

PUBLIC DISCLOSURE

May 20, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Citizens Trust Bank
230 Peachtree Street, N.W.
Suite 2700
Atlanta, Georgia 30303**

RSSD ID NUMBER: 680130

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The following table indicates the performance level of Citizens Trust Bank with respect to the lending and community development tests.

PERFORMANCE LEVELS	Citizens Trust Bank	
	PERFORMANCE TESTS	
	Lending Test	Community Development Test
Outstanding		X
Satisfactory	X	
Needs to Improve		
Substantial Noncompliance		

****Note:** The lending test and the community development test are weighted equally when arriving at an overall rating.

Major factors supporting the institution's rating include the following:

- The bank's loan-to-deposit ratio is reasonable.
- A majority of loans were made in the assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of loans reflects reasonable penetration among businesses of different sizes.
- Considering the bank's asset size, capacity, and the availability of community development opportunities in the assessment areas, the bank demonstrates excellent responsiveness to community development needs through a combination of community development loans, qualified investments, and community development services.

INSTITUTION

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, and the economic and demographic characteristics of its defined assessment area. Citizens Trust Bank's CRA performance evaluation was based on CRA activities within its assessment areas using the Interagency Intermediate Small Institution Examination Procedures. Under these procedures, effective as of September 1, 2005, institutions meeting the threshold size are evaluated using two separately rated tests: a lending test and a community development test. The community development test includes an evaluation of community development loans, investments, and services in light of community needs within the assessment area and the capacity of the bank. Responsiveness to complaints was not evaluated as neither the bank nor the Reserve Bank received any CRA-related complaints during the review period.

For purposes of the CRA, Citizens Trust Bank has four assessment areas: Atlanta and Columbus in Georgia, and Birmingham and Eutaw in Alabama. The assessment areas have changed slightly since the previous evaluation in that the Columbus, Georgia assessment area no longer includes Russell County, Alabama. The Atlanta and Birmingham assessment areas were evaluated using full-scope examination procedures, and the Columbus and Eutaw assessment areas were evaluated using limited-scope procedures. When determining the overall rating, the greatest weight was placed on the performance in the Atlanta assessment area because the largest percentage of the bank's deposits and loans are in this assessment area.

The lending test included an analysis of small business loans originated from January 1, 2015, through December 31, 2017. A small business loan is defined as a business loan with an original amount of \$1 million or less and typically is either secured by nonfarm nonresidential real estate or classified as a commercial loan. Given its asset size, Citizens Trust Bank is not required to report CRA small business loan data. Although the bank reports residential mortgage loans under the Home Mortgage Disclosure Act (HMDA), the volume is not large and the majority of these loans are made to businesses; therefore, they were not included in the review.

For the community development test, the examination covered community development loans, qualified investments, and community development services from January 1, 2016, through December 31, 2018. The CRA defines a community development activity as one that has a primary purpose of providing affordable housing for, or community services targeted to, low- or moderate-income persons; promoting economic development by financing small businesses and farms that meet the requirements set forth in 12 CFR 228.12(g); or revitalizing or stabilizing low- or moderate-income areas, designated disaster areas, or underserved or distressed nonmetropolitan middle-income areas. Community development activities must benefit the assessment area or a larger statewide or regional area that includes the assessment area.

As part of this evaluation, information obtained from four community contacts was used to establish a context for the communities in which the bank operates. The contacts were consulted for information about the economic and demographic characteristics of the full-scope assessment areas and the community development opportunities. The contacts represented organizations that assist small businesses by providing credit and other services. These individuals discussed the various opportunities and challenges in the area and how financial institutions can be responsive to local community development needs through lending, investment, or service activities. Specific information obtained from the community contacts is included in the applicable sections of the evaluation.

DESCRIPTION OF INSTITUTION

With offices in Georgia and Alabama, Citizens Trust Bank is a community bank that is wholly owned by Citizens Bancshares Corporation. Both the bank and the holding company are headquartered in Atlanta, Georgia. The bank has not undergone any significant changes in structure since the previous examination. Citizens Trust Bank is a full-service bank that offers traditional personal and business deposit and loan products. The bank focuses on building relationships through personalized engagement, seeking to enhance the financial well-being of its customers, shareholders, employees, and the communities it serves. The bank's goal is to help its customers achieve their life goals by providing options for healthy financial living. According to the March 31, 2019 Report of Condition, the bank's assets totaled \$403.9 million, which represents an increase of approximately \$16.0 million (4.1 percent) since the bank's last CRA evaluation.

Citizens Trust Bank is certified as a Community Development Financial Institution (CDFI) through the CDFI Fund of the U.S. Department of the Treasury and is one of only two banks in Georgia that are certified CDFIs. A certified CDFI is a specialized financial institution that works in market niches that are underserved by traditional financial institutions. CDFIs share a common goal of expanding economic opportunity in low-income communities by providing access to financial products and services for local residents and businesses. CDFIs strive to foster economic opportunity and revitalize neighborhoods. By financing community businesses, CDFIs spark job growth and retention in hard-to-serve markets across the nation.

In 2016, 2017, and 2018, the bank received awards through the Bank Enterprise Award (BEA) Program, which are reviewed and approved by the CDFI Fund. Through the BEA Program, the CDFI Fund provides monetary awards to FDIC-insured depository institutions that successfully demonstrate an increase in their investments in and support of CDFIs or in their own lending, investing, or service activities in the most economically distressed communities. Organizations that receive awards must then reinvest that money back into distressed communities. Under the program, Citizens Trust Bank received an award of \$227,282 in 2016; \$233,389 in 2017; and \$106,844 in 2018.

No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a "Satisfactory" CRA rating at its previous evaluation dated March 21, 2016, conducted by the Federal Reserve Bank of Atlanta using the Intermediate Small Institution Examination Procedures.

Branch Offices

Citizens Trust Bank operates eight full-service banking offices: five in the Atlanta area; one in Columbus, Georgia; one in Birmingham; and one in Eutaw, Alabama. In addition to the ATMs located at all eight banking offices, the bank operates three standalone ATMs in the Atlanta area. The bank closed two banking offices in the Atlanta area in 2017.

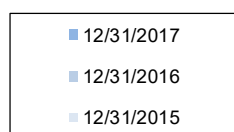
Loan Portfolio

The following chart shows the composition of the loan portfolio according to the Consolidated Reports of Condition and Income (Call Report).

