.9%	0.0%
TOTAL	**62**	**100.0%**	**100.0%**	**$17,879**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	2.3%	$0	0.0%	0.7%	17.9%
Moderate	2	13.3%	9.9%	$306	5.1%	4.9%	15.8%
Middle	5	33.3%	16.7%	$1,193	19.8%	11.9%	19.2%
Upper	7	46.7%	54.4%	$3,663	60.7%	65.0%	47.1%
Unknown	1	6.7%	16.7%	$875	14.5%	17.4%	0.0%
TOTAL	**15**	**100.0%**	**100.0%**	**$6,037**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	5.3%	$0	0.0%	2.5%	17.9%
Moderate	3	9.4%	15.2%	$324	4.4%	9.5%	15.8%
Middle	4	12.5%	20.4%	$574	7.7%	16.8%	19.2%
Upper	25	78.1%	47.2%	$6,543	87.9%	56.7%	47.1%
Unknown	0	0.0%	11.8%	$0	0.0%	14.4%	0.0%
TOTAL	**32**	**100.0%**	**100.0%**	**$7,441**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	5.6%	4.0%	$80	3.3%	2.1%	17.9%
Moderate	1	5.6%	10.3%	$111	4.6%	5.1%	15.8%
Middle	3	16.7%	16.7%	$515	21.1%	11.3%	19.2%
Upper	13	72.2%	66.0%	$1,730	71.0%	78.0%	47.1%
Unknown	0	0.0%	3.0%	$0	0.0%	3.5%	0.0%
TOTAL	**18**	**100.0%**	**100.0%**	**$2,436**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.8%	$0	0.0%	1.5%	17.9%
Moderate	0	0.0%	11.0%	$0	0.0%	5.3%	15.8%
Middle	1	50.0%	16.9%	$50	25.0%	10.9%	19.2%
Upper	0	0.0%	66.4%	$0	0.0%	78.8%	47.1%
Unknown	1	50.0%	2.9%	$150	75.0%	3.6%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$200**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.1%	$0	0.0%	1.7%	17.9%
Moderate	2	50.0%	11.1%	$303	31.3%	5.8%	15.8%
Middle	0	0.0%	12.9%	$0	0.0%	7.4%	19.2%
Upper	1	25.0%	65.5%	$344	35.6%	75.5%	47.1%
Unknown	1	25.0%	6.4%	$320	33.1%	9.4%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$967**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	7.3%	$0	0.0%	5.9%	17.9%
Moderate	0	0.0%	7.3%	$0	0.0%	9.9%	15.8%
Middle	0	0.0%	3.6%	$0	0.0%	2.0%	19.2%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	47.1%
Unknown	0	0.0%	81.8%	$0	0.0%	82.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	2.6%	$0	0.0%	0.1%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	97.4%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	1	1.4%	3.3%	$80	0.5%	1.2%	17.9%
Moderate	8	11.3%	11.5%	$1,044	6.1%	5.7%	15.8%
Middle	13	18.3%	17.6%	$2,332	13.7%	12.4%	19.2%
Upper	46	64.8%	53.8%	$12,280	71.9%	61.1%	47.1%
Unknown	3	4.2%	13.9%	$1,345	7.9%	19.6%	0.0%
TOTAL	**71**	**100.0%**	**100.0%**	**$17,081**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	9.6%	$0	0.0%	5.4%	15.5%
Middle	11	50.0%	32.8%	$2,287	29.2%	27.9%	44.7%
Upper	11	50.0%	57.5%	$5,551	70.8%	66.7%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**22**	**100.0%**	**100.0%**	**$7,838**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	5	16.1%	6.5%	$545	6.5%	4.1%	15.5%
Middle	11	35.5%	33.1%	$2,511	30.2%	27.9%	44.7%
Upper	15	48.4%	60.4%	$5,271	63.3%	67.9%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**31**	**100.0%**	**100.0%**	**$8,327**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	6.7%	$0	0.0%	3.3%	15.5%
Middle	1	25.0%	32.4%	$130	37.8%	27.1%	44.7%
Upper	3	75.0%	60.9%	$214	62.2%	69.6%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$344**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	7.1%	$0	0.0%	4.9%	15.5%
Middle	2	50.0%	31.4%	$54	6.3%	24.1%	44.7%
Upper	2	50.0%	61.5%	$801	93.7%	71.0%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$855**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	4.9%	$0	0.0%	1.6%	15.5%
Middle	0	0.0%	30.6%	$0	0.0%	20.5%	44.7%
Upper	0	0.0%	64.6%	$0	0.0%	78.0%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	17.7%	$0	0.0%	8.5%	15.5%
Middle	0	0.0%	45.6%	$0	0.0%	33.5%	44.7%
Upper	0	0.0%	36.7%	$0	0.0%	58.0%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	4.5%	$0	0.0%	0.2%	14.6%
Middle	1	100.0%	27.3%	$515	100.0%	14.7%	33.2%
Upper	0	0.0%	68.2%	$0	0.0%	85.1%	52.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$515**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	5	8.1%	7.9%	$545	3.0%	4.5%	15.5%
Middle	26	41.9%	32.9%	$5,497	30.7%	27.2%	44.7%
Upper	31	50.0%	59.1%	$11,837	66.2%	68.2%	39.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**62**	**100.0%**	**100.0%**	**$17,879**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.6%	$0	0.0%	0.4%	0.3%
Moderate	0	0.0%	4.1%	$0	0.0%	2.3%	6.7%
Middle	9	60.0%	30.1%	$2,518	41.7%	21.5%	45.7%
Upper	6	40.0%	62.6%	$3,519	58.3%	72.4%	45.5%
Unknown	0	0.0%	2.6%	$0	0.0%	3.4%	1.8%
TOTAL	**15**	**100.0%**	**100.0%**	**$6,037**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.2%	$0	0.0%	0.2%	0.3%
Moderate	2	6.3%	4.2%	$270	3.6%	2.7%	6.7%
Middle	18	56.3%	35.5%	$3,615	48.6%	28.1%	45.7%
Upper	11	34.4%	57.7%	$2,782	37.4%	65.3%	45.5%
Unknown	1	3.1%	2.4%	$774	10.4%	3.8%	1.8%
TOTAL	**32**	**100.0%**	**100.0%**	**$7,441**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.6%	$0	0.0%	0.4%	0.3%
Moderate	0	0.0%	3.9%	$0	0.0%	2.4%	6.7%
Middle	6	33.3%	32.6%	$652	26.8%	23.1%	45.7%
Upper	10	55.6%	59.1%	$1,554	63.8%	69.6%	45.5%
Unknown	2	11.1%	3.9%	$230	9.4%	4.5%	1.8%
TOTAL	**18**	**100.0%**	**100.0%**	**$2,436**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.4%	$0	0.0%	0.4%	0.3%
Moderate	0	0.0%	2.9%	$0	0.0%	2.1%	6.7%
Middle	0	0.0%	31.8%	$0	0.0%	20.6%	45.7%
Upper	1	50.0%	61.6%	$50	25.0%	72.0%	45.5%
Unknown	1	50.0%	3.3%	$150	75.0%	5.0%	1.8%
TOTAL	**2**	**100.0%**	**100.0%**	**$200**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.3%
Moderate	0	0.0%	1.8%	$0	0.0%	0.6%	6.7%
Middle	1	25.0%	25.7%	$50	5.2%	13.4%	45.7%
Upper	3	75.0%	71.9%	$917	94.8%	85.1%	45.5%
Unknown	0	0.0%	0.6%	$0	0.0%	1.0%	1.8%
TOTAL	**4**	**100.0%**	**100.0%**	**$967**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.8%	$0	0.0%	0.8%	0.3%
Moderate	0	0.0%	10.9%	$0	0.0%	11.2%	6.7%
Middle	0	0.0%	43.6%	$0	0.0%	38.9%	45.7%
Upper	0	0.0%	41.8%	$0	0.0%	48.6%	45.5%
Unknown	0	0.0%	1.8%	$0	0.0%	0.4%	1.8%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	7.9%	$0	0.0%	24.7%	0.7%
Moderate	0	0.0%	5.3%	$0	0.0%	14.6%	10.8%
Middle	0	0.0%	31.6%	$0	0.0%	14.3%	20.1%
Upper	0	0.0%	44.7%	$0	0.0%	36.3%	55.9%
Unknown	0	0.0%	10.5%	$0	0.0%	10.2%	12.4%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.5%	$0	0.0%	1.4%	0.3%
Moderate	2	2.8%	4.0%	$270	1.6%	2.9%	6.7%
Middle	34	47.9%	31.9%	$6,835	40.0%	22.6%	45.7%
Upper	31	43.7%	60.9%	$8,822	51.6%	69.3%	45.5%
Unknown	4	5.6%	2.7%	$1,154	6.8%	3.8%	1.8%
TOTAL	**71**	**100.0%**	**100.0%**	**$17,081**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	47	25.0%	55.5%	$1,896	15.7%	44.6%	92.4%
		Over $1 Million/ Unknown	141	75.0%	44.5%	$10,183	84.3%	55.4%	7.6%
		TOTAL	**188**	**100.0%**	**100.0%**	**$12,079**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	158	84.0%	90.7%	$3,891	32.2%	34.2%	
		$100,001–$250,000	21	11.2%	5.4%	$3,247	26.9%	20.0%	
		$250,001–$1 Million	9	4.8%	3.9%	$4,941	40.9%	45.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**188**	**100.0%**	**100.0%**	**$12,079**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	41	87.2%		$1,023	54.0%		
		$100,001–$250,000	6	12.8%		$873	46.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**47**	**100.0%**		**$1,896**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	20	52.6%	57.5%	$1,803	21.1%	45.7%	92.2%
		Over $1 Million/ Unknown	18	47.4%	42.5%	$6,756	78.9%	54.3%	7.8%
		TOTAL	**38**	**100.0%**	**100.0%**	**$8,559**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	20	52.6%	92.8%	$515	6.0%	36.6%	
		$100,001–$250,000	4	10.5%	3.8%	$542	6.3%	16.8%	
		$250,001–$1 Million	14	36.8%	3.4%	$7,502	87.7%	46.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**38**	**100.0%**	**100.0%**	**$8,559**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	15	75.0%		$318	17.6%		
		$100,001–$250,000	2	10.0%		$273	15.1%		
		$250,001–$1 Million	3	15.0%		$1,212	67.2%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**20**	**100.0%**		**$1,803**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	54	28.7%	15.4%	$3,323	27.5%	18.4%	18.5%
Middle	63	33.5%	35.8%	$2,126	17.6%	31.2%	39.4%
Upper	71	37.8%	47.4%	$6,630	54.9%	50.2%	42.1%
Unknown	0	0.0%	1.4%	$0	0.0%	0.2%	0.0%
TOTAL	**188**	**100.0%**	**100.0%**	**$12,079**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	1.0%	$0	0.0%	0.4%	0.9%
Moderate	5	13.2%	5.5%	$1,122	13.1%	6.9%	8.4%
Middle	15	39.5%	33.9%	$4,430	51.8%	34.0%	36.8%
Upper	18	47.4%	54.8%	$3,007	35.1%	54.5%	49.4%
Unknown	0	0.0%	4.8%	$0	0.0%	4.2%	4.5%
TOTAL	**38**	**100.0%**	**100.0%**	**$8,559**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