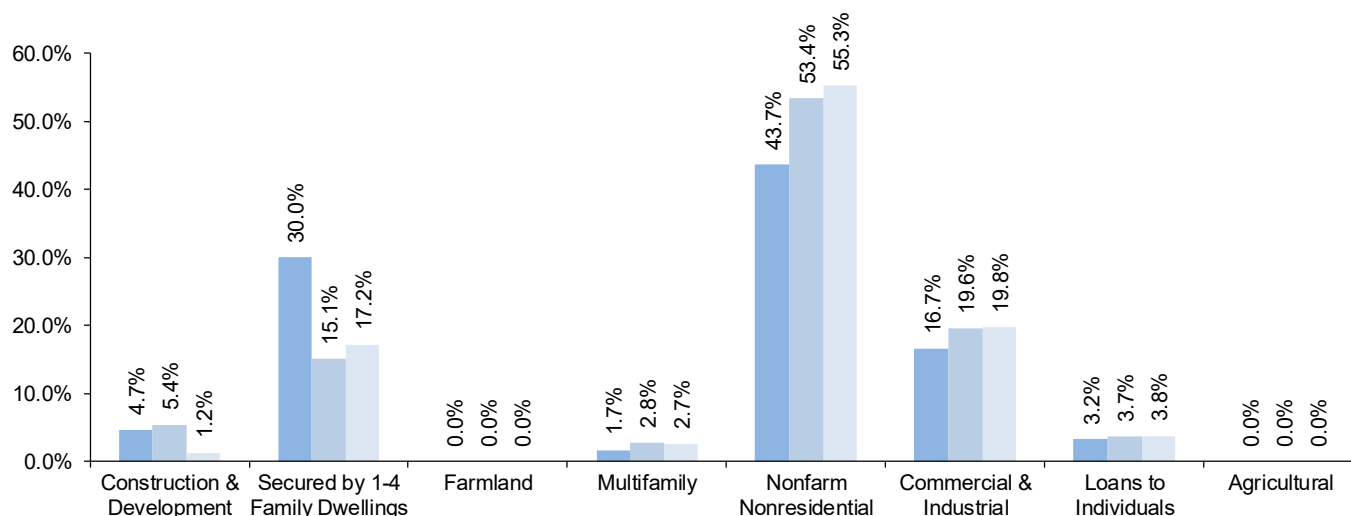
COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2017		12/31/2016		12/31/2015	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	11,166	4.7%	10,787	5.4%	2,220	1.2%
Secured by One- to Four- Family Dwellings	71,098	30.0%	30,142	15.1%	31,096	17.2%
Other Real Estate: Farmland	0	0.0%	0	0.0%	0	0.0%
Multifamily	3,940	1.7%	5,597	2.8%	4,829	2.7%
Nonfarm nonresidential	103,426	43.7%	106,724	53.4%	99,656	55.3%
Commercial and Industrial	39,424	16.7%	39,203	19.6%	35,701	19.8%
Loans to Individuals	7,688	3.2%	7,377	3.7%	6,802	3.8%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
Total	\$236,742	100.00%	\$199,830	100.00%	\$180,304	100.00%

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

Over the review period, the loan portfolio has shown a large increase in the volume of loans secured by one- to four-family dwellings. Although the proportion of the portfolio secured by nonfarm nonresidential property (commercial real estate) has declined, the bank remains primarily focused on commercial lending as indicated by the share of the portfolio made up of commercial real estate and commercial and industrial loans shown in the table above. As of December 31, 2017, loans secured by nonfarm nonresidential property made up the largest percentage of the loan portfolio at 43.7 percent of total loans, followed by loans secured by one- to four-family dwellings at 30.0 percent and commercial and industrial loans at 16.7 percent. Total loans increased by 31.3 percent over the period shown. The following chart illustrates the changes in the loan portfolio.



Loan Portfolio Trend



Credit Products

The bank offers the following types of credit products: personal loans (including installment loans, auto loans, secured and unsecured lines of credit, home equity lines of credit, and credit cards), residential mortgages (including conventional, FHA, VA, USDA, and jumbo mortgage loans), and commercial loans (including lines of credit, vehicle/equipment loans, commercial mortgages, SBA loans, and credit cards).

The bank offers a special loan program – Community Relief Loans – in its Eutaw, Alabama market. The product is a small dollar (\$500 - \$1,550) unsecured loan available to borrowers in immediate need of funds who reside in Greene County or Hale County, Alabama, which have been designated as persistent poverty counties.¹ The product is offered to address a need identified in the Eutaw market for an alternative to payday loans. This program follows guidelines set by the FDIC's Affordable Small Dollar Loan Pilot Program.

In 2012, Citizens Trust Bank was named one of the first approved lenders in the State Small Business Credit Initiative (SSBCI) program in both Georgia and Alabama. The SSBCI was created and federally funded to strengthen state lending programs that support small businesses and manufacturers. The programs are intended to provide access to capital to small businesses and to small businesses in underserved markets (including low- and moderate-income, minority, and other underserved communities and women- and minority-owned small businesses). Participation in the loan program encourages the spirit of entrepreneurship, private lending, job expansion, and neighborhood revitalization for economic growth in the state.

Other Products

Citizens Trust Bank developed a checking account product – the CHOICE account – to address the growing population of unbanked and underbanked consumers in its markets and to help them establish credible banking relationships and have an alternative to high check cashing fees. This product is consistent with the FDIC's initiative to expand banking to the unbanked and underbanked populations. The account is check-less, allows only cash deposits, and offers options including online banking, bill payments, ATM services, money transfers, and debit card access.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

Citizens Trust Bank's overall performance rating for the lending test is satisfactory. The bank's loan-to-deposit ratio is reasonable. The lending test included an analysis of small business loans originated from January 1, 2015, through December 31, 2017. A majority of the loans were originated inside the assessment areas. The geographic distribution of loans and the distribution of loans by business revenue size are reasonable. Performance context information was considered in evaluating the bank's lending performance, such as factors related to competition, demographics, economic conditions, business strategy, and opportunities. Details on the geographic and borrower distribution of the small business loans can be found in the full-scope assessment area sections of this report.

Loan-to-Deposit Ratio

The bank's net average loan-to-deposit ratio for the 12 quarters ending December 31, 2018, was 63.6 percent. The loan-to-deposit ratio ranged from a low of 55.1 percent as of March 31, 2016, to a high of 74.4 percent as of December 31, 2018, and shows an increasing trend. The bank's average loan-to-deposit ratio was compared with the average loan-to-deposit ratios of 12 other financial institutions of comparable asset size located in the bank's assessment areas. The average loan-to-deposit ratios for these institutions ranged from 51.5 percent to 104.5 percent. Citizens Trust Bank's loan-to-deposit ratio is considered reasonable given the bank's size, financial condition, and assessment area credit needs and opportunities.

¹ A persistent poverty county is defined as any county that has had 20 percent or more of its population living in poverty over the past 30 years as measured by the U.S. Census Bureau.

Assessment Area Concentration

The bank originated a majority of its small business loans to businesses located within the bank's assessment areas. As can be seen in the following table, 73.5 percent of the small business loans, and 53.6 percent of the dollars associated with these loans, were made inside the bank's assessment areas, indicating the bank's willingness to originate loans that meet the credit needs of its assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Small Business	119	73.5	\$51,313	53.6	43	26.5	\$44,388	46.4
Total Small Bus. related	119	73.5	\$51,313	53.6	43	26.5	\$44,388	46.4
TOTAL LOANS	119	73.5	\$51,313	53.6	43	26.5	\$44,388	46.4

Note: Affiliate loans not included

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business loans was compared to available demographic information. Performance context issues were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.

Lending to Businesses of Different Sizes

For this analysis, the distribution of small business loans across business revenue sizes was compared to available demographic information. Performance context issues were taken into consideration. Considering all of these factors, the bank's distribution of loans reflects reasonable penetration among businesses of different sizes.

COMMUNITY DEVELOPMENT TEST

Citizens Trust Bank's rating for the community development test is outstanding. The bank demonstrated excellent responsiveness to its assessment areas' community development needs through a combination of loans, investments, and services, considering the bank's capacity and the availability of opportunities in the assessment areas. In evaluating community development performance, consideration was given also to the level of competition in the assessment areas. The bank has greater capacity and opportunity for community development activities in the Atlanta assessment area as compared to the other three assessment areas.

During the review period, Citizens Trust Bank made 14 community development loans totaling approximately \$35.7 million, primarily in the Atlanta assessment area. Several of the loans contributed to the revitalization or stabilization of areas designated by the City of Atlanta as target areas for revitalization, with goals such as creating jobs, increasing economic activity, and spurring community infrastructure. Two loans made in Birmingham were responsive to the City's energy efficiency and neighborhood revitalization efforts. Loans in Eutaw allowed for continuous operation of the only hospital in the county. Other loans led to the creation of jobs for low- and moderate-income individuals and facilitated the creation of an entrepreneurship center that will help create new jobs and provide space to emerging entrepreneurial companies. Still other loans will facilitate provision of community services such as a food pantry, clothing bank, and at-risk youth programs in low-income areas.

The bank made contributions totaling \$21,000 to provide training materials for homeowner workshops and financial literacy courses and maintained a prior period investment of approximately \$77,200 in a CDFI credit union. In addition, bank staff contributed 431 hours of qualified community development services that benefited low- and moderate-income individuals and small businesses in the assessment areas. Activities included service on the boards or loan committee of organizations dedicated to revitalization or stabilization efforts and organizations that provide assistance to small businesses or low-income individuals. Bank staff also conducted home buying seminars and homeowners workshops and provided financial literacy training to low- and moderate-income students.

The bank's community development activities are discussed in more detail in the individual assessment area sections.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

STATE – GEORGIA

CRA RATING FOR GEORGIA: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

Major factors supporting the institution's rating include the following:

- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of lending reflects reasonable penetration among businesses of different sizes.
- The bank demonstrates excellent responsiveness to community development needs in its assessment areas through community development loans, qualified investments or contributions, and community development services, considering the bank's capacity and the availability of community development opportunities in the assessment areas.

SCOPE OF EXAMINATION

Citizens Trust Bank has two assessment areas in Georgia: the Atlanta assessment area and the Columbus assessment area. The Atlanta assessment area was evaluated using full-scope examination procedures, and the Columbus assessment area was evaluated using limited-scope procedures. The time periods covered and the loan products reviewed were the same as those discussed in the Institution section of this report. The lending test included an analysis of small business loans originated from January 1, 2015, through December 31, 2017. For the community development test, the examination covered community development loans, qualified investments, and community development services from January 1, 2016, through December 31, 2018.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

Citizens Trust Bank operates six of its eight branch offices in Georgia. As of June 30, 2017, the bank had \$286.5 million in deposits in Georgia, accounting for 81.6 percent of its total deposits. Of the bank's small business loans inside its four assessment areas during the review period, 84.9 percent, by number, were originated in the Georgia assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

LENDING TEST

The bank's lending performance in Georgia is satisfactory. The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment areas. The distribution of loans reflects reasonable penetration among businesses of different sizes.

During the review period, Citizens Trust Bank originated 101 small business loans in the two Georgia assessment areas. Because all but one of the loans were made in the Atlanta assessment area, the rating for Georgia is based on performance in the Atlanta full-scope assessment area. Performance in the Columbus limited-scope assessment area was not consistent with the bank's performance in the full-scope assessment area but this did not impact the overall rating for the state.

COMMUNITY DEVELOPMENT TEST

The community development test rating for Georgia is outstanding. Considering the bank's asset size, capacity, and the availability of community development opportunities in the assessment area, the bank demonstrates excellent responsiveness to community development needs through a combination of community development loans, qualified investments, and community development services.

During the review period, Citizens Trust Bank made 10 community development loans totaling approximately \$28.6 million; all of the loans were in the Atlanta assessment area. The bank made qualified contributions totaling approximately \$17,800, primarily in the Atlanta assessment area. Bank staff contributed 233 hours of qualified community development services benefiting the Georgia assessment areas. Because most of the community development activities took place in the Atlanta assessment area, the rating for Georgia is based on performance in the Atlanta full-scope assessment area. Performance in the Columbus limited-scope assessment area was not consistent with the bank's performance in the full-scope assessment area but this did not impact the overall rating for the state.

METROPOLITAN AREA – ATLANTA, GEORGIA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ATLANTA ASSESSMENT AREA

Overview

The Atlanta assessment area has not changed since the previous examination and consists of Clayton, DeKalb, Fayette, Fulton, Gwinnett, Henry, and Rockdale counties, which are 7 of the 29 counties that make up the Atlanta-Sandy Springs-Roswell, Georgia MSA. The bank closed two branches in the assessment area in 2017 and currently operates five full-service banking offices with ATMs and three standalone ATMs in the assessment area.

Population and Income Characteristics

The 2018 population of the assessment area was estimated to be 3,458,341. Of the seven counties, Fulton, Gwinnett, and DeKalb contain the most residents, and Fulton County is the most populous county in the state. All counties in the assessment area gained population between 2010 and 2018, with Gwinnett and Fulton counties experiencing the largest percentage gains.²

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the relevant area. The following table sets forth the estimated median family income for 2015 through 2017 for the Atlanta MSA. The table also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

Borrower Income Levels
Atlanta-Sandy Springs-Roswell, GA MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2015	\$70,700	0	- \$35,349	\$35,350	- \$56,559	\$56,560	- \$84,839	\$84,840	- & above
2016	\$67,200	0	- \$33,599	\$33,600	- \$53,759	\$53,760	- \$80,639	\$80,640	- & above
2017	\$69,200	0	- \$34,599	\$34,600	- \$55,359	\$55,360	- \$83,039	\$83,040	- & above

The estimated median family income in the MSA dropped from 2015 to 2016—from \$70,700 to \$67,200—and then increased in 2017 to \$69,200, which was still below the 2015 figure. The median family income varies among the counties in the assessment area, from a high of \$91,077 in Fayette County to a low of \$45,702 in Clayton County.

According to 2017 census data, 738,410 families lived in the Atlanta assessment area. Of those families, 24.4 percent were low-income, 16.6 percent were moderate-income, 17.6 percent were middle-income, and 41.3 percent were upper-income. Of the total families, 13.2 percent had incomes below the poverty level, which was slightly higher than the MSA poverty rate of 12.0 percent.

² “QuickFacts.” U.S. Census Bureau, n.d. Web. 28 May 2019. <<https://www.census.gov/quickfacts>>.

Poverty levels in the individual counties in the assessment area illustrate the area's economic diversity, and financial instability is a concern throughout parts of the area. According to 2017 census data, 21.2 percent of families in Clayton County lived below the poverty level compared to 6.7 percent of families in Fayette County. For the five-year period ending in 2017, 29.3 percent of families in Clayton County used food stamps, an indicator of financial distress, while only 5.1 percent of families in Fayette County used food stamps.³

Assessment Area Demographics

The following tables provide demographic characteristics of the assessment area used to analyze the bank's lending performance. The first table is based on 2016 FFIEC census data⁴ along with 2016 Dun & Bradstreet (D&B) information and is used for the analysis of 2015–2016 lending performance. The second table is based on 2017 FFIEC census data⁵ and 2017 D&B information and is used for analysis of 2017 lending performance.

The release of the 2017 FFIEC census data resulted in the reclassification of the income level of several census tracts. Although the total number of census tracts in the assessment area remained the same, the number of low-income tracts increased from 84 to 88; moderate-income tracts increased from 142 to 158; middle-income tracts decreased from 161 to 132; upper-income tracts increased from 180 to 186; and the number of tracts with unknown income levels increased from 5 to 8. According to the 2017 data, 43.0 percent of the tracts were low- or moderate-income.

³ "Atlanta assessment area (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*, n.d. Web. 29 May 2019. <<https://www.policymap.com/>>.