ALABAMA

Birmingham Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	28	18.1%	6.1%	$3,703	8.4%	3.0%	23.5%
Moderate	44	28.4%	20.1%	$7,348	16.6%	14.0%	15.2%
Middle	26	16.8%	20.3%	$6,705	15.2%	18.4%	17.7%
Upper	51	32.9%	37.8%	$24,330	55.1%	50.0%	43.6%
Unknown	6	3.9%	15.7%	$2,102	4.8%	14.6%	0.0%
TOTAL	**155**	**100.0%**	**100.0%**	**$44,188**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	5	3.9%	5.0%	$691	1.6%	2.4%	23.5%
Moderate	10	7.8%	13.2%	$1,313	3.0%	8.5%	15.2%
Middle	18	14.1%	19.2%	$3,920	8.9%	15.6%	17.7%
Upper	80	62.5%	42.1%	$32,517	74.1%	53.6%	43.6%
Unknown	15	11.7%	20.5%	$5,427	12.4%	19.9%	0.0%
TOTAL	**128**	**100.0%**	**100.0%**	**$43,868**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	6.7%	$0	0.0%	3.4%	23.5%
Moderate	2	3.5%	12.2%	$230	2.2%	8.3%	15.2%
Middle	2	3.5%	18.6%	$92	0.9%	13.4%	17.7%
Upper	53	93.0%	59.5%	$9,988	96.9%	71.6%	43.6%
Unknown	0	0.0%	2.9%	$0	0.0%	3.3%	0.0%
TOTAL	**57**	**100.0%**	**100.0%**	**$10,310**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.0%	$0	0.0%	2.1%	23.5%
Moderate	0	0.0%	9.2%	$0	0.0%	4.7%	15.2%
Middle	1	10.0%	15.7%	$206	12.3%	10.4%	17.7%
Upper	9	90.0%	67.6%	$1,465	87.7%	80.8%	43.6%
Unknown	0	0.0%	2.5%	$0	0.0%	1.9%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,671**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	20.0%	9.7%	$124	10.5%	3.6%	23.5%
Moderate	1	20.0%	17.7%	$64	5.4%	9.1%	15.2%
Middle	0	0.0%	11.7%	$0	0.0%	7.1%	17.7%
Upper	2	40.0%	53.1%	$640	54.3%	71.9%	43.6%
Unknown	1	20.0%	7.7%	$350	29.7%	8.2%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,178**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.7%	$0	0.0%	1.5%	23.5%
Moderate	0	0.0%	1.9%	$0	0.0%	2.1%	15.2%
Middle	0	0.0%	0.5%	$0	0.0%	0.3%	17.7%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.6%
Unknown	0	0.0%	94.9%	$0	0.0%	96.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.7%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.7%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.8%	$0	0.0%	0.2%	N/A
Unknown	7	100.0%	95.8%	$26,065	100.0%	99.7%	N/A
TOTAL	**7**	**100.0%**	**100.0%**	**$26,065**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	34	9.4%	5.5%	$4,518	3.5%	2.5%	23.5%
Moderate	57	15.7%	15.8%	$8,955	7.0%	10.3%	15.2%
Middle	47	13.0%	19.3%	$10,923	8.6%	15.6%	17.7%
Upper	195	53.9%	41.1%	$68,940	54.2%	48.8%	43.6%
Unknown	29	8.0%	18.3%	$33,944	26.7%	22.8%	0.0%
TOTAL	**362**	**100.0%**	**100.0%**	**$127,280**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	35	26.1%	7.4%	$4,476	11.0%	3.2%	21.4%
Moderate	40	29.9%	20.8%	$7,069	17.3%	13.9%	16.4%
Middle	21	15.7%	19.7%	$6,678	16.4%	17.7%	18.3%
Upper	38	28.4%	37.4%	$22,610	55.4%	51.0%	43.9%
Unknown	0	0.0%	14.8%	$0	0.0%	14.1%	0.0%
TOTAL	**134**	**100.0%**	**100.0%**	**$40,833**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	8	15.4%	10.3%	$938	6.1%	5.2%	21.4%
Moderate	8	15.4%	20.1%	$1,334	8.7%	13.9%	16.4%
Middle	0	0.0%	22.0%	$0	0.0%	19.6%	18.3%
Upper	33	63.5%	34.9%	$12,719	83.3%	48.2%	43.9%
Unknown	3	5.8%	12.7%	$287	1.9%	13.2%	0.0%
TOTAL	**52**	**100.0%**	**100.0%**	**$15,278**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	8.0%	$0	0.0%	3.7%	21.4%
Moderate	2	3.7%	13.8%	$121	1.3%	8.5%	16.4%
Middle	2	3.7%	20.3%	$102	1.1%	15.6%	18.3%
Upper	49	90.7%	54.0%	$9,106	96.8%	67.5%	43.9%
Unknown	1	1.9%	4.0%	$75	0.8%	4.8%	0.0%
TOTAL	**54**	**100.0%**	**100.0%**	**$9,404**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.9%	$0	0.0%	2.3%	21.4%
Moderate	2	33.3%	12.4%	$90	8.2%	6.8%	16.4%
Middle	0	0.0%	19.2%	$0	0.0%	12.3%	18.3%
Upper	4	66.7%	58.9%	$1,003	91.8%	74.5%	43.9%
Unknown	0	0.0%	4.5%	$0	0.0%	4.1%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,093**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	33.3%	9.2%	$200	6.1%	3.1%	21.4%
Moderate	0	0.0%	13.9%	$0	0.0%	5.1%	16.4%
Middle	0	0.0%	16.3%	$0	0.0%	9.4%	18.3%
Upper	0	0.0%	50.1%	$0	0.0%	73.9%	43.9%
Unknown	2	66.7%	10.4%	$3,099	93.9%	8.5%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$3,299**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.1%	$0	0.0%	0.4%	21.4%
Moderate	1	100.0%	3.3%	$34	100.0%	2.2%	16.4%
Middle	0	0.0%	1.1%	$0	0.0%	1.1%	18.3%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.9%
Unknown	0	0.0%	94.5%	$0	0.0%	96.4%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$34**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.6%	$0	0.0%	0.2%	N/A
Unknown	2	100.0%	97.4%	$2,520	100.0%	99.8%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$2,520**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	44	17.5%	8.0%	$5,614	7.7%	3.4%	21.4%
Moderate	53	21.0%	19.1%	$8,648	11.9%	12.3%	16.4%
Middle	23	9.1%	20.0%	$6,780	9.4%	16.3%	18.3%
Upper	124	49.2%	39.3%	$45,438	62.7%	47.4%	43.9%
Unknown	8	3.2%	13.7%	$5,981	8.3%	20.6%	0.0%
TOTAL	**252**	**100.0%**	**100.0%**	**$72,461**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	3	1.9%	2.4%	$228	0.5%	1.2%	6.4%
Moderate	36	23.2%	11.8%	$5,550	12.6%	6.5%	18.0%
Middle	42	27.1%	28.6%	$7,537	17.1%	22.3%	29.9%
Upper	74	47.7%	57.3%	$30,873	69.9%	70.0%	45.6%
Unknown	0	0.0%	0.1%	$0	0.0%	0.0%	0.0%
TOTAL	**155**	**100.0%**	**100.0%**	**$44,188**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	0.8%	1.3%	$65	0.1%	0.7%	6.4%
Moderate	11	8.6%	7.2%	$1,802	4.1%	4.0%	18.0%
Middle	21	16.4%	25.8%	$4,321	9.9%	19.4%	29.9%
Upper	95	74.2%	65.7%	$37,680	85.9%	76.0%	45.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**128**	**100.0%**	**100.0%**	**$43,868**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.5%	$0	0.0%	1.2%	6.4%
Moderate	1	1.8%	7.5%	$10	0.1%	3.8%	18.0%
Middle	7	12.3%	22.6%	$1,063	10.3%	16.0%	29.9%
Upper	49	86.0%	67.4%	$9,237	89.6%	79.0%	45.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**57**	**100.0%**	**100.0%**	**$10,310**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.6%	$0	0.0%	0.6%	6.4%
Moderate	0	0.0%	6.3%	$0	0.0%	3.3%	18.0%
Middle	0	0.0%	19.6%	$0	0.0%	13.1%	29.9%
Upper	10	100.0%	72.5%	$1,671	100.0%	83.0%	45.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$1,671**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.7%	$0	0.0%	0.9%	6.4%
Moderate	0	0.0%	10.6%	$0	0.0%	5.3%	18.0%
Middle	1	20.0%	26.9%	$140	11.9%	17.6%	29.9%
Upper	4	80.0%	58.9%	$1,038	88.1%	76.2%	45.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,178**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.4%	$0	0.0%	2.2%	6.4%
Moderate	0	0.0%	27.7%	$0	0.0%	20.2%	18.0%
Middle	0	0.0%	37.5%	$0	0.0%	35.1%	29.9%
Upper	0	0.0%	30.4%	$0	0.0%	42.5%	45.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	2	28.6%	21.7%	$17,387	66.7%	6.3%	19.5%
Moderate	2	28.6%	32.2%	$2,590	9.9%	26.4%	27.8%
Middle	2	28.6%	28.0%	$4,088	15.7%	51.2%	22.9%
Upper	1	14.3%	17.5%	$2,000	7.7%	15.1%	27.6%
Unknown	0	0.0%	0.7%	$0	0.0%	1.0%	2.2%
TOTAL	**7**	**100.0%**	**100.0%**	**$26,065**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	6	1.7%	1.9%	$17,680	13.9%	1.3%	6.4%
Moderate	50	13.8%	9.4%	$9,952	7.8%	6.7%	18.0%
Middle	73	20.2%	26.8%	$17,149	13.5%	22.7%	29.9%
Upper	233	64.4%	61.9%	$82,499	64.8%	69.2%	45.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.1%	0.0%
TOTAL	**362**	**100.0%**	**100.0%**	**$127,280**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	8	6.0%	2.8%	$1,182	2.9%	1.4%	4.8%
Moderate	35	26.1%	13.1%	$4,819	11.8%	6.6%	18.3%
Middle	40	29.9%	36.2%	$7,825	19.2%	29.5%	34.0%
Upper	49	36.6%	47.7%	$26,819	65.7%	62.4%	42.1%
Unknown	2	1.5%	0.2%	$188	0.5%	0.1%	0.8%
TOTAL	**134**	**100.0%**	**100.0%**	**$40,833**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.1%	$0	0.0%	1.0%	4.8%
Moderate	5	9.6%	13.2%	$575	3.8%	7.6%	18.3%
Middle	9	17.3%	35.4%	$1,290	8.4%	27.8%	34.0%
Upper	38	73.1%	49.1%	$13,413	87.8%	63.6%	42.1%
Unknown	0	0.0%	0.1%	$0	0.0%	0.0%	0.8%
TOTAL	**52**	**100.0%**	**100.0%**	**$15,278**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.7%	$0	0.0%	1.0%	4.8%
Moderate	0	0.0%	8.5%	$0	0.0%	4.7%	18.3%
Middle	5	9.3%	29.3%	$659	7.0%	22.7%	34.0%
Upper	49	90.7%	60.3%	$8,745	93.0%	71.3%	42.1%
Unknown	0	0.0%	0.3%	$0	0.0%	0.1%	0.8%
TOTAL	**54**	**100.0%**	**100.0%**	**$9,404**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.9%	$0	0.0%	0.4%	4.8%
Moderate	1	16.7%	6.7%	$30	2.7%	3.4%	18.3%
Middle	1	16.7%	26.3%	$60	5.5%	17.6%	34.0%
Upper	4	66.7%	66.1%	$1,003	91.8%	78.5%	42.1%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.8%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,093**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.8%	$0	0.0%	0.9%	4.8%
Moderate	0	0.0%	11.8%	$0	0.0%	4.2%	18.3%
Middle	0	0.0%	32.4%	$0	0.0%	15.7%	34.0%
Upper	3	100.0%	51.8%	$3,299	100.0%	79.1%	42.1%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.8%
TOTAL	**3**	**100.0%**	**100.0%**	**$3,299**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.2%	$0	0.0%	0.5%	4.8%
Moderate	1	100.0%	31.7%	$34	100.0%	11.4%	18.3%
Middle	0	0.0%	40.2%	$0	0.0%	22.7%	34.0%
Upper	0	0.0%	25.5%	$0	0.0%	65.4%	42.1%
Unknown	0	0.0%	0.4%	$0	0.0%	0.1%	0.8%
TOTAL	**1**	**100.0%**	**100.0%**	**$34**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	50.0%	19.3%	$2,047	81.2%	11.5%	14.6%
Moderate	1	50.0%	35.1%	$473	18.8%	19.8%	23.9%
Middle	0	0.0%	18.4%	$0	0.0%	43.7%	26.8%
Upper	0	0.0%	23.7%	$0	0.0%	24.4%	32.8%
Unknown	0	0.0%	3.5%	$0	0.0%	0.7%	1.9%
TOTAL	**2**	**100.0%**	**100.0%**	**$2,520**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	9	3.6%	2.5%	$3,229	4.5%	2.0%	4.8%
Moderate	43	17.1%	12.5%	$5,931	8.2%	7.8%	18.3%
Middle	55	21.8%	34.6%	$9,834	13.6%	29.5%	34.0%
Upper	143	56.7%	50.1%	$53,279	73.5%	60.6%	42.1%
Unknown	2	0.8%	0.2%	$188	0.3%	0.1%	0.8%
TOTAL	**252**	**100.0%**	**100.0%**	**$72,461**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	196	33.5%	41.4%	$11,839	20.5%	27.8%	90.4%
		Over $1 Million/ Unknown	389	66.5%	58.6%	$46,002	79.5%	72.2%	9.6%
		TOTAL	**585**	**100.0%**	**100.0%**	**$57,841**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	466	79.7%	87.8%	$14,018	24.2%	26.5%	
		$100,001–$250,000	55	9.4%	6.1%	$8,945	15.5%	17.7%	
		$250,001–$1 Million	64	10.9%	6.1%	$34,878	60.3%	55.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**585**	**100.0%**	**100.0%**	**$57,841**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	174	88.8%		$5,646	47.7%		
		$100,001–$250,000	13	6.6%		$2,042	17.2%		
		$250,001–$1 Million	9	4.6%		$4,151	35.1%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**196**	**100.0%**		**$11,839**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	74	43.0%	43.3%	$8,932	29.3%	29.0%	90.7%
		Over $1 Million/ Unknown	98	57.0%	56.7%	$21,563	70.7%	71.0%	9.3%
		TOTAL	**172**	**100.0%**	**100.0%**	**$30,495**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	108	62.8%	90.5%	$5,764	18.9%	28.6%	
		$100,001–$250,000	30	17.4%	4.5%	$5,602	18.4%	15.7%	
		$250,001–$1 Million	34	19.8%	5.0%	$19,129	62.7%	55.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**172**	**100.0%**	**100.0%**	**$30,495**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	53	71.6%		$2,486	27.8%		
		$100,001–$250,000	12	16.2%		$2,191	24.5%		
		$250,001–$1 Million	9	12.2%		$4,255	47.6%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**74**	**100.0%**		**$8,932**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	40	6.8%	7.6%	$3,323	5.7%	10.5%	8.1%
Moderate	85	14.5%	17.2%	$10,407	18.0%	19.9%	19.7%
Middle	131	22.4%	23.6%	$9,894	17.1%	20.3%	25.4%
Upper	319	54.5%	50.1%	$33,093	57.2%	47.7%	45.5%
Unknown	10	1.7%	1.5%	$1,124	1.9%	1.6%	1.3%
TOTAL	**585**	**100.0%**	**100.0%**	**$57,841**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	8	4.7%	7.2%	$2,181	7.2%	10.6%	8.7%
Moderate	31	18.0%	13.5%	$3,640	11.9%	11.2%	15.6%
Middle	27	15.7%	27.6%	$4,971	16.3%	25.5%	28.6%
Upper	102	59.3%	50.2%	$19,348	63.4%	50.9%	45.8%
Unknown	4	2.3%	1.5%	$355	1.2%	1.8%	1.4%
TOTAL	**172**	**100.0%**	**100.0%**	**$30,495**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Mobile Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	2	1.4%	5.2%	$302	0.5%	2.7%	22.9%
Moderate	13	9.0%	17.3%	$2,342	3.8%	11.9%	16.3%
Middle	22	15.3%	21.2%	$4,997	8.1%	18.0%	19.6%
Upper	101	70.1%	40.2%	$50,656	82.4%	51.4%	41.2%
Unknown	6	4.2%	16.1%	$3,147	5.1%	16.1%	0.0%
TOTAL	**144**	**100.0%**	**100.0%**	**$61,444**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	2.7%	4.5%	$385	0.8%	2.5%	22.9%
Moderate	6	5.4%	13.0%	$943	1.8%	8.7%	16.3%
Middle	10	9.0%	18.6%	$1,950	3.8%	15.1%	19.6%
Upper	89	80.2%	40.1%	$47,381	92.3%	50.0%	41.2%
Unknown	3	2.7%	23.7%	$661	1.3%	23.7%	0.0%
TOTAL	**111**	**100.0%**	**100.0%**	**$51,320**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	6.3%	$0	0.0%	2.9%	22.9%
Moderate	0	0.0%	13.2%	$0	0.0%	7.5%	16.3%
Middle	1	4.8%	23.2%	$100	2.8%	19.2%	19.6%
Upper	20	95.2%	54.2%	$3,467	97.2%	65.8%	41.2%
Unknown	0	0.0%	3.0%	$0	0.0%	4.6%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$3,567**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.9%	$0	0.0%	3.4%	22.9%
Moderate	1	5.0%	12.0%	$35	1.1%	7.2%	16.3%
Middle	2	10.0%	16.7%	$207	6.4%	11.3%	19.6%
Upper	17	85.0%	61.3%	$2,980	92.5%	74.0%	41.2%
Unknown	0	0.0%	4.1%	$0	0.0%	4.1%	0.0%
TOTAL	**20**	**100.0%**	**100.0%**	**$3,222**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	20.0%	9.8%	$140	7.3%	4.9%	22.9%
Moderate	0	0.0%	18.9%	$0	0.0%	11.5%	16.3%
Middle	0	0.0%	21.1%	$0	0.0%	14.2%	19.6%
Upper	3	60.0%	46.0%	$1,090	56.5%	61.3%	41.2%
Unknown	1	20.0%	4.2%	$698	36.2%	8.1%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,928**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.5%	$0	0.0%	1.5%	22.9%
Moderate	0	0.0%	2.9%	$0	0.0%	2.7%	16.3%
Middle	0	0.0%	1.4%	$0	0.0%	1.2%	19.6%
Upper	0	0.0%	1.8%	$0	0.0%	2.1%	41.2%
Unknown	0	0.0%	91.4%	$0	0.0%	92.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.1%	$0	0.0%	0.4%	N/A
Unknown	2	100.0%	98.9%	$2,103	100.0%	99.6%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$2,103**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	6	2.0%	4.9%	$827	0.7%	2.6%	22.9%
Moderate	20	6.6%	15.1%	$3,320	2.7%	10.3%	16.3%
Middle	35	11.6%	19.8%	$7,254	5.9%	16.3%	19.6%
Upper	230	75.9%	40.6%	$105,574	85.4%	49.9%	41.2%
Unknown	12	4.0%	19.6%	$6,609	5.3%	20.9%	0.0%
TOTAL	**303**	**100.0%**	**100.0%**	**$123,584**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	4	3.4%	4.6%	$615	0.9%	2.2%	21.1%
Moderate	14	12.1%	17.7%	$2,945	4.3%	11.9%	18.1%
Middle	11	9.5%	21.3%	$2,947	4.3%	17.7%	20.3%
Upper	85	73.3%	39.1%	$61,723	89.7%	50.5%	40.6%
Unknown	2	1.7%	17.3%	$543	0.8%	17.7%	0.0%
TOTAL	**116**	**100.0%**	**100.0%**	**$68,773**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	2.0%	9.0%	$158	0.6%	4.9%	21.1%
Moderate	3	5.9%	19.8%	$420	1.6%	14.0%	18.1%
Middle	1	2.0%	21.3%	$100	0.4%	17.9%	20.3%
Upper	41	80.4%	36.3%	$22,130	82.7%	47.9%	40.6%
Unknown	5	9.8%	13.5%	$3,957	14.8%	15.3%	0.0%
TOTAL	**51**	**100.0%**	**100.0%**	**$26,765**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	7.0%	$0	0.0%	3.6%	21.1%
Moderate	0	0.0%	14.4%	$0	0.0%	9.2%	18.1%
Middle	2	9.5%	21.2%	$149	2.6%	14.8%	20.3%
Upper	19	90.5%	53.4%	$5,572	97.4%	67.3%	40.6%
Unknown	0	0.0%	4.0%	$0	0.0%	5.1%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$5,721**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.1%	$0	0.0%	3.0%	21.1%
Moderate	3	14.3%	14.5%	$425	11.0%	7.7%	18.1%
Middle	1	4.8%	19.1%	$250	6.5%	13.2%	20.3%
Upper	17	81.0%	57.7%	$3,174	82.5%	72.6%	40.6%
Unknown	0	0.0%	3.7%	$0	0.0%	3.6%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$3,849**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	10.8%	$0	0.0%	5.2%	21.1%
Moderate	0	0.0%	14.4%	$0	0.0%	8.6%	18.1%
Middle	0	0.0%	23.6%	$0	0.0%	13.7%	20.3%
Upper	2	100.0%	45.0%	$456	100.0%	60.8%	40.6%
Unknown	0	0.0%	6.2%	$0	0.0%	11.7%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$456**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.6%	$0	0.0%	0.4%	21.1%
Moderate	0	0.0%	1.1%	$0	0.0%	0.7%	18.1%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	20.3%
Upper	0	0.0%	1.1%	$0	0.0%	1.5%	40.6%
Unknown	0	0.0%	97.2%	$0	0.0%	97.4%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	1	100.0%	99.0%	$765	100.0%	100.0%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$765**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	5	2.4%	5.9%	$773	0.7%	2.7%	21.1%
Moderate	20	9.4%	17.6%	$3,790	3.6%	11.2%	18.1%
Middle	15	7.1%	21.0%	$3,446	3.2%	16.2%	20.3%
Upper	164	77.4%	39.7%	$93,055	87.5%	46.9%	40.6%
Unknown	8	3.8%	15.8%	$5,265	5.0%	23.0%	0.0%
TOTAL	**212**	**100.0%**	**100.0%**	**$106,329**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.5%	$0	0.0%	0.2%	3.7%
Moderate	4	2.8%	13.6%	$1,303	2.1%	13.1%	14.9%
Middle	55	38.2%	48.2%	$19,972	32.5%	45.9%	47.5%
Upper	85	59.0%	37.8%	$40,169	65.4%	40.8%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**144**	**100.0%**	**100.0%**	**$61,444**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.4%	$0	0.0%	0.1%	3.7%
Moderate	4	3.6%	10.3%	$1,030	2.0%	9.4%	14.9%
Middle	34	30.6%	46.1%	$12,393	24.1%	43.9%	47.5%
Upper	73	65.8%	43.2%	$37,897	73.8%	46.6%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**111**	**100.0%**	**100.0%**	**$51,320**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.2%	$0	0.0%	0.1%	3.7%
Moderate	1	4.8%	10.0%	$300	8.4%	9.6%	14.9%
Middle	9	42.9%	47.5%	$1,788	50.1%	45.7%	47.5%
Upper	11	52.4%	42.3%	$1,479	41.5%	44.7%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$3,567**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.2%	$0	0.0%	0.0%	3.7%
Moderate	1	5.0%	10.3%	$160	5.0%	10.0%	14.9%
Middle	9	45.0%	43.6%	$1,628	50.5%	40.7%	47.5%
Upper	10	50.0%	46.0%	$1,434	44.5%	49.3%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**20**	**100.0%**	**100.0%**	**$3,222**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.4%	$0	0.0%	0.6%	3.7%
Moderate	0	0.0%	11.6%	$0	0.0%	13.4%	14.9%
Middle	3	60.0%	45.6%	$690	35.8%	39.9%	47.5%
Upper	2	40.0%	41.4%	$1,238	64.2%	46.1%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$1,928**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.1%	$0	0.0%	0.9%	3.7%
Moderate	0	0.0%	13.2%	$0	0.0%	9.5%	14.9%
Middle	0	0.0%	45.7%	$0	0.0%	43.2%	47.5%
Upper	0	0.0%	38.9%	$0	0.0%	46.4%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	10.5%	$0	0.0%	2.7%	2.7%
Moderate	2	100.0%	37.9%	$2,103	100.0%	37.8%	27.0%
Middle	0	0.0%	35.8%	$0	0.0%	41.2%	37.2%
Upper	0	0.0%	15.8%	$0	0.0%	18.3%	33.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$2,103**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.5%	$0	0.0%	0.2%	3.7%
Moderate	12	4.0%	12.0%	$4,896	4.0%	12.0%	14.9%
Middle	110	36.3%	47.1%	$36,471	29.5%	44.9%	47.5%
Upper	181	59.7%	40.4%	$82,217	66.5%	42.8%	33.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**303**	**100.0%**	**100.0%**	**$123,584**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.3%	$0	0.0%	0.1%	1.3%
Moderate	6	5.2%	14.3%	$1,157	1.7%	10.3%	19.4%
Middle	38	32.8%	49.2%	$25,691	37.4%	47.0%	50.1%
Upper	69	59.5%	33.6%	$34,665	50.4%	38.1%	28.7%
Unknown	3	2.6%	2.6%	$7,260	10.6%	4.5%	0.5%
TOTAL	**116**	**100.0%**	**100.0%**	**$68,773**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.3%	$0	0.0%	0.1%	1.3%
Moderate	1	2.0%	13.5%	$205	0.8%	9.1%	19.4%
Middle	19	37.3%	48.6%	$11,604	43.4%	48.5%	50.1%
Upper	31	60.8%	36.1%	$14,956	55.9%	40.2%	28.7%
Unknown	0	0.0%	1.5%	$0	0.0%	2.1%	0.5%
TOTAL	**51**	**100.0%**	**100.0%**	**$26,765**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.6%	$0	0.0%	0.3%	1.3%
Moderate	1	4.8%	11.0%	$100	1.7%	7.4%	19.4%
Middle	6	28.6%	45.0%	$2,110	36.9%	45.2%	50.1%
Upper	14	66.7%	42.4%	$3,511	61.4%	45.2%	28.7%
Unknown	0	0.0%	1.0%	$0	0.0%	1.9%	0.5%
TOTAL	**21**	**100.0%**	**100.0%**	**$5,721**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.2%	$0	0.0%	0.1%	1.3%
Moderate	1	4.8%	10.1%	$250	6.5%	6.9%	19.4%
Middle	6	28.6%	45.0%	$1,063	27.6%	43.3%	50.1%
Upper	14	66.7%	43.5%	$2,536	65.9%	47.8%	28.7%
Unknown	0	0.0%	1.2%	$0	0.0%	2.0%	0.5%
TOTAL	**21**	**100.0%**	**100.0%**	**$3,849**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	1.3%
Moderate	0	0.0%	16.8%	$0	0.0%	9.6%	19.4%
Middle	1	50.0%	48.2%	$200	43.9%	43.7%	50.1%
Upper	1	50.0%	34.4%	$256	56.1%	46.3%	28.7%
Unknown	0	0.0%	0.5%	$0	0.0%	0.4%	0.5%
TOTAL	**2**	**100.0%**	**100.0%**	**$456**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.3%	$0	0.0%	0.8%	1.3%
Moderate	0	0.0%	23.7%	$0	0.0%	16.6%	19.4%
Middle	0	0.0%	45.8%	$0	0.0%	49.7%	50.1%
Upper	0	0.0%	28.2%	$0	0.0%	32.9%	28.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	3.0%	$0	0.0%	4.0%	1.7%
Moderate	0	0.0%	31.3%	$0	0.0%	16.2%	23.8%
Middle	1	100.0%	48.5%	$765	100.0%	50.6%	42.8%
Upper	0	0.0%	16.2%	$0	0.0%	29.0%	25.8%
Unknown	0	0.0%	1.0%	$0	0.0%	0.2%	5.9%
TOTAL	**1**	**100.0%**	**100.0%**	**$765**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.4%	$0	0.0%	0.4%	1.3%
Moderate	9	4.2%	13.9%	$1,712	1.6%	10.4%	19.4%
Middle	71	33.5%	48.6%	$41,433	39.0%	47.5%	50.1%
Upper	129	60.8%	35.1%	$55,924	52.6%	38.2%	28.7%
Unknown	3	1.4%	2.1%	$7,260	6.8%	3.5%	0.5%
TOTAL	**212**	**100.0%**	**100.0%**	**$106,329**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	120	33.1%	39.7%	$22,436	29.0%	32.9%	91.5%
		Over $1 Million/ Unknown	243	66.9%	60.3%	$54,838	71.0%	67.1%	8.5%
		TOTAL	**363**	**100.0%**	**100.0%**	**$77,274**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	196	54.0%	87.6%	$8,120	10.5%	27.1%	
		$100,001–$250,000	64	17.6%	6.4%	$11,253	14.6%	18.5%	
		$250,001–$1 Million	103	28.4%	6.0%	$57,901	74.9%	54.4%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**363**	**100.0%**	**100.0%**	**$77,274**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	72	60.0%		$2,967	13.2%		
		$100,001–$250,000	18	15.0%		$3,363	15.0%		
		$250,001–$1 Million	30	25.0%		$16,106	71.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**120**	**100.0%**		**$22,436**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	52	32.3%	44.0%	$13,192	26.3%	35.5%	91.8%
		Over $1 Million/ Unknown	109	67.7%	56.0%	$36,997	73.7%	64.5%	8.2%
		TOTAL	**161**	**100.0%**	**100.0%**	**$50,189**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	49	30.4%	88.9%	$2,938	5.9%	26.3%	
		$100,001–$250,000	44	27.3%	5.5%	$8,436	16.8%	18.1%	
		$250,001–$1 Million	68	42.2%	5.5%	$38,815	77.3%	55.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**161**	**100.0%**	**100.0%**	**$50,189**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	21	40.4%		$1,139	8.6%		
		$100,001–$250,000	12	23.1%		$1,969	14.9%		
		$250,001–$1 Million	19	36.5%		$10,084	76.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**52**	**100.0%**		**$13,192**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	21	5.8%	3.9%	$5,270	6.8%	5.2%	4.1%
Moderate	37	10.2%	17.5%	$8,191	10.6%	19.7%	19.1%
Middle	127	35.0%	41.5%	$35,009	45.3%	39.5%	42.6%
Upper	178	49.0%	36.1%	$28,804	37.3%	35.6%	34.2%
Unknown	0	0.0%	1.0%	$0	0.0%	0.1%	0.1%
TOTAL	**363**	**100.0%**	**100.0%**	**$77,274**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	12	7.5%	2.0%	$4,746	9.5%	2.7%	2.3%
Moderate	35	21.7%	19.5%	$9,666	19.3%	19.4%	21.9%
Middle	65	40.4%	43.4%	$22,764	45.4%	43.5%	44.0%
Upper	49	30.4%	33.4%	$13,013	25.9%	33.2%	30.8%
Unknown	0	0.0%	1.7%	$0	0.0%	1.3%	0.9%
TOTAL	**161**	**100.0%**	**100.0%**	**$50,189**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Huntsville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	14	6.9%	6.1%	$1,904	3.0%	3.4%	23.8%
Moderate	35	17.2%	16.2%	$7,628	12.1%	12.6%	16.9%
Middle	56	27.5%	20.9%	$16,998	26.9%	19.7%	17.3%
Upper	96	47.1%	36.7%	$36,010	57.0%	44.3%	41.9%
Unknown	3	1.5%	20.1%	$634	1.0%	20.0%	0.0%
TOTAL	**204**	**100.0%**	**100.0%**	**$63,174**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	3.4%	6.6%	$394	2.1%	3.5%	23.8%
Moderate	9	15.3%	13.1%	$1,774	9.5%	9.1%	16.9%
Middle	6	10.2%	16.2%	$1,440	7.7%	13.8%	17.3%
Upper	41	69.5%	35.0%	$14,688	78.9%	41.5%	41.9%
Unknown	1	1.7%	29.2%	$309	1.7%	32.0%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$18,605**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	6.5%	$0	0.0%	3.4%	23.8%
Moderate	3	30.0%	14.8%	$248	11.7%	10.7%	16.9%
Middle	0	0.0%	19.9%	$0	0.0%	16.0%	17.3%
Upper	7	70.0%	54.1%	$1,876	88.3%	63.8%	41.9%
Unknown	0	0.0%	4.7%	$0	0.0%	6.0%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$2,124**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.0%	$0	0.0%	2.2%	23.8%
Moderate	0	0.0%	13.5%	$0	0.0%	7.6%	16.9%
Middle	0	0.0%	17.1%	$0	0.0%	11.5%	17.3%
Upper	0	0.0%	59.8%	$0	0.0%	75.4%	41.9%
Unknown	0	0.0%	4.5%	$0	0.0%	3.2%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.6%	$0	0.0%	4.5%	23.8%
Moderate	0	0.0%	15.5%	$0	0.0%	10.4%	16.9%
Middle	0	0.0%	14.9%	$0	0.0%	14.0%	17.3%
Upper	4	100.0%	51.7%	$865	100.0%	58.8%	41.9%
Unknown	0	0.0%	9.2%	$0	0.0%	12.3%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$865**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.9%	$0	0.0%	0.7%	23.8%
Moderate	0	0.0%	0.9%	$0	0.0%	0.7%	16.9%
Middle	0	0.0%	0.4%	$0	0.0%	0.5%	17.3%
Upper	0	0.0%	0.4%	$0	0.0%	0.2%	41.9%
Unknown	0	0.0%	97.4%	$0	0.0%	97.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	1.1%	$0	0.0%	0.1%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	4.6%	$0	0.0%	0.5%	N/A
Unknown	0	0.0%	94.3%	$0	0.0%	99.4%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	16	5.8%	6.3%	$2,298	2.7%	3.3%	23.8%
Moderate	47	17.0%	14.4%	$9,650	11.4%	10.4%	16.9%
Middle	62	22.4%	18.3%	$18,438	21.8%	16.1%	17.3%
Upper	148	53.4%	36.7%	$53,439	63.0%	41.5%	41.9%
Unknown	4	1.4%	24.3%	$943	1.1%	28.7%	0.0%
TOTAL	**277**	**100.0%**	**100.0%**	**$84,768**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	6	6.3%	5.7%	$790	2.0%	2.9%	23.1%
Moderate	18	18.9%	16.3%	$4,272	11.0%	12.2%	16.3%
Middle	24	25.3%	23.0%	$7,912	20.3%	21.7%	19.5%
Upper	45	47.4%	35.3%	$25,298	64.9%	42.9%	41.1%
Unknown	2	2.1%	19.7%	$717	1.8%	20.2%	0.0%
TOTAL	**95**	**100.0%**	**100.0%**	**$38,989**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	11.2%	$0	0.0%	6.3%	23.1%
Moderate	0	0.0%	19.5%	$0	0.0%	14.8%	16.3%
Middle	6	42.9%	20.5%	$1,534	27.9%	19.1%	19.5%
Upper	8	57.1%	33.5%	$3,967	72.1%	42.9%	41.1%
Unknown	0	0.0%	15.3%	$0	0.0%	17.0%	0.0%
TOTAL	**14**	**100.0%**	**100.0%**	**$5,501**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	7.2%	$0	0.0%	5.6%	23.1%
Moderate	1	12.5%	17.2%	$38	6.2%	12.4%	16.3%
Middle	1	12.5%	22.0%	$70	11.4%	18.7%	19.5%
Upper	6	75.0%	49.3%	$507	82.4%	57.5%	41.1%
Unknown	0	0.0%	4.3%	$0	0.0%	5.9%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$615**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	6.1%	$0	0.0%	3.0%	23.1%
Moderate	0	0.0%	15.3%	$0	0.0%	9.6%	16.3%
Middle	0	0.0%	19.8%	$0	0.0%	14.4%	19.5%
Upper	8	100.0%	55.1%	$1,072	100.0%	69.0%	41.1%
Unknown	0	0.0%	3.8%	$0	0.0%	4.0%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$1,072**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.8%	$0	0.0%	4.9%	23.1%
Moderate	1	100.0%	13.7%	$379	100.0%	9.3%	16.3%
Middle	0	0.0%	20.7%	$0	0.0%	18.0%	19.5%
Upper	0	0.0%	44.1%	$0	0.0%	49.1%	41.1%
Unknown	0	0.0%	12.8%	$0	0.0%	18.8%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$379**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.9%	$0	0.0%	0.3%	23.1%
Moderate	0	0.0%	0.9%	$0	0.0%	0.4%	16.3%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	19.5%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.1%
Unknown	0	0.0%	98.3%	$0	0.0%	99.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	2.1%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.1%	$0	0.0%	0.1%	N/A
Unknown	0	0.0%	95.7%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	6	4.8%	7.3%	$790	1.7%	3.4%	23.1%
Moderate	20	15.9%	17.0%	$4,689	10.1%	11.3%	16.3%
Middle	31	24.6%	21.8%	$9,516	20.4%	18.4%	19.5%
Upper	67	53.2%	36.6%	$30,844	66.3%	38.6%	41.1%
Unknown	2	1.6%	17.2%	$717	1.5%	28.3%	0.0%
TOTAL	**126**	**100.0%**	**100.0%**	**$46,556**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	2	1.0%	3.1%	$307	0.5%	1.8%	4.0%
Moderate	26	12.7%	16.9%	$6,657	10.5%	13.2%	24.5%
Middle	73	35.8%	39.4%	$21,780	34.5%	37.9%	33.8%
Upper	103	50.5%	40.6%	$34,430	54.5%	47.0%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**204**	**100.0%**	**100.0%**	**$63,174**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	1.7%	1.4%	$100	0.5%	1.1%	4.0%
Moderate	1	1.7%	14.9%	$70	0.4%	11.6%	24.5%
Middle	18	30.5%	34.7%	$4,706	25.3%	32.2%	33.8%
Upper	39	66.1%	49.1%	$13,729	73.8%	55.2%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$18,605**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.3%	$0	0.0%	1.6%	4.0%
Moderate	0	0.0%	16.5%	$0	0.0%	14.1%	24.5%
Middle	5	50.0%	33.4%	$686	32.3%	31.8%	33.8%
Upper	5	50.0%	47.8%	$1,438	67.7%	52.5%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$2,124**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.8%	$0	0.0%	0.3%	4.0%
Moderate	0	0.0%	14.7%	$0	0.0%	11.1%	24.5%
Middle	0	0.0%	34.7%	$0	0.0%	30.8%	33.8%
Upper	0	0.0%	49.8%	$0	0.0%	57.9%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.4%	$0	0.0%	2.4%	4.0%
Moderate	1	25.0%	17.2%	$145	16.8%	10.7%	24.5%
Middle	1	25.0%	38.5%	$300	34.7%	36.7%	33.8%
Upper	2	50.0%	40.8%	$420	48.6%	50.1%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$865**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.2%	$0	0.0%	1.2%	4.0%
Moderate	0	0.0%	27.6%	$0	0.0%	17.9%	24.5%
Middle	0	0.0%	39.0%	$0	0.0%	43.7%	33.8%
Upper	0	0.0%	31.1%	$0	0.0%	37.2%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	31.0%	$0	0.0%	27.4%	24.3%
Moderate	0	0.0%	35.6%	$0	0.0%	32.5%	31.8%
Middle	0	0.0%	24.1%	$0	0.0%	26.7%	31.7%
Upper	0	0.0%	9.2%	$0	0.0%	13.5%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	3	1.1%	2.2%	$407	0.5%	2.6%	4.0%
Moderate	28	10.1%	16.0%	$6,872	8.1%	13.3%	24.5%
Middle	97	35.0%	36.7%	$27,472	32.4%	34.8%	33.8%
Upper	149	53.8%	45.0%	$50,017	59.0%	49.3%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**277**	**100.0%**	**100.0%**	**$84,768**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	4.6%	$0	0.0%	2.5%	6.1%
Moderate	9	9.5%	15.7%	$2,663	6.8%	12.8%	17.4%
Middle	47	49.5%	39.9%	$18,384	47.2%	39.1%	35.0%
Upper	39	41.1%	39.8%	$17,942	46.0%	45.5%	41.4%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.1%
TOTAL	**95**	**100.0%**	**100.0%**	**$38,989**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	5.2%	$0	0.0%	2.8%	6.1%
Moderate	1	7.1%	15.7%	$149	2.7%	12.5%	17.4%
Middle	4	28.6%	37.4%	$1,109	20.2%	36.5%	35.0%
Upper	9	64.3%	41.7%	$4,243	77.1%	48.2%	41.4%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.1%
TOTAL	**14**	**100.0%**	**100.0%**	**$5,501**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.4%	$0	0.0%	2.5%	6.1%
Moderate	0	0.0%	13.5%	$0	0.0%	11.6%	17.4%
Middle	4	50.0%	36.1%	$244	39.7%	34.1%	35.0%
Upper	4	50.0%	46.9%	$371	60.3%	51.8%	41.4%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.1%
TOTAL	**8**	**100.0%**	**100.0%**	**$615**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.5%	$0	0.0%	1.5%	6.1%
Moderate	0	0.0%	9.3%	$0	0.0%	6.7%	17.4%
Middle	1	12.5%	37.2%	$72	6.7%	32.4%	35.0%
Upper	7	87.5%	50.9%	$1,000	93.3%	59.3%	41.4%
Unknown	0	0.0%	0.1%	$0	0.0%	0.2%	0.1%
TOTAL	**8**	**100.0%**	**100.0%**	**$1,072**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.4%	$0	0.0%	3.5%	6.1%
Moderate	0	0.0%	16.3%	$0	0.0%	11.3%	17.4%
Middle	1	100.0%	33.5%	$379	100.0%	26.5%	35.0%
Upper	0	0.0%	45.8%	$0	0.0%	58.6%	41.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**1**	**100.0%**	**100.0%**	**$379**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	11.3%	$0	0.0%	5.0%	6.1%
Moderate	0	0.0%	33.9%	$0	0.0%	16.3%	17.4%
Middle	0	0.0%	32.2%	$0	0.0%	26.5%	35.0%
Upper	0	0.0%	22.6%	$0	0.0%	52.2%	41.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	36.2%	$0	0.0%	9.4%	28.1%
Moderate	0	0.0%	24.5%	$0	0.0%	14.6%	26.7%
Middle	0	0.0%	23.4%	$0	0.0%	40.0%	22.9%
Upper	0	0.0%	13.8%	$0	0.0%	27.2%	18.7%
Unknown	0	0.0%	2.1%	$0	0.0%	8.7%	3.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	4.7%	$0	0.0%	3.4%	6.1%
Moderate	10	7.9%	15.4%	$2,812	6.0%	12.8%	17.4%
Middle	57	45.2%	38.6%	$20,188	43.4%	38.3%	35.0%
Upper	59	46.8%	41.2%	$23,556	50.6%	44.4%	41.4%
Unknown	0	0.0%	0.1%	$0	0.0%	1.1%	0.1%
TOTAL	**126**	**100.0%**	**100.0%**	**$46,556**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	50	54.9%	45.7%	$4,831	42.2%	36.7%	92.4%
		Over $1 Million/ Unknown	41	45.1%	54.3%	$6,618	57.8%	63.3%	7.6%
		TOTAL	**91**	**100.0%**	**100.0%**	**$11,449**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	64	70.3%	87.7%	$1,655	14.5%	25.8%	
		$100,001–$250,000	12	13.2%	6.3%	$1,995	17.4%	18.5%	
		$250,001–$1 Million	15	16.5%	6.1%	$7,799	68.1%	55.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**91**	**100.0%**	**100.0%**	**$11,449**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	37	74.0%		$1,123	23.2%		
		$100,001–$250,000	6	12.0%		$890	18.4%		
		$250,001–$1 Million	7	14.0%		$2,818	58.3%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**50**	**100.0%**		**$4,831**	**100.0%**		

Distribution of 2022 Small Business Lending
By Borrower Income Level

Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	19	48.7%	46.9%	$2,356	27.0%	35.1%	92.6%
	Over $1 Million/ Unknown	20	51.3%	53.1%	$6,369	73.0%	64.9%	7.4%
	TOTAL	**39**	**100.0%**	**100.0%**	**$8,725**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	22	56.4%	89.3%	$952	10.9%	26.1%	
	$100,001–$250,000	7	17.9%	5.1%	$1,325	15.2%	16.8%	
	$250,001–$1 Million	10	25.6%	5.6%	$6,448	73.9%	57.1%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**39**	**100.0%**	**100.0%**	**$8,725**	**100.0%**	**100.0%**	
Loan Size / Revenue $1 Million or Less	$100,000 or Less	14	73.7%		$490	20.8%		
	$100,001–$250,000	2	10.5%		$325	13.8%		
	$250,001–$1 Million	3	15.8%		$1,541	65.4%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**19**	**100.0%**		**$2,356**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	13	14.3%	11.8%	$1,540	13.5%	15.2%	11.1%
Moderate	16	17.6%	21.9%	$2,241	19.6%	22.4%	24.4%
Middle	23	25.3%	30.6%	$3,090	27.0%	27.7%	29.8%
Upper	39	42.9%	35.3%	$4,578	40.0%	34.7%	34.7%
Unknown	0	0.0%	0.5%	$0	0.0%	0.1%	0.0%
TOTAL	**91**	**100.0%**	**100.0%**	**$11,449**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	12	30.8%	12.8%	$3,363	38.5%	19.1%	14.2%
Moderate	2	5.1%	15.8%	$165	1.9%	14.9%	17.4%
Middle	5	12.8%	27.2%	$1,492	17.1%	21.1%	27.2%
Upper	18	46.2%	41.8%	$3,405	39.0%	41.9%	38.5%
Unknown	2	5.1%	2.4%	$300	3.4%	3.0%	2.7%
TOTAL	**39**	**100.0%**	**100.0%**	**$8,725**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

ARKANSAS

Little Rock Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	44	12.9%	6.1%	$5,781	6.6%	3.2%	21.7%
Moderate	103	30.2%	18.4%	$17,343	19.7%	13.3%	17.7%
Middle	55	16.1%	17.8%	$11,247	12.8%	16.5%	19.1%
Upper	138	40.5%	34.5%	$53,491	60.8%	44.6%	41.5%
Unknown	1	0.3%	23.2%	$55	0.1%	22.5%	0.0%
TOTAL	**341**	**100.0%**	**100.0%**	**$87,917**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	5	3.4%	4.1%	$623	1.7%	2.0%	21.7%
Moderate	24	16.4%	12.1%	$2,933	7.8%	7.7%	17.7%
Middle	25	17.1%	17.6%	$4,049	10.8%	13.9%	19.1%
Upper	85	58.2%	37.7%	$28,521	76.3%	47.1%	41.5%
Unknown	7	4.8%	28.5%	$1,276	3.4%	29.2%	0.0%
TOTAL	**146**	**100.0%**	**100.0%**	**$37,402**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	4	8.3%	5.7%	$135	2.6%	2.9%	21.7%
Moderate	3	6.3%	12.3%	$158	3.0%	8.9%	17.7%
Middle	4	8.3%	20.0%	$288	5.5%	15.4%	19.1%
Upper	37	77.1%	54.4%	$4,628	88.8%	61.2%	41.5%
Unknown	0	0.0%	7.5%	$0	0.0%	11.6%	0.0%
TOTAL	**48**	**100.0%**	**100.0%**	**$5,209**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.6%	$0	0.0%	2.1%	21.7%
Moderate	0	0.0%	7.1%	$0	0.0%	4.0%	17.7%
Middle	2	16.7%	14.3%	$72	3.2%	8.0%	19.1%
Upper	10	83.3%	68.9%	$2,167	96.8%	82.7%	41.5%
Unknown	0	0.0%	5.1%	$0	0.0%	3.2%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,239**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.8%	$0	0.0%	2.9%	21.7%
Moderate	3	50.0%	18.3%	$479	24.6%	13.0%	17.7%
Middle	0	0.0%	20.1%	$0	0.0%	16.9%	19.1%
Upper	2	33.3%	56.0%	$1,276	65.6%	66.1%	41.5%
Unknown	1	16.7%	0.9%	$190	9.8%	1.2%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,945**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.2%	$0	0.0%	0.7%	21.7%
Moderate	0	0.0%	2.2%	$0	0.0%	2.2%	17.7%
Middle	0	0.0%	0.2%	$0	0.0%	0.3%	19.1%
Upper	0	0.0%	0.2%	$0	0.0%	0.4%	41.5%
Unknown	0	0.0%	96.1%	$0	0.0%	96.4%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.6%	$0	0.0%	0.4%	N/A
Unknown	1	100.0%	97.4%	$650	100.0%	99.6%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$650**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	53	9.6%	5.1%	$6,539	4.8%	2.4%	21.7%
Moderate	133	24.0%	15.0%	$20,913	15.4%	9.8%	17.7%
Middle	86	15.5%	17.4%	$15,656	11.6%	14.0%	19.1%
Upper	272	49.1%	36.2%	$90,083	66.5%	42.2%	41.5%
Unknown	10	1.8%	26.4%	$2,171	1.6%	31.5%	0.0%
TOTAL	**554**	**100.0%**	**100.0%**	**$135,362**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	41	15.9%	6.5%	$5,001	7.1%	3.3%	23.0%
Moderate	79	30.6%	18.4%	$14,628	20.8%	13.1%	15.9%
Middle	41	15.9%	18.2%	$8,997	12.8%	16.9%	19.3%
Upper	95	36.8%	32.8%	$41,015	58.3%	44.2%	41.8%
Unknown	2	0.8%	24.1%	$724	1.0%	22.5%	0.0%
TOTAL	**258**	**100.0%**	**100.0%**	**$70,365**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	7	12.7%	7.4%	$611	5.0%	3.7%	23.0%
Moderate	9	16.4%	18.9%	$976	8.0%	13.3%	15.9%
Middle	6	10.9%	21.6%	$714	5.9%	17.9%	19.3%
Upper	32	58.2%	34.1%	$9,087	74.5%	46.4%	41.8%
Unknown	1	1.8%	18.0%	$805	6.6%	18.7%	0.0%
TOTAL	**55**	**100.0%**	**100.0%**	**$12,193**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	1.7%	6.4%	$42	0.6%	3.7%	23.0%
Moderate	4	6.8%	15.0%	$253	3.7%	9.0%	15.9%
Middle	11	18.6%	20.4%	$1,482	21.6%	15.7%	19.3%
Upper	43	72.9%	49.7%	$5,079	74.1%	60.4%	41.8%
Unknown	0	0.0%	8.5%	$0	0.0%	11.1%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$6,856**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	8.3%	4.3%	$25	1.6%	2.2%	23.0%
Moderate	1	8.3%	13.6%	$82	5.2%	9.9%	15.9%
Middle	2	16.7%	15.8%	$190	11.9%	10.4%	19.3%
Upper	8	66.7%	59.0%	$1,293	81.3%	72.5%	41.8%
Unknown	0	0.0%	7.3%	$0	0.0%	5.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$1,590**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.6%	$0	0.0%	2.1%	23.0%
Moderate	0	0.0%	13.5%	$0	0.0%	8.0%	15.9%
Middle	0	0.0%	26.4%	$0	0.0%	18.3%	19.3%
Upper	1	100.0%	51.0%	$71	100.0%	65.2%	41.8%
Unknown	0	0.0%	4.6%	$0	0.0%	6.4%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$71**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.9%	$0	0.0%	1.5%	23.0%
Moderate	0	0.0%	1.9%	$0	0.0%	2.0%	15.9%
Middle	0	0.0%	0.5%	$0	0.0%	0.9%	19.3%
Upper	0	0.0%	0.5%	$0	0.0%	0.6%	41.8%
Unknown	0	0.0%	95.2%	$0	0.0%	95.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.3%	$0	0.0%	0.1%	N/A
Unknown	0	0.0%	98.7%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	50	13.0%	6.5%	$5,679	6.2%	2.7%	23.0%
Moderate	93	24.2%	17.7%	$15,939	17.5%	10.5%	15.9%
Middle	60	15.6%	18.8%	$11,383	12.5%	13.8%	19.3%
Upper	179	46.5%	34.4%	$56,545	62.1%	36.9%	41.8%
Unknown	3	0.8%	22.6%	$1,529	1.7%	36.0%	0.0%
TOTAL	**385**	**100.0%**	**100.0%**	**$91,075**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	7	2.1%	1.9%	$1,192	1.4%	1.5%	3.3%
Moderate	38	11.1%	12.3%	$6,073	6.9%	7.7%	17.9%
Middle	123	36.1%	40.8%	$23,340	26.5%	36.7%	40.0%
Upper	170	49.9%	44.6%	$56,496	64.3%	53.9%	38.4%
Unknown	3	0.9%	0.3%	$816	0.9%	0.2%	0.4%
TOTAL	**341**	**100.0%**	**100.0%**	**$87,917**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.2%	$0	0.0%	1.3%	3.3%
Moderate	10	6.8%	9.4%	$1,414	3.8%	6.2%	17.9%
Middle	31	21.2%	37.6%	$4,805	12.8%	32.5%	40.0%
Upper	105	71.9%	51.7%	$31,183	83.4%	59.8%	38.4%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.4%
TOTAL	**146**	**100.0%**	**100.0%**	**$37,402**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.9%	$0	0.0%	1.1%	3.3%
Moderate	3	6.3%	11.5%	$95	1.8%	9.4%	17.9%
Middle	14	29.2%	35.3%	$971	18.6%	27.8%	40.0%
Upper	31	64.6%	51.1%	$4,143	79.5%	61.5%	38.4%
Unknown	0	0.0%	0.2%	$0	0.0%	0.2%	0.4%
TOTAL	**48**	**100.0%**	**100.0%**	**$5,209**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.0%	$0	0.0%	0.4%	3.3%
Moderate	0	0.0%	11.2%	$0	0.0%	6.8%	17.9%
Middle	3	25.0%	33.2%	$160	7.1%	22.7%	40.0%
Upper	9	75.0%	54.6%	$2,079	92.9%	70.0%	38.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,239**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.4%	$0	0.0%	1.5%	3.3%
Moderate	0	0.0%	14.1%	$0	0.0%	8.0%	17.9%
Middle	0	0.0%	35.0%	$0	0.0%	23.8%	40.0%
Upper	6	100.0%	48.5%	$1,945	100.0%	66.7%	38.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**6**	**100.0%**	**100.0%**	**$1,945**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.2%	$0	0.0%	2.1%	3.3%
Moderate	0	0.0%	25.0%	$0	0.0%	13.4%	17.9%
Middle	0	0.0%	47.8%	$0	0.0%	38.2%	40.0%
Upper	0	0.0%	23.0%	$0	0.0%	46.4%	38.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.4%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	5.8%	$0	0.0%	6.3%	9.9%
Moderate	0	0.0%	33.8%	$0	0.0%	23.7%	23.5%
Middle	0	0.0%	24.0%	$0	0.0%	10.2%	26.2%
Upper	1	100.0%	33.8%	$650	100.0%	52.5%	40.2%
Unknown	0	0.0%	2.6%	$0	0.0%	7.2%	0.3%
TOTAL	**1**	**100.0%**	**100.0%**	**$650**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	7	1.3%	1.7%	$1,192	0.9%	1.8%	3.3%
Moderate	51	9.2%	11.3%	$7,582	5.6%	8.4%	17.9%
Middle	171	30.9%	39.1%	$29,276	21.6%	32.8%	40.0%
Upper	322	58.1%	47.6%	$96,496	71.3%	56.3%	38.4%
Unknown	3	0.5%	0.2%	$816	0.6%	0.7%	0.4%
TOTAL	**554**	**100.0%**	**100.0%**	**$135,362**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	7	2.7%	4.4%	$831	1.2%	2.4%	4.4%
Moderate	50	19.4%	13.7%	$8,449	12.0%	9.3%	16.3%
Middle	84	32.6%	44.4%	$20,190	28.7%	41.5%	42.8%
Upper	117	45.3%	37.5%	$40,895	58.1%	46.8%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**258**	**100.0%**	**100.0%**	**$70,365**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	1.8%	3.5%	$68	0.6%	1.8%	4.4%
Moderate	4	7.3%	14.0%	$352	2.9%	9.0%	16.3%
Middle	20	36.4%	44.9%	$2,572	21.1%	41.1%	42.8%
Upper	30	54.5%	37.6%	$9,201	75.5%	48.1%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**55**	**100.0%**	**100.0%**	**$12,193**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.2%	$0	0.0%	2.2%	4.4%
Moderate	3	5.1%	12.6%	$95	1.4%	9.8%	16.3%
Middle	15	25.4%	37.3%	$1,682	24.5%	33.6%	42.8%
Upper	41	69.5%	45.9%	$5,079	74.1%	54.5%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**59**	**100.0%**	**100.0%**	**$6,856**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.5%	$0	0.0%	2.1%	4.4%
Moderate	1	8.3%	6.8%	$82	5.2%	3.6%	16.3%
Middle	4	33.3%	37.2%	$250	15.7%	27.4%	42.8%
Upper	7	58.3%	52.5%	$1,258	79.1%	66.9%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$1,590**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	100.0%	3.6%	$71	100.0%	3.3%	4.4%
Moderate	0	0.0%	11.5%	$0	0.0%	10.1%	16.3%
Middle	0	0.0%	41.3%	$0	0.0%	28.7%	42.8%
Upper	0	0.0%	43.5%	$0	0.0%	57.9%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$71**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	8.1%	$0	0.0%	4.8%	4.4%
Moderate	0	0.0%	29.7%	$0	0.0%	23.7%	16.3%
Middle	0	0.0%	47.4%	$0	0.0%	51.9%	42.8%
Upper	0	0.0%	14.8%	$0	0.0%	19.6%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	20.3%	$0	0.0%	15.9%	10.7%
Moderate	0	0.0%	25.9%	$0	0.0%	15.3%	25.5%
Middle	0	0.0%	31.6%	$0	0.0%	26.2%	35.3%
Upper	0	0.0%	22.2%	$0	0.0%	42.5%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	9	2.3%	4.3%	$970	1.1%	4.8%	4.4%
Moderate	58	15.1%	13.8%	$8,978	9.9%	10.4%	16.3%
Middle	123	31.9%	43.8%	$24,694	27.1%	38.3%	42.8%
Upper	195	50.6%	38.0%	$56,433	62.0%	46.5%	36.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**385**	**100.0%**	**100.0%**	**$91,075**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	157	35.0%	40.7%	$12,815	28.1%	34.9%	90.6%
		Over $1 Million/ Unknown	291	65.0%	59.3%	$32,835	71.9%	65.1%	9.4%
		TOTAL	**448**	**100.0%**	**100.0%**	**$45,650**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	338	75.4%	88.6%	$10,412	22.8%	30.0%	
		$100,001–$250,000	60	13.4%	6.4%	$10,244	22.4%	20.2%	
		$250,001–$1 Million	50	11.2%	5.0%	$24,994	54.8%	49.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**448**	**100.0%**	**100.0%**	**$45,650**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	133	84.7%		$4,207	32.8%		
		$100,001–$250,000	12	7.6%		$2,120	16.5%		
		$250,001–$1 Million	12	7.6%		$6,488	50.6%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**157**	**100.0%**		**$12,815**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	72	53.3%	50.5%	$10,210	40.8%	40.0%	90.9%
		Over $1 Million/ Unknown	63	46.7%	49.5%	$14,820	59.2%	60.0%	9.1%
		TOTAL	**135**	**100.0%**	**100.0%**	**$25,030**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	76	56.3%	90.6%	$3,674	14.7%	30.5%	
		$100,001–$250,000	25	18.5%	4.7%	$4,756	19.0%	16.9%	
		$250,001–$1 Million	34	25.2%	4.7%	$16,600	66.3%	52.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**135**	**100.0%**	**100.0%**	**$25,030**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	50	69.4%		$2,023	19.8%		
		$100,001–$250,000	10	13.9%		$1,863	18.2%		
		$250,001–$1 Million	12	16.7%		$6,324	61.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**72**	**100.0%**		**$10,210**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	30	6.7%	5.2%	$2,871	6.3%	5.8%	5.5%
Moderate	86	19.2%	18.8%	$12,082	26.5%	20.6%	21.0%
Middle	98	21.9%	29.1%	$8,234	18.0%	25.1%	28.4%
Upper	234	52.2%	46.2%	$22,463	49.2%	48.4%	44.8%
Unknown	0	0.0%	0.6%	$0	0.0%	0.3%	0.2%
TOTAL	**448**	**100.0%**	**100.0%**	**$45,650**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	13	9.6%	6.6%	$2,055	8.2%	8.8%	7.4%
Moderate	33	24.4%	19.1%	$6,377	25.5%	22.3%	21.2%
Middle	25	18.5%	34.7%	$3,191	12.7%	30.2%	33.7%
Upper	64	47.4%	38.9%	$13,407	53.6%	38.4%	37.3%
Unknown	0	0.0%	0.6%	$0	0.0%	0.3%	0.4%
TOTAL	**135**	**100.0%**	**100.0%**	**$25,030**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Fayetteville, Arkansas Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	18	3.5%	4.6%	$2,665	1.8%	2.6%	19.9%
Moderate	72	14.0%	14.4%	$14,517	9.7%	10.5%	18.5%
Middle	120	23.3%	18.5%	$30,077	20.0%	16.0%	20.3%
Upper	299	57.9%	40.5%	$100,451	66.8%	48.9%	41.2%
Unknown	7	1.4%	22.0%	$2,709	1.8%	22.0%	0.0%
TOTAL	**516**	**100.0%**	**100.0%**	**$150,419**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	9	2.1%	5.9%	$865	0.9%	3.1%	19.9%
Moderate	55	12.6%	12.7%	$8,194	8.1%	8.5%	18.5%
Middle	79	18.0%	17.4%	$13,768	13.6%	14.1%	20.3%
Upper	282	64.4%	42.7%	$74,761	73.9%	51.6%	41.2%
Unknown	13	3.0%	21.3%	$3,621	3.6%	22.8%	0.0%
TOTAL	**438**	**100.0%**	**100.0%**	**$101,209**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.2%	$0	0.0%	2.5%	19.9%
Moderate	3	7.1%	10.1%	$159	3.3%	5.8%	18.5%
Middle	7	16.7%	17.5%	$429	9.0%	12.1%	20.3%
Upper	32	76.2%	55.0%	$4,188	87.7%	62.5%	41.2%
Unknown	0	0.0%	13.3%	$0	0.0%	17.1%	0.0%
TOTAL	**42**	**100.0%**	**100.0%**	**$4,776**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	11.1%	4.1%	$35	5.8%	1.8%	19.9%
Moderate	0	0.0%	10.5%	$0	0.0%	5.8%	18.5%
Middle	3	33.3%	14.8%	$235	38.7%	8.6%	20.3%
Upper	5	55.6%	56.6%	$337	55.5%	59.1%	41.2%
Unknown	0	0.0%	14.1%	$0	0.0%	24.7%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$607**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	9.1%	10.2%	$975	37.5%	7.2%	19.9%
Moderate	3	27.3%	12.2%	$351	13.5%	8.6%	18.5%
Middle	2	18.2%	16.8%	$270	10.4%	12.2%	20.3%
Upper	5	45.5%	51.9%	$1,001	38.5%	63.2%	41.2%
Unknown	0	0.0%	8.9%	$0	0.0%	8.7%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$2,597**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.2%	$0	0.0%	0.9%	19.9%
Moderate	0	0.0%	0.6%	$0	0.0%	0.0%	18.5%
Middle	0	0.0%	1.2%	$0	0.0%	1.4%	20.3%
Upper	0	0.0%	1.2%	$0	0.0%	2.9%	41.2%
Unknown	0	0.0%	95.7%	$0	0.0%	94.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.9%	$0	0.0%	0.1%	N/A
Upper	0	0.0%	4.9%	$0	0.0%	0.7%	N/A
Unknown	2	100.0%	93.4%	$33,151	100.0%	99.2%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$33,151**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	29	2.8%	5.2%	$4,540	1.6%	2.5%	19.9%
Moderate	133	13.1%	13.2%	$23,221	7.9%	8.4%	18.5%
Middle	211	20.7%	17.7%	$44,779	15.3%	13.3%	20.3%
Upper	623	61.2%	41.8%	$180,738	61.7%	44.7%	41.2%
Unknown	22	2.2%	22.0%	$39,481	13.5%	31.1%	0.0%
TOTAL	**1,018**	**100.0%**	**100.0%**	**$292,759**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	7	2.9%	3.9%	$1,076	1.4%	1.9%	20.4%
Moderate	51	20.9%	13.3%	$11,207	14.2%	9.2%	18.2%
Middle	52	21.3%	20.7%	$14,452	18.3%	17.8%	20.3%
Upper	134	54.9%	41.3%	$52,307	66.2%	50.6%	41.1%
Unknown	0	0.0%	20.7%	$0	0.0%	20.5%	0.0%
TOTAL	**244**	**100.0%**	**100.0%**	**$79,042**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	2.4%	9.7%	$349	1.5%	4.9%	20.4%
Moderate	9	11.0%	17.7%	$1,432	6.2%	12.2%	18.2%
Middle	17	20.7%	20.6%	$3,300	14.4%	17.6%	20.3%
Upper	54	65.9%	36.8%	$17,862	77.9%	48.3%	41.1%
Unknown	0	0.0%	15.1%	$0	0.0%	17.1%	0.0%
TOTAL	**82**	**100.0%**	**100.0%**	**$22,943**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	3.1%	5.8%	$79	1.1%	2.7%	20.4%
Moderate	3	4.6%	11.3%	$95	1.3%	7.2%	18.2%
Middle	14	21.5%	18.1%	$1,198	16.4%	14.4%	20.3%
Upper	46	70.8%	52.4%	$5,952	81.3%	61.1%	41.1%
Unknown	0	0.0%	12.3%	$0	0.0%	14.6%	0.0%
TOTAL	**65**	**100.0%**	**100.0%**	**$7,324**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	5.9%	5.1%	$15	0.6%	2.1%	20.4%
Moderate	3	17.6%	10.7%	$195	7.9%	5.9%	18.2%
Middle	5	29.4%	20.4%	$677	27.6%	14.4%	20.3%
Upper	8	47.1%	50.9%	$1,567	63.9%	62.0%	41.1%
Unknown	0	0.0%	12.8%	$0	0.0%	15.6%	0.0%
TOTAL	**17**	**100.0%**	**100.0%**	**$2,454**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.1%	$0	0.0%	7.1%	20.4%
Moderate	0	0.0%	17.3%	$0	0.0%	11.3%	18.2%
Middle	1	12.5%	21.8%	$248	12.2%	13.6%	20.3%
Upper	7	87.5%	47.6%	$1,778	87.8%	59.5%	41.1%
Unknown	0	0.0%	5.2%	$0	0.0%	8.4%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$2,026**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	20.4%
Moderate	0	0.0%	5.7%	$0	0.0%	2.0%	18.2%
Middle	0	0.0%	1.9%	$0	0.0%	1.7%	20.3%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.1%
Unknown	0	0.0%	92.5%	$0	0.0%	96.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	2.3%	$0	0.0%	0.4%	N/A
Middle	0	0.0%	0.8%	$0	0.0%	0.1%	N/A
Upper	0	0.0%	1.5%	$0	0.0%	0.4%	N/A
Unknown	0	0.0%	95.5%	$0	0.0%	99.1%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	12	2.9%	5.7%	$1,519	1.3%	2.5%	20.4%
Moderate	66	15.9%	14.3%	$12,929	11.4%	9.1%	18.2%
Middle	89	21.4%	20.4%	$19,875	17.5%	16.2%	20.3%
Upper	249	59.9%	41.0%	$79,466	69.8%	46.5%	41.1%
Unknown	0	0.0%	18.6%	$0	0.0%	25.8%	0.0%
TOTAL	**416**	**100.0%**	**100.0%**	**$113,789**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	3	0.6%	0.5%	$390	0.3%	0.5%	0.7%
Moderate	53	10.3%	10.7%	$12,188	8.1%	8.8%	15.4%
Middle	209	40.5%	43.0%	$56,294	37.4%	39.7%	46.2%
Upper	251	48.6%	45.9%	$81,547	54.2%	51.0%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**516**	**100.0%**	**100.0%**	**$150,419**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	0.7%	0.4%	$262	0.3%	0.3%	0.7%
Moderate	44	10.0%	10.3%	$9,140	9.0%	8.0%	15.4%
Middle	138	31.5%	40.5%	$29,216	28.9%	37.3%	46.2%
Upper	253	57.8%	48.8%	$62,591	61.8%	54.4%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**438**	**100.0%**	**100.0%**	**$101,209**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.1%	$0	0.0%	0.1%	0.7%
Moderate	4	9.5%	11.2%	$182	3.8%	9.6%	15.4%
Middle	17	40.5%	40.9%	$2,261	47.3%	37.7%	46.2%
Upper	21	50.0%	47.8%	$2,333	48.8%	52.6%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**42**	**100.0%**	**100.0%**	**$4,776**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.5%	$0	0.0%	0.1%	0.7%
Moderate	1	11.1%	9.1%	$70	11.5%	5.7%	15.4%
Middle	2	22.2%	39.3%	$50	8.2%	37.8%	46.2%
Upper	6	66.7%	51.1%	$487	80.2%	56.4%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$607**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	9.1%	0.8%	$81	3.1%	0.5%	0.7%
Moderate	1	9.1%	15.5%	$131	5.0%	11.9%	15.4%
Middle	3	27.3%	39.2%	$604	23.3%	37.1%	46.2%
Upper	6	54.5%	44.5%	$1,781	68.6%	50.5%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$2,597**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.6%	$0	0.0%	0.3%	0.7%
Moderate	0	0.0%	19.6%	$0	0.0%	16.5%	15.4%
Middle	0	0.0%	46.0%	$0	0.0%	44.2%	46.2%
Upper	0	0.0%	33.7%	$0	0.0%	38.9%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	8.8%	$0	0.0%	6.8%	11.4%
Moderate	1	50.0%	23.9%	$2,350	7.1%	7.6%	28.5%
Middle	0	0.0%	39.4%	$0	0.0%	32.6%	30.4%
Upper	1	50.0%	27.9%	$30,801	92.9%	53.0%	29.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$33,151**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	7	0.7%	0.5%	$733	0.3%	1.1%	0.7%
Moderate	104	10.2%	10.7%	$24,061	8.2%	8.4%	15.4%
Middle	369	36.2%	41.6%	$88,425	30.2%	37.9%	46.2%
Upper	538	52.8%	47.2%	$179,540	61.3%	52.6%	37.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1,018**	**100.0%**	**100.0%**	**$292,759**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	3	1.2%	1.5%	$484	0.6%	1.2%	1.3%
Moderate	22	9.0%	12.2%	$5,326	6.7%	9.3%	16.5%
Middle	112	45.9%	45.6%	$33,288	42.1%	42.7%	47.1%
Upper	105	43.0%	40.5%	$39,489	50.0%	46.6%	34.9%
Unknown	2	0.8%	0.2%	$455	0.6%	0.3%	0.2%
TOTAL	**244**	**100.0%**	**100.0%**	**$79,042**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.2%	$0	0.0%	0.8%	1.3%
Moderate	9	11.0%	14.3%	$2,624	11.4%	10.7%	16.5%
Middle	35	42.7%	47.4%	$9,228	40.2%	45.5%	47.1%
Upper	36	43.9%	36.7%	$10,628	46.3%	42.6%	34.9%
Unknown	2	2.4%	0.4%	$463	2.0%	0.5%	0.2%
TOTAL	**82**	**100.0%**	**100.0%**	**$22,943**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	1.5%	0.9%	$39	0.5%	0.7%	1.3%
Moderate	3	4.6%	12.6%	$223	3.0%	9.9%	16.5%
Middle	34	52.3%	45.4%	$3,965	54.1%	45.8%	47.1%
Upper	27	41.5%	40.9%	$3,097	42.3%	43.1%	34.9%
Unknown	0	0.0%	0.3%	$0	0.0%	0.5%	0.2%
TOTAL	**65**	**100.0%**	**100.0%**	**$7,324**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.4%	$0	0.0%	0.1%	1.3%
Moderate	0	0.0%	10.3%	$0	0.0%	6.1%	16.5%
Middle	10	58.8%	43.2%	$772	31.5%	36.8%	47.1%
Upper	7	41.2%	45.8%	$1,682	68.5%	56.5%	34.9%
Unknown	0	0.0%	0.3%	$0	0.0%	0.5%	0.2%
TOTAL	**17**	**100.0%**	**100.0%**	**$2,454**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.4%	$0	0.0%	0.7%	1.3%
Moderate	0	0.0%	10.1%	$0	0.0%	7.8%	16.5%
Middle	7	87.5%	51.2%	$1,891	93.3%	43.1%	47.1%
Upper	1	12.5%	36.7%	$135	6.7%	45.8%	34.9%
Unknown	0	0.0%	0.6%	$0	0.0%	2.6%	0.2%
TOTAL	**8**	**100.0%**	**100.0%**	**$2,026**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.9%	$0	0.0%	0.1%	1.3%
Moderate	0	0.0%	18.9%	$0	0.0%	3.9%	16.5%
Middle	0	0.0%	56.6%	$0	0.0%	11.5%	47.1%
Upper	0	0.0%	22.6%	$0	0.0%	84.5%	34.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	13.6%	$0	0.0%	11.9%	19.1%
Moderate	0	0.0%	26.5%	$0	0.0%	10.1%	23.4%
Middle	0	0.0%	36.4%	$0	0.0%	42.5%	34.3%
Upper	0	0.0%	20.5%	$0	0.0%	34.8%	20.6%
Unknown	0	0.0%	3.0%	$0	0.0%	0.8%	2.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	4	1.0%	1.4%	$523	0.5%	1.9%	1.3%
Moderate	34	8.2%	12.8%	$8,173	7.2%	9.6%	16.5%
Middle	198	47.6%	46.1%	$49,144	43.2%	43.2%	47.1%
Upper	176	42.3%	39.4%	$55,031	48.4%	44.9%	34.9%
Unknown	4	1.0%	0.3%	$918	0.8%	0.4%	0.2%
TOTAL	**416**	**100.0%**	**100.0%**	**$113,789**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	54	25.4%	40.3%	$5,789	18.8%	36.6%	91.8%
		Over $1 Million/ Unknown	159	74.6%	59.7%	$24,983	81.2%	63.4%	8.2%
		TOTAL	**213**	**100.0%**	**100.0%**	**$30,772**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	99	46.5%	87.7%	$3,503	11.4%	29.7%	
		$100,001–$250,000	88	41.3%	6.6%	$16,147	52.5%	19.7%	
		$250,001–$1 Million	26	12.2%	5.7%	$11,122	36.1%	50.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**213**	**100.0%**	**100.0%**	**$30,772**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	40	74.1%		$1,468	25.4%		
		$100,001–$250,000	8	14.8%		$1,261	21.8%		
		$250,001–$1 Million	6	11.1%		$3,060	52.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**54**	**100.0%**		**$5,789**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	32	46.4%	51.4%	$3,329	29.1%	39.9%	91.7%
		Over $1 Million/ Unknown	37	53.6%	48.6%	$8,093	70.9%	60.1%	8.3%
		TOTAL	**69**	**100.0%**	**100.0%**	**$11,422**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	39	56.5%	91.2%	$1,864	16.3%	36.4%	
		$100,001–$250,000	13	18.8%	4.9%	$2,186	19.1%	18.5%	
		$250,001–$1 Million	17	24.6%	3.9%	$7,372	64.5%	45.1%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**69**	**100.0%**	**100.0%**	**$11,422**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	25	78.1%		$1,119	33.6%		
		$100,001–$250,000	4	12.5%		$612	18.4%		
		$250,001–$1 Million	3	9.4%		$1,598	48.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**32**	**100.0%**		**$3,329**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	8	3.8%	1.5%	$2,159	7.0%	2.0%	1.9%
Moderate	15	7.0%	15.2%	$3,233	10.5%	14.6%	16.7%
Middle	60	28.2%	44.4%	$5,192	16.9%	42.6%	45.7%
Upper	130	61.0%	38.2%	$20,188	65.6%	40.6%	35.7%
Unknown	0	0.0%	0.8%	$0	0.0%	0.1%	0.0%
TOTAL	**213**	**100.0%**	**100.0%**	**$30,772**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	2	2.9%	2.8%	$525	4.6%	4.2%	3.5%
Moderate	9	13.0%	17.2%	$2,686	23.5%	18.7%	19.7%
Middle	35	50.7%	42.0%	$4,783	41.9%	41.9%	41.0%
Upper	21	30.4%	35.0%	$3,178	27.8%	32.1%	32.8%
Unknown	2	2.9%	3.0%	$250	2.2%	3.2%	3.0%
TOTAL	**69**	**100.0%**	**100.0%**	**$11,422**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Jonesboro Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	3.0%	$0	0.0%	1.5%	19.9%
Moderate	3	10.3%	12.5%	$405	6.4%	8.7%	16.9%
Middle	6	20.7%	18.1%	$1,101	17.3%	16.1%	19.4%
Upper	17	58.6%	38.5%	$4,406	69.3%	48.5%	43.9%
Unknown	3	10.3%	27.9%	$449	7.1%	25.2%	0.0%
TOTAL	**29**	**100.0%**	**100.0%**	**$6,361**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	4.8%	2.8%	$87	1.0%	1.3%	19.9%
Moderate	7	16.7%	9.3%	$554	6.5%	5.9%	16.9%
Middle	2	4.8%	15.0%	$222	2.6%	11.6%	19.4%
Upper	30	71.4%	42.9%	$7,155	84.5%	51.5%	43.9%
Unknown	1	2.4%	30.0%	$450	5.3%	29.6%	0.0%
TOTAL	**42**	**100.0%**	**100.0%**	**$8,468**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.3%	$0	0.0%	1.9%	19.9%
Moderate	0	0.0%	7.4%	$0	0.0%	7.6%	16.9%
Middle	1	9.1%	13.1%	$10	1.1%	8.9%	19.4%
Upper	10	90.9%	62.3%	$934	98.9%	59.0%	43.9%
Unknown	0	0.0%	13.9%	$0	0.0%	22.6%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$944**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	14.3%	13.9%	$32	2.3%	8.5%	19.9%
Moderate	1	14.3%	2.8%	$25	1.8%	0.9%	16.9%
Middle	0	0.0%	13.9%	$0	0.0%	7.8%	19.4%
Upper	5	71.4%	63.9%	$1,329	95.9%	80.6%	43.9%
Unknown	0	0.0%	5.6%	$0	0.0%	2.3%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,386**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	8.0%	$0	0.0%	3.1%	19.9%
Moderate	0	0.0%	10.0%	$0	0.0%	9.2%	16.9%
Middle	0	0.0%	14.0%	$0	0.0%	11.8%	19.4%
Upper	0	0.0%	68.0%	$0	0.0%	75.9%	43.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.9%	$0	0.0%	1.6%	19.9%
Moderate	0	0.0%	1.9%	$0	0.0%	1.4%	16.9%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	19.4%
Upper	0	0.0%	1.9%	$0	0.0%	4.4%	43.9%
Unknown	0	0.0%	94.2%	$0	0.0%	92.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	9.0%	$0	0.0%	1.7%	N/A
Unknown	4	100.0%	91.0%	$4,108	100.0%	98.3%	N/A
TOTAL	**4**	**100.0%**	**100.0%**	**$4,108**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	3	3.2%	3.0%	$119	0.6%	1.3%	19.9%
Moderate	11	11.8%	10.7%	$984	4.6%	6.6%	16.9%
Middle	9	9.7%	16.2%	$1,333	6.3%	12.4%	19.4%
Upper	62	66.7%	40.5%	$13,824	65.0%	44.0%	43.9%
Unknown	8	8.6%	29.5%	$5,007	23.5%	35.7%	0.0%
TOTAL	**93**	**100.0%**	**100.0%**	**$21,267**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	8.3%	4.6%	$104	3.6%	2.5%	20.7%
Moderate	1	8.3%	15.9%	$71	2.5%	11.7%	15.9%
Middle	5	41.7%	18.6%	$928	32.1%	16.2%	19.5%
Upper	4	33.3%	33.2%	$1,660	57.4%	44.7%	43.8%
Unknown	1	8.3%	27.7%	$128	4.4%	25.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,891**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	12.0%	8.2%	$293	6.3%	4.1%	20.7%
Moderate	1	4.0%	13.8%	$30	0.6%	8.7%	15.9%
Middle	6	24.0%	20.0%	$1,088	23.5%	15.5%	19.5%
Upper	14	56.0%	38.9%	$3,089	66.8%	52.4%	43.8%
Unknown	1	4.0%	19.0%	$127	2.7%	19.2%	0.0%
TOTAL	**25**	**100.0%**	**100.0%**	**$4,627**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	7.0%	$0	0.0%	3.0%	20.7%
Moderate	1	14.3%	7.7%	$25	6.0%	5.3%	15.9%
Middle	1	14.3%	17.6%	$25	6.0%	12.6%	19.5%
Upper	5	71.4%	55.6%	$370	88.1%	68.6%	43.8%
Unknown	0	0.0%	12.0%	$0	0.0%	10.5%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$420**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.2%	$0	0.0%	1.1%	20.7%
Moderate	1	33.3%	14.5%	$21	16.7%	10.9%	15.9%
Middle	0	0.0%	24.2%	$0	0.0%	15.6%	19.5%
Upper	1	33.3%	50.0%	$75	59.5%	67.1%	43.8%
Unknown	1	33.3%	8.1%	$30	23.8%	5.4%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$126**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.6%	$0	0.0%	2.3%	20.7%
Moderate	0	0.0%	18.5%	$0	0.0%	12.3%	15.9%
Middle	0	0.0%	24.6%	$0	0.0%	18.1%	19.5%
Upper	0	0.0%	47.7%	$0	0.0%	62.4%	43.8%
Unknown	0	0.0%	4.6%	$0	0.0%	4.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	8.7%	$0	0.0%	1.9%	20.7%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	15.9%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	19.5%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.8%
Unknown	0	0.0%	91.3%	$0	0.0%	98.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.6%	$0	0.0%	0.4%	N/A
Unknown	0	0.0%	98.4%	$0	0.0%	99.6%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	4	8.5%	5.5%	$397	4.9%	2.4%	20.7%
Moderate	4	8.5%	14.7%	$147	1.8%	9.2%	15.9%
Middle	12	25.5%	18.6%	$2,041	25.3%	13.5%	19.5%
Upper	24	51.1%	35.3%	$5,194	64.4%	40.0%	43.8%
Unknown	3	6.4%	25.8%	$285	3.5%	34.9%	0.0%
TOTAL	**47**	**100.0%**	**100.0%**	**$8,064**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	3	10.3%	2.7%	$393	6.2%	1.9%	3.0%
Moderate	2	6.9%	8.4%	$303	4.8%	6.7%	9.9%
Middle	11	37.9%	54.0%	$1,969	31.0%	48.4%	58.5%
Upper	13	44.8%	34.9%	$3,696	58.1%	43.0%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**29**	**100.0%**	**100.0%**	**$6,361**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	9.5%	2.2%	$1,178	13.9%	1.9%	3.0%
Moderate	1	2.4%	7.5%	$126	1.5%	7.0%	9.9%
Middle	21	50.0%	52.9%	$4,076	48.1%	47.5%	58.5%
Upper	16	38.1%	37.4%	$3,088	36.5%	43.6%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**42**	**100.0%**	**100.0%**	**$8,468**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.9%	$0	0.0%	7.8%	3.0%
Moderate	1	9.1%	8.2%	$50	5.3%	6.7%	9.9%
Middle	5	45.5%	60.7%	$162	17.2%	53.9%	58.5%
Upper	5	45.5%	26.2%	$732	77.5%	31.6%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$944**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.8%	$0	0.0%	2.2%	3.0%
Moderate	0	0.0%	2.8%	$0	0.0%	0.9%	9.9%
Middle	1	14.3%	38.9%	$57	4.1%	18.0%	58.5%
Upper	6	85.7%	55.6%	$1,329	95.9%	78.8%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,386**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.0%	$0	0.0%	4.4%	3.0%
Moderate	0	0.0%	6.0%	$0	0.0%	5.5%	9.9%
Middle	0	0.0%	64.0%	$0	0.0%	56.1%	58.5%
Upper	0	0.0%	26.0%	$0	0.0%	33.9%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.9%	$0	0.0%	1.1%	3.0%
Moderate	0	0.0%	17.3%	$0	0.0%	10.3%	9.9%
Middle	0	0.0%	55.8%	$0	0.0%	54.7%	58.5%
Upper	0	0.0%	25.0%	$0	0.0%	33.9%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	25.0%	11.5%	$1,625	39.6%	9.2%	28.5%
Moderate	0	0.0%	25.6%	$0	0.0%	45.2%	38.6%
Middle	3	75.0%	48.7%	$2,483	60.4%	28.2%	24.7%
Upper	0	0.0%	14.1%	$0	0.0%	17.4%	8.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$4,108**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	8	8.6%	2.7%	$3,196	15.0%	2.8%	3.0%
Moderate	4	4.3%	8.3%	$479	2.3%	11.4%	9.9%
Middle	41	44.1%	53.6%	$8,747	41.1%	45.7%	58.5%
Upper	40	43.0%	35.4%	$8,845	41.6%	40.1%	28.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**93**	**100.0%**	**100.0%**	**$21,267**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.8%	$0	0.0%	0.5%	0.5%
Moderate	4	33.3%	16.7%	$553	19.1%	13.1%	16.7%
Middle	4	33.3%	37.4%	$976	33.8%	32.7%	39.2%
Upper	4	33.3%	45.1%	$1,362	47.1%	53.7%	43.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,891**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.3%	$0	0.0%	0.5%	0.5%
Moderate	3	12.0%	17.6%	$711	15.4%	13.0%	16.7%
Middle	5	20.0%	30.1%	$805	17.4%	26.9%	39.2%
Upper	17	68.0%	52.0%	$3,111	67.2%	59.7%	43.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**25**	**100.0%**	**100.0%**	**$4,627**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
Moderate	0	0.0%	14.8%	$0	0.0%	13.7%	16.7%
Middle	2	28.6%	33.8%	$130	31.0%	21.0%	39.2%
Upper	5	71.4%	51.4%	$290	69.0%	65.2%	43.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$420**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
Moderate	1	33.3%	9.7%	$75	59.5%	12.8%	16.7%
Middle	0	0.0%	37.1%	$0	0.0%	27.1%	39.2%
Upper	2	66.7%	53.2%	$51	40.5%	60.1%	43.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$126**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
Moderate	0	0.0%	10.8%	$0	0.0%	6.6%	16.7%
Middle	0	0.0%	41.5%	$0	0.0%	47.9%	39.2%
Upper	0	0.0%	47.7%	$0	0.0%	45.5%	43.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.5%
Moderate	0	0.0%	30.4%	$0	0.0%	31.7%	16.7%
Middle	0	0.0%	34.8%	$0	0.0%	37.7%	39.2%
Upper	0	0.0%	34.8%	$0	0.0%	30.5%	43.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	23.0%	$0	0.0%	12.7%	18.4%
Moderate	0	0.0%	36.1%	$0	0.0%	59.0%	36.7%
Middle	0	0.0%	26.2%	$0	0.0%	16.8%	35.8%
Upper	0	0.0%	14.8%	$0	0.0%	11.5%	9.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	1.0%	$0	0.0%	2.4%	0.5%
Moderate	8	17.0%	17.1%	$1,339	16.6%	20.0%	16.7%
Middle	11	23.4%	35.3%	$1,911	23.7%	29.0%	39.2%
Upper	28	59.6%	46.6%	$4,814	59.7%	48.6%	43.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**47**	**100.0%**	**100.0%**	**$8,064**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	50	36.0%	52.4%	$3,705	19.8%	49.3%	89.4%
		Over $1 Million/ Unknown	89	64.0%	47.6%	$14,962	80.2%	50.7%	10.6%
		TOTAL	**139**	**100.0%**	**100.0%**	**$18,667**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	99	71.2%	85.5%	$3,924	21.0%	28.4%	
		$100,001–$250,000	18	12.9%	7.8%	$3,247	17.4%	19.6%	
		$250,001–$1 Million	22	15.8%	6.7%	$11,496	61.6%	52.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**139**	**100.0%**	**100.0%**	**$18,667**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	44	88.0%		$1,817	49.0%		
		$100,001–$250,000	2	4.0%		$374	10.1%		
		$250,001–$1 Million	4	8.0%		$1,514	40.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**50**	**100.0%**		**$3,705**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	26	46.4%	54.3%	$2,004	20.5%	51.9%	89.4%
		Over $1 Million/ Unknown	30	53.6%	45.7%	$7,759	79.5%	48.1%	10.6%
		TOTAL	**56**	**100.0%**	**100.0%**	**$9,763**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	38	67.9%	88.3%	$2,123	21.7%	33.2%	
		$100,001–$250,000	8	14.3%	6.8%	$1,646	16.9%	21.0%	
		$250,001–$1 Million	10	17.9%	4.9%	$5,994	61.4%	45.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**56**	**100.0%**	**100.0%**	**$9,763**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	23	88.5%		$1,133	56.5%		
		$100,001–$250,000	2	7.7%		$371	18.5%		
		$250,001–$1 Million	1	3.8%		$500	25.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**26**	**100.0%**		**$2,004**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	32	23.0%	8.1%	$3,438	18.4%	9.2%	10.0%
Moderate	21	15.1%	13.8%	$4,209	22.5%	17.3%	17.7%
Middle	59	42.4%	54.1%	$8,762	46.9%	51.8%	51.2%
Upper	27	19.4%	23.5%	$2,258	12.1%	21.6%	21.2%
Unknown	0	0.0%	0.5%	$0	0.0%	0.1%	0.0%
TOTAL	**139**	**100.0%**	**100.0%**	**$18,667**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	1	1.8%	1.4%	$285	2.9%	2.0%	2.4%
Moderate	22	39.3%	25.1%	$3,312	33.9%	28.2%	27.6%
Middle	15	26.8%	38.4%	$3,892	39.9%	42.3%	38.1%
Upper	18	32.1%	34.2%	$2,274	23.3%	27.0%	32.0%
Unknown	0	0.0%	1.0%	$0	0.0%	0.4%	0.0%
TOTAL	**56**	**100.0%**	**100.0%**	**$9,763**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NonMSA Arkansas