⁴ The 2016 FFIEC census data is derived from the 2010 census data and the 2006–2010 American Community Survey (ACS) five-year estimates.

⁵ The 2017 FFIEC census data is derived from the 2011–2015 ACS five-year estimates.

Combined Demographics Report

Assessment Area: GA Atlanta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	84	14.7	59,161	8.3	19,027	32.2	162,086	22.8
Moderate-income	142	24.8	157,477	22.1	26,286	16.7	119,695	16.8
Middle-income	161	28.1	241,876	34	19,273	8	132,270	18.6
Upper-income	180	31.5	253,800	35.6	9,697	3.8	298,263	41.9
Unknown-income	5	0.9	0	0	0	0	0	0
Total Assessment Area	572	100.0	712,314	100.0	74,283	10.4	712,314	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	139,565	30,964	4.4	22.2	76,279	54.7	32,322	23.2
Moderate-income	309,563	128,054	18.3	41.4	129,189	41.7	52,320	16.9
Middle-income	400,168	251,785	36	62.9	102,805	25.7	45,578	11.4
Upper-income	420,434	287,999	41.2	68.5	94,684	22.5	37,751	9
Unknown-income	33	0	0	0	33	100	0	0
Total Assessment Area	1,269,763	698,802	100.0	55.0	402,990	31.7	167,971	13.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	11,936	6.4	10,602	6.2	1,232	8.8	102	7.3
Moderate-income	36,724	19.6	33,368	19.4	3,112	22.2	244	17.4
Middle-income	59,187	31.5	55,188	32	3,634	25.9	365	26
Upper-income	79,829	42.5	73,108	42.4	6,027	42.9	694	49.4
Unknown-income	130	0.1	98	0.1	31	0.2	1	0.1
Total Assessment Area	187,806	100.0	172,364	100.0	14,036	100.0	1,406	100.0
	Percentage of Total Businesses:			91.8		7.5		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	31	5.1	28	4.8	3	17.6	0	0
Moderate-income	65	10.8	63	10.7	2	11.8	0	0
Middle-income	222	36.8	214	36.5	8	47.1	0	0
Upper-income	283	46.9	281	47.9	2	11.8	0	0
Unknown-income	3	0.5	1	0.2	2	11.8	0	0
Total Assessment Area	604	100.0	587	100.0	17	100.0	0	.0
	Percentage of Total Farms:			97.2		2.8		.0

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area: GA Atlanta

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	88	15.4	66,956	9.1	24,206	36.2	180,502	24.4
Moderate-income	158	27.6	190,030	25.7	38,712	20.4	122,896	16.6
Middle-income	132	23.1	218,816	29.6	21,204	9.7	129,752	17.6
Upper-income	186	32.5	262,346	35.5	12,871	4.9	305,260	41.3
Unknown-income	8	1.4	262	0	93	35.5	0	0
Total Assessment Area	572	100.0	738,410	100.0	97,086	13.1	738,410	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	156,113	33,020	4.9	21.2	90,479	58	32,614	20.9
Moderate-income	359,539	144,981	21.4	40.3	163,426	45.5	51,132	14.2
Middle-income	341,153	213,473	31.6	62.6	93,804	27.5	33,876	9.9
Upper-income	444,309	284,282	42.1	64	122,865	27.7	37,162	8.4
Unknown-income	2,621	186	0	7.1	2,086	79.6	349	13.3
Total Assessment Area	1,303,735	675,942	100.0	51.8	472,660	36.3	155,133	11.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	11,572	6.9	10,414	6.8	1,085	7.8	73	5.8
Moderate-income	37,387	22.3	33,882	22.2	3,272	23.5	233	18.6
Middle-income	43,938	26.2	40,927	26.8	2,744	19.7	267	21.3
Upper-income	73,416	43.8	66,206	43.4	6,549	47	661	52.7
Unknown-income	1,359	0.8	1,044	0.7	295	2.1	20	1.6
Total Assessment Area	167,672	100.0	152,473	100.0	13,945	100.0	1,254	100.0
	Percentage of Total Businesses:			90.9		8.3		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	26	4.8	25	4.7	1	6.3	0	0
Moderate-income	83	15.3	82	15.6	1	6.3	0	0
Middle-income	155	28.5	150	28.5	5	31.3	0	0
Upper-income	273	50.3	267	50.7	6	37.5	0	0
Unknown-income	6	1.1	3	0.6	3	18.8	0	0
Total Assessment Area	543	100.0	527	100.0	16	100.0	0	.0
	Percentage of Total Farms:			97.1		2.9		.0

2017 FFIEC Census Data and 2017 D&B Information

Housing Characteristics

The 2017 FFIEC census data shows 1,303,735 housing units in the assessment area. Of the total units, 51.8 percent were owner-occupied, 36.3 percent were rental units, and 11.9 percent were vacant. In low-income tracts, more than half of the housing units consisted of rental units, which together with a relatively high percentage of vacant units, indicates reduced opportunities for mortgage originations in these geographies.

The median age of the housing stock in the assessment area was 33 years, although older at 43 years in low-income tracts. The housing stock was newest in Henry County, with a median age of 17 years, and oldest in DeKalb County at 35 years. Housing in the assessment area is generally older than that in the entire Atlanta MSA, where the median age was 25 years.

The median housing value in the assessment area was \$169,555, which was higher than the median housing value for both the state of Georgia at \$148,100 and the Atlanta MSA at \$168,085. The median housing value was highest in Fulton County (\$241,300) and lowest in Clayton County (\$85,200). Affordability ratios from the census data show that housing is slightly less affordable in the assessment area than in both the MSA and the state. Housing is most affordable in Clayton County and least affordable in Fulton County.

The multifamily housing market in the Atlanta metro area is thriving with increased construction, rising rents, and declining vacancy rates. As rents continue to rise, it will be a challenge for low- and moderate-income renters to find affordable housing options in counties closest to the urban core and job centers. Renters are currently struggling with high housing costs in several counties in the assessment area, with more than 50.0 percent of renters in Clayton, DeKalb, Gwinnett, and Rockdale counties considered housing cost-burdened.⁶ Rental households are considered cost-burdened if their rental costs account for more than 30.0 percent of household income.

Economic Conditions

Metro Atlanta has experienced significant job growth since the recession; the area is now the 9th largest labor market in the country.⁷ The metropolitan area added an average of 61,850 jobs per year from the end of 2010 through 2015, representing a 2.6 percent average annual increase.⁸ Every industry sector added jobs except for the information sector, and the greatest growth occurred in the wholesale and retail trade, and the professional and business services sectors. Excluding government, the region's largest industry sectors are professional and business services, wholesale and retail trade, and education and health services.⁹ Delta Airlines, Emory University/Emory Healthcare, The Home Depot, WellStar Health System, AT&T, UPS, Northside Hospital, and Piedmont Healthcare are among the top employers in the region.¹⁰ Within the assessment area, Fulton, Gwinnett, and DeKalb counties are the largest employment centers.¹¹

Small businesses are vital to the metro Atlanta economy. According to 2017 D&B information, there were 167,672 businesses in the assessment area, 90.9 percent of which had total annual revenues of \$1 million or less and were therefore considered to be small businesses. Between 2014 and 2016, small business lending (loans in

⁶ "Atlanta assessment area (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*, n.d. Web. 29 May 2019. <<https://www.policymap.com/>>.

⁷ "Metro Atlanta Overview." Georgia Power Community and Economic Development, Nov. 2017. Web. 5 Feb. 2019. <<https://www.selectgeorgia.com/resources/publications/metro-atlanta-overview/>>.