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	2	6.7%	5.6%	$189	5.0%	3.5%	24.3%
Moderate	9	30.0%	18.2%	$962	25.5%	13.8%	18.7%
Middle	7	23.3%	22.0%	$618	16.4%	20.6%	19.1%
Upper	11	36.7%	29.6%	$1,972	52.4%	36.4%	37.8%
Unknown	1	3.3%	24.6%	$25	0.7%	25.7%	0.0%
TOTAL	**30**	**100.0%**	**100.0%**	**$3,766**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	5.9%	6.2%	$49	1.6%	3.0%	24.3%
Moderate	6	17.6%	12.6%	$301	9.8%	7.7%	18.7%
Middle	12	35.3%	19.0%	$875	28.6%	17.4%	19.1%
Upper	13	38.2%	41.1%	$1,633	53.3%	49.8%	37.8%
Unknown	1	2.9%	21.1%	$204	6.7%	22.1%	0.0%
TOTAL	**34**	**100.0%**	**100.0%**	**$3,062**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	9.5%	$0	0.0%	6.1%	24.3%
Moderate	2	28.6%	26.2%	$58	23.7%	21.2%	18.7%
Middle	0	0.0%	16.7%	$0	0.0%	15.8%	19.1%
Upper	5	71.4%	42.9%	$187	76.3%	44.1%	37.8%
Unknown	0	0.0%	4.8%	$0	0.0%	12.8%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$245**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	24.3%
Moderate	2	33.3%	30.0%	$25	8.6%	7.8%	18.7%
Middle	1	16.7%	30.0%	$108	37.2%	50.5%	19.1%
Upper	3	50.0%	30.0%	$157	54.1%	32.4%	37.8%
Unknown	0	0.0%	10.0%	$0	0.0%	9.3%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$290**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	17.4%	$0	0.0%	9.7%	24.3%
Moderate	0	0.0%	4.3%	$0	0.0%	4.2%	18.7%
Middle	1	50.0%	17.4%	$30	26.1%	16.9%	19.1%
Upper	1	50.0%	60.9%	$85	73.9%	69.2%	37.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$115**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	24.3%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	18.7%
Middle	0	0.0%	5.3%	$0	0.0%	2.2%	19.1%
Upper	0	0.0%	5.3%	$0	0.0%	0.1%	37.8%
Unknown	0	0.0%	89.5%	$0	0.0%	97.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	11.1%	$0	0.0%	1.3%	N/A
Unknown	0	0.0%	88.9%	$0	0.0%	98.7%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	4	5.1%	6.0%	$238	3.2%	3.1%	24.3%
Moderate	19	24.1%	15.9%	$1,346	18.0%	10.4%	18.7%
Middle	21	26.6%	20.4%	$1,631	21.8%	17.8%	19.1%
Upper	33	41.8%	34.3%	$4,034	53.9%	38.6%	37.8%
Unknown	2	2.5%	23.5%	$229	3.1%	30.1%	0.0%
TOTAL	**79**	**100.0%**	**100.0%**	**$7,478**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	3.8%	6.9%	$32	0.7%	3.7%	21.5%
Moderate	5	19.2%	18.9%	$466	10.4%	14.4%	18.6%
Middle	7	26.9%	21.6%	$1,132	25.2%	20.9%	21.7%
Upper	12	46.2%	28.8%	$2,793	62.2%	36.9%	38.2%
Unknown	1	3.8%	23.8%	$69	1.5%	24.2%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$4,492**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	15.8%	11.7%	$172	9.3%	6.5%	21.5%
Moderate	6	31.6%	21.5%	$482	26.0%	17.5%	18.6%
Middle	2	10.5%	21.5%	$83	4.5%	20.4%	21.7%
Upper	8	42.1%	37.7%	$1,119	60.3%	48.0%	38.2%
Unknown	0	0.0%	7.5%	$0	0.0%	7.7%	0.0%
TOTAL	**19**	**100.0%**	**100.0%**	**$1,856**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	7.1%	11.3%	$30	6.3%	11.4%	21.5%
Moderate	3	21.4%	16.1%	$110	23.3%	12.3%	18.6%
Middle	2	14.3%	21.0%	$65	13.7%	14.9%	21.7%
Upper	8	57.1%	46.8%	$268	56.7%	50.2%	38.2%
Unknown	0	0.0%	4.8%	$0	0.0%	11.2%	0.0%
TOTAL	**14**	**100.0%**	**100.0%**	**$473**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	12.5%	$0	0.0%	4.7%	21.5%
Moderate	0	0.0%	25.0%	$0	0.0%	13.8%	18.6%
Middle	2	40.0%	37.5%	$160	28.8%	37.6%	21.7%
Upper	3	60.0%	25.0%	$396	71.2%	43.9%	38.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$556**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	100.0%	33.3%	$50	100.0%	40.0%	21.5%
Moderate	0	0.0%	16.7%	$0	0.0%	14.9%	18.6%
Middle	0	0.0%	16.7%	$0	0.0%	24.9%	21.7%
Upper	0	0.0%	33.3%	$0	0.0%	20.1%	38.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$50**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	21.5%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	18.6%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	21.7%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	38.2%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	26.7%	$0	0.0%	7.0%	N/A
Unknown	0	0.0%	73.3%	$0	0.0%	93.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	6	9.2%	8.7%	$284	3.8%	4.5%	21.5%
Moderate	14	21.5%	19.1%	$1,058	14.2%	14.2%	18.6%
Middle	13	20.0%	21.2%	$1,440	19.4%	19.6%	21.7%
Upper	31	47.7%	32.0%	$4,576	61.6%	38.1%	38.2%
Unknown	1	1.5%	19.1%	$69	0.9%	23.6%	0.0%
TOTAL	**65**	**100.0%**	**100.0%**	**$7,427**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	7	23.3%	21.8%	$895	23.8%	22.2%	18.5%
Middle	23	76.7%	78.1%	$2,871	76.2%	77.7%	81.5%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.0%
TOTAL	**30**	**100.0%**	**100.0%**	**$3,766**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	7	20.6%	18.6%	$875	28.6%	21.1%	18.5%
Middle	27	79.4%	81.4%	$2,187	71.4%	78.9%	81.5%
Upper	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%
TOTAL	**34**	**100.0%**	**100.0%**	**$3,062**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	28.6%	31.0%	$97	39.6%	27.7%	18.5%
Middle	5	71.4%	69.0%	$148	60.4%	72.3%	81.5%
Upper	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%
TOTAL	**7**	**100.0%**	**100.0%**	**$245**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	3	50.0%	40.0%	$130	44.8%	29.5%	18.5%
Middle	3	50.0%	60.0%	$160	55.2%	70.5%	81.5%
Upper	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%
TOTAL	**6**	**100.0%**	**100.0%**	**$290**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	50.0%	21.7%	$85	73.9%	23.6%	18.5%
Middle	1	50.0%	78.3%	$30	26.1%	76.4%	81.5%
Upper	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%
TOTAL	**2**	**100.0%**	**100.0%**	**$115**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	26.3%	$0	0.0%	37.3%	18.5%
Middle	0	0.0%	73.7%	$0	0.0%	62.7%	81.5%
Upper	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%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	66.7%	$0	0.0%	64.1%	11.9%
Middle	0	0.0%	33.3%	$0	0.0%	35.9%	88.1%
Upper	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%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	20	25.3%	21.4%	$2,082	27.8%	25.2%	18.5%
Middle	59	74.7%	78.6%	$5,396	72.2%	74.8%	81.5%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	0.1%	$0	0.0%	0.0%	0.0%
TOTAL	**79**	**100.0%**	**100.0%**	**$7,478**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	7.7%	8.0%	$601	13.4%	8.8%	9.9%
Middle	24	92.3%	92.0%	$3,891	86.6%	91.2%	90.1%
Upper	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%
TOTAL	**26**	**100.0%**	**100.0%**	**$4,492**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	7	36.8%	10.2%	$495	26.7%	10.0%	9.9%
Middle	12	63.2%	89.8%	$1,361	73.3%	90.0%	90.1%
Upper	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%
TOTAL	**19**	**100.0%**	**100.0%**	**$1,856**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	7.1%	6.5%	$30	6.3%	4.1%	9.9%
Middle	13	92.9%	93.5%	$443	93.7%	95.9%	90.1%
Upper	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%
TOTAL	**14**	**100.0%**	**100.0%**	**$473**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	9.9%
Middle	5	100.0%	100.0%	$556	100.0%	100.0%	90.1%
Upper	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%
TOTAL	**5**	**100.0%**	**100.0%**	**$556**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	8.3%	$0	0.0%	13.8%	9.9%
Middle	1	100.0%	91.7%	$50	100.0%	86.2%	90.1%
Upper	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%
TOTAL	**1**	**100.0%**	**100.0%**	**$50**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	9.9%
Middle	0	0.0%	100.0%	$0	0.0%	100.0%	90.1%
Upper	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%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	20.0%	$0	0.0%	13.3%	10.8%
Middle	0	0.0%	80.0%	$0	0.0%	86.7%	89.2%
Upper	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%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	10	15.4%	8.5%	$1,126	15.2%	9.1%	9.9%
Middle	55	84.6%	91.5%	$6,301	84.8%	90.9%	90.1%
Upper	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%
TOTAL	**65**	**100.0%**	**100.0%**	**$7,427**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	26	40.0%	41.1%	$915	22.1%	42.5%	87.8%
		Over $1 Million/ Unknown	39	60.0%	58.9%	$3,216	77.9%	57.5%	12.2%
		TOTAL	**65**	**100.0%**	**100.0%**	**$4,131**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	58	89.2%	93.3%	$1,425	34.5%	46.1%	
		$100,001–$250,000	3	4.6%	4.2%	$534	12.9%	19.1%	
		$250,001–$1 Million	4	6.2%	2.5%	$2,172	52.6%	34.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**65**	**100.0%**	**100.0%**	**$4,131**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	24	92.3%		$457	49.9%		
		$100,001–$250,000	1	3.8%		$158	17.3%		
		$250,001–$1 Million	1	3.8%		$300	32.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**26**	**100.0%**		**$915**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	15	68.2%	54.1%	$1,478	44.1%	58.6%	88.0%
		Over $1 Million/ Unknown	7	31.8%	45.9%	$1,877	55.9%	41.4%	12.0%
		TOTAL	**22**	**100.0%**	**100.0%**	**$3,355**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	15	68.2%	91.2%	$615	18.3%	36.3%	
		$100,001–$250,000	4	18.2%	5.4%	$839	25.0%	20.1%	
		$250,001–$1 Million	3	13.6%	3.4%	$1,901	56.7%	43.6%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**22**	**100.0%**	**100.0%**	**$3,355**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	12	80.0%		$490	33.2%		
		$100,001–$250,000	2	13.3%		$488	33.0%		
		$250,001–$1 Million	1	6.7%		$500	33.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**15**	**100.0%**		**$1,478**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	8	12.3%	16.6%	$317	7.7%	14.0%	15.4%
Middle	57	87.7%	81.9%	$3,814	92.3%	85.7%	84.6%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	1.5%	$0	0.0%	0.3%	0.0%
TOTAL	**65**	**100.0%**	**100.0%**	**$4,131**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	9.1%	8.0%	$129	3.8%	8.6%	6.8%
Middle	20	90.9%	88.3%	$3,226	96.2%	89.8%	93.2%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Unknown	0	0.0%	3.7%	$0	0.0%	1.5%	0.0%
TOTAL	**22**	**100.0%**	**100.0%**	**$3,355**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TEXAS

Houston Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	16	7.1%	2.4%	$2,288	1.9%	1.2%	25.7%
Moderate	30	13.4%	14.6%	$5,929	5.0%	9.8%	16.4%
Middle	20	8.9%	20.5%	$5,119	4.3%	17.0%	16.9%
Upper	136	60.7%	39.9%	$93,704	78.8%	52.5%	41.1%
Unknown	22	9.8%	22.6%	$11,826	9.9%	19.5%	0.0%
TOTAL	**224**	**100.0%**	**100.0%**	**$118,866**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	11	7.0%	2.6%	$1,553	1.6%	1.2%	25.7%
Moderate	16	10.1%	9.9%	$2,418	2.4%	5.8%	16.4%
Middle	9	5.7%	16.7%	$1,675	1.7%	12.1%	16.9%
Upper	109	69.0%	48.6%	$84,103	84.8%	59.5%	41.1%
Unknown	13	8.2%	22.1%	$9,475	9.5%	21.3%	0.0%
TOTAL	**158**	**100.0%**	**100.0%**	**$99,224**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	12.5%	4.7%	$268	13.4%	2.5%	25.7%
Moderate	2	12.5%	9.2%	$236	11.8%	6.3%	16.4%
Middle	4	25.0%	16.5%	$328	16.4%	12.0%	16.9%
Upper	8	50.0%	66.7%	$1,163	58.3%	75.1%	41.1%
Unknown	0	0.0%	2.9%	$0	0.0%	4.2%	0.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$1,995**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.9%	$0	0.0%	2.4%	25.7%
Moderate	0	0.0%	9.7%	$0	0.0%	5.3%	16.4%
Middle	0	0.0%	14.7%	$0	0.0%	9.6%	16.9%
Upper	7	100.0%	67.2%	$1,391	100.0%	80.2%	41.1%
Unknown	0	0.0%	2.5%	$0	0.0%	2.6%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,391**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.9%	$0	0.0%	2.7%	25.7%
Moderate	1	11.1%	13.3%	$100	1.1%	6.3%	16.4%
Middle	0	0.0%	17.7%	$0	0.0%	8.5%	16.9%
Upper	4	44.4%	57.2%	$3,821	42.8%	72.0%	41.1%
Unknown	4	44.4%	5.9%	$5,006	56.1%	10.5%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$8,927**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	1	100.0%	0.6%	$28	100.0%	0.3%	25.7%
Moderate	0	0.0%	0.9%	$0	0.0%	0.7%	16.4%
Middle	0	0.0%	0.3%	$0	0.0%	0.3%	16.9%
Upper	0	0.0%	0.3%	$0	0.0%	0.4%	41.1%
Unknown	0	0.0%	98.0%	$0	0.0%	98.4%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$28**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.7%	$0	0.0%	0.0%	N/A
Unknown	2	100.0%	99.3%	$38,745	100.0%	100.0%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$38,745**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	30	7.2%	2.5%	$4,137	1.5%	1.1%	25.7%
Moderate	49	11.8%	12.2%	$8,683	3.2%	7.5%	16.4%
Middle	33	7.9%	18.4%	$7,122	2.6%	13.8%	16.9%
Upper	264	63.3%	43.8%	$184,182	68.4%	52.0%	41.1%
Unknown	41	9.8%	23.0%	$65,052	24.2%	25.7%	0.0%
TOTAL	**417**	**100.0%**	**100.0%**	**$269,176**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	18	7.3%	2.7%	$5,228	3.1%	1.3%	25.1%
Moderate	38	15.4%	14.6%	$8,440	5.0%	9.5%	17.1%
Middle	9	3.6%	20.3%	$2,741	1.6%	16.9%	17.7%
Upper	177	71.7%	39.9%	$142,677	85.1%	52.3%	40.1%
Unknown	5	2.0%	22.5%	$8,574	5.1%	20.0%	0.0%
TOTAL	**247**	**100.0%**	**100.0%**	**$167,660**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	12.1%	7.5%	$621	2.9%	3.8%	25.1%
Moderate	3	9.1%	17.5%	$417	1.9%	11.2%	17.1%
Middle	1	3.0%	21.2%	$123	0.6%	16.5%	17.7%
Upper	24	72.7%	40.3%	$19,673	91.1%	54.0%	40.1%
Unknown	1	3.0%	13.4%	$750	3.5%	14.6%	0.0%
TOTAL	**33**	**100.0%**	**100.0%**	**$21,584**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	5.8%	$0	0.0%	3.3%	25.1%
Moderate	0	0.0%	11.8%	$0	0.0%	7.7%	17.1%
Middle	4	13.8%	17.2%	$253	4.9%	12.4%	17.7%
Upper	25	86.2%	63.2%	$4,884	95.1%	74.2%	40.1%
Unknown	0	0.0%	2.0%	$0	0.0%	2.4%	0.0%
TOTAL	**29**	**100.0%**	**100.0%**	**$5,137**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.9%	$0	0.0%	3.8%	25.1%
Moderate	1	9.1%	11.5%	$60	3.2%	6.3%	17.1%
Middle	1	9.1%	15.6%	$79	4.2%	10.8%	17.7%
Upper	9	81.8%	62.7%	$1,750	92.6%	74.9%	40.1%
Unknown	0	0.0%	4.3%	$0	0.0%	4.1%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$1,889**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	14.3%	7.6%	$85	1.9%	4.4%	25.1%
Moderate	0	0.0%	16.8%	$0	0.0%	8.8%	17.1%
Middle	0	0.0%	19.3%	$0	0.0%	10.4%	17.7%
Upper	4	57.1%	49.2%	$1,967	44.0%	64.0%	40.1%
Unknown	2	28.6%	7.2%	$2,420	54.1%	12.3%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$4,472**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.5%	$0	0.0%	0.8%	25.1%
Moderate	0	0.0%	1.3%	$0	0.0%	1.2%	17.1%
Middle	0	0.0%	0.4%	$0	0.0%	0.3%	17.7%
Upper	0	0.0%	0.2%	$0	0.0%	0.3%	40.1%
Unknown	0	0.0%	96.7%	$0	0.0%	97.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.2%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Unknown	1	100.0%	99.4%	$943	100.0%	100.0%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$943**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	23	7.0%	4.0%	$5,934	2.9%	1.5%	25.1%
Moderate	42	12.8%	15.0%	$8,917	4.4%	8.2%	17.1%
Middle	15	4.6%	20.0%	$3,196	1.6%	13.9%	17.7%
Upper	239	72.9%	40.4%	$170,951	84.8%	44.4%	40.1%
Unknown	9	2.7%	20.6%	$12,687	6.3%	32.0%	0.0%
TOTAL	**328**	**100.0%**	**100.0%**	**$201,685**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	16	7.1%	3.8%	$3,125	2.6%	2.9%	6.4%
Moderate	42	18.8%	13.3%	$10,283	8.7%	9.2%	22.7%
Middle	35	15.6%	27.2%	$11,646	9.8%	21.0%	27.4%
Upper	131	58.5%	55.5%	$93,812	78.9%	66.8%	43.4%
Unknown	0	0.0%	0.2%	$0	0.0%	0.2%	0.1%
TOTAL	**224**	**100.0%**	**100.0%**	**$118,866**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	10	6.3%	2.6%	$3,866	3.9%	1.9%	6.4%
Moderate	16	10.1%	10.6%	$4,981	5.0%	7.0%	22.7%
Middle	13	8.2%	24.1%	$3,163	3.2%	17.3%	27.4%
Upper	119	75.3%	62.7%	$87,214	87.9%	73.7%	43.4%
Unknown	0	0.0%	0.1%	$0	0.0%	0.0%	0.1%
TOTAL	**158**	**100.0%**	**100.0%**	**$99,224**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	6.3%	3.1%	$50	2.5%	2.4%	6.4%
Moderate	2	12.5%	13.1%	$409	20.5%	9.3%	22.7%
Middle	5	31.3%	18.5%	$475	23.8%	13.0%	27.4%
Upper	8	50.0%	65.2%	$1,061	53.2%	75.4%	43.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**16**	**100.0%**	**100.0%**	**$1,995**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.3%	$0	0.0%	1.5%	6.4%
Moderate	0	0.0%	10.1%	$0	0.0%	6.4%	22.7%
Middle	0	0.0%	16.6%	$0	0.0%	10.8%	27.4%
Upper	7	100.0%	70.9%	$1,391	100.0%	81.4%	43.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,391**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.9%	$0	0.0%	2.0%	6.4%
Moderate	0	0.0%	15.3%	$0	0.0%	6.1%	22.7%
Middle	2	22.2%	24.5%	$300	3.4%	11.0%	27.4%
Upper	7	77.8%	56.3%	$8,627	96.6%	80.9%	43.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**9**	**100.0%**	**100.0%**	**$8,927**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.4%	$0	0.0%	2.6%	6.4%
Moderate	1	100.0%	22.0%	$28	100.0%	15.5%	22.7%
Middle	0	0.0%	42.3%	$0	0.0%	41.0%	27.4%
Upper	0	0.0%	32.3%	$0	0.0%	40.9%	43.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**1**	**100.0%**	**100.0%**	**$28**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	25.6%	$0	0.0%	20.3%	27.9%
Moderate	0	0.0%	30.7%	$0	0.0%	27.1%	28.3%
Middle	0	0.0%	15.7%	$0	0.0%	18.3%	19.2%
Upper	2	100.0%	27.8%	$38,745	100.0%	33.3%	23.8%
Unknown	0	0.0%	0.2%	$0	0.0%	1.0%	0.8%
TOTAL	**2**	**100.0%**	**100.0%**	**$38,745**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	27	6.5%	3.3%	$7,041	2.6%	3.6%	6.4%
Moderate	61	14.6%	12.2%	$15,701	5.8%	9.5%	22.7%
Middle	55	13.2%	25.8%	$15,584	5.8%	19.3%	27.4%
Upper	274	65.7%	58.7%	$230,850	85.8%	67.4%	43.4%
Unknown	0	0.0%	0.1%	$0	0.0%	0.2%	0.1%
TOTAL	**417**	**100.0%**	**100.0%**	**$269,176**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	12	4.9%	4.7%	$2,479	1.5%	3.2%	6.2%
Moderate	40	16.2%	15.9%	$10,380	6.2%	11.0%	21.4%
Middle	30	12.1%	30.7%	$11,861	7.1%	25.5%	29.5%
Upper	161	65.2%	47.9%	$141,458	84.4%	59.7%	42.1%
Unknown	4	1.6%	0.8%	$1,482	0.9%	0.7%	0.9%
TOTAL	**247**	**100.0%**	**100.0%**	**$167,660**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	6.1%	3.8%	$353	1.6%	2.5%	6.2%
Moderate	3	9.1%	16.9%	$1,500	6.9%	11.0%	21.4%
Middle	7	21.2%	31.0%	$1,721	8.0%	23.7%	29.5%
Upper	21	63.6%	47.6%	$18,010	83.4%	62.2%	42.1%
Unknown	0	0.0%	0.7%	$0	0.0%	0.6%	0.9%
TOTAL	**33**	**100.0%**	**100.0%**	**$21,584**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.7%	$0	0.0%	2.7%	6.2%
Moderate	2	6.9%	12.4%	$551	10.7%	8.5%	21.4%
Middle	4	13.8%	23.2%	$345	6.7%	18.2%	29.5%
Upper	23	79.3%	60.0%	$4,241	82.6%	70.0%	42.1%
Unknown	0	0.0%	0.7%	$0	0.0%	0.5%	0.9%
TOTAL	**29**	**100.0%**	**100.0%**	**$5,137**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.4%	$0	0.0%	1.3%	6.2%
Moderate	3	27.3%	8.7%	$579	30.7%	5.4%	21.4%
Middle	1	9.1%	21.9%	$60	3.2%	16.2%	29.5%
Upper	7	63.6%	66.2%	$1,250	66.2%	76.4%	42.1%
Unknown	0	0.0%	0.8%	$0	0.0%	0.7%	0.9%
TOTAL	**11**	**100.0%**	**100.0%**	**$1,889**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	14.3%	3.7%	$85	1.9%	1.9%	6.2%
Moderate	0	0.0%	16.8%	$0	0.0%	8.6%	21.4%
Middle	0	0.0%	27.9%	$0	0.0%	16.5%	29.5%
Upper	6	85.7%	50.9%	$4,387	98.1%	71.7%	42.1%
Unknown	0	0.0%	0.6%	$0	0.0%	1.3%	0.9%
TOTAL	**7**	**100.0%**	**100.0%**	**$4,472**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.5%	$0	0.0%	8.4%	6.2%
Moderate	0	0.0%	28.8%	$0	0.0%	20.1%	21.4%
Middle	0	0.0%	40.8%	$0	0.0%	36.5%	29.5%
Upper	0	0.0%	25.1%	$0	0.0%	34.3%	42.1%
Unknown	0	0.0%	0.9%	$0	0.0%	0.7%	0.9%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	22.2%	$0	0.0%	13.5%	25.3%
Moderate	1	100.0%	27.5%	$943	100.0%	20.4%	27.6%
Middle	0	0.0%	18.8%	$0	0.0%	27.9%	19.9%
Upper	0	0.0%	27.7%	$0	0.0%	33.0%	22.8%
Unknown	0	0.0%	3.8%	$0	0.0%	5.2%	4.4%
TOTAL	**1**	**100.0%**	**100.0%**	**$943**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	15	4.6%	4.5%	$2,917	1.4%	4.7%	6.2%
Moderate	49	14.9%	16.1%	$13,953	6.9%	12.5%	21.4%
Middle	42	12.8%	30.5%	$13,987	6.9%	25.5%	29.5%
Upper	218	66.5%	48.1%	$169,346	84.0%	56.0%	42.1%
Unknown	4	1.2%	0.8%	$1,482	0.7%	1.4%	0.9%
TOTAL	**328**	**100.0%**	**100.0%**	**$201,685**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	66	32.0%	41.7%	$8,227	22.6%	26.3%	91.7%
		Over $1 Million/ Unknown	140	68.0%	58.3%	$28,112	77.4%	73.7%	8.3%
		TOTAL	**206**	**100.0%**	**100.0%**	**$36,339**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	125	60.7%	92.4%	$3,999	11.0%	36.7%	
		$100,001–$250,000	30	14.6%	4.2%	$4,824	13.3%	17.4%	
		$250,001–$1 Million	51	24.8%	3.4%	$27,516	75.7%	45.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**206**	**100.0%**	**100.0%**	**$36,339**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	50	75.8%		$1,706	20.7%		
		$100,001–$250,000	6	9.1%		$1,001	12.2%		
		$250,001–$1 Million	10	15.2%		$5,520	67.1%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**66**	**100.0%**		**$8,227**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	43	51.8%	50.1%	$9,922	46.6%	33.9%	91.9%
		Over $1 Million/ Unknown	40	48.2%	49.9%	$11,353	53.4%	66.1%	8.1%
		TOTAL	**83**	**100.0%**	**100.0%**	**$21,275**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	44	53.0%	94.6%	$2,523	11.9%	41.0%	
		$100,001–$250,000	11	13.3%	2.9%	$1,736	8.2%	15.0%	
		$250,001–$1 Million	28	33.7%	2.5%	$17,016	80.0%	44.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**83**	**100.0%**	**100.0%**	**$21,275**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	27	62.8%		$1,483	14.9%		
		$100,001–$250,000	5	11.6%		$732	7.4%		
		$250,001–$1 Million	11	25.6%		$7,707	77.7%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**43**	**100.0%**		**$9,922**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	22	10.7%	11.0%	$6,850	18.9%	13.6%	11.5%
Moderate	45	21.8%	19.3%	$8,409	23.1%	20.4%	19.9%
Middle	23	11.2%	23.1%	$2,889	8.0%	21.3%	22.3%
Upper	115	55.8%	46.0%	$18,179	50.0%	44.4%	46.1%
Unknown	1	0.5%	0.6%	$12	0.0%	0.2%	0.2%
TOTAL	**206**	**100.0%**	**100.0%**	**$36,339**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	8	9.6%	9.2%	$2,223	10.4%	10.6%	10.1%
Moderate	22	26.5%	20.0%	$5,338	25.1%	22.4%	21.3%
Middle	18	21.7%	24.6%	$5,078	23.9%	22.8%	24.5%
Upper	35	42.2%	44.2%	$8,636	40.6%	42.4%	42.3%
Unknown	0	0.0%	2.0%	$0	0.0%	1.8%	1.8%
TOTAL	**83**	**100.0%**	**100.0%**	**$21,275**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Dallas Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	3	0.9%	2.9%	$594	0.3%	1.3%	24.0%
Moderate	22	6.3%	13.6%	$5,335	2.7%	8.9%	16.4%
Middle	35	9.9%	18.4%	$10,972	5.5%	15.5%	17.3%
Upper	283	80.4%	44.1%	$169,824	84.7%	55.5%	42.3%
Unknown	9	2.6%	20.9%	$13,754	6.9%	18.8%	0.0%
TOTAL	**352**	**100.0%**	**100.0%**	**$200,479**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	6	2.3%	3.3%	$939	0.7%	1.5%	24.0%
Moderate	11	4.2%	10.7%	$2,439	1.7%	6.4%	16.4%
Middle	24	9.2%	16.7%	$6,350	4.5%	13.0%	17.3%
Upper	204	78.5%	49.2%	$117,015	82.3%	58.8%	42.3%
Unknown	15	5.8%	20.1%	$15,496	10.9%	20.2%	0.0%
TOTAL	**260**	**100.0%**	**100.0%**	**$142,239**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.5%	$0	0.0%	1.8%	24.0%
Moderate	2	3.5%	7.8%	$170	1.7%	5.2%	16.4%
Middle	3	5.3%	13.2%	$399	3.9%	9.8%	17.3%
Upper	52	91.2%	73.0%	$9,664	94.4%	79.5%	42.3%
Unknown	0	0.0%	2.6%	$0	0.0%	3.7%	0.0%
TOTAL	**57**	**100.0%**	**100.0%**	**$10,233**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	6.1%	$0	0.0%	3.3%	24.0%
Moderate	0	0.0%	7.6%	$0	0.0%	3.8%	16.4%
Middle	1	11.1%	11.6%	$200	8.7%	7.3%	17.3%
Upper	8	88.9%	70.8%	$2,095	91.3%	81.3%	42.3%
Unknown	0	0.0%	4.0%	$0	0.0%	4.3%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,295**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	1	16.7%	5.9%	$114	3.1%	2.0%	24.0%
Moderate	0	0.0%	12.2%	$0	0.0%	4.4%	16.4%
Middle	0	0.0%	12.7%	$0	0.0%	5.9%	17.3%
Upper	3	50.0%	60.0%	$2,543	68.3%	76.6%	42.3%
Unknown	2	33.3%	9.2%	$1,064	28.6%	11.2%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$3,721**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	2	100.0%	1.1%	$39	100.0%	0.6%	24.0%
Moderate	0	0.0%	0.7%	$0	0.0%	0.6%	16.4%
Middle	0	0.0%	0.2%	$0	0.0%	0.2%	17.3%
Upper	0	0.0%	0.2%	$0	0.0%	0.2%	42.3%
Unknown	0	0.0%	97.8%	$0	0.0%	98.4%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$39**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.3%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.5%	$0	0.0%	0.1%	N/A
Unknown	0	0.0%	98.2%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	12	1.7%	3.1%	$1,686	0.5%	1.3%	24.0%
Moderate	35	5.1%	11.8%	$7,944	2.2%	7.1%	16.4%
Middle	63	9.2%	17.2%	$17,921	5.0%	13.1%	17.3%
Upper	550	80.2%	47.1%	$301,141	83.9%	53.5%	42.3%
Unknown	26	3.8%	20.8%	$30,314	8.4%	25.0%	0.0%
TOTAL	**686**	**100.0%**	**100.0%**	**$359,006**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	3	0.8%	1.9%	$672	0.2%	0.8%	22.8%
Moderate	9	2.3%	10.6%	$2,250	0.8%	6.4%	17.2%
Middle	36	9.4%	18.6%	$12,714	4.7%	15.3%	18.5%
Upper	323	84.3%	46.4%	$240,560	89.0%	58.4%	41.6%
Unknown	12	3.1%	22.4%	$14,150	5.2%	19.2%	0.0%
TOTAL	**383**	**100.0%**	**100.0%**	**$270,346**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	2.7%	7.6%	$253	0.5%	3.6%	22.8%
Moderate	7	9.3%	15.8%	$1,445	3.0%	9.7%	17.2%
Middle	7	9.3%	19.8%	$1,762	3.6%	15.5%	18.5%
Upper	55	73.3%	43.5%	$39,214	80.3%	56.4%	41.6%
Unknown	4	5.3%	13.3%	$6,131	12.6%	14.9%	0.0%
TOTAL	**75**	**100.0%**	**100.0%**	**$48,805**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	4.1%	4.1%	$74	0.7%	2.5%	22.8%
Moderate	1	2.0%	7.7%	$300	2.9%	4.7%	17.2%
Middle	4	8.2%	14.0%	$471	4.5%	9.6%	18.5%
Upper	40	81.6%	71.3%	$8,885	85.1%	79.4%	41.6%
Unknown	2	4.1%	2.8%	$706	6.8%	3.9%	0.0%
TOTAL	**49**	**100.0%**	**100.0%**	**$10,436**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.2%	$0	0.0%	2.1%	22.8%
Moderate	0	0.0%	6.6%	$0	0.0%	3.7%	17.2%
Middle	1	7.1%	13.3%	$85	1.6%	8.2%	18.5%
Upper	13	92.9%	71.7%	$5,224	98.4%	81.3%	41.6%
Unknown	0	0.0%	5.2%	$0	0.0%	4.8%	0.0%
TOTAL	**14**	**100.0%**	**100.0%**	**$5,309**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	7.4%	$0	0.0%	3.4%	22.8%
Moderate	1	16.7%	11.6%	$296	8.1%	5.5%	17.2%
Middle	0	0.0%	16.5%	$0	0.0%	8.1%	18.5%
Upper	3	50.0%	58.2%	$1,820	50.1%	73.0%	41.6%
Unknown	2	33.3%	6.3%	$1,520	41.8%	10.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$3,636**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.5%	$0	0.0%	0.4%	22.8%
Moderate	0	0.0%	0.4%	$0	0.0%	0.4%	17.2%
Middle	0	0.0%	0.2%	$0	0.0%	0.2%	18.5%
Upper	0	0.0%	0.1%	$0	0.0%	0.5%	41.6%
Unknown	0	0.0%	98.8%	$0	0.0%	98.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.2%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.2%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.2%	$0	0.0%	0.1%	N/A
Unknown	0	0.0%	98.4%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	7	1.3%	3.6%	$999	0.3%	1.3%	22.8%
Moderate	18	3.4%	11.7%	$4,291	1.3%	6.0%	17.2%
Middle	48	9.1%	18.3%	$15,032	4.4%	12.9%	18.5%
Upper	434	82.4%	46.4%	$295,703	87.3%	50.2%	41.6%
Unknown	20	3.8%	20.0%	$22,507	6.6%	29.6%	0.0%
TOTAL	**527**	**100.0%**	**100.0%**	**$338,532**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	14	4.0%	4.2%	$4,526	2.3%	2.7%	5.7%
Moderate	30	8.5%	13.3%	$9,680	4.8%	9.1%	20.9%
Middle	64	18.2%	31.2%	$26,279	13.1%	25.8%	25.9%
Upper	244	69.3%	50.9%	$159,994	79.8%	62.1%	47.5%
Unknown	0	0.0%	0.4%	$0	0.0%	0.4%	0.2%
TOTAL	**352**	**100.0%**	**100.0%**	**$200,479**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	7	2.7%	2.2%	$2,199	1.5%	1.6%	5.7%
Moderate	14	5.4%	9.7%	$3,779	2.7%	6.3%	20.9%
Middle	37	14.2%	24.7%	$10,078	7.1%	19.5%	25.9%
Upper	201	77.3%	63.2%	$126,000	88.6%	72.4%	47.5%
Unknown	1	0.4%	0.1%	$183	0.1%	0.1%	0.2%
TOTAL	**260**	**100.0%**	**100.0%**	**$142,239**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.1%	$0	0.0%	1.3%	5.7%
Moderate	3	5.3%	8.3%	$281	2.7%	5.5%	20.9%
Middle	5	8.8%	18.4%	$803	7.8%	13.9%	25.9%
Upper	49	86.0%	71.1%	$9,149	89.4%	79.2%	47.5%
Unknown	0	0.0%	0.2%	$0	0.0%	0.1%	0.2%
TOTAL	**57**	**100.0%**	**100.0%**	**$10,233**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.6%	$0	0.0%	1.0%	5.7%
Moderate	1	11.1%	8.3%	$200	8.7%	5.6%	20.9%
Middle	0	0.0%	15.3%	$0	0.0%	8.9%	25.9%
Upper	8	88.9%	74.6%	$2,095	91.3%	84.3%	47.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.2%	0.2%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,295**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.1%	$0	0.0%	1.1%	5.7%
Moderate	0	0.0%	13.1%	$0	0.0%	5.5%	20.9%
Middle	1	16.7%	20.0%	$314	8.4%	10.4%	25.9%
Upper	5	83.3%	63.4%	$3,407	91.6%	82.5%	47.5%
Unknown	0	0.0%	0.3%	$0	0.0%	0.4%	0.2%
TOTAL	**6**	**100.0%**	**100.0%**	**$3,721**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	5.3%	$0	0.0%	2.9%	5.7%
Moderate	1	50.0%	30.2%	$4	10.3%	19.3%	20.9%
Middle	1	50.0%	34.5%	$35	89.7%	30.5%	25.9%
Upper	0	0.0%	29.9%	$0	0.0%	47.2%	47.5%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.2%
TOTAL	**2**	**100.0%**	**100.0%**	**$39**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	26.9%	$0	0.0%	18.9%	24.7%
Moderate	0	0.0%	32.8%	$0	0.0%	20.2%	26.5%
Middle	0	0.0%	21.5%	$0	0.0%	31.6%	23.9%
Upper	0	0.0%	18.2%	$0	0.0%	28.2%	24.1%
Unknown	0	0.0%	0.5%	$0	0.0%	1.1%	0.8%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	21	3.1%	3.1%	$6,725	1.9%	3.3%	5.7%
Moderate	49	7.1%	11.5%	$13,944	3.9%	8.5%	20.9%
Middle	108	15.7%	27.4%	$37,509	10.4%	23.0%	25.9%
Upper	507	73.9%	57.7%	$300,645	83.7%	64.9%	47.5%
Unknown	1	0.1%	0.3%	$183	0.1%	0.3%	0.2%
TOTAL	**686**	**100.0%**	**100.0%**	**$359,006**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	5	1.3%	5.2%	$1,250	0.5%	2.4%	5.6%
Moderate	32	8.4%	13.4%	$12,286	4.5%	8.8%	20.0%
Middle	65	17.0%	34.1%	$34,095	12.6%	29.1%	28.8%
Upper	271	70.8%	46.8%	$214,442	79.3%	59.1%	45.3%
Unknown	10	2.6%	0.6%	$8,273	3.1%	0.6%	0.4%
TOTAL	**383**	**100.0%**	**100.0%**	**$270,346**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	3.2%	$0	0.0%	1.7%	5.6%
Moderate	3	4.0%	14.0%	$765	1.6%	8.6%	20.0%
Middle	11	14.7%	30.8%	$2,424	5.0%	23.6%	28.8%
Upper	60	80.0%	51.5%	$45,298	92.8%	65.4%	45.3%
Unknown	1	1.3%	0.5%	$318	0.7%	0.6%	0.4%
TOTAL	**75**	**100.0%**	**100.0%**	**$48,805**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.0%	$0	0.0%	1.2%	5.6%
Moderate	3	6.1%	9.0%	$216	2.1%	6.6%	20.0%
Middle	3	6.1%	21.3%	$289	2.8%	16.9%	28.8%
Upper	43	87.8%	67.3%	$9,931	95.2%	74.9%	45.3%
Unknown	0	0.0%	0.4%	$0	0.0%	0.4%	0.4%
TOTAL	**49**	**100.0%**	**100.0%**	**$10,436**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.8%	$0	0.0%	0.4%	5.6%
Moderate	0	0.0%	5.6%	$0	0.0%	3.5%	20.0%
Middle	1	7.1%	19.4%	$117	2.2%	13.2%	28.8%
Upper	13	92.9%	73.6%	$5,192	97.8%	82.4%	45.3%
Unknown	0	0.0%	0.6%	$0	0.0%	0.5%	0.4%
TOTAL	**14**	**100.0%**	**100.0%**	**$5,309**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.6%	$0	0.0%	1.4%	5.6%
Moderate	0	0.0%	10.1%	$0	0.0%	4.8%	20.0%
Middle	1	16.7%	25.7%	$770	21.2%	13.6%	28.8%
Upper	5	83.3%	59.8%	$2,866	78.8%	79.1%	45.3%
Unknown	0	0.0%	0.8%	$0	0.0%	1.1%	0.4%
TOTAL	**6**	**100.0%**	**100.0%**	**$3,636**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	16.1%	$0	0.0%	7.3%	5.6%
Moderate	0	0.0%	33.1%	$0	0.0%	22.6%	20.0%
Middle	0	0.0%	35.6%	$0	0.0%	31.6%	28.8%
Upper	0	0.0%	13.7%	$0	0.0%	24.1%	45.3%
Unknown	0	0.0%	1.5%	$0	0.0%	14.3%	0.4%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	19.7%	$0	0.0%	12.2%	18.7%
Moderate	0	0.0%	35.0%	$0	0.0%	27.1%	28.0%
Middle	0	0.0%	19.5%	$0	0.0%	25.0%	27.3%
Upper	0	0.0%	23.2%	$0	0.0%	33.0%	23.6%
Unknown	0	0.0%	2.6%	$0	0.0%	2.7%	2.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	5	0.9%	4.6%	$1,250	0.4%	3.6%	5.6%
Moderate	38	7.2%	13.6%	$13,267	3.9%	11.3%	20.0%
Middle	81	15.4%	32.3%	$37,695	11.1%	27.0%	28.8%
Upper	392	74.4%	48.9%	$277,729	82.0%	57.2%	45.3%
Unknown	11	2.1%	0.6%	$8,591	2.5%	1.0%	0.4%
TOTAL	**527**	**100.0%**	**100.0%**	**$338,532**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	62	30.4%	43.0%	$14,571	32.9%	26.7%	92.2%
		Over $1 Million/ Unknown	142	69.6%	57.0%	$29,770	67.1%	73.3%	7.8%
		TOTAL	**204**	**100.0%**	**100.0%**	**$44,341**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	103	50.5%	92.3%	$3,433	7.7%	36.5%	
		$100,001–$250,000	31	15.2%	4.2%	$5,180	11.7%	17.5%	
		$250,001–$1 Million	70	34.3%	3.5%	$35,728	80.6%	46.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**204**	**100.0%**	**100.0%**	**$44,341**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	33	53.2%		$1,299	8.9%		
		$100,001–$250,000	8	12.9%		$1,360	9.3%		
		$250,001–$1 Million	21	33.9%		$11,912	81.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**62**	**100.0%**		**$14,571**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	12	33.3%	49.4%	$2,860	24.3%	32.8%	92.2%
		Over $1 Million/ Unknown	24	66.7%	50.6%	$8,903	75.7%	67.2%	7.8%
		TOTAL	**36**	**100.0%**	**100.0%**	**$11,763**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	13	36.1%	94.5%	$768	6.5%	41.7%	
		$100,001–$250,000	7	19.4%	2.9%	$1,495	12.7%	15.0%	
		$250,001–$1 Million	16	44.4%	2.6%	$9,500	80.8%	43.3%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**36**	**100.0%**	**100.0%**	**$11,763**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	6	50.0%		$370	12.9%		
		$100,001–$250,000	1	8.3%		$200	7.0%		
		$250,001–$1 Million	5	41.7%		$2,290	80.1%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**12**	**100.0%**		**$2,860**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	14	6.9%	7.6%	$4,140	9.3%	8.7%	8.2%
Moderate	20	9.8%	18.5%	$4,933	11.1%	21.2%	19.3%
Middle	48	23.5%	23.5%	$11,547	26.0%	22.7%	24.9%
Upper	120	58.8%	49.1%	$23,407	52.8%	45.4%	46.8%
Unknown	2	1.0%	1.3%	$314	0.7%	2.0%	0.8%
TOTAL	**204**	**100.0%**	**100.0%**	**$44,341**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	1	2.8%	4.9%	$500	4.3%	5.1%	6.0%
Moderate	2	5.6%	17.4%	$750	6.4%	17.0%	18.8%
Middle	12	33.3%	28.1%	$4,887	41.5%	28.5%	30.0%
Upper	21	58.3%	48.2%	$5,626	47.8%	47.9%	44.2%
Unknown	0	0.0%	1.4%	$0	0.0%	1.4%	1.0%
TOTAL	**36**	**100.0%**	**100.0%**	**$11,763**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

GEORGIA

Atlanta Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	25	11.5%	4.2%	$5,176	5.2%	2.2%	21.8%
Moderate	43	19.8%	16.0%	$10,301	10.4%	10.9%	15.5%
Middle	24	11.1%	19.5%	$8,477	8.5%	16.8%	16.8%
Upper	118	54.4%	42.6%	$71,263	71.7%	53.3%	46.0%
Unknown	7	3.2%	17.6%	$4,199	4.2%	16.8%	0.0%
TOTAL	**217**	**100.0%**	**100.0%**	**$99,416**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	21	7.7%	5.7%	$2,898	2.1%	2.9%	21.8%
Moderate	25	9.2%	13.6%	$4,563	3.2%	9.1%	15.5%
Middle	22	8.1%	18.3%	$7,008	5.0%	15.2%	16.8%
Upper	194	71.1%	43.5%	$115,306	81.8%	53.6%	46.0%
Unknown	11	4.0%	18.8%	$11,269	8.0%	19.1%	0.0%
TOTAL	**273**	**100.0%**	**100.0%**	**$141,044**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.5%	$0	0.0%	2.6%	21.8%
Moderate	1	1.7%	9.9%	$80	0.7%	6.8%	15.5%
Middle	7	11.7%	18.0%	$1,004	8.8%	14.1%	16.8%
Upper	51	85.0%	63.8%	$9,863	86.2%	72.1%	46.0%
Unknown	1	1.7%	3.8%	$500	4.4%	4.4%	0.0%
TOTAL	**60**	**100.0%**	**100.0%**	**$11,447**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	1	4.8%	3.7%	$100	2.7%	1.9%	21.8%
Moderate	0	0.0%	8.7%	$0	0.0%	4.9%	15.5%
Middle	3	14.3%	14.6%	$301	8.1%	9.6%	16.8%
Upper	17	81.0%	68.3%	$3,333	89.3%	79.7%	46.0%
Unknown	0	0.0%	4.8%	$0	0.0%	4.0%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$3,734**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.6%	$0	0.0%	2.2%	21.8%
Moderate	0	0.0%	12.7%	$0	0.0%	5.9%	15.5%
Middle	0	0.0%	16.6%	$0	0.0%	9.7%	16.8%
Upper	5	100.0%	55.5%	$3,674	100.0%	72.3%	46.0%
Unknown	0	0.0%	9.6%	$0	0.0%	9.8%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$3,674**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.8%	$0	0.0%	1.8%	21.8%
Moderate	1	50.0%	2.6%	$32	30.5%	2.3%	15.5%
Middle	1	50.0%	0.9%	$73	69.5%	0.9%	16.8%
Upper	0	0.0%	0.4%	$0	0.0%	0.6%	46.0%
Unknown	0	0.0%	93.4%	$0	0.0%	94.4%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$105**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.4%	$0	0.0%	0.0%	N/A
Unknown	5	100.0%	99.6%	$26,449	100.0%	100.0%	N/A
TOTAL	**5**	**100.0%**	**100.0%**	**$26,449**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	47	8.1%	5.0%	$8,174	2.9%	2.5%	21.8%
Moderate	70	12.0%	14.3%	$14,976	5.2%	9.4%	15.5%
Middle	57	9.8%	18.6%	$16,863	5.9%	15.0%	16.8%
Upper	385	66.0%	43.9%	$203,439	71.2%	51.2%	46.0%
Unknown	24	4.1%	18.3%	$42,417	14.8%	22.0%	0.0%
TOTAL	**583**	**100.0%**	**100.0%**	**$285,869**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	23	8.0%	2.9%	$4,225	2.2%	1.4%	20.2%
Moderate	42	14.5%	14.1%	$10,987	5.7%	9.3%	15.5%
Middle	33	11.4%	19.9%	$12,609	6.5%	16.7%	18.3%
Upper	177	61.2%	42.5%	$149,908	77.1%	53.2%	46.0%
Unknown	14	4.8%	20.6%	$16,616	8.5%	19.4%	0.0%
TOTAL	**289**	**100.0%**	**100.0%**	**$194,345**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	13	13.5%	10.0%	$1,930	4.7%	5.6%	20.2%
Moderate	12	12.5%	20.2%	$2,236	5.5%	15.0%	15.5%
Middle	10	10.4%	21.1%	$2,456	6.0%	18.9%	18.3%
Upper	56	58.3%	34.4%	$31,452	76.8%	45.7%	46.0%
Unknown	5	5.2%	14.2%	$2,893	7.1%	14.9%	0.0%
TOTAL	**96**	**100.0%**	**100.0%**	**$40,967**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	1.5%	3.9%	$25	0.2%	2.3%	20.2%
Moderate	2	3.1%	11.6%	$360	2.7%	7.6%	15.5%
Middle	5	7.7%	19.5%	$597	4.4%	14.5%	18.3%
Upper	57	87.7%	60.9%	$12,486	92.7%	71.7%	46.0%
Unknown	0	0.0%	4.0%	$0	0.0%	3.9%	0.0%
TOTAL	**65**	**100.0%**	**100.0%**	**$13,468**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.0%	$0	0.0%	2.3%	20.2%
Moderate	1	4.2%	10.2%	$45	0.6%	5.5%	15.5%
Middle	1	4.2%	18.7%	$29	0.4%	12.1%	18.3%
Upper	22	91.7%	61.2%	$7,793	99.1%	75.2%	46.0%
Unknown	0	0.0%	5.9%	$0	0.0%	4.9%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$7,867**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.7%	$0	0.0%	2.9%	20.2%
Moderate	0	0.0%	14.3%	$0	0.0%	6.9%	15.5%
Middle	1	10.0%	19.3%	$193	4.9%	10.5%	18.3%
Upper	7	70.0%	49.9%	$2,716	69.5%	66.1%	46.0%
Unknown	2	20.0%	10.7%	$1,000	25.6%	13.5%	0.0%
TOTAL	**10**	**100.0%**	**100.0%**	**$3,909**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.5%	$0	0.0%	1.8%	20.2%
Moderate	0	0.0%	1.6%	$0	0.0%	1.6%	15.5%
Middle	0	0.0%	0.5%	$0	0.0%	0.8%	18.3%
Upper	0	0.0%	0.2%	$0	0.0%	0.2%	46.0%
Unknown	0	0.0%	95.2%	$0	0.0%	95.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.8%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.8%	$0	0.0%	0.0%	N/A
Unknown	1	100.0%	98.5%	$34,395	100.0%	100.0%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$34,395**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	37	7.6%	5.2%	$6,180	2.1%	2.3%	20.2%
Moderate	57	11.8%	15.5%	$13,628	4.6%	9.6%	15.5%
Middle	50	10.3%	20.0%	$15,884	5.4%	15.4%	18.3%
Upper	319	65.8%	41.9%	$204,355	69.3%	47.0%	46.0%
Unknown	22	4.5%	17.5%	$54,904	18.6%	25.7%	0.0%
TOTAL	**485**	**100.0%**	**100.0%**	**$294,951**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	16	7.4%	5.1%	$3,244	3.3%	3.7%	3.8%
Moderate	56	25.8%	16.3%	$16,391	16.5%	12.1%	16.0%
Middle	28	12.9%	28.8%	$11,108	11.2%	24.8%	28.8%
Upper	117	53.9%	49.8%	$68,673	69.1%	59.3%	51.3%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.0%
TOTAL	**217**	**100.0%**	**100.0%**	**$99,416**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	9	3.3%	2.9%	$1,708	1.2%	2.3%	3.8%
Moderate	32	11.7%	12.6%	$6,836	4.8%	9.0%	16.0%
Middle	33	12.1%	28.1%	$14,172	10.0%	23.1%	28.8%
Upper	199	72.9%	56.4%	$118,328	83.9%	65.6%	51.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**273**	**100.0%**	**100.0%**	**$141,044**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.6%	$0	0.0%	1.9%	3.8%
Moderate	2	3.3%	9.3%	$108	0.9%	7.3%	16.0%
Middle	12	20.0%	23.6%	$1,053	9.2%	19.1%	28.8%
Upper	46	76.7%	64.5%	$10,286	89.9%	71.7%	51.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**60**	**100.0%**	**100.0%**	**$11,447**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.8%	$0	0.0%	1.0%	3.8%
Moderate	1	4.8%	8.1%	$110	2.9%	4.7%	16.0%
Middle	1	4.8%	20.1%	$50	1.3%	15.4%	28.8%
Upper	19	90.5%	70.0%	$3,574	95.7%	78.9%	51.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**21**	**100.0%**	**100.0%**	**$3,734**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.7%	$0	0.0%	1.9%	3.8%
Moderate	0	0.0%	11.8%	$0	0.0%	6.3%	16.0%
Middle	0	0.0%	23.8%	$0	0.0%	16.1%	28.8%
Upper	5	100.0%	60.7%	$3,674	100.0%	75.7%	51.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**5**	**100.0%**	**100.0%**	**$3,674**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.7%	$0	0.0%	3.1%	3.8%
Moderate	0	0.0%	27.9%	$0	0.0%	21.2%	16.0%
Middle	1	50.0%	41.3%	$32	30.5%	40.8%	28.8%
Upper	1	50.0%	26.1%	$73	69.5%	34.9%	51.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$105**	**100.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	20.0%	24.2%	$13,000	49.2%	12.9%	19.6%
Moderate	0	0.0%	26.4%	$0	0.0%	22.5%	28.9%
Middle	0	0.0%	24.7%	$0	0.0%	43.0%	18.6%
Upper	4	80.0%	24.2%	$13,449	50.8%	20.6%	32.3%
Unknown	0	0.0%	0.4%	$0	0.0%	0.9%	0.6%
TOTAL	**5**	**100.0%**	**100.0%**	**$26,449**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	26	4.5%	3.7%	$17,952	6.3%	3.4%	3.8%
Moderate	91	15.6%	13.9%	$23,445	8.2%	11.0%	16.0%
Middle	75	12.9%	28.2%	$26,415	9.2%	24.8%	28.8%
Upper	391	67.1%	54.1%	$218,057	76.3%	60.8%	51.3%
Unknown	0	0.0%	0.1%	$0	0.0%	0.1%	0.0%
TOTAL	**583**	**100.0%**	**100.0%**	**$285,869**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	17	5.9%	4.2%	$4,778	2.5%	2.8%	3.2%
Moderate	50	17.3%	16.1%	$15,107	7.8%	12.0%	14.9%
Middle	36	12.5%	29.5%	$13,904	7.2%	25.5%	28.7%
Upper	182	63.0%	47.8%	$157,183	80.9%	57.5%	51.6%
Unknown	4	1.4%	2.5%	$3,373	1.7%	2.1%	1.6%
TOTAL	**289**	**100.0%**	**100.0%**	**$194,345**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	3.1%	3.7%	$477	1.2%	2.5%	3.2%
Moderate	16	16.7%	16.0%	$3,585	8.8%	11.5%	14.9%
Middle	19	19.8%	32.1%	$3,365	8.2%	27.5%	28.7%
Upper	56	58.3%	46.4%	$32,002	78.1%	56.9%	51.6%
Unknown	2	2.1%	1.8%	$1,538	3.8%	1.6%	1.6%
TOTAL	**96**	**100.0%**	**100.0%**	**$40,967**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.8%	$0	0.0%	1.3%	3.2%
Moderate	4	6.2%	8.7%	$584	4.3%	6.6%	14.9%
Middle	6	9.2%	24.8%	$585	4.3%	19.6%	28.7%
Upper	55	84.6%	63.6%	$12,299	91.3%	71.5%	51.6%
Unknown	0	0.0%	1.1%	$0	0.0%	1.0%	1.6%
TOTAL	**65**	**100.0%**	**100.0%**	**$13,468**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.8%	$0	0.0%	1.0%	3.2%
Moderate	5	20.8%	9.0%	$608	7.7%	5.6%	14.9%
Middle	1	4.2%	24.1%	$145	1.8%	17.5%	28.7%
Upper	18	75.0%	64.1%	$7,114	90.4%	75.1%	51.6%
Unknown	0	0.0%	0.9%	$0	0.0%	0.8%	1.6%
TOTAL	**24**	**100.0%**	**100.0%**	**$7,867**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	2	20.0%	3.4%	$324	8.3%	1.9%	3.2%
Moderate	0	0.0%	12.3%	$0	0.0%	6.7%	14.9%
Middle	0	0.0%	28.5%	$0	0.0%	16.2%	28.7%
Upper	8	80.0%	54.7%	$3,585	91.7%	74.1%	51.6%
Unknown	0	0.0%	1.1%	$0	0.0%	1.0%	1.6%
TOTAL	**10**	**100.0%**	**100.0%**	**$3,909**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.6%	$0	0.0%	2.8%	3.2%
Moderate	0	0.0%	22.6%	$0	0.0%	14.9%	14.9%
Middle	0	0.0%	39.6%	$0	0.0%	33.4%	28.7%
Upper	0	0.0%	31.0%	$0	0.0%	47.1%	51.6%
Unknown	0	0.0%	2.2%	$0	0.0%	1.8%	1.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	16.2%	$0	0.0%	9.3%	13.4%
Moderate	0	0.0%	27.8%	$0	0.0%	26.9%	26.0%
Middle	1	100.0%	19.9%	$34,395	100.0%	15.7%	18.5%
Upper	0	0.0%	30.8%	$0	0.0%	42.2%	34.6%
Unknown	0	0.0%	5.3%	$0	0.0%	5.9%	7.6%
TOTAL	**1**	**100.0%**	**100.0%**	**$34,395**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	22	4.5%	3.8%	$5,579	1.9%	3.3%	3.2%
Moderate	75	15.5%	15.2%	$19,884	6.7%	13.1%	14.9%
Middle	63	13.0%	29.8%	$52,394	17.8%	24.7%	28.7%
Upper	319	65.8%	49.2%	$212,183	71.9%	56.7%	51.6%
Unknown	6	1.2%	2.1%	$4,911	1.7%	2.3%	1.6%
TOTAL	**485**	**100.0%**	**100.0%**	**$294,951**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	180	22.0%	42.6%	$25,734	16.7%	27.3%	93.0%
		Over $1 Million/ Unknown	639	78.0%	57.4%	$128,389	83.3%	72.7%	7.0%
		TOTAL	**819**	**100.0%**	**100.0%**	**$154,123**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	457	55.8%	94.4%	$16,622	10.8%	42.4%	
		$100,001–$250,000	162	19.8%	3.2%	$27,097	17.6%	16.9%	
		$250,001–$1 Million	200	24.4%	2.4%	$110,404	71.6%	40.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**819**	**100.0%**	**100.0%**	**$154,123**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	125	69.4%		$4,584	17.8%		
		$100,001–$250,000	24	13.3%		$3,913	15.2%		
		$250,001–$1 Million	31	17.2%		$17,237	67.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**180**	**100.0%**		**$25,734**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	85	39.4%	48.5%	$23,341	30.2%	33.9%	93.2%
		Over $1 Million/ Unknown	131	60.6%	51.5%	$53,909	69.8%	66.1%	6.8%
		TOTAL	**216**	**100.0%**	**100.0%**	**$77,250**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	65	30.1%	96.1%	$3,415	4.4%	49.5%	
		$100,001–$250,000	47	21.8%	2.1%	$9,035	11.7%	13.5%	
		$250,001–$1 Million	104	48.1%	1.7%	$64,800	83.9%	37.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**216**	**100.0%**	**100.0%**	**$77,250**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	40	47.1%		$2,058	8.8%		
		$100,001–$250,000	15	17.6%		$2,833	12.1%		
		$250,001–$1 Million	30	35.3%		$18,450	79.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**85**	**100.0%**		**$23,341**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	13	1.6%	5.9%	$5,368	3.5%	5.7%	6.0%
Moderate	113	13.8%	19.6%	$22,735	14.8%	19.2%	19.7%
Middle	160	19.5%	26.4%	$30,124	19.5%	25.1%	26.6%
Upper	526	64.2%	47.4%	$94,154	61.1%	49.1%	47.1%
Unknown	7	0.9%	0.7%	$1,742	1.1%	0.8%	0.6%
TOTAL	**819**	**100.0%**	**100.0%**	**$154,123**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	8	3.7%	4.5%	$2,843	3.7%	4.7%	5.1%
Moderate	27	12.5%	18.6%	$9,433	12.2%	18.1%	19.5%
Middle	29	13.4%	26.1%	$10,062	13.0%	24.3%	25.4%
Upper	143	66.2%	47.5%	$49,926	64.6%	49.5%	46.7%
Unknown	9	4.2%	3.3%	$4,986	6.5%	3.5%	3.4%
TOTAL	**216**	**100.0%**	**100.0%**	**$77,250**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NonMSA Georgia