⁸ Blount, Casey M. "HUD PD&R Housing Market Profiles: Atlanta-Sandy Springs-Roswell, Georgia." Office of Policy Development and Research (PD&R), U.S. Department of Housing and Urban Development, 1 May 2016. Web. 5 Feb. 2019. <<https://www.huduser.gov/portal/periodicals/USHMC/reg//AtlantaGA-HMP-June16.pdf>>.

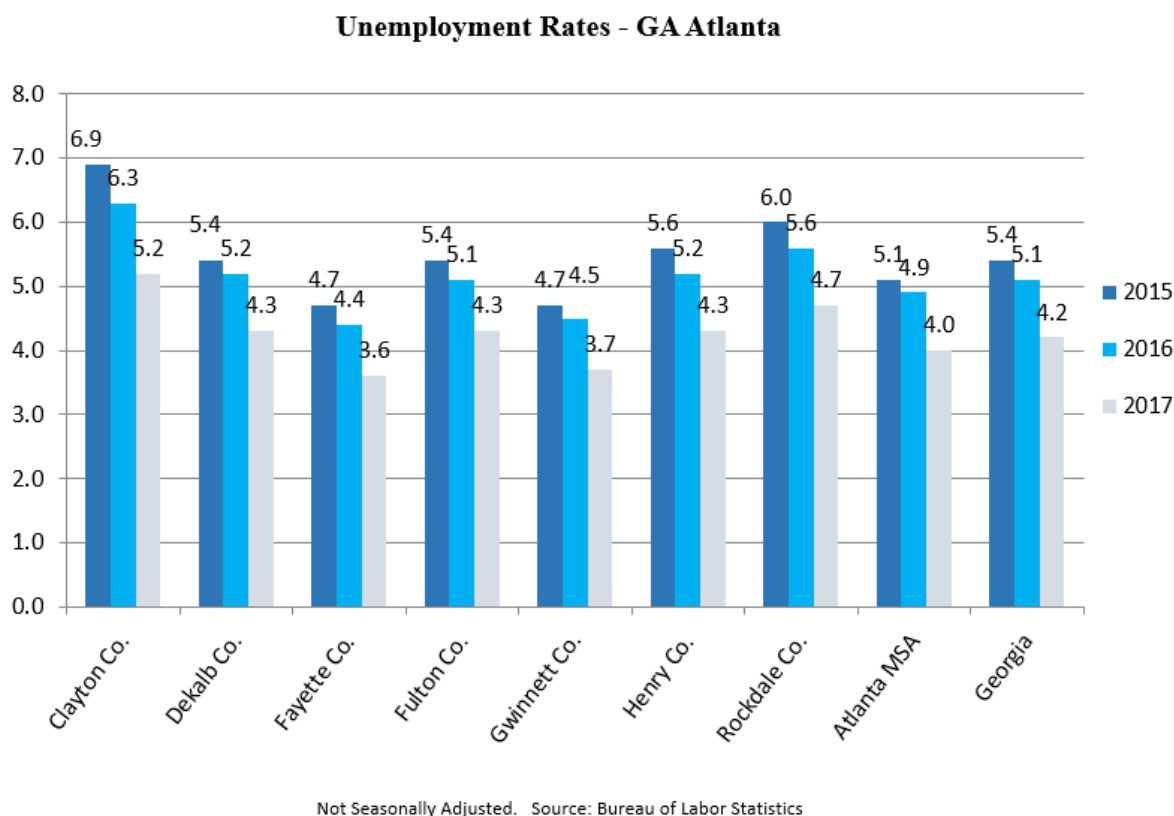
⁹ Ibid.

¹⁰ "Metro Atlanta Overview." Georgia Power Community and Economic Development, Nov. 2017. Web. 5 Feb. 2019. <<https://www.selectgeorgia.com/resources/publications/metro-atlanta-overview/>>.

¹¹ Georgia Department of Labor, n.d. Web. 5 Feb. 2019. <<https://explorer.gdol.ga.gov/vosnet/mis/current/laborforce.pdf>>.

amounts of \$1 million or less) increased by 23.7 percent, with 82,672 loans made in 2016. During this same period, loans made to businesses with revenues of \$1 million or less increased by 28.9 percent, representing 55.0 percent of total small business loans in 2016. The number of loans per year made to small businesses has been increasing since hitting a low in 2010 but is still well below the peak level in 2007.¹²

The following chart shows the unemployment rates for 2015 through 2017 for the seven counties in the bank's assessment area, the Atlanta MSA, and the state of Georgia. The unemployment rate has been falling in all counties since peaking in 2010, although some counties still face significant challenges. For 2017, five of the counties in the assessment area had an unemployment rate higher than the statewide unemployment rate. Clayton County continues to have the highest unemployment rate, while the unemployment rates are lowest in Fayette and Gwinnett counties.



Competition

Atlanta has a highly competitive banking market dominated by money-center and large regional banks. According to the FDIC Deposit Market Share Report as of June 30, 2017, 66 financial institutions operated 719 offices inside the assessment area. Citizens Trust Bank ranked 32nd in deposit market share with \$260.1 million, or 0.2 percent of total deposits. With 108 offices in the assessment area, SunTrust Bank held the largest deposit market share with 33.1 percent followed by Bank of America (92 offices) with 20.8 percent, and Wells Fargo Bank (126 offices) with 18.3 percent. The top three banks held almost three-quarters of the deposits in the assessment area.

¹² "Atlanta assessment area (CRA data)." *GIS Mapping and Geographic Information System Data*, n.d. Web. 29 May 2019. <<https://www.policymap.com/>>.

Credit and Community Development Needs

Contacts made with individuals familiar with the assessment area and community development activities were used to help examiners better understand local community development and economic conditions. These individuals discussed the various opportunities and challenges in the area and how financial institutions can be responsive to local community development needs through lending, investment, and/or service activities. Numerous opportunities are available in the assessment area for banks to partner with nonprofit organizations, developers, and others to engage in a wide range of community development activities, including affordable housing development, workforce development, neighborhood revitalization, small business lending, financial education, or the provision of technical assistance to nonprofit organizations and their constituencies.

A community contact with an organization that facilitates small business lending identified the lack of business knowledge and savvy as the predominant challenge facing small businesses in the market. Although the economy is recovering, small business owners often lack awareness of the availability of resources and loan products. Many small businesses also need training on creating robust business plans or grasping certain business concepts, such as profit and loss statements. Business owners are distressed over not meeting banks' application, qualification, or collateralization standards for financing, and some distrust banks. The contact believes that financial education and credit coaching are the highest priority needs that must be met for small businesses to be sustainable. Banks can support nonprofits that work with small businesses by providing funds to help them expand their reach or services or by lending debt capital to create loan pools for small business financing.

Another contact representing an organization that provides credit and other services to small businesses that have difficulty obtaining loans from traditional lenders cited the lack of financial education and access to bank branch locations and credit as major challenges for small businesses. Many small business owners do not understand the importance of good credit and that their personal credit is essential for them to obtain loans for their businesses. The contact voiced concerns over the prevalence of payday lenders in neighborhoods with no bank branches and also noted distrust of banks among many of the organization's clients. Nonprofits that provide services to businesses that do not meet banks' minimum credit requirements would benefit from referrals from banks, but banks are often reluctant to do so, according to the contact.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ATLANTA ASSESSMENT AREA

LENDING TEST

Overview

The bank's lending performance is satisfactory. The review included 100 small business loans made in the assessment area. Loans made in 2015 and 2016 were analyzed using 2016 FFIEC census data and 2016 D&B information, while loans made in 2017 were analyzed using 2017 FFIEC census data and 2017 D&B information. Therefore, in the discussions of the geographic distribution of loans and lending to businesses of different sizes, separate tables are presented depicting lending in 2015 and 2016 and lending in 2017.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business loans was compared to available demographic information. Performance context issues were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects reasonable dispersion throughout the assessment area.