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	1.2%	$0	0.0%	0.6%	18.7%
Moderate	0	0.0%	9.7%	$0	0.0%	5.9%	14.4%
Middle	0	0.0%	20.2%	$0	0.0%	16.4%	18.5%
Upper	0	0.0%	49.6%	$0	0.0%	58.1%	48.4%
Unknown	0	0.0%	19.3%	$0	0.0%	19.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.3%	$0	0.0%	1.1%	18.7%
Moderate	1	11.1%	9.2%	$69	3.0%	6.6%	14.4%
Middle	0	0.0%	17.7%	$0	0.0%	14.4%	18.5%
Upper	8	88.9%	47.1%	$2,222	97.0%	52.3%	48.4%
Unknown	0	0.0%	23.6%	$0	0.0%	25.6%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,291**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.5%	$0	0.0%	0.8%	18.7%
Moderate	0	0.0%	3.5%	$0	0.0%	2.0%	14.4%
Middle	0	0.0%	22.4%	$0	0.0%	11.8%	18.5%
Upper	0	0.0%	69.4%	$0	0.0%	83.4%	48.4%
Unknown	0	0.0%	1.2%	$0	0.0%	2.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	18.7%
Moderate	0	0.0%	5.7%	$0	0.0%	4.6%	14.4%
Middle	0	0.0%	20.0%	$0	0.0%	13.6%	18.5%
Upper	3	100.0%	71.4%	$538	100.0%	80.5%	48.4%
Unknown	0	0.0%	2.9%	$0	0.0%	1.3%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$538**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	9.1%	$0	0.0%	2.6%	18.7%
Moderate	0	0.0%	9.1%	$0	0.0%	3.2%	14.4%
Middle	0	0.0%	18.2%	$0	0.0%	20.3%	18.5%
Upper	0	0.0%	63.6%	$0	0.0%	73.9%	48.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	18.7%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	14.4%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.5%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	48.4%
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	20.0%	$0	0.0%	24.4%	N/A
Unknown	0	0.0%	80.0%	$0	0.0%	75.6%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	0	0.0%	1.9%	$0	0.0%	0.8%	18.7%
Moderate	1	8.3%	9.1%	$69	2.4%	6.1%	14.4%
Middle	0	0.0%	18.8%	$0	0.0%	15.3%	18.5%
Upper	11	91.7%	49.0%	$2,760	97.6%	55.7%	48.4%
Unknown	0	0.0%	21.2%	$0	0.0%	22.1%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,829**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	1.8%	$0	0.0%	0.8%	17.8%
Moderate	0	0.0%	11.1%	$0	0.0%	6.9%	16.9%
Middle	1	100.0%	23.2%	$273	100.0%	19.5%	18.4%
Upper	0	0.0%	42.6%	$0	0.0%	51.8%	46.8%
Unknown	0	0.0%	21.3%	$0	0.0%	21.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$273**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	4.8%	$0	0.0%	1.9%	17.8%
Moderate	2	66.7%	15.6%	$254	63.7%	10.9%	16.9%
Middle	0	0.0%	23.0%	$0	0.0%	18.5%	18.4%
Upper	1	33.3%	44.3%	$145	36.3%	54.6%	46.8%
Unknown	0	0.0%	12.3%	$0	0.0%	14.1%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$399**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	16.7%	3.1%	$20	4.1%	0.6%	17.8%
Moderate	2	33.3%	13.5%	$164	33.3%	10.3%	16.9%
Middle	0	0.0%	22.9%	$0	0.0%	21.2%	18.4%
Upper	3	50.0%	56.3%	$308	62.6%	63.3%	46.8%
Unknown	0	0.0%	4.2%	$0	0.0%	4.6%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$492**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.9%	$0	0.0%	2.9%	17.8%
Moderate	0	0.0%	7.8%	$0	0.0%	5.6%	16.9%
Middle	0	0.0%	25.5%	$0	0.0%	17.6%	18.4%
Upper	1	100.0%	56.9%	$50	100.0%	71.4%	46.8%
Unknown	0	0.0%	5.9%	$0	0.0%	2.5%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$50**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	15.0%	$0	0.0%	2.9%	17.8%
Moderate	0	0.0%	12.5%	$0	0.0%	7.2%	16.9%
Middle	0	0.0%	10.0%	$0	0.0%	5.4%	18.4%
Upper	0	0.0%	55.0%	$0	0.0%	73.6%	46.8%
Unknown	0	0.0%	7.5%	$0	0.0%	11.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	17.8%
Moderate	0	0.0%	9.1%	$0	0.0%	4.8%	16.9%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.4%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	46.8%
Unknown	0	0.0%	90.9%	$0	0.0%	95.2%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	16.7%	$0	0.0%	12.2%	N/A
Unknown	0	0.0%	83.3%	$0	0.0%	87.8%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	1	9.1%	3.1%	$20	1.6%	1.1%	17.8%
Moderate	4	36.4%	12.4%	$418	34.4%	8.0%	16.9%
Middle	1	9.1%	22.7%	$273	22.5%	18.9%	18.4%
Upper	5	45.5%	44.0%	$503	41.4%	52.7%	46.8%
Unknown	0	0.0%	17.8%	$0	0.0%	19.4%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$1,214**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	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%
Middle	0	0.0%	66.8%	$0	0.0%	63.9%	65.9%
Upper	0	0.0%	33.2%	$0	0.0%	36.1%	34.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Refinance							
Low	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%
Middle	6	66.7%	63.5%	$992	43.3%	61.8%	65.9%
Upper	3	33.3%	36.5%	$1,299	56.7%	38.2%	34.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$2,291**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	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%
Middle	0	0.0%	57.6%	$0	0.0%	43.4%	65.9%
Upper	0	0.0%	42.4%	$0	0.0%	56.6%	34.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	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%
Middle	1	33.3%	74.3%	$38	7.1%	63.7%	65.9%
Upper	2	66.7%	25.7%	$500	92.9%	36.3%	34.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$538**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	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%
Middle	0	0.0%	48.5%	$0	0.0%	41.9%	65.9%
Upper	0	0.0%	51.5%	$0	0.0%	58.1%	34.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	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%
Middle	0	0.0%	59.1%	$0	0.0%	67.2%	65.9%
Upper	0	0.0%	40.9%	$0	0.0%	32.8%	34.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	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%
Middle	0	0.0%	60.0%	$0	0.0%	53.5%	98.3%
Upper	0	0.0%	40.0%	$0	0.0%	46.5%	1.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	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%
Middle	7	58.3%	64.7%	$1,030	36.4%	62.5%	65.9%
Upper	5	41.7%	35.3%	$1,799	63.6%	37.5%	34.1%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$2,829**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	10.6%	$0	0.0%	8.1%	5.4%
Middle	1	100.0%	58.3%	$273	100.0%	56.3%	65.6%
Upper	0	0.0%	31.2%	$0	0.0%	35.7%	29.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$273**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	3.3%	$0	0.0%	2.2%	5.4%
Middle	2	66.7%	67.0%	$254	63.7%	65.2%	65.6%
Upper	1	33.3%	29.8%	$145	36.3%	32.6%	29.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$399**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	5.2%	$0	0.0%	2.5%	5.4%
Middle	5	83.3%	60.4%	$342	69.5%	61.5%	65.6%
Upper	1	16.7%	34.4%	$150	30.5%	35.9%	29.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$492**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	2.0%	$0	0.0%	3.3%	5.4%
Middle	1	100.0%	62.7%	$50	100.0%	64.7%	65.6%
Upper	0	0.0%	35.3%	$0	0.0%	32.0%	29.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$50**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	2.5%	$0	0.0%	0.4%	5.4%
Middle	0	0.0%	70.0%	$0	0.0%	64.0%	65.6%
Upper	0	0.0%	27.5%	$0	0.0%	35.7%	29.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	18.2%	$0	0.0%	14.0%	5.4%
Middle	0	0.0%	36.4%	$0	0.0%	44.4%	65.6%
Upper	0	0.0%	45.5%	$0	0.0%	41.6%	29.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	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%
Middle	0	0.0%	66.7%	$0	0.0%	46.8%	97.3%
Upper	0	0.0%	33.3%	$0	0.0%	53.2%	2.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	7.8%	$0	0.0%	6.2%	5.4%
Middle	9	81.8%	61.2%	$919	75.7%	58.8%	65.6%
Upper	2	18.2%	31.0%	$295	24.3%	35.0%	29.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$1,214**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	5	45.5%	44.8%	$108	48.2%	48.5%	94.2%
		Over $1 Million/ Unknown	6	54.5%	55.2%	$116	51.8%	51.5%	5.8%
		TOTAL	**11**	**100.0%**	**100.0%**	**$224**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	11	100.0%	94.1%	$224	100.0%	46.8%	
		$100,001–$250,000	0	0.0%	3.6%	$0	0.0%	19.3%	
		$250,001–$1 Million	0	0.0%	2.2%	$0	0.0%	33.9%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**11**	**100.0%**	**100.0%**	**$224**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	5	100.0%		$108	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**5**	**100.0%**		**$108**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	3	100.0%	50.0%	$42	100.0%	35.2%	94.3%
		Over $1 Million/ Unknown	0	0.0%	50.0%	$0	0.0%	64.8%	5.7%
		TOTAL	**3**	**100.0%**	**100.0%**	**$42**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	3	100.0%	94.1%	$42	100.0%	44.6%	
		$100,001–$250,000	0	0.0%	2.8%	$0	0.0%	13.7%	
		$250,001–$1 Million	0	0.0%	3.1%	$0	0.0%	41.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**3**	**100.0%**	**100.0%**	**$42**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	3	100.0%		$42	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**3**	**100.0%**		**$42**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	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%
Middle	9	81.8%	68.7%	$150	67.0%	71.7%	73.2%
Upper	2	18.2%	30.2%	$74	33.0%	28.1%	26.8%
Unknown	0	0.0%	1.1%	$0	0.0%	0.2%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$224**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	33.3%	3.7%	$10	23.8%	2.1%	5.0%
Middle	1	33.3%	63.0%	$5	11.9%	64.2%	66.5%
Upper	1	33.3%	32.6%	$27	64.3%	33.5%	28.5%
Unknown	0	0.0%	0.7%	$0	0.0%	0.2%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$42**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

SOUTH CAROLINA

Greenville Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	6	26.1%	5.8%	$777	13.6%	3.4%	21.3%
Moderate	5	21.7%	21.6%	$825	14.4%	16.4%	16.3%
Middle	3	13.0%	21.9%	$661	11.5%	20.2%	18.4%
Upper	8	34.8%	33.2%	$2,470	43.1%	43.2%	44.0%
Unknown	1	4.3%	17.4%	$997	17.4%	16.8%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$5,730**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	4	13.8%	5.8%	$500	6.0%	3.1%	21.3%
Moderate	4	13.8%	16.0%	$641	7.7%	11.3%	16.3%
Middle	3	10.3%	20.7%	$439	5.3%	17.5%	18.4%
Upper	18	62.1%	37.2%	$6,775	81.1%	47.3%	44.0%
Unknown	0	0.0%	20.3%	$0	0.0%	20.7%	0.0%
TOTAL	**29**	**100.0%**	**100.0%**	**$8,355**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	66.7%	6.2%	$100	86.2%	3.2%	21.3%
Moderate	1	33.3%	14.6%	$16	13.8%	10.3%	16.3%
Middle	0	0.0%	19.9%	$0	0.0%	14.1%	18.4%
Upper	0	0.0%	55.2%	$0	0.0%	67.9%	44.0%
Unknown	0	0.0%	4.1%	$0	0.0%	4.6%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$116**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	4.2%	$0	0.0%	2.3%	21.3%
Moderate	0	0.0%	10.2%	$0	0.0%	5.8%	16.3%
Middle	0	0.0%	17.5%	$0	0.0%	11.2%	18.4%
Upper	2	66.7%	65.2%	$240	25.5%	78.3%	44.0%
Unknown	1	33.3%	2.8%	$700	74.5%	2.4%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$940**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	9.1%	$0	0.0%	4.6%	21.3%
Moderate	0	0.0%	15.9%	$0	0.0%	9.0%	16.3%
Middle	0	0.0%	20.6%	$0	0.0%	14.9%	18.4%
Upper	0	0.0%	47.6%	$0	0.0%	61.1%	44.0%
Unknown	0	0.0%	6.8%	$0	0.0%	10.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.1%	$0	0.0%	0.9%	21.3%
Moderate	0	0.0%	3.7%	$0	0.0%	2.9%	16.3%
Middle	0	0.0%	1.1%	$0	0.0%	1.3%	18.4%
Upper	0	0.0%	0.6%	$0	0.0%	0.7%	44.0%
Unknown	0	0.0%	93.5%	$0	0.0%	94.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.9%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.9%	$0	0.0%	0.2%	N/A
Unknown	0	0.0%	98.2%	$0	0.0%	99.8%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	12	20.7%	5.8%	$1,377	9.1%	3.1%	21.3%
Moderate	10	17.2%	18.3%	$1,482	9.8%	13.1%	16.3%
Middle	6	10.3%	21.0%	$1,100	7.3%	17.8%	18.4%
Upper	28	48.3%	36.2%	$9,485	62.6%	43.6%	44.0%
Unknown	2	3.4%	18.8%	$1,697	11.2%	22.3%	0.0%
TOTAL	**58**	**100.0%**	**100.0%**	**$15,141**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	3	11.5%	4.7%	$378	3.3%	2.4%	19.2%
Moderate	6	23.1%	18.9%	$1,212	10.7%	13.4%	17.0%
Middle	1	3.8%	23.1%	$228	2.0%	20.5%	20.3%
Upper	16	61.5%	36.2%	$9,519	84.0%	47.0%	43.5%
Unknown	0	0.0%	17.2%	$0	0.0%	16.7%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$11,337**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	9	45.0%	9.8%	$967	15.3%	5.5%	19.2%
Moderate	2	10.0%	21.2%	$154	2.4%	16.0%	17.0%
Middle	3	15.0%	24.5%	$725	11.5%	22.5%	20.3%
Upper	6	30.0%	32.9%	$4,463	70.7%	43.7%	43.5%
Unknown	0	0.0%	11.5%	$0	0.0%	12.4%	0.0%
TOTAL	**20**	**100.0%**	**100.0%**	**$6,309**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	22.2%	6.1%	$105	10.2%	3.5%	19.2%
Moderate	0	0.0%	13.9%	$0	0.0%	8.7%	17.0%
Middle	2	22.2%	20.6%	$110	10.7%	16.3%	20.3%
Upper	5	55.6%	55.2%	$817	79.2%	66.4%	43.5%
Unknown	0	0.0%	4.3%	$0	0.0%	5.1%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,032**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	6.0%	$0	0.0%	3.3%	19.2%
Moderate	0	0.0%	12.4%	$0	0.0%	6.7%	17.0%
Middle	0	0.0%	20.7%	$0	0.0%	15.0%	20.3%
Upper	2	100.0%	57.7%	$250	100.0%	72.2%	43.5%
Unknown	0	0.0%	3.2%	$0	0.0%	2.8%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$250**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	7.4%	$0	0.0%	5.8%	19.2%
Moderate	0	0.0%	17.7%	$0	0.0%	13.2%	17.0%
Middle	0	0.0%	22.6%	$0	0.0%	17.0%	20.3%
Upper	0	0.0%	45.5%	$0	0.0%	59.3%	43.5%
Unknown	0	0.0%	6.8%	$0	0.0%	4.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.3%	$0	0.0%	1.8%	19.2%
Moderate	0	0.0%	0.6%	$0	0.0%	0.7%	17.0%
Middle	0	0.0%	1.2%	$0	0.0%	0.7%	20.3%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	43.5%
Unknown	0	0.0%	95.9%	$0	0.0%	96.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.8%	$0	0.0%	0.1%	N/A
Unknown	0	0.0%	98.2%	$0	0.0%	99.9%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	14	24.6%	6.2%	$1,450	7.7%	2.9%	19.2%
Moderate	8	14.0%	18.7%	$1,366	7.2%	12.3%	17.0%
Middle	6	10.5%	23.0%	$1,063	5.6%	18.6%	20.3%
Upper	29	50.9%	37.3%	$15,049	79.5%	42.5%	43.5%
Unknown	0	0.0%	14.7%	$0	0.0%	23.8%	0.0%
TOTAL	**57**	**100.0%**	**100.0%**	**$18,928**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	4.3%	2.9%	$153	2.7%	2.4%	3.2%
Moderate	4	17.4%	11.7%	$689	12.0%	9.0%	14.5%
Middle	7	30.4%	40.1%	$1,358	23.7%	36.6%	40.6%
Upper	11	47.8%	45.3%	$3,530	61.6%	52.0%	41.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$5,730**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	3.4%	2.1%	$151	1.8%	1.9%	3.2%
Moderate	2	6.9%	8.0%	$327	3.9%	5.7%	14.5%
Middle	10	34.5%	37.5%	$1,902	22.8%	32.7%	40.6%
Upper	16	55.2%	52.5%	$5,975	71.5%	59.7%	41.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**29**	**100.0%**	**100.0%**	**$8,355**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.3%	$0	0.0%	2.8%	3.2%
Moderate	0	0.0%	9.0%	$0	0.0%	6.7%	14.5%
Middle	2	66.7%	35.0%	$66	56.9%	28.9%	40.6%
Upper	1	33.3%	53.7%	$50	43.1%	61.6%	41.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$116**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.6%	$0	0.0%	1.7%	3.2%
Moderate	0	0.0%	7.2%	$0	0.0%	5.2%	14.5%
Middle	0	0.0%	31.3%	$0	0.0%	24.1%	40.6%
Upper	3	100.0%	59.9%	$940	100.0%	69.0%	41.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$940**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.4%	$0	0.0%	5.1%	3.2%
Moderate	0	0.0%	8.4%	$0	0.0%	5.8%	14.5%
Middle	0	0.0%	35.8%	$0	0.0%	29.8%	40.6%
Upper	0	0.0%	50.3%	$0	0.0%	59.3%	41.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.8%	$0	0.0%	1.2%	3.2%
Moderate	0	0.0%	16.4%	$0	0.0%	24.4%	14.5%
Middle	0	0.0%	43.6%	$0	0.0%	38.0%	40.6%
Upper	0	0.0%	37.1%	$0	0.0%	36.4%	41.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	14.5%	$0	0.0%	13.1%	7.5%
Moderate	0	0.0%	34.5%	$0	0.0%	24.5%	23.3%
Middle	0	0.0%	28.2%	$0	0.0%	26.9%	35.6%
Upper	0	0.0%	22.7%	$0	0.0%	35.6%	33.6%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	2	3.4%	2.5%	$304	2.0%	2.7%	3.2%
Moderate	6	10.3%	9.8%	$1,016	6.7%	8.2%	14.5%
Middle	19	32.8%	38.5%	$3,326	22.0%	34.2%	40.6%
Upper	31	53.4%	49.2%	$10,495	69.3%	54.9%	41.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**58**	**100.0%**	**100.0%**	**$15,141**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	2.0%	$0	0.0%	1.4%	2.4%
Moderate	6	23.1%	13.9%	$1,326	11.7%	10.9%	13.4%
Middle	7	26.9%	43.8%	$1,966	17.3%	39.8%	45.0%
Upper	13	50.0%	39.9%	$8,045	71.0%	47.6%	38.9%
Unknown	0	0.0%	0.3%	$0	0.0%	0.4%	0.3%
TOTAL	**26**	**100.0%**	**100.0%**	**$11,337**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	1.8%	$0	0.0%	1.2%	2.4%
Moderate	4	20.0%	11.5%	$949	15.0%	8.7%	13.4%
Middle	10	50.0%	43.6%	$2,038	32.3%	39.3%	45.0%
Upper	6	30.0%	43.0%	$3,322	52.7%	50.6%	38.9%
Unknown	0	0.0%	0.1%	$0	0.0%	0.2%	0.3%
TOTAL	**20**	**100.0%**	**100.0%**	**$6,309**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.9%	$0	0.0%	0.9%	2.4%
Moderate	0	0.0%	10.1%	$0	0.0%	8.0%	13.4%
Middle	2	22.2%	35.7%	$110	10.7%	31.0%	45.0%
Upper	7	77.8%	53.1%	$922	89.3%	59.7%	38.9%
Unknown	0	0.0%	0.2%	$0	0.0%	0.4%	0.3%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,032**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.5%	$0	0.0%	0.2%	2.4%
Moderate	0	0.0%	6.9%	$0	0.0%	5.3%	13.4%
Middle	0	0.0%	37.3%	$0	0.0%	30.3%	45.0%
Upper	2	100.0%	54.8%	$250	100.0%	63.0%	38.9%
Unknown	0	0.0%	0.5%	$0	0.0%	1.3%	0.3%
TOTAL	**2**	**100.0%**	**100.0%**	**$250**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.7%	$0	0.0%	1.5%	2.4%
Moderate	0	0.0%	11.5%	$0	0.0%	9.2%	13.4%
Middle	0	0.0%	40.8%	$0	0.0%	34.2%	45.0%
Upper	0	0.0%	45.3%	$0	0.0%	53.2%	38.9%
Unknown	0	0.0%	0.8%	$0	0.0%	1.9%	0.3%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.5%	$0	0.0%	2.0%	2.4%
Moderate	0	0.0%	10.5%	$0	0.0%	6.8%	13.4%
Middle	0	0.0%	52.9%	$0	0.0%	48.0%	45.0%
Upper	0	0.0%	32.6%	$0	0.0%	43.0%	38.9%
Unknown	0	0.0%	0.6%	$0	0.0%	0.2%	0.3%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	8.8%	$0	0.0%	4.9%	4.3%
Moderate	0	0.0%	36.0%	$0	0.0%	39.1%	25.9%
Middle	0	0.0%	29.8%	$0	0.0%	28.4%	35.2%
Upper	0	0.0%	24.6%	$0	0.0%	24.6%	32.1%
Unknown	0	0.0%	0.9%	$0	0.0%	3.0%	2.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	1.9%	$0	0.0%	1.7%	2.4%
Moderate	10	17.5%	12.7%	$2,275	12.0%	13.1%	13.4%
Middle	19	33.3%	42.9%	$4,114	21.7%	38.1%	45.0%
Upper	28	49.1%	42.2%	$12,539	66.2%	46.5%	38.9%
Unknown	0	0.0%	0.3%	$0	0.0%	0.7%	0.3%
TOTAL	**57**	**100.0%**	**100.0%**	**$18,928**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	54	22.7%	47.0%	$5,174	22.3%	32.1%	91.0%
		Over $1 Million/ Unknown	184	77.3%	53.0%	$18,066	77.7%	67.9%	9.0%
		TOTAL	**238**	**100.0%**	**100.0%**	**$23,240**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	186	78.2%	90.1%	$3,808	16.4%	30.3%	
		$100,001–$250,000	24	10.1%	5.2%	$3,814	16.4%	17.9%	
		$250,001–$1 Million	28	11.8%	4.7%	$15,618	67.2%	51.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**238**	**100.0%**	**100.0%**	**$23,240**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	44	81.5%		$976	18.9%		
		$100,001–$250,000	2	3.7%		$349	6.7%		
		$250,001–$1 Million	8	14.8%		$3,849	74.4%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**54**	**100.0%**		**$5,174**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	34	63.0%	50.0%	$5,078	48.2%	34.7%	91.3%
		Over $1 Million/ Unknown	20	37.0%	50.0%	$5,468	51.8%	65.3%	8.7%
		TOTAL	**54**	**100.0%**	**100.0%**	**$10,546**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	35	64.8%	93.5%	$1,731	16.4%	37.8%	
		$100,001–$250,000	8	14.8%	3.3%	$1,597	15.1%	15.2%	
		$250,001–$1 Million	11	20.4%	3.2%	$7,218	68.4%	47.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**54**	**100.0%**	**100.0%**	**$10,546**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	24	70.6%		$1,021	20.1%		
		$100,001–$250,000	4	11.8%		$814	16.0%		
		$250,001–$1 Million	6	17.6%		$3,243	63.9%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**34**	**100.0%**		**$5,078**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	11	4.6%	4.9%	$2,571	11.1%	5.9%	5.4%
Moderate	57	23.9%	14.4%	$3,888	16.7%	17.3%	16.7%
Middle	71	29.8%	34.6%	$7,135	30.7%	30.9%	34.9%
Upper	99	41.6%	45.3%	$9,646	41.5%	45.8%	43.0%
Unknown	0	0.0%	0.8%	$0	0.0%	0.1%	0.0%
TOTAL	**238**	**100.0%**	**100.0%**	**$23,240**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	1	1.9%	2.9%	$30	0.3%	3.6%	3.1%
Moderate	12	22.2%	14.7%	$2,514	23.8%	17.0%	17.4%
Middle	22	40.7%	39.1%	$4,528	42.9%	35.5%	38.0%
Upper	18	33.3%	41.8%	$3,444	32.7%	42.3%	40.4%
Unknown	1	1.9%	1.6%	$30	0.3%	1.6%	1.2%
TOTAL	**54**	**100.0%**	**100.0%**	**$10,546**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Columbia Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	11.1%	6.7%	$120	3.7%	3.6%	23.3%
Moderate	3	33.3%	21.1%	$490	15.2%	15.1%	15.9%
Middle	2	22.2%	21.6%	$525	16.3%	20.4%	18.2%
Upper	3	33.3%	32.1%	$2,094	64.8%	42.4%	42.6%
Unknown	0	0.0%	18.5%	$0	0.0%	18.4%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$3,229**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	3.8%	$0	0.0%	2.0%	23.3%
Moderate	0	0.0%	12.3%	$0	0.0%	8.0%	15.9%
Middle	1	16.7%	16.7%	$35	1.4%	13.7%	18.2%
Upper	5	83.3%	34.7%	$2,454	98.6%	41.8%	42.6%
Unknown	0	0.0%	32.5%	$0	0.0%	34.5%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$2,489**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.8%	$0	0.0%	3.0%	23.3%
Moderate	1	33.3%	12.1%	$150	13.9%	7.2%	15.9%
Middle	0	0.0%	23.3%	$0	0.0%	17.9%	18.2%
Upper	2	66.7%	58.1%	$930	86.1%	69.0%	42.6%
Unknown	0	0.0%	2.8%	$0	0.0%	3.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$1,080**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	3.6%	$0	0.0%	1.9%	23.3%
Moderate	0	0.0%	11.9%	$0	0.0%	6.2%	15.9%
Middle	0	0.0%	17.0%	$0	0.0%	15.0%	18.2%
Upper	0	0.0%	64.5%	$0	0.0%	73.3%	42.6%
Unknown	0	0.0%	3.0%	$0	0.0%	3.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	5.5%	$0	0.0%	2.4%	23.3%
Moderate	0	0.0%	24.1%	$0	0.0%	16.6%	15.9%
Middle	0	0.0%	17.2%	$0	0.0%	11.9%	18.2%
Upper	0	0.0%	48.3%	$0	0.0%	66.5%	42.6%
Unknown	0	0.0%	4.8%	$0	0.0%	2.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.7%	$0	0.0%	1.4%	23.3%
Moderate	0	0.0%	1.4%	$0	0.0%	0.8%	15.9%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.2%
Upper	0	0.0%	0.3%	$0	0.0%	0.6%	42.6%
Unknown	0	0.0%	96.6%	$0	0.0%	97.1%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	1	100.0%	100.0%	$985	100.0%	100.0%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$985**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	1	5.3%	5.1%	$120	1.5%	2.7%	23.3%
Moderate	4	21.1%	16.2%	$640	8.2%	10.9%	15.9%
Middle	3	15.8%	18.9%	$560	7.2%	16.1%	18.2%
Upper	10	52.6%	34.1%	$5,478	70.4%	40.1%	42.6%
Unknown	1	5.3%	25.8%	$985	12.7%	30.2%	0.0%
TOTAL	**19**	**100.0%**	**100.0%**	**$7,783**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	6.8%	$0	0.0%	3.5%	24.0%
Moderate	2	16.7%	21.2%	$390	7.6%	15.9%	16.0%
Middle	1	8.3%	21.8%	$292	5.7%	21.2%	18.2%
Upper	8	66.7%	28.4%	$4,183	81.2%	37.4%	41.8%
Unknown	1	8.3%	21.8%	$284	5.5%	22.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$5,149**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	9.6%	$0	0.0%	5.3%	24.0%
Moderate	2	28.6%	20.4%	$292	21.3%	15.1%	16.0%
Middle	1	14.3%	24.2%	$132	9.6%	22.7%	18.2%
Upper	4	57.1%	30.0%	$948	69.1%	39.7%	41.8%
Unknown	0	0.0%	15.8%	$0	0.0%	17.2%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,372**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	5.9%	$0	0.0%	3.8%	24.0%
Moderate	0	0.0%	15.5%	$0	0.0%	11.9%	16.0%
Middle	2	25.0%	22.3%	$125	14.0%	18.6%	18.2%
Upper	6	75.0%	52.7%	$771	86.0%	62.4%	41.8%
Unknown	0	0.0%	3.5%	$0	0.0%	3.3%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$896**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.9%	$0	0.0%	2.8%	24.0%
Moderate	0	0.0%	13.1%	$0	0.0%	8.4%	16.0%
Middle	0	0.0%	20.8%	$0	0.0%	15.6%	18.2%
Upper	0	0.0%	58.4%	$0	0.0%	71.5%	41.8%
Unknown	0	0.0%	1.8%	$0	0.0%	1.6%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	12.1%	$0	0.0%	6.5%	24.0%
Moderate	1	100.0%	16.5%	$128	100.0%	10.5%	16.0%
Middle	0	0.0%	19.9%	$0	0.0%	15.4%	18.2%
Upper	0	0.0%	42.2%	$0	0.0%	56.6%	41.8%
Unknown	0	0.0%	9.2%	$0	0.0%	11.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$128**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	1.2%	$0	0.0%	0.7%	24.0%
Moderate	0	0.0%	1.2%	$0	0.0%	1.5%	16.0%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.2%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	41.8%
Unknown	0	0.0%	97.7%	$0	0.0%	97.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	7.9%	$0	0.0%	0.9%	N/A
Unknown	0	0.0%	92.1%	$0	0.0%	99.1%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	0	0.0%	7.4%	$0	0.0%	3.7%	24.0%
Moderate	5	17.9%	20.1%	$810	10.7%	14.3%	16.0%
Middle	4	14.3%	22.1%	$549	7.3%	19.8%	18.2%
Upper	18	64.3%	30.7%	$5,902	78.2%	36.2%	41.8%
Unknown	1	3.6%	19.7%	$284	3.8%	25.9%	0.0%
TOTAL	**28**	**100.0%**	**100.0%**	**$7,545**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	11.1%	3.6%	$167	5.2%	2.2%	5.0%
Moderate	1	11.1%	12.5%	$229	7.1%	8.0%	17.9%
Middle	2	22.2%	22.2%	$299	9.3%	17.7%	27.6%
Upper	5	55.6%	61.7%	$2,534	78.5%	72.2%	49.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$3,229**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.1%	$0	0.0%	1.2%	5.0%
Moderate	1	16.7%	8.7%	$35	1.4%	5.5%	17.9%
Middle	1	16.7%	20.8%	$45	1.8%	16.0%	27.6%
Upper	4	66.7%	68.4%	$2,409	96.8%	77.3%	49.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$2,489**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.4%	$0	0.0%	1.7%	5.0%
Moderate	0	0.0%	5.7%	$0	0.0%	3.7%	17.9%
Middle	0	0.0%	19.2%	$0	0.0%	17.8%	27.6%
Upper	3	100.0%	72.7%	$1,080	100.0%	76.9%	49.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$1,080**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.2%	$0	0.0%	0.6%	5.0%
Moderate	0	0.0%	5.1%	$0	0.0%	2.4%	17.9%
Middle	0	0.0%	19.4%	$0	0.0%	15.9%	27.6%
Upper	0	0.0%	74.3%	$0	0.0%	81.0%	49.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.4%	$0	0.0%	2.0%	5.0%
Moderate	0	0.0%	13.1%	$0	0.0%	7.6%	17.9%
Middle	0	0.0%	18.6%	$0	0.0%	15.1%	27.6%
Upper	0	0.0%	64.8%	$0	0.0%	75.3%	49.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.8%	$0	0.0%	2.2%	5.0%
Moderate	0	0.0%	14.0%	$0	0.0%	10.5%	17.9%
Middle	0	0.0%	37.5%	$0	0.0%	33.8%	27.6%
Upper	0	0.0%	44.7%	$0	0.0%	53.5%	49.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	22.9%	$0	0.0%	6.4%	22.2%
Moderate	0	0.0%	22.9%	$0	0.0%	19.8%	41.7%
Middle	1	100.0%	18.8%	$985	100.0%	7.2%	16.0%
Upper	0	0.0%	35.4%	$0	0.0%	66.6%	19.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.8%
TOTAL	**1**	**100.0%**	**100.0%**	**$985**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	5.3%	2.8%	$167	2.1%	1.9%	5.0%
Moderate	2	10.5%	10.4%	$264	3.4%	7.5%	17.9%
Middle	4	21.1%	21.6%	$1,329	17.1%	16.4%	27.6%
Upper	12	63.2%	65.1%	$6,023	77.4%	74.1%	49.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**19**	**100.0%**	**100.0%**	**$7,783**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	1.8%	$0	0.0%	0.8%	3.7%
Moderate	4	33.3%	12.8%	$791	15.4%	8.1%	16.8%
Middle	1	8.3%	40.6%	$349	6.8%	36.2%	38.3%
Upper	7	58.3%	43.2%	$4,009	77.9%	53.6%	39.7%
Unknown	0	0.0%	1.6%	$0	0.0%	1.3%	1.5%
TOTAL	**12**	**100.0%**	**100.0%**	**$5,149**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.3%	$0	0.0%	1.2%	3.7%
Moderate	1	14.3%	12.3%	$73	5.3%	7.9%	16.8%
Middle	0	0.0%	42.3%	$0	0.0%	38.0%	38.3%
Upper	6	85.7%	41.6%	$1,299	94.7%	51.7%	39.7%
Unknown	0	0.0%	1.5%	$0	0.0%	1.3%	1.5%
TOTAL	**7**	**100.0%**	**100.0%**	**$1,372**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.4%	$0	0.0%	1.6%	3.7%
Moderate	0	0.0%	8.2%	$0	0.0%	6.2%	16.8%
Middle	1	12.5%	32.6%	$75	8.4%	29.0%	38.3%
Upper	7	87.5%	55.4%	$821	91.6%	62.2%	39.7%
Unknown	0	0.0%	1.4%	$0	0.0%	1.0%	1.5%
TOTAL	**8**	**100.0%**	**100.0%**	**$896**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.5%	$0	0.0%	0.9%	3.7%
Moderate	0	0.0%	8.0%	$0	0.0%	4.2%	16.8%
Middle	0	0.0%	27.8%	$0	0.0%	21.8%	38.3%
Upper	0	0.0%	61.2%	$0	0.0%	71.4%	39.7%
Unknown	0	0.0%	1.5%	$0	0.0%	1.7%	1.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	2.4%	$0	0.0%	1.6%	3.7%
Moderate	0	0.0%	14.1%	$0	0.0%	13.5%	16.8%
Middle	0	0.0%	34.0%	$0	0.0%	27.3%	38.3%
Upper	1	100.0%	48.1%	$128	100.0%	54.9%	39.7%
Unknown	0	0.0%	1.5%	$0	0.0%	2.7%	1.5%
TOTAL	**1**	**100.0%**	**100.0%**	**$128**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.9%	$0	0.0%	1.8%	3.7%
Moderate	0	0.0%	11.6%	$0	0.0%	8.2%	16.8%
Middle	0	0.0%	62.8%	$0	0.0%	56.9%	38.3%
Upper	0	0.0%	19.2%	$0	0.0%	27.7%	39.7%
Unknown	0	0.0%	3.5%	$0	0.0%	5.4%	1.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	10.5%	$0	0.0%	4.5%	6.2%
Moderate	0	0.0%	39.5%	$0	0.0%	52.2%	46.1%
Middle	0	0.0%	13.2%	$0	0.0%	20.4%	24.8%
Upper	0	0.0%	36.8%	$0	0.0%	22.9%	19.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	3.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	2.0%	$0	0.0%	1.2%	3.7%
Moderate	5	17.9%	12.4%	$864	11.5%	11.0%	16.8%
Middle	2	7.1%	40.4%	$424	5.6%	35.3%	38.3%
Upper	21	75.0%	43.7%	$6,257	82.9%	51.3%	39.7%
Unknown	0	0.0%	1.6%	$0	0.0%	1.2%	1.5%
TOTAL	**28**	**100.0%**	**100.0%**	**$7,545**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	23	31.9%	45.7%	$1,551	19.1%	31.6%	92.6%
		Over $1 Million/ Unknown	49	68.1%	54.3%	$6,561	80.9%	68.4%	7.4%
		TOTAL	**72**	**100.0%**	**100.0%**	**$8,112**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	55	76.4%	91.6%	$1,516	18.7%	33.7%	
		$100,001–$250,000	6	8.3%	4.5%	$981	12.1%	17.8%	
		$250,001–$1 Million	11	15.3%	3.9%	$5,615	69.2%	48.5%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**72**	**100.0%**	**100.0%**	**$8,112**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	19	82.6%		$544	35.1%		
		$100,001–$250,000	2	8.7%		$354	22.8%		
		$250,001–$1 Million	2	8.7%		$653	42.1%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**23**	**100.0%**		**$1,551**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		**2022**						
		Count			**Dollars**			**Total Businesses**
		Bank		**Aggregate**	**Bank**		**Aggregate**	
		#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue	$1 Million or Less	6	33.3%	51.7%	$330	5.4%	40.2%	93.2%
	Over $1 Million/ Unknown	12	66.7%	48.3%	$5,834	94.6%	59.8%	6.8%
	TOTAL	**18**	**100.0%**	**100.0%**	**$6,164**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	8	44.4%	93.7%	$319	5.2%	40.5%	
	$100,001–$250,000	2	11.1%	3.6%	$275	4.5%	17.3%	
	$250,001–$1 Million	8	44.4%	2.7%	$5,570	90.4%	42.1%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**18**	**100.0%**	**100.0%**	**$6,164**	**100.0%**	**100.0%**	
Loan Size / **Revenue $1 Million or Less**	$100,000 or Less	4	66.7%		$55	16.7%		
	$100,001–$250,000	2	33.3%		$275	83.3%		
	$250,001–$1 Million	0	0.0%		$0	0.0%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**6**	**100.0%**		**$330**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	18	25.0%	10.7%	$1,327	16.4%	15.4%	14.6%
Moderate	12	16.7%	19.3%	$1,102	13.6%	26.8%	21.2%
Middle	13	18.1%	23.5%	$527	6.5%	19.9%	23.8%
Upper	26	36.1%	45.5%	$4,300	53.0%	37.1%	39.9%
Unknown	3	4.2%	1.0%	$856	10.6%	0.7%	0.6%
TOTAL	**72**	**100.0%**	**100.0%**	**$8,112**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	4.1%	$0	0.0%	3.3%	5.6%
Moderate	6	33.3%	22.4%	$2,272	36.9%	29.8%	27.1%
Middle	3	16.7%	34.3%	$528	8.6%	29.0%	33.3%
Upper	9	50.0%	36.6%	$3,364	54.6%	36.2%	31.3%
Unknown	0	0.0%	2.6%	$0	0.0%	1.7%	2.8%
TOTAL	**18**	**100.0%**	**100.0%**	**$6,164**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Charleston Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	4.1%	$0	0.0%	1.7%	22.8%
Moderate	3	37.5%	13.9%	$737	14.5%	7.7%	15.1%
Middle	1	12.5%	16.7%	$361	7.1%	12.1%	17.6%
Upper	4	50.0%	50.2%	$3,988	78.4%	64.1%	44.4%
Unknown	0	0.0%	15.1%	$0	0.0%	14.5%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$5,086**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	4.1%	$0	0.0%	1.9%	22.8%
Moderate	1	8.3%	13.2%	$104	1.1%	7.9%	15.1%
Middle	0	0.0%	18.4%	$0	0.0%	14.0%	17.6%
Upper	7	58.3%	46.1%	$6,628	69.4%	58.2%	44.4%
Unknown	4	33.3%	18.3%	$2,817	29.5%	18.0%	0.0%
TOTAL	**12**	**100.0%**	**100.0%**	**$9,549**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.6%	$0	0.0%	1.7%	22.8%
Moderate	0	0.0%	8.1%	$0	0.0%	4.8%	15.1%
Middle	1	100.0%	16.0%	$150	100.0%	10.4%	17.6%
Upper	0	0.0%	67.3%	$0	0.0%	72.4%	44.4%
Unknown	0	0.0%	4.9%	$0	0.0%	10.7%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$150**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.9%	$0	0.0%	2.8%	22.8%
Moderate	0	0.0%	6.8%	$0	0.0%	2.8%	15.1%
Middle	0	0.0%	11.1%	$0	0.0%	5.1%	17.6%
Upper	0	0.0%	76.6%	$0	0.0%	87.1%	44.4%
Unknown	0	0.0%	2.7%	$0	0.0%	2.2%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	3.9%	$0	0.0%	0.9%	22.8%
Moderate	0	0.0%	7.1%	$0	0.0%	1.8%	15.1%
Middle	0	0.0%	15.5%	$0	0.0%	4.7%	17.6%
Upper	1	100.0%	66.0%	$5,000	100.0%	72.2%	44.4%
Unknown	0	0.0%	7.4%	$0	0.0%	20.3%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$5,000**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.8%	$0	0.0%	2.0%	22.8%
Moderate	0	0.0%	2.9%	$0	0.0%	2.5%	15.1%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	17.6%
Upper	0	0.0%	1.0%	$0	0.0%	0.0%	44.4%
Unknown	0	0.0%	92.3%	$0	0.0%	95.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.9%	$0	0.0%	0.4%	N/A
Unknown	1	100.0%	98.1%	$504	100.0%	99.6%	N/A
TOTAL	**1**	**100.0%**	**100.0%**	**$504**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	0	0.0%	4.0%	$0	0.0%	1.7%	22.8%
Moderate	4	17.4%	13.1%	$841	4.1%	7.4%	15.1%
Middle	2	8.7%	17.4%	$511	2.5%	12.5%	17.6%
Upper	12	52.2%	48.9%	$15,616	77.0%	60.0%	44.4%
Unknown	5	21.7%	16.6%	$3,321	16.4%	18.4%	0.0%
TOTAL	**23**	**100.0%**	**100.0%**	**$20,289**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Families by Family Income %**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	3.6%	$0	0.0%	1.5%	21.2%
Moderate	0	0.0%	12.6%	$0	0.0%	6.5%	15.4%
Middle	2	12.5%	15.6%	$693	4.3%	11.0%	18.1%
Upper	14	87.5%	47.4%	$15,346	95.7%	62.7%	45.3%
Unknown	0	0.0%	20.9%	$0	0.0%	18.3%	0.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$16,039**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	9.1%	$0	0.0%	4.2%	21.2%
Moderate	1	12.5%	16.5%	$125	3.1%	9.9%	15.4%
Middle	1	12.5%	19.3%	$230	5.7%	14.8%	18.1%
Upper	5	62.5%	39.7%	$2,272	56.1%	55.6%	45.3%
Unknown	1	12.5%	15.5%	$1,425	35.2%	15.4%	0.0%
TOTAL	**8**	**100.0%**	**100.0%**	**$4,052**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	3.2%	$0	0.0%	1.5%	21.2%
Moderate	0	0.0%	10.3%	$0	0.0%	5.4%	15.4%
Middle	0	0.0%	16.5%	$0	0.0%	9.2%	18.1%
Upper	7	100.0%	67.1%	$3,778	100.0%	79.4%	45.3%
Unknown	0	0.0%	3.0%	$0	0.0%	4.5%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$3,778**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	2.6%	$0	0.0%	1.7%	21.2%
Moderate	0	0.0%	7.0%	$0	0.0%	3.1%	15.4%
Middle	0	0.0%	15.4%	$0	0.0%	8.8%	18.1%
Upper	0	0.0%	71.1%	$0	0.0%	83.5%	45.3%
Unknown	0	0.0%	3.9%	$0	0.0%	2.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	6.8%	$0	0.0%	3.0%	21.2%
Moderate	0	0.0%	11.7%	$0	0.0%	4.6%	15.4%
Middle	0	0.0%	16.7%	$0	0.0%	5.7%	18.1%
Upper	0	0.0%	55.1%	$0	0.0%	74.7%	45.3%
Unknown	0	0.0%	9.7%	$0	0.0%	11.9%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	21.2%
Moderate	0	0.0%	1.9%	$0	0.0%	4.0%	15.4%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	18.1%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	45.3%
Unknown	0	0.0%	98.1%	$0	0.0%	96.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	0	0.0%	5.1%	$0	0.0%	2.1%	21.2%
Moderate	1	3.2%	13.1%	$125	0.5%	6.7%	15.4%
Middle	3	9.7%	16.6%	$923	3.9%	10.9%	18.1%
Upper	26	83.9%	47.9%	$21,396	89.6%	58.1%	45.3%
Unknown	1	3.2%	17.3%	$1,425	6.0%	22.2%	0.0%
TOTAL	**31**	**100.0%**	**100.0%**	**$23,869**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	6.8%	$0	0.0%	4.4%	6.4%
Moderate	1	12.5%	12.3%	$153	3.0%	7.8%	14.8%
Middle	2	25.0%	33.4%	$661	13.0%	26.5%	31.4%
Upper	5	62.5%	46.6%	$4,272	84.0%	60.2%	46.9%
Unknown	0	0.0%	1.0%	$0	0.0%	1.1%	0.5%
TOTAL	**8**	**100.0%**	**100.0%**	**$5,086**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.9%	$0	0.0%	2.2%	6.4%
Moderate	0	0.0%	9.2%	$0	0.0%	5.7%	14.8%
Middle	1	8.3%	32.2%	$104	1.1%	25.8%	31.4%
Upper	11	91.7%	55.1%	$9,445	98.9%	65.6%	46.9%
Unknown	0	0.0%	0.5%	$0	0.0%	0.6%	0.5%
TOTAL	**12**	**100.0%**	**100.0%**	**$9,549**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.2%	$0	0.0%	2.0%	6.4%
Moderate	0	0.0%	6.9%	$0	0.0%	5.0%	14.8%
Middle	0	0.0%	28.6%	$0	0.0%	19.8%	31.4%
Upper	1	100.0%	61.5%	$150	100.0%	72.7%	46.9%
Unknown	0	0.0%	0.8%	$0	0.0%	0.6%	0.5%
TOTAL	**1**	**100.0%**	**100.0%**	**$150**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.9%	$0	0.0%	0.4%	6.4%
Moderate	0	0.0%	4.1%	$0	0.0%	2.3%	14.8%
Middle	0	0.0%	22.5%	$0	0.0%	14.4%	31.4%
Upper	0	0.0%	72.0%	$0	0.0%	82.0%	46.9%
Unknown	0	0.0%	0.5%	$0	0.0%	0.9%	0.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	4.9%	$0	0.0%	1.6%	6.4%
Moderate	0	0.0%	5.2%	$0	0.0%	2.2%	14.8%
Middle	0	0.0%	20.7%	$0	0.0%	7.8%	31.4%
Upper	1	100.0%	68.3%	$5,000	100.0%	87.9%	46.9%
Unknown	0	0.0%	1.0%	$0	0.0%	0.5%	0.5%
TOTAL	**1**	**100.0%**	**100.0%**	**$5,000**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	9.6%	$0	0.0%	4.6%	6.4%
Moderate	0	0.0%	36.5%	$0	0.0%	29.0%	14.8%
Middle	0	0.0%	23.1%	$0	0.0%	23.9%	31.4%
Upper	0	0.0%	29.8%	$0	0.0%	41.0%	46.9%
Unknown	0	0.0%	1.0%	$0	0.0%	1.6%	0.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	1	100.0%	31.5%	$504	100.0%	45.5%	15.2%
Moderate	0	0.0%	20.4%	$0	0.0%	17.4%	19.8%
Middle	0	0.0%	22.2%	$0	0.0%	16.7%	31.0%
Upper	0	0.0%	20.4%	$0	0.0%	19.2%	31.2%
Unknown	0	0.0%	5.6%	$0	0.0%	1.2%	2.8%
TOTAL	**1**	**100.0%**	**100.0%**	**$504**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	4.3%	4.5%	$504	2.5%	4.3%	6.4%
Moderate	1	4.3%	10.4%	$153	0.8%	6.9%	14.8%
Middle	3	13.0%	32.3%	$765	3.8%	25.4%	31.4%
Upper	18	78.3%	52.1%	$18,867	93.0%	62.5%	46.9%
Unknown	0	0.0%	0.7%	$0	0.0%	0.9%	0.5%
TOTAL	**23**	**100.0%**	**100.0%**	**$20,289**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	4.4%	$0	0.0%	2.1%	4.4%
Moderate	1	6.3%	13.8%	$470	2.9%	8.2%	15.9%
Middle	3	18.8%	27.2%	$2,457	15.3%	22.6%	25.6%
Upper	12	75.0%	52.9%	$13,112	81.8%	64.5%	52.9%
Unknown	0	0.0%	1.6%	$0	0.0%	2.7%	1.2%
TOTAL	**16**	**100.0%**	**100.0%**	**$16,039**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.8%	$0	0.0%	1.3%	4.4%
Moderate	0	0.0%	13.0%	$0	0.0%	7.2%	15.9%
Middle	1	12.5%	26.3%	$255	6.3%	19.9%	25.6%
Upper	7	87.5%	56.0%	$3,797	93.7%	68.7%	52.9%
Unknown	0	0.0%	1.8%	$0	0.0%	2.9%	1.2%
TOTAL	**8**	**100.0%**	**100.0%**	**$4,052**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.8%	$0	0.0%	0.5%	4.4%
Moderate	0	0.0%	6.2%	$0	0.0%	3.7%	15.9%
Middle	1	14.3%	26.4%	$207	5.5%	19.2%	25.6%
Upper	6	85.7%	65.0%	$3,571	94.5%	74.6%	52.9%
Unknown	0	0.0%	1.5%	$0	0.0%	2.0%	1.2%
TOTAL	**7**	**100.0%**	**100.0%**	**$3,778**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.9%	$0	0.0%	0.4%	4.4%
Moderate	0	0.0%	5.6%	$0	0.0%	2.4%	15.9%
Middle	0	0.0%	21.3%	$0	0.0%	16.9%	25.6%
Upper	0	0.0%	71.7%	$0	0.0%	79.3%	52.9%
Unknown	0	0.0%	0.5%	$0	0.0%	0.9%	1.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.5%	$0	0.0%	0.3%	4.4%
Moderate	0	0.0%	7.5%	$0	0.0%	2.4%	15.9%
Middle	0	0.0%	22.3%	$0	0.0%	9.3%	25.6%
Upper	0	0.0%	67.7%	$0	0.0%	85.4%	52.9%
Unknown	0	0.0%	1.0%	$0	0.0%	2.6%	1.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	11.1%	$0	0.0%	4.5%	4.4%
Moderate	0	0.0%	40.7%	$0	0.0%	27.0%	15.9%
Middle	0	0.0%	29.6%	$0	0.0%	25.4%	25.6%
Upper	0	0.0%	18.5%	$0	0.0%	43.1%	52.9%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.2%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	25.5%	$0	0.0%	19.6%	9.5%
Moderate	0	0.0%	29.8%	$0	0.0%	14.3%	21.9%
Middle	0	0.0%	14.9%	$0	0.0%	18.9%	25.6%
Upper	0	0.0%	25.5%	$0	0.0%	46.7%	39.3%
Unknown	0	0.0%	4.3%	$0	0.0%	0.5%	3.6%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	3.5%	$0	0.0%	2.9%	4.4%
Moderate	1	3.2%	12.6%	$470	2.0%	8.0%	15.9%
Middle	5	16.1%	26.5%	$2,919	12.2%	21.2%	25.6%
Upper	25	80.6%	55.8%	$20,480	85.8%	65.3%	52.9%
Unknown	0	0.0%	1.6%	$0	0.0%	2.6%	1.2%
TOTAL	**31**	**100.0%**	**100.0%**	**$23,869**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	10	29.4%	44.4%	$592	7.9%	31.7%	92.3%
		Over $1 Million/ Unknown	24	70.6%	55.6%	$6,859	92.1%	68.3%	7.7%
		TOTAL	**34**	**100.0%**	**100.0%**	**$7,451**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	16	47.1%	89.8%	$514	6.9%	30.8%	
		$100,001–$250,000	9	26.5%	5.5%	$1,472	19.8%	18.5%	
		$250,001–$1 Million	9	26.5%	4.7%	$5,465	73.3%	50.7%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**34**	**100.0%**	**100.0%**	**$7,451**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	8	80.0%		$206	34.8%		
		$100,001–$250,000	2	20.0%		$386	65.2%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**10**	**100.0%**		**$592**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	11	68.8%	49.1%	$1,296	66.3%	34.6%	92.5%
		Over $1 Million/ Unknown	5	31.3%	50.9%	$660	33.7%	65.4%	7.5%
		TOTAL	**16**	**100.0%**	**100.0%**	**$1,956**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	9	56.3%	92.9%	$475	24.3%	38.8%	
		$100,001–$250,000	6	37.5%	3.9%	$1,148	58.7%	16.8%	
		$250,001–$1 Million	1	6.3%	3.2%	$333	17.0%	44.4%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**16**	**100.0%**	**100.0%**	**$1,956**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	6	54.5%		$215	16.6%		
		$100,001–$250,000	4	36.4%		$748	57.7%		
		$250,001–$1 Million	1	9.1%		$333	25.7%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**11**	**100.0%**		**$1,296**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	4	11.8%	10.2%	$122	1.6%	14.0%	11.4%
Moderate	4	11.8%	13.8%	$1,246	16.7%	17.0%	16.3%
Middle	6	17.6%	26.0%	$1,351	18.1%	20.0%	25.7%
Upper	14	41.2%	46.8%	$1,962	26.3%	45.4%	44.3%
Unknown	6	17.6%	3.2%	$2,770	37.2%	3.6%	2.3%
TOTAL	**34**	**100.0%**	**100.0%**	**$7,451**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	6.7%	$0	0.0%	8.2%	7.4%
Moderate	0	0.0%	15.7%	$0	0.0%	19.8%	18.2%
Middle	8	50.0%	25.1%	$1,132	57.9%	23.1%	24.8%
Upper	8	50.0%	49.4%	$824	42.1%	45.3%	47.7%
Unknown	0	0.0%	3.2%	$0	0.0%	3.5%	2.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$1,956**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