The following table shows the geographic distribution of small business loans made in the Atlanta assessment area in 2015 and 2016.

Geographic Distribution of Small Business Loans

Assessment Area: GA Atlanta

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	8	15.7%	\$6,757	23.1%	6.2%
Moderate	8	15.7%	\$2,323	7.9%	19.4%
Middle	16	31.4%	\$7,986	27.3%	32.0%
Upper	18	35.3%	\$9,195	31.4%	42.4%
Unknown	1	2.0%	\$3,000	10.3%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>\$29,261</i>	<i>100.0%</i>	<i>100.0%</i>

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

As can be seen in the table, the proportion of the bank's loans made in low-income tracts (15.7 percent) exceeded the proportion of small businesses located in those tracts (6.2 percent). The proportion of loans made in moderate-income census tracts, also at 15.7 percent, was slightly less than the proportion of small businesses located in those tracts, at 19.4 percent.

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

Geographic Distribution of Small Business Loans

Assessment Area: GA Atlanta

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	9	18.4%	\$3,506	29.1%	6.8%
Moderate	5	10.2%	\$952	7.9%	22.2%
Middle	14	28.6%	\$3,189	26.5%	26.8%
Upper	21	42.9%	\$4,400	36.5%	43.4%
Unknown	0	0.0%	\$0	0.0%	0.7%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>49</i>	<i>100.0%</i>	<i>\$12,047</i>	<i>100.0%</i>	<i>100.0%</i>

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

The proportion of the bank's loans made in low-income tracts (18.4 percent) exceeded the proportion of small businesses located in those tracts (6.8 percent). However, at 10.2 percent, the proportion of loans made in moderate-income census tracts was less than the proportion of small businesses located in those tracts, at 22.2 percent.

Lending to Businesses of Different Sizes

For this analysis, the distribution of small business loans across business revenue sizes was compared to demographic information. Performance context issues were taken into consideration. Considering all of these factors, the bank's distribution of loans reflects reasonable penetration among businesses of different sizes.

The following table shows, by business revenue and loan size, the number and dollar volume of small business loans made in the Atlanta assessment area in 2015 and 2016.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: GA Atlanta

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2015, 2016				
		Bank				Total Businesses
		Count		\$ (000s)		%
		#	%	\$	%	
BUSINESS REVENUE	\$1million or Less	35	68.6%	\$13,635	46.6%	91.8%
	Over \$1 Million	15	29.4%	\$14,351	49.0%	7.5%
	<i>Total Rev. available</i>	50	98.0%	\$27,986	95.6%	99.3%
	Rev. Not Known	1	2.0%	\$1,275	4.4%	0.7%
	<i>Total</i>	51	100.0%	\$29,261	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	20	39.2%	\$688	2.4%	
	\$100,001 - \$250,000	11	21.6%	\$2,013	6.9%	
	\$250,001 - \$1 Million	12	23.5%	\$6,040	20.6%	
	Over \$1 Million	8	15.7%	\$20,520	70.1%	
	<i>Total</i>	51	100.0%	\$29,261	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	13	37.1%	\$517	3.8%	
	\$100,001 - \$250,000	8	22.9%	\$1,453	10.7%	
	\$250,001 - \$1 Million	12	34.3%	\$6,040	44.3%	
	Over \$1 Million	2	5.7%	\$5,625	41.3%	
	<i>Total</i>	35	100.0%	\$13,635	100.0%	

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

Of the 51 small business loans included in the analysis, 35 (68.6 percent) were extended to businesses with revenues of \$1 million or less, which was less than the percentage of businesses in the assessment area that were considered small businesses (91.8 percent). While a direct comparison is not used in this evaluation, a review of aggregate data from CRA reporters in the assessment area shows that the bank's performance in lending to small businesses compares favorably to the other lenders. The bank made 60.8 percent of its small business loans in amounts of \$250,000 or less, which represent loan amounts typically requested by small businesses.

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: GA Atlanta

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2017				
		Bank		Total		Businesses
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	37	75.5%	\$8,907	73.9%	90.9%
	Over \$1 Million	12	24.5%	\$3,139	26.1%	8.3%
	<i>Total Rev. available</i>	49	100.0%	\$12,047	100.0%	99.2%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.7%
	<i>Total</i>	49	100.0%	\$12,047	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	30	61.2%	\$1,064	8.8%	
	\$100,001 - \$250,000	9	18.4%	\$1,392	11.6%	
	\$250,001 - \$1 Million	8	16.3%	\$4,694	39.0%	
	Over \$1 Million	2	4.1%	\$4,897	40.7%	
	<i>Total</i>	49	100.0%	\$12,047	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	19	51.4%	\$822	9.2%	
	\$100,001 - \$250,000	9	24.3%	\$1,392	15.6%	
	\$250,001 - \$1 Million	8	21.6%	\$4,694	52.7%	
	Over \$1 Million	1	2.7%	\$2,000	22.5%	
	<i>Total</i>	37	100.0%	\$8,907	100.0%	

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

Of the 49 small business loans included in the analysis, 37 (75.5 percent) were extended to businesses with revenues of \$1 million or less, which was less than the 90.9 percent of businesses in the assessment area that are considered small businesses. Again, the bank's performance in lending to small businesses compares favorably to CRA reporters in the assessment area. The bank made 79.6 percent of its small business loans in amounts of \$250,000 or less, which represent loan amounts typically requested by small businesses.

COMMUNITY DEVELOPMENT TEST

The bank's community development performance is outstanding. Considering the bank's asset size, capacity, and the availability of community development opportunities in the assessment area, the bank demonstrates excellent responsiveness to community development needs through a combination of community development loans, qualified investments or contributions, and community development services.

During the review period, Citizens Trust Bank made 10 community development loans totaling approximately \$28.6 million in the Atlanta assessment area. Several of the loans contributed to the revitalization or stabilization of areas designated by the City of Atlanta as target areas for revitalization, with goals such as creating jobs, increasing economic activity, and spurring community infrastructure. Loan purposes included renovation of retail space; renovation of a hotel that will provide jobs to low- and moderate-income individuals and help stabilize the neighborhood; redevelopment of distressed property that will include residential, retail, and community amenities; and expansion of a church whose ministries and community activities include

providing health care facilities for low- and moderate-income individuals, a homeless shelter, and a food kitchen for low-income families. Loans contributing to economic development consisted of a loan involving the Georgia SSBCI program that financed the construction of a hotel that will create jobs for low- and moderate-income individuals and a loan that facilitated the creation of an entrepreneurship center that will help create new jobs and provide space to emerging entrepreneurial companies. For the latter loan, the bank was particularly flexible in putting together a deal that would allow the center to obtain a grant from the U.S. Department of Commerce. The bank also made two refinance loans to churches in low-income tracts that are heavily involved in providing community services such as a food pantry, clothing bank, addiction recovery programs, at-risk youth programs, and support of affordable housing. In a few cases, the bank sold participations in its loans, allowing it to make loans that were responsive to community development needs but that exceeded the bank's capacity.