VIRGINIA

NonMSA Virginia

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	6.8%	$0	0.0%	3.1%	24.4%
Moderate	0	0.0%	17.4%	$0	0.0%	11.1%	19.2%
Middle	2	50.0%	17.0%	$171	43.2%	14.0%	21.4%
Upper	1	25.0%	39.1%	$75	18.9%	53.5%	35.0%
Unknown	1	25.0%	19.8%	$150	37.9%	18.3%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$396**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	1	3.8%	4.8%	$75	2.1%	2.4%	24.4%
Moderate	8	30.8%	12.4%	$675	18.5%	7.8%	19.2%
Middle	5	19.2%	18.6%	$407	11.2%	14.7%	21.4%
Upper	12	46.2%	43.6%	$2,484	68.2%	53.4%	35.0%
Unknown	0	0.0%	20.6%	$0	0.0%	21.7%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$3,641**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	2	28.6%	7.4%	$95	14.8%	5.3%	24.4%
Moderate	0	0.0%	11.7%	$0	0.0%	7.8%	19.2%
Middle	2	28.6%	22.1%	$89	13.9%	17.9%	21.4%
Upper	3	42.9%	57.1%	$458	71.3%	67.9%	35.0%
Unknown	0	0.0%	1.8%	$0	0.0%	1.1%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$642**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	7.6%	$0	0.0%	5.7%	24.4%
Moderate	2	33.3%	10.5%	$81	33.3%	5.3%	19.2%
Middle	4	66.7%	20.0%	$162	66.7%	16.9%	21.4%
Upper	0	0.0%	56.2%	$0	0.0%	65.5%	35.0%
Unknown	0	0.0%	5.7%	$0	0.0%	6.7%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$243**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	6.8%	$0	0.0%	3.6%	24.4%
Moderate	0	0.0%	22.7%	$0	0.0%	19.8%	19.2%
Middle	0	0.0%	15.9%	$0	0.0%	16.2%	21.4%
Upper	0	0.0%	52.3%	$0	0.0%	57.6%	35.0%
Unknown	0	0.0%	2.3%	$0	0.0%	2.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	4.0%	$0	0.0%	3.4%	24.4%
Moderate	0	0.0%	10.0%	$0	0.0%	7.2%	19.2%
Middle	0	0.0%	2.0%	$0	0.0%	4.3%	21.4%
Upper	0	0.0%	2.0%	$0	0.0%	3.2%	35.0%
Unknown	0	0.0%	82.0%	$0	0.0%	81.8%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	6.3%	$0	0.0%	4.0%	N/A
Unknown	0	0.0%	93.8%	$0	0.0%	96.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	3	7.0%	5.9%	$170	3.5%	2.8%	24.4%
Moderate	10	23.3%	14.8%	$756	15.4%	9.6%	19.2%
Middle	13	30.2%	17.7%	$829	16.8%	14.2%	21.4%
Upper	16	37.2%	41.6%	$3,017	61.3%	53.2%	35.0%
Unknown	1	2.3%	20.0%	$150	3.0%	20.1%	0.0%
TOTAL	**43**	**100.0%**	**100.0%**	**$4,922**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	14.3%	6.1%	$96	10.2%	2.9%	23.8%
Moderate	3	42.9%	19.4%	$422	44.7%	12.6%	19.5%
Middle	1	14.3%	18.5%	$295	31.2%	16.1%	20.7%
Upper	1	14.3%	34.2%	$24	2.5%	48.4%	36.0%
Unknown	1	14.3%	21.7%	$108	11.4%	20.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$945**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	12.5%	9.8%	$116	4.9%	4.4%	23.8%
Moderate	3	12.5%	19.2%	$460	19.4%	12.7%	19.5%
Middle	12	50.0%	22.6%	$1,238	52.2%	20.3%	20.7%
Upper	6	25.0%	36.7%	$558	23.5%	49.1%	36.0%
Unknown	0	0.0%	11.7%	$0	0.0%	13.5%	0.0%
TOTAL	**24**	**100.0%**	**100.0%**	**$2,372**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	9.1%	10.8%	$20	2.4%	5.9%	23.8%
Moderate	3	27.3%	21.1%	$150	17.7%	14.0%	19.5%
Middle	3	27.3%	21.1%	$245	28.9%	18.4%	20.7%
Upper	4	36.4%	40.4%	$434	51.1%	56.3%	36.0%
Unknown	0	0.0%	6.7%	$0	0.0%	5.4%	0.0%
TOTAL	**11**	**100.0%**	**100.0%**	**$849**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	2	28.6%	10.8%	$50	12.3%	5.6%	23.8%
Moderate	1	14.3%	15.1%	$25	6.2%	8.6%	19.5%
Middle	1	14.3%	29.5%	$60	14.8%	25.9%	20.7%
Upper	3	42.9%	42.8%	$271	66.7%	58.4%	36.0%
Unknown	0	0.0%	1.8%	$0	0.0%	1.4%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$406**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	11.9%	$0	0.0%	5.5%	23.8%
Moderate	0	0.0%	11.9%	$0	0.0%	10.1%	19.5%
Middle	0	0.0%	28.8%	$0	0.0%	20.1%	20.7%
Upper	0	0.0%	42.4%	$0	0.0%	60.3%	36.0%
Unknown	0	0.0%	5.1%	$0	0.0%	4.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	5.4%	$0	0.0%	2.6%	23.8%
Moderate	0	0.0%	5.4%	$0	0.0%	3.3%	19.5%
Middle	0	0.0%	2.7%	$0	0.0%	3.5%	20.7%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	36.0%
Unknown	0	0.0%	86.5%	$0	0.0%	90.7%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	4.8%	$0	0.0%	0.9%	N/A
Moderate	0	0.0%	4.8%	$0	0.0%	0.4%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	4.8%	$0	0.0%	0.4%	N/A
Unknown	0	0.0%	85.7%	$0	0.0%	98.2%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	7	14.3%	7.7%	$282	6.2%	3.3%	23.8%
Moderate	10	20.4%	18.9%	$1,057	23.1%	12.1%	19.5%
Middle	17	34.7%	20.2%	$1,838	40.2%	16.7%	20.7%
Upper	14	28.6%	35.3%	$1,287	28.1%	47.1%	36.0%
Unknown	1	2.0%	17.9%	$108	2.4%	20.7%	0.0%
TOTAL	**49**	**100.0%**	**100.0%**	**$4,572**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	50.0%	16.3%	$126	31.8%	10.6%	23.2%
Middle	2	50.0%	73.1%	$270	68.2%	76.4%	72.4%
Upper	0	0.0%	10.6%	$0	0.0%	13.0%	4.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$396**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	3	11.5%	12.6%	$466	12.8%	8.6%	23.2%
Middle	22	84.6%	77.0%	$3,089	84.8%	80.3%	72.4%
Upper	1	3.8%	10.4%	$86	2.4%	11.0%	4.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**26**	**100.0%**	**100.0%**	**$3,641**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	14.3%	17.8%	$150	23.4%	12.0%	23.2%
Middle	6	85.7%	67.5%	$492	76.6%	69.0%	72.4%
Upper	0	0.0%	14.7%	$0	0.0%	19.1%	4.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**7**	**100.0%**	**100.0%**	**$642**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	3	50.0%	13.3%	$132	54.3%	9.7%	23.2%
Middle	3	50.0%	77.1%	$111	45.7%	81.4%	72.4%
Upper	0	0.0%	9.5%	$0	0.0%	8.9%	4.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$243**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	13.6%	$0	0.0%	6.6%	23.2%
Middle	0	0.0%	75.0%	$0	0.0%	74.0%	72.4%
Upper	0	0.0%	11.4%	$0	0.0%	19.4%	4.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	40.0%	$0	0.0%	38.0%	23.2%
Middle	0	0.0%	58.0%	$0	0.0%	59.5%	72.4%
Upper	0	0.0%	2.0%	$0	0.0%	2.5%	4.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	68.8%	$0	0.0%	43.2%	17.9%
Middle	0	0.0%	31.3%	$0	0.0%	56.8%	75.1%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	7.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	9	20.9%	15.0%	$874	17.8%	10.1%	23.2%
Middle	33	76.7%	74.5%	$3,962	80.5%	77.8%	72.4%
Upper	1	2.3%	10.5%	$86	1.7%	12.1%	4.4%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**43**	**100.0%**	**100.0%**	**$4,922**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	0	0.0%	1.7%	$0	0.0%	0.9%	2.3%
Moderate	4	57.1%	22.1%	$589	62.3%	16.6%	23.2%
Middle	3	42.9%	60.1%	$356	37.7%	59.7%	62.2%
Upper	0	0.0%	16.1%	$0	0.0%	22.8%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**7**	**100.0%**	**100.0%**	**$945**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.4%	$0	0.0%	2.5%	2.3%
Moderate	2	8.3%	19.5%	$120	5.1%	15.5%	23.2%
Middle	20	83.3%	60.8%	$2,004	84.5%	58.9%	62.2%
Upper	2	8.3%	17.2%	$248	10.5%	23.2%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**24**	**100.0%**	**100.0%**	**$2,372**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.2%	$0	0.0%	1.6%	2.3%
Moderate	3	27.3%	20.2%	$165	19.4%	15.1%	23.2%
Middle	5	45.5%	53.4%	$325	38.3%	51.4%	62.2%
Upper	3	27.3%	24.2%	$359	42.3%	32.0%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**11**	**100.0%**	**100.0%**	**$849**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.8%	$0	0.0%	1.7%	2.3%
Moderate	1	14.3%	13.9%	$20	4.9%	11.8%	23.2%
Middle	5	71.4%	62.7%	$356	87.7%	65.9%	62.2%
Upper	1	14.3%	21.7%	$30	7.4%	20.6%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**7**	**100.0%**	**100.0%**	**$406**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.7%	$0	0.0%	1.8%	2.3%
Moderate	0	0.0%	6.8%	$0	0.0%	4.4%	23.2%
Middle	0	0.0%	67.8%	$0	0.0%	61.7%	62.2%
Upper	0	0.0%	23.7%	$0	0.0%	32.2%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	2.7%	$0	0.0%	1.5%	2.3%
Moderate	0	0.0%	29.7%	$0	0.0%	33.1%	23.2%
Middle	0	0.0%	45.9%	$0	0.0%	46.7%	62.2%
Upper	0	0.0%	21.6%	$0	0.0%	18.7%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	4.4%
Moderate	0	0.0%	42.9%	$0	0.0%	36.3%	32.9%
Middle	0	0.0%	42.9%	$0	0.0%	31.0%	55.4%
Upper	0	0.0%	14.3%	$0	0.0%	32.7%	7.3%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	1.9%	$0	0.0%	1.3%	2.3%
Moderate	10	20.4%	20.8%	$894	19.6%	16.9%	23.2%
Middle	33	67.3%	59.9%	$3,041	66.5%	58.3%	62.2%
Upper	6	12.2%	17.3%	$637	13.9%	23.5%	12.2%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.1%
TOTAL	**49**	**100.0%**	**100.0%**	**$4,572**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	8	22.9%	48.9%	$272	14.9%	43.7%	91.5%
		Over $1 Million/ Unknown	27	77.1%	51.1%	$1,555	85.1%	56.3%	8.5%
		TOTAL	**35**	**100.0%**	**100.0%**	**$1,827**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	29	82.9%	91.3%	$723	39.6%	33.2%	
		$100,001–$250,000	5	14.3%	5.0%	$604	33.1%	19.7%	
		$250,001–$1 Million	1	2.9%	3.7%	$500	27.4%	47.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**35**	**100.0%**	**100.0%**	**$1,827**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	7	87.5%		$144	52.9%		
		$100,001–$250,000	1	12.5%		$128	47.1%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**8**	**100.0%**		**$272**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	11	84.6%	58.6%	$485	68.8%	48.5%	91.5%
		Over $1 Million/ Unknown	2	15.4%	41.4%	$220	31.2%	51.5%	8.5%
		TOTAL	**13**	**100.0%**	**100.0%**	**$705**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	12	92.3%	94.0%	$505	71.6%	38.8%	
		$100,001–$250,000	1	7.7%	3.6%	$200	28.4%	21.2%	
		$250,001–$1 Million	0	0.0%	2.3%	$0	0.0%	40.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**13**	**100.0%**	**100.0%**	**$705**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	11	100.0%		$485	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**11**	**100.0%**		**$485**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	8	22.9%	16.8%	$403	22.1%	17.3%	17.9%
Middle	27	77.1%	74.2%	$1,424	77.9%	73.4%	76.9%
Upper	0	0.0%	7.6%	$0	0.0%	9.1%	5.1%
Unknown	0	0.0%	1.4%	$0	0.0%	0.3%	0.1%
TOTAL	**35**	**100.0%**	**100.0%**	**$1,827**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	2.8%	$0	0.0%	5.0%	2.6%
Moderate	2	15.4%	21.1%	$155	22.0%	19.5%	21.8%
Middle	8	61.5%	63.2%	$295	41.8%	63.6%	65.0%
Upper	3	23.1%	11.1%	$255	36.2%	11.4%	10.5%
Unknown	0	0.0%	1.8%	$0	0.0%	0.6%	0.1%
TOTAL	**13**	**100.0%**	**100.0%**	**$705**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Roanoke Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	7.8%	$0	0.0%	3.4%	22.5%
Moderate	1	33.3%	18.9%	$120	12.2%	11.2%	19.4%
Middle	0	0.0%	16.5%	$0	0.0%	11.5%	23.1%
Upper	1	33.3%	43.6%	$200	20.4%	61.2%	35.0%
Unknown	1	33.3%	13.1%	$660	67.3%	12.8%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$980**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	22.2%	7.4%	$115	8.8%	3.5%	22.5%
Moderate	2	22.2%	17.2%	$312	23.9%	11.7%	19.4%
Middle	3	33.3%	20.6%	$300	23.0%	16.5%	23.1%
Upper	2	22.2%	37.2%	$577	44.2%	51.9%	35.0%
Unknown	0	0.0%	17.6%	$0	0.0%	16.4%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,304**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	33.3%	6.8%	$50	8.8%	2.4%	22.5%
Moderate	1	33.3%	12.8%	$15	2.7%	9.0%	19.4%
Middle	0	0.0%	26.5%	$0	0.0%	18.1%	23.1%
Upper	1	33.3%	50.4%	$500	88.5%	67.2%	35.0%
Unknown	0	0.0%	3.4%	$0	0.0%	3.3%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$565**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	5.2%	$0	0.0%	2.0%	22.5%
Moderate	0	0.0%	11.5%	$0	0.0%	6.0%	19.4%
Middle	1	50.0%	37.5%	$300	66.7%	29.4%	23.1%
Upper	1	50.0%	36.5%	$150	33.3%	56.3%	35.0%
Unknown	0	0.0%	9.4%	$0	0.0%	6.3%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$450**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	12.8%	$0	0.0%	2.6%	22.5%
Moderate	0	0.0%	21.3%	$0	0.0%	9.7%	19.4%
Middle	0	0.0%	19.1%	$0	0.0%	8.2%	23.1%
Upper	0	0.0%	46.8%	$0	0.0%	79.5%	35.0%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	20.0%	$0	0.0%	16.1%	22.5%
Moderate	0	0.0%	5.0%	$0	0.0%	6.6%	19.4%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	23.1%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	35.0%
Unknown	0	0.0%	75.0%	$0	0.0%	77.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	3	17.6%	7.6%	$165	5.0%	3.4%	22.5%
Moderate	4	23.5%	17.5%	$447	13.5%	11.1%	19.4%
Middle	4	23.5%	19.6%	$600	18.2%	14.1%	23.1%
Upper	5	29.4%	40.0%	$1,427	43.3%	56.1%	35.0%
Unknown	1	5.9%	15.3%	$660	20.0%	15.3%	0.0%
TOTAL	**17**	**100.0%**	**100.0%**	**$3,299**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	1	100.0%	9.2%	$75	100.0%	3.3%	22.3%
Moderate	0	0.0%	19.2%	$0	0.0%	11.2%	18.5%
Middle	0	0.0%	17.1%	$0	0.0%	12.6%	22.4%
Upper	0	0.0%	40.1%	$0	0.0%	60.3%	36.8%
Unknown	0	0.0%	14.4%	$0	0.0%	12.6%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$75**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	3	17.6%	13.3%	$156	4.8%	7.7%	22.3%
Moderate	4	23.5%	20.5%	$343	10.5%	12.6%	18.5%
Middle	3	17.6%	21.2%	$455	13.9%	17.6%	22.4%
Upper	7	41.2%	34.2%	$2,320	70.9%	50.1%	36.8%
Unknown	0	0.0%	10.7%	$0	0.0%	12.0%	0.0%
TOTAL	**17**	**100.0%**	**100.0%**	**$3,274**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	1	100.0%	9.4%	$30	100.0%	5.0%	22.3%
Moderate	0	0.0%	18.0%	$0	0.0%	11.0%	18.5%
Middle	0	0.0%	25.2%	$0	0.0%	21.0%	22.4%
Upper	0	0.0%	45.3%	$0	0.0%	61.3%	36.8%
Unknown	0	0.0%	2.2%	$0	0.0%	1.7%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$30**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	8.3%	$0	0.0%	2.7%	22.3%
Moderate	0	0.0%	24.1%	$0	0.0%	12.4%	18.5%
Middle	0	0.0%	21.1%	$0	0.0%	18.7%	22.4%
Upper	1	100.0%	45.1%	$100	100.0%	63.9%	36.8%
Unknown	0	0.0%	1.5%	$0	0.0%	2.3%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$100**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	15.7%	$0	0.0%	6.5%	22.3%
Moderate	0	0.0%	25.5%	$0	0.0%	11.3%	18.5%
Middle	2	100.0%	27.5%	$475	100.0%	25.6%	22.4%
Upper	0	0.0%	27.5%	$0	0.0%	44.0%	36.8%
Unknown	0	0.0%	3.9%	$0	0.0%	12.6%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$475**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	27.3%	$0	0.0%	27.9%	22.3%
Moderate	0	0.0%	9.1%	$0	0.0%	9.5%	18.5%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	22.4%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	36.8%
Unknown	0	0.0%	63.6%	$0	0.0%	62.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	5	22.7%	10.6%	$261	6.6%	4.6%	22.3%
Moderate	4	18.2%	19.9%	$343	8.7%	11.6%	18.5%
Middle	5	22.7%	19.4%	$930	23.5%	14.4%	22.4%
Upper	8	36.4%	38.4%	$2,420	61.2%	56.9%	36.8%
Unknown	0	0.0%	11.7%	$0	0.0%	12.6%	0.0%
TOTAL	**22**	**100.0%**	**100.0%**	**$3,954**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	33.3%	31.3%	$120	12.2%	18.8%	44.6%
Middle	0	0.0%	45.9%	$0	0.0%	51.3%	42.9%
Upper	2	66.7%	22.8%	$860	87.8%	30.0%	12.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$980**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	3	33.3%	26.0%	$222	17.0%	17.2%	44.6%
Middle	3	33.3%	50.3%	$305	23.4%	49.5%	42.9%
Upper	3	33.3%	23.6%	$777	59.6%	33.3%	12.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**9**	**100.0%**	**100.0%**	**$1,304**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	33.3%	26.5%	$15	2.7%	14.3%	44.6%
Middle	2	66.7%	53.8%	$550	97.3%	58.4%	42.9%
Upper	0	0.0%	19.7%	$0	0.0%	27.3%	12.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**3**	**100.0%**	**100.0%**	**$565**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	35.4%	$0	0.0%	18.7%	44.6%
Middle	1	50.0%	41.7%	$300	66.7%	39.4%	42.9%
Upper	1	50.0%	22.9%	$150	33.3%	41.9%	12.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$450**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	23.4%	$0	0.0%	9.4%	44.6%
Middle	0	0.0%	55.3%	$0	0.0%	41.3%	42.9%
Upper	0	0.0%	21.3%	$0	0.0%	49.3%	12.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	55.0%	$0	0.0%	51.8%	44.6%
Middle	0	0.0%	40.0%	$0	0.0%	41.4%	42.9%
Upper	0	0.0%	5.0%	$0	0.0%	6.7%	12.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	42.9%	$0	0.0%	8.0%	45.8%
Middle	0	0.0%	57.1%	$0	0.0%	92.0%	22.7%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	31.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	5	29.4%	28.6%	$357	10.8%	17.8%	44.6%
Middle	6	35.3%	48.5%	$1,155	35.0%	50.6%	42.9%
Upper	6	35.3%	22.9%	$1,787	54.2%	31.6%	12.5%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**17**	**100.0%**	**100.0%**	**$3,299**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	100.0%	12.9%	$75	100.0%	7.7%	20.3%
Middle	0	0.0%	54.4%	$0	0.0%	43.6%	61.9%
Upper	0	0.0%	32.7%	$0	0.0%	48.7%	17.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$75**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	2	11.8%	13.5%	$400	12.2%	9.8%	20.3%
Middle	7	41.2%	52.1%	$818	25.0%	46.0%	61.9%
Upper	8	47.1%	34.4%	$2,056	62.8%	44.2%	17.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**17**	**100.0%**	**100.0%**	**$3,274**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	9.4%	$0	0.0%	7.3%	20.3%
Middle	1	100.0%	61.2%	$30	100.0%	54.7%	61.9%
Upper	0	0.0%	29.5%	$0	0.0%	38.0%	17.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$30**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	1	100.0%	11.3%	$100	100.0%	6.5%	20.3%
Middle	0	0.0%	50.4%	$0	0.0%	39.6%	61.9%
Upper	0	0.0%	38.3%	$0	0.0%	53.8%	17.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$100**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	23.5%	$0	0.0%	17.7%	20.3%
Middle	0	0.0%	43.1%	$0	0.0%	36.9%	61.9%
Upper	2	100.0%	33.3%	$475	100.0%	45.4%	17.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**2**	**100.0%**	**100.0%**	**$475**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	27.3%	$0	0.0%	12.4%	20.3%
Middle	0	0.0%	54.5%	$0	0.0%	49.0%	61.9%
Upper	0	0.0%	18.2%	$0	0.0%	38.6%	17.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	40.0%	$0	0.0%	40.8%	24.4%
Middle	0	0.0%	60.0%	$0	0.0%	59.2%	16.7%
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	58.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	4	18.2%	13.1%	$575	14.5%	8.6%	20.3%
Middle	8	36.4%	53.6%	$848	21.4%	44.4%	61.9%
Upper	10	45.5%	33.2%	$2,531	64.0%	46.9%	17.8%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
TOTAL	**22**	**100.0%**	**100.0%**	**$3,954**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	13	65.0%	57.0%	$239	46.3%	46.3%	94.0%
		Over $1 Million/ Unknown	7	35.0%	43.0%	$277	53.7%	53.7%	6.0%
		TOTAL	**20**	**100.0%**	**100.0%**	**$516**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	20	100.0%	89.6%	$516	100.0%	33.7%	
		$100,001–$250,000	0	0.0%	6.5%	$0	0.0%	23.1%	
		$250,001–$1 Million	0	0.0%	4.0%	$0	0.0%	43.1%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**20**	**100.0%**	**100.0%**	**$516**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	13	100.0%		$239	100.0%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**13**	**100.0%**		**$239**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2022**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	10	76.9%	61.2%	$497	42.0%	43.2%	93.9%
		Over $1 Million/ Unknown	3	23.1%	38.8%	$685	58.0%	56.8%	6.1%
		TOTAL	**13**	**100.0%**	**100.0%**	**$1,182**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	11	84.6%	92.5%	$432	36.5%	42.1%	
		$100,001–$250,000	1	7.7%	4.7%	$250	21.2%	20.1%	
		$250,001–$1 Million	1	7.7%	2.8%	$500	42.3%	37.8%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**13**	**100.0%**	**100.0%**	**$1,182**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	9	90.0%		$247	49.7%		
		$100,001–$250,000	1	10.0%		$250	50.3%		
		$250,001–$1 Million	0	0.0%		$0	0.0%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**10**	**100.0%**		**$497**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	11	55.0%	39.0%	$323	62.6%	35.2%	45.2%
Middle	8	40.0%	46.0%	$173	33.5%	46.7%	42.3%
Upper	1	5.0%	14.2%	$20	3.9%	18.0%	12.5%
Unknown	0	0.0%	0.8%	$0	0.0%	0.1%	0.0%
TOTAL	**20**	**100.0%**	**100.0%**	**$516**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	3	23.1%	19.9%	$525	44.4%	20.6%	23.3%
Middle	7	53.8%	57.1%	$332	28.1%	61.6%	51.4%
Upper	3	23.1%	22.6%	$325	27.5%	17.7%	25.3%
Unknown	0	0.0%	0.3%	$0	0.0%	0.1%	0.0%
TOTAL	**13**	**100.0%**	**100.0%**	**$1,182**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

NEW YORK

New York Assessment Area

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.1%	$0	0.0%	0.1%	25.2%
Moderate	0	0.0%	1.5%	$0	0.0%	0.3%	11.4%
Middle	0	0.0%	6.9%	$0	0.0%	2.2%	10.6%
Upper	21	52.5%	84.8%	$29,731	46.7%	84.9%	52.8%
Unknown	19	47.5%	6.7%	$33,934	53.3%	12.5%	0.0%
TOTAL	**40**	**100.0%**	**100.0%**	**$63,665**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.4%	$0	0.0%	0.4%	25.2%
Moderate	0	0.0%	1.6%	$0	0.0%	0.5%	11.4%
Middle	0	0.0%	6.1%	$0	0.0%	2.0%	10.6%
Upper	8	50.0%	85.6%	$8,690	38.6%	84.1%	52.8%
Unknown	8	50.0%	6.3%	$13,848	61.4%	12.9%	0.0%
TOTAL	**16**	**100.0%**	**100.0%**	**$22,538**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	0.4%	$0	0.0%	0.5%	25.2%
Moderate	0	0.0%	2.9%	$0	0.0%	0.6%	11.4%
Middle	0	0.0%	9.1%	$0	0.0%	2.8%	10.6%
Upper	0	0.0%	82.2%	$0	0.0%	71.9%	52.8%
Unknown	1	100.0%	5.4%	$750	100.0%	24.2%	0.0%
TOTAL	**1**	**100.0%**	**100.0%**	**$750**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.5%	$0	0.0%	0.7%	25.2%
Moderate	0	0.0%	0.7%	$0	0.0%	0.1%	11.4%
Middle	0	0.0%	4.4%	$0	0.0%	1.5%	10.6%
Upper	0	0.0%	88.2%	$0	0.0%	82.5%	52.8%
Unknown	0	0.0%	5.1%	$0	0.0%	15.3%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.7%	$0	0.0%	0.5%	25.2%
Moderate	0	0.0%	0.6%	$0	0.0%	0.1%	11.4%
Middle	0	0.0%	3.3%	$0	0.0%	0.7%	10.6%
Upper	1	25.0%	79.3%	$1,735	25.0%	62.7%	52.8%
Unknown	3	75.0%	16.1%	$5,200	75.0%	36.1%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$6,935**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	25.2%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	11.4%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	10.6%
Upper	0	0.0%	5.7%	$0	0.0%	3.0%	52.8%
Unknown	0	0.0%	94.3%	$0	0.0%	97.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	$0	0.0%	100.0%	N/A
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families by Family Income %**
Low	0	0.0%	0.2%	$0	0.0%	0.2%	25.2%
Moderate	0	0.0%	1.5%	$0	0.0%	0.3%	11.4%
Middle	0	0.0%	6.2%	$0	0.0%	1.6%	10.6%
Upper	30	49.2%	81.3%	$40,156	42.8%	64.0%	52.8%
Unknown	31	50.8%	10.8%	$53,732	57.2%	33.9%	0.0%
TOTAL	**61**	**100.0%**	**100.0%**	**$93,888**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	0.3%	$0	0.0%	0.2%	24.3%
Moderate	0	0.0%	2.1%	$0	0.0%	0.5%	11.0%
Middle	0	0.0%	7.0%	$0	0.0%	2.1%	11.0%
Upper	29	70.7%	82.0%	$36,324	64.6%	81.7%	53.6%
Unknown	12	29.3%	8.5%	$19,913	35.4%	15.5%	0.0%
TOTAL	**41**	**100.0%**	**100.0%**	**$56,237**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	0.7%	$0	0.0%	0.4%	24.3%
Moderate	0	0.0%	2.4%	$0	0.0%	0.6%	11.0%
Middle	0	0.0%	6.4%	$0	0.0%	1.6%	11.0%
Upper	1	16.7%	79.5%	$510	7.8%	76.1%	53.6%
Unknown	5	83.3%	10.9%	$5,998	92.2%	21.3%	0.0%
TOTAL	**6**	**100.0%**	**100.0%**	**$6,508**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	1.0%	$0	0.0%	0.1%	24.3%
Moderate	0	0.0%	3.8%	$0	0.0%	1.2%	11.0%
Middle	0	0.0%	8.6%	$0	0.0%	3.8%	11.0%
Upper	0	0.0%	79.4%	$0	0.0%	76.4%	53.6%
Unknown	0	0.0%	7.3%	$0	0.0%	18.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	24.3%
Moderate	0	0.0%	0.6%	$0	0.0%	0.1%	11.0%
Middle	0	0.0%	3.7%	$0	0.0%	0.8%	11.0%
Upper	0	0.0%	90.2%	$0	0.0%	66.6%	53.6%
Unknown	0	0.0%	5.5%	$0	0.0%	32.5%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	0.8%	$0	0.0%	0.5%	24.3%
Moderate	0	0.0%	0.9%	$0	0.0%	0.6%	11.0%
Middle	0	0.0%	2.9%	$0	0.0%	0.4%	11.0%
Upper	1	25.0%	75.5%	$1,820	36.0%	65.3%	53.6%
Unknown	3	75.0%	19.8%	$3,240	64.0%	33.2%	0.0%
TOTAL	**4**	**100.0%**	**100.0%**	**$5,060**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	0.0%	$0	0.0%	0.0%	24.3%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	11.0%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	11.0%
Upper	0	0.0%	3.3%	$0	0.0%	1.0%	53.6%
Unknown	0	0.0%	96.7%	$0	0.0%	99.0%	0.0%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	$0	0.0%	0.0%	N/A
Unknown	2	100.0%	100.0%	$21,000	100.0%	100.0%	N/A
TOTAL	**2**	**100.0%**	**100.0%**	**$21,000**	**100.0%**	**100.0%**	**N/A**
Total Home Mortgage Loans							**Families By Family Income %**
Low	0	0.0%	0.4%	$0	0.0%	0.2%	24.3%
Moderate	0	0.0%	2.0%	$0	0.0%	0.4%	11.0%
Middle	0	0.0%	6.2%	$0	0.0%	1.2%	11.0%
Upper	31	58.5%	75.0%	$38,654	43.5%	53.0%	53.6%
Unknown	22	41.5%	16.4%	$50,151	56.5%	45.3%	0.0%
TOTAL	**53**	**100.0%**	**100.0%**	**$88,805**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner-Occupied Units
	#	# %	# %	$	$ %	$ %	
Home Purchase Loans							
Low	0	0.0%	2.2%	$0	0.0%	1.6%	2.1%
Moderate	0	0.0%	5.9%	$0	0.0%	4.0%	6.8%
Middle	0	0.0%	4.3%	$0	0.0%	3.1%	5.4%
Upper	40	100.0%	86.7%	$63,665	100.0%	90.9%	84.7%
Unknown	0	0.0%	0.8%	$0	0.0%	0.4%	1.1%
TOTAL	**40**	**100.0%**	**100.0%**	**$63,665**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	2	12.5%	2.1%	$1,315	5.8%	1.6%	2.1%
Moderate	1	6.3%	7.5%	$500	2.2%	4.5%	6.8%
Middle	1	6.3%	4.6%	$942	4.2%	3.3%	5.4%
Upper	12	75.0%	85.0%	$19,781	87.8%	90.1%	84.7%
Unknown	0	0.0%	0.8%	$0	0.0%	0.5%	1.1%
TOTAL	**16**	**100.0%**	**100.0%**	**$22,538**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	4.1%	$0	0.0%	2.9%	2.1%
Moderate	0	0.0%	7.1%	$0	0.0%	3.1%	6.8%
Middle	0	0.0%	6.6%	$0	0.0%	2.8%	5.4%
Upper	1	100.0%	81.7%	$750	100.0%	90.9%	84.7%
Unknown	0	0.0%	0.4%	$0	0.0%	0.3%	1.1%
TOTAL	**1**	**100.0%**	**100.0%**	**$750**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	1.5%	$0	0.0%	0.3%	2.1%
Moderate	0	0.0%	4.4%	$0	0.0%	1.9%	6.8%
Middle	0	0.0%	6.6%	$0	0.0%	4.3%	5.4%
Upper	0	0.0%	87.5%	$0	0.0%	93.4%	84.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.3%	$0	0.0%	1.3%	2.1%
Moderate	0	0.0%	3.5%	$0	0.0%	1.9%	6.8%
Middle	1	25.0%	1.8%	$1,000	14.4%	0.5%	5.4%
Upper	3	75.0%	93.4%	$5,935	85.6%	96.3%	84.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.1%
TOTAL	**4**	**100.0%**	**100.0%**	**$6,935**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	8.6%	$0	0.0%	64.3%	2.1%
Moderate	0	0.0%	8.6%	$0	0.0%	6.6%	6.8%
Middle	0	0.0%	0.0%	$0	0.0%	0.0%	5.4%
Upper	0	0.0%	82.9%	$0	0.0%	29.1%	84.7%
Unknown	0	0.0%	0.0%	$0	0.0%	0.0%	1.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	6.9%	$0	0.0%	12.9%	10.1%
Moderate	0	0.0%	21.0%	$0	0.0%	21.6%	16.7%
Middle	0	0.0%	6.3%	$0	0.0%	8.7%	6.6%
Upper	0	0.0%	65.4%	$0	0.0%	56.5%	65.6%
Unknown	0	0.0%	0.4%	$0	0.0%	0.3%	1.1%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	2	3.3%	2.4%	$1,315	1.4%	4.2%	2.1%
Moderate	1	1.6%	7.2%	$500	0.5%	8.1%	6.8%
Middle	2	3.3%	4.5%	$1,942	2.1%	4.3%	5.4%
Upper	56	91.8%	85.1%	$90,131	96.0%	83.0%	84.7%
Unknown	0	0.0%	0.8%	$0	0.0%	0.4%	1.1%
TOTAL	**61**	**100.0%**	**100.0%**	**$93,888**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**% of Owner-Occupied Units**
	#	**# %**	**# %**	**$**	**$ %**	**$ %**	
Home Purchase Loans							
Low	1	2.4%	3.3%	$1,420	2.5%	2.4%	2.7%
Moderate	2	4.9%	4.9%	$2,540	4.5%	3.5%	6.3%
Middle	5	12.2%	7.2%	$5,899	10.5%	4.3%	7.4%
Upper	31	75.6%	82.0%	$43,812	77.9%	87.9%	82.2%
Unknown	2	4.9%	2.7%	$2,566	4.6%	2.0%	1.5%
TOTAL	**41**	**100.0%**	**100.0%**	**$56,237**	**100.0%**	**100.0%**	**100.0%**
Refinance							
Low	0	0.0%	2.5%	$0	0.0%	1.4%	2.7%
Moderate	1	16.7%	4.4%	$510	7.8%	2.3%	6.3%
Middle	0	0.0%	7.1%	$0	0.0%	3.8%	7.4%
Upper	5	83.3%	84.0%	$5,998	92.2%	91.2%	82.2%
Unknown	0	0.0%	1.9%	$0	0.0%	1.4%	1.5%
TOTAL	**6**	**100.0%**	**100.0%**	**$6,508**	**100.0%**	**100.0%**	**100.0%**
Home Improvement							
Low	0	0.0%	2.2%	$0	0.0%	1.0%	2.7%
Moderate	0	0.0%	5.7%	$0	0.0%	4.5%	6.3%
Middle	0	0.0%	7.6%	$0	0.0%	5.4%	7.4%
Upper	0	0.0%	81.9%	$0	0.0%	87.6%	82.2%
Unknown	0	0.0%	2.5%	$0	0.0%	1.5%	1.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose LOC							
Low	0	0.0%	6.1%	$0	0.0%	4.4%	2.7%
Moderate	0	0.0%	0.6%	$0	0.0%	0.2%	6.3%
Middle	0	0.0%	7.3%	$0	0.0%	1.6%	7.4%
Upper	0	0.0%	82.9%	$0	0.0%	91.5%	82.2%
Unknown	0	0.0%	3.0%	$0	0.0%	2.4%	1.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt							
Low	0	0.0%	1.3%	$0	0.0%	0.5%	2.7%
Moderate	0	0.0%	1.8%	$0	0.0%	0.9%	6.3%
Middle	0	0.0%	3.1%	$0	0.0%	1.0%	7.4%
Upper	4	100.0%	92.7%	$5,060	100.0%	97.3%	82.2%
Unknown	0	0.0%	1.2%	$0	0.0%	0.4%	1.5%
TOTAL	**4**	**100.0%**	**100.0%**	**$5,060**	**100.0%**	**100.0%**	**100.0%**

Purpose Not Applicable							
Low	0	0.0%	3.3%	$0	0.0%	0.9%	2.7%
Moderate	0	0.0%	6.7%	$0	0.0%	5.0%	6.3%
Middle	0	0.0%	3.3%	$0	0.0%	1.1%	7.4%
Upper	0	0.0%	83.3%	$0	0.0%	90.0%	82.2%
Unknown	0	0.0%	3.3%	$0	0.0%	3.0%	1.5%
TOTAL	**0**	**0.0%**	**100.0%**	**$0**	**0.0%**	**100.0%**	**100.0%**
Multifamily Loans							**% of Multifamily Units**
Low	0	0.0%	6.6%	$0	0.0%	4.9%	11.4%
Moderate	1	50.0%	15.7%	$3,000	14.3%	13.3%	13.8%
Middle	0	0.0%	10.2%	$0	0.0%	8.0%	9.2%
Upper	1	50.0%	64.4%	$18,000	85.7%	70.9%	63.0%
Unknown	0	0.0%	3.0%	$0	0.0%	2.8%	2.6%
TOTAL	**2**	**100.0%**	**100.0%**	**$21,000**	**100.0%**	**100.0%**	**100.0%**
Total Home Mortgage Loans							**% of Owner-Occupied Units**
Low	1	1.9%	3.3%	$1,420	1.6%	2.9%	2.7%
Moderate	4	7.5%	5.4%	$6,050	6.8%	6.2%	6.3%
Middle	5	9.4%	7.2%	$5,899	6.6%	5.1%	7.4%
Upper	41	77.4%	81.7%	$72,870	82.1%	83.8%	82.2%
Unknown	2	3.8%	2.5%	$2,566	2.9%	2.0%	1.5%
TOTAL	**53**	**100.0%**	**100.0%**	**$88,805**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			**2021**						
			Count			**Dollars**			**Total Businesses**
			Bank		**Aggregate**	**Bank**		**Aggregate**	
			#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue		$1 Million or Less	8	19.0%	33.0%	$638	6.6%	13.6%	85.2%
		Over $1 Million/ Unknown	34	81.0%	67.0%	$9,045	93.4%	86.4%	14.8%
		TOTAL	**42**	**100.0%**	**100.0%**	**$9,683**	**100.0%**	**100.0%**	**100.0%**
Loan Size		$100,000 or Less	21	50.0%	88.5%	$855	8.8%	31.3%	
		$100,001–$250,000	6	14.3%	6.6%	$1,215	12.5%	20.6%	
		$250,001–$1 Million	15	35.7%	4.9%	$7,613	78.6%	48.0%	
		Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
		TOTAL	**42**	**100.0%**	**100.0%**	**$9,683**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less**	$100,000 or Less	7	87.5%		$295	46.2%		
		$100,001–$250,000	0	0.0%		$0	0.0%		
		$250,001–$1 Million	1	12.5%		$343	53.8%		
		Over $1 Million	0	0.0%		$0	0.0%		
		TOTAL	**8**	**100.0%**		**$638**	**100.0%**		

Distribution of 2022 Small Business Lending By Borrower Income Level

Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	5	38.5%	41.3%	$1,570	34.1%	23.8%	85.2%
	Over $1 Million/ Unknown	8	61.5%	58.7%	$3,031	65.9%	76.2%	14.8%
	TOTAL	**13**	**100.0%**	**100.0%**	**$4,601**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	5	38.5%	94.3%	$210	4.6%	44.9%	
	$100,001–$250,000	2	15.4%	3.5%	$475	10.3%	17.9%	
	$250,001–$1 Million	6	46.2%	2.2%	$3,916	85.1%	37.2%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**13**	**100.0%**	**100.0%**	**$4,601**	**100.0%**	**100.0%**	
Loan Size / Revenue $1 Million or Less	$100,000 or Less	2	40.0%		$70	4.5%		
	$100,001–$250,000	0	0.0%		$0	0.0%		
	$250,001–$1 Million	3	60.0%		$1,500	95.5%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**5**	**100.0%**		**$1,570**	**100.0%**		

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	4.1%	$0	0.0%	2.3%	3.6%
Moderate	2	4.8%	8.1%	$520	5.4%	4.9%	7.3%
Middle	1	2.4%	3.6%	$376	3.9%	1.9%	2.9%
Upper	35	83.3%	79.1%	$8,102	83.7%	83.7%	79.8%
Unknown	4	9.5%	5.1%	$685	7.1%	7.2%	6.4%
TOTAL	**42**	**100.0%**	**100.0%**	**$9,683**	**100.0%**	**100.0%**	**100.0%**

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**# %**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	4.2%	$0	0.0%	2.6%	4.0%
Moderate	1	7.7%	6.7%	$500	10.9%	4.2%	5.8%
Middle	0	0.0%	5.1%	$0	0.0%	3.0%	4.6%
Upper	12	92.3%	74.4%	$4,101	89.1%	78.8%	75.1%
Unknown	0	0.0%	9.6%	$0	0.0%	11.4%	10.6%
TOTAL	**13**	**100.0%**	**100.0%**	**$4,601**	**100.0%**	**100.0%**	**100.0%**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2011–2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX D – 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.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

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

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily 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 low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders who 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 applicants; the amount of loan requested; and the disposition of the application (e.g., approved, denied, and 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: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual 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.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

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

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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 businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were $1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports 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 secured either 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): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of $500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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.