The bank made contributions totaling approximately \$15,200 to provide training materials for homeowner workshops and financial literacy courses.

During the review period, bank staff used their financial and technical expertise to contribute 233 hours of qualified community development services by providing financial services that benefit low- and moderate-income individuals and small businesses in the assessment area. Bank staff provided financial expertise by conducting home buying seminars and homeowners workshops, providing financial literacy training to low- and moderate-income students, serving on an organization's small business loan committee, serving as the board treasurer for a nonprofit dedicated to revitalizing and stabilizing a neighborhood, and serving on the board of a nonprofit engaged in assisting inner-city youth from low-income families.

METROPOLITAN AREA – COLUMBUS, GEORGIA

LIMITED-SCOPE REVIEW

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBUS ASSESSMENT AREA

The assessment area consists of Muscogee County, Georgia, which is one of the five counties that make up the Columbus, Georgia-Alabama MSA. The assessment area has changed since the previous evaluation in that it no longer includes Russell County, Alabama. The bank operates one branch office with an ATM in the Columbus assessment area. According to the FDIC Deposit Market Share Report as of June 30, 2017, the bank had total deposits of \$26.4 million. With a deposit market share of 0.4 percent, Citizens Trust Bank was ranked 11th out of 13 financial institutions that operated in the assessment area. Synovus Bank dominated the market with 66.9 percent of deposits.

According to 2017 FFIEC census data, the assessment area contains 53 census tracts, of which 10 (18.9 percent) are low-income; 16 (30.2 percent) are moderate-income; 15 (28.3 percent) are middle-income; 11 (20.8 percent) are upper-income; and one (1.9 percent) has an unknown income level. Of the families in the assessment area, 41.2 percent are low- or moderate-income, and 15.8 percent live below the poverty level. Only slightly more than 43.0 percent of the housing units in the assessment area are owner-occupied, and there are more rental units than owner-occupied units. Of total businesses in the assessment area, 88.8 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Performance in the assessment area was evaluated and compared with the bank's performance in the state. Citizens Trust Bank has a small presence in the Columbus assessment area. The bank made only one small business loan in the assessment area during the review period. Regarding community development activities, the bank did not make any community development loans or provide any community development services during the review period. The bank made a contribution of approximately \$2,700 to provide training materials for financial literacy courses.

For the state of Georgia, Citizens Trust Bank received a satisfactory rating for the lending test and an outstanding rating for the community development test. Performance in the Columbus assessment area was inconsistent with the bank's performance in the state for both the lending test and the community development test. The bank's performance in the limited-scope assessment area did not change the overall state rating.

STATE – ALABAMA

CRA RATING FOR ALABAMA: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

Major factors supporting the institution's rating include the following:

- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of lending reflects excellent penetration among businesses of different sizes.
- The bank demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments or contributions, and community development services, considering the bank's capacity and the availability of community development opportunities in the assessment areas.

SCOPE OF EXAMINATION

Citizens Trust Bank has two assessment areas in Alabama: the Birmingham assessment area and the Eutaw assessment area. The Birmingham assessment area was evaluated using full-scope examination procedures, and the Eutaw assessment area was evaluated using limited-scope procedures. The time periods covered and the loan products reviewed were the same as those discussed in the Institution section of this report. The lending test included an analysis of small business loans originated from January 1, 2015, through December 31, 2017. For the community development test, the examination covered community development loans, qualified investments, and community development services from January 1, 2016, through December 31, 2018.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

Citizens Trust Bank operates two of its eight branch offices in Alabama. As of June 30, 2017, the bank had \$64.5 million in deposits in Alabama, accounting for 18.4 percent of its total deposits. Of the bank's small business loans inside its four assessment areas during the review period, 15.1 percent, by number, were originated in the Alabama assessment areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The bank's lending performance in Alabama is satisfactory. The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment areas. The distribution of loans reflects excellent penetration among businesses of different sizes.

During the review period, Citizens Trust Bank originated 18 small business loans in the two Alabama assessment areas. Because most of the loans were made in the Birmingham assessment area, the rating for Alabama is based on performance in the Birmingham full-scope assessment area. Performance in the Eutaw limited-scope assessment area was not consistent with the bank's performance in the full-scope assessment area but did not impact the overall rating for the state.

COMMUNITY DEVELOPMENT TEST

The community development test rating for Alabama is satisfactory. Considering the bank's asset size, capacity, and the availability of community development opportunities in the assessment area, the bank demonstrates adequate responsiveness to community development needs through a combination of community development loans, qualified investments, and community development services.

During the review period, Citizens Trust Bank made four community development loans totaling approximately \$7.1 million in the Alabama assessment areas. The dollar amounts were fairly evenly split between the two assessment areas. The bank made qualified contributions of approximately \$3,200 in the Alabama assessment areas and maintained a prior period investment of \$77,200 in the Eutaw assessment area. Bank staff contributed 198 hours of qualified community development services to community organizations serving the Birmingham assessment area. Performance in the Eutaw limited-scope assessment area was consistent with the bank's performance in the Birmingham full-scope assessment area.

METROPOLITAN AREA – BIRMINGHAM, ALABAMA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE BIRMINGHAM ASSESSMENT AREA

Overview

The Birmingham assessment area consists of Jefferson and Shelby counties, which are two of the seven counties that make up the Birmingham-Hoover, Alabama MSA. The bank operates one branch with an ATM in the Birmingham assessment area.

Population and Income Characteristics

The 2018 population of the assessment area was estimated to be 875,007. Jefferson County contains three-fourths of the assessment area population. Jefferson County is Alabama’s most populous county. Between 2010 and 2018, Shelby County experienced significant population growth of 10.4 percent, exceeding the state’s growth rate of 2.3 percent, while population growth was minimal in Jefferson County at 0.1 percent.¹³

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the relevant area. The following table sets forth the estimated median family income for 2015 through 2017 for the Birmingham MSA. The table also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

Borrower Income Levels Birmingham-Hoover, AL

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
2015	\$62,500	0	- \$31,249	\$31,250	- \$49,999	\$50,000	- \$74,999	\$75,000	- & above
2016	\$62,500	0	- \$31,249	\$31,250	- \$49,999	\$50,000	- \$74,999	\$75,000	- & above
2017	\$61,400	0	- \$30,699	\$30,700	- \$49,119	\$49,120	- \$73,679	\$73,680	- & above

The estimated median family income in the MSA was constant from 2015 to 2016 and then dropped in 2017. The median family income was higher in Shelby County (\$84,311) than in Jefferson County (\$60,367). The median family income in the city of Birmingham was \$41,185, indicating that the urban center of the region is where many of the community development opportunities may exist. The median income in Birmingham was lower than the median family income for the state of Alabama (\$55,341).

According to 2017 census data, 220,532 families lived in the Birmingham assessment area. Of those families, 23.1 percent were low-income, 15.0 percent were moderate-income, 17.6 percent were middle-income, and 44.4 percent were upper-income. Of the total families, 12.7 percent had incomes below the poverty level, which was slightly lower than the MSA poverty rate of 13.0 percent.

Poverty levels in the two counties in the assessment area further illustrate economic distinctions between the counties. According to 2017 census data, 15.0 percent of families in Jefferson County lived below the poverty level while only 5.6 percent of families in Shelby County lived in poverty.

¹³ “QuickFacts.” U.S. Census Bureau, n.d. Web. 28 May 2019. <<https://www.census.gov/quickfacts>>.

Assessment Area Demographics

The following tables provide demographic characteristics of the assessment area used to analyze the bank's lending performance. The first table is based on 2016 FFIEC census data¹⁴ along with 2016 D&B information and is used for the analysis of 2015–2016 lending performance. The second table is based on 2017 FFIEC census data¹⁵ and 2017 D&B information and is used for analysis of 2017 lending performance. The release of the 2017 FFIEC census data resulted in the reclassification of the income level of several census tracts. Although the total number of census tracts in the assessment area remained the same, the number of low-income tracts increased from 25 to 31; moderate-income tracts increased from 47 to 51; middle-income tracts decreased from 67 to 56; upper-income tracts remained the same at 71; and the number of tracts with unknown income levels increased from 1 to 2. As of the 2017 data, 38.9 percent of the tracts were low- or moderate-income.

¹⁴ The 2016 FFIEC census data is derived from the 2010 census data and the 2006–2010 American Community Survey (ACS) five-year estimates.

¹⁵ The 2017 FFIEC census data is derived from the 2011–2015 ACS five-year estimates.

Combined Demographics Report

Assessment Area: AL Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	25	11.8	17,911	8.1	5,928	33.1	46,278	21
Moderate-income	47	22.3	38,153	17.3	6,968	18.3	35,992	16.3
Middle-income	67	31.8	71,561	32.5	6,432	9	41,212	18.7
Upper-income	71	33.6	92,690	42.1	2,648	2.9	96,833	44
Unknown-income	1	0.5	0	0	0	0	0	0
Total Assessment Area	211	100.0	220,315	100.0	21,976	10.0	220,315	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	39,955	13,121	5.7	32.8	17,881	44.8	8,953	22.4
Moderate-income	76,732	34,336	14.8	44.7	28,346	36.9	14,050	18.3
Middle-income	122,026	78,838	34	64.6	29,804	24.4	13,384	11
Upper-income	140,230	105,486	45.5	75.2	24,388	17.4	10,356	7.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	378,943	231,781	100.0	61.2	100,419	26.5	46,743	12.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	3,377	9.2	2,808	8.6	545	13.8	24	7.9
Moderate-income	5,784	15.7	4,981	15.3	751	19.1	52	17
Middle-income	10,149	27.6	9,086	27.9	967	24.6	96	31.5
Upper-income	17,458	47.5	15,651	48.1	1,674	42.5	133	43.6
Unknown-income	7	0	7	0	0	0	0	0
Total Assessment Area	36,775	100.0	32,533	100.0	3,937	100.0	305	100.0
	Percentage of Total Businesses:			88.5		10.7		.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	0.5	1	0.5	0	0	0	0
Moderate-income	18	8.3	17	8.3	1	8.3	0	0
Middle-income	67	31	61	29.9	6	50	0	0
Upper-income	130	60.2	125	61.3	5	41.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	216	100.0	204	100.0	12	100.0	0	.0
	Percentage of Total Farms:			94.4		5.6		.0

Combined Demographics Report

Assessment Area: AL Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	31	14.7	21,614	9.8	8,559	39.6	50,843	23.1
Moderate-income	51	24.2	42,592	19.3	8,997	21.1	33,104	15
Middle-income	56	26.5	61,135	27.7	6,275	10.3	38,734	17.6
Upper-income	71	33.6	94,779	43	3,885	4.1	97,851	44.4
Unknown-income	2	0.9	412	0.2	343	83.3	0	0
Total Assessment Area	211	100.0	220,532	100.0	28,059	12.7	220,532	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	49,012	14,468	6.4	29.5	23,222	47.4	11,322	23.1
Moderate-income	86,600	39,710	17.7	45.9	30,911	35.7	15,979	18.5
Middle-income	104,006	64,784	28.9	62.3	27,266	26.2	11,956	11.5
Upper-income	145,402	105,408	47	72.5	29,389	20.2	10,605	7.3
Unknown-income	1,585	112	0	7.1	1,193	75.3	280	17.7
Total Assessment Area	386,605	224,482	100.0	58.1	111,981	29.0	50,142	13.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2,553	7.9	2,080	7.4	453	11.6	20	7
Moderate-income	5,808	18	4,964	17.7	777	19.9	67	23.5
Middle-income	8,402	26	7,311	26.1	1,018	26	73	25.6
Upper-income	15,006	46.5	13,307	47.4	1,576	40.3	123	43.2
Unknown-income	489	1.5	402	1.4	85	2.2	2	0.7
Total Assessment Area	32,258	100.0	28,064	100.0	3,909	100.0	285	100.0
	Percentage of Total Businesses:			87.0		12.1		.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	0.5	1	0.6	0	0	0	0
Moderate-income	18	9.5	17	9.6	1	8.3	0	0
Middle-income	48	25.3	42	23.6	6	50	0	0
Upper-income	123	64.7	118	66.3	5	41.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	190	100.0	178	100.0	12	100.0	0	.0
	Percentage of Total Farms:			93.7		6.3		.0

Housing Characteristics

The 2017 FFIEC census data shows 386,605 housing units in the assessment area. Of the total units, 58.1 percent were owner-occupied, 29.0 percent were rental units, and 13.0 percent were vacant. Jefferson County has higher proportions of rental and vacant units than Shelby County. In low-income tracts, almost half of the housing units consisted of rental units, which together with a relatively high percentage of vacant units, indicates reduced opportunities for mortgage originations in these geographies.

The median age of the housing stock in the assessment area was 44 years, although older at 60 years in low-income tracts. The housing stock was newer in Shelby County than in Jefferson County.

The median housing value in the assessment area was \$157,911, which was higher than the median housing value for both the state of Alabama at \$125,500 and the Birmingham MSA at \$146,184. The median housing value was higher in Shelby County than in Jefferson County. Affordability ratios from the census data show that housing is less affordable in the assessment area than in both the MSA and the state. Housing is more affordable in Shelby County than in Jefferson County.

Increasing the supply of affordable housing for a large segment of the Birmingham workforce is a concern in the region. The city's 2015–2019 Consolidated Plan indicated that the vast majority of households in Birmingham have a problem related to housing affordability. In Birmingham, half of renters are estimated to spend more than 30.0 percent of their income on housing.

Employment Statistics

Birmingham was historically a manufacturing-based economy driven by the iron and steel industry. The economy has gradually transitioned to a diversified service-based economy, with manufacturing making up only 7.2 percent of total employment in the region in 2016. The top employment sectors include wholesale and retail trade, government, education and health services, and professional and business services.¹⁶ The University of Alabama at Birmingham is the largest employer in the region with 23,000 employees. Other major employers include Regions Financial Corporation, St. Vincent's Health System, Children's of Alabama, and AT&T.¹⁷

Slow population growth and low educational attainment in the MSA have hindered job growth, according to Moody's Analytics.¹⁸ The economy is characterized by significant mid-wage work in several sectors, such as finance, health, and manufacturing, but a high percentage of jobs in low-skilled, low-wage sectors as well, namely retail trade and accommodation services.

Small businesses are vital to the Birmingham economy, and the entrepreneurial community is growing. According to 2017 D&B information, there were 32,258 businesses in the assessment area, 87.0 percent of which had total annual revenues of \$1 million or less and were therefore considered to be small businesses. The number of small business loans (loans in amounts of \$1 million or less) has been slowly increasing since hitting a low point in 2010, but fewer than half of the loans are made to firms with revenues of \$1 million or less.¹⁹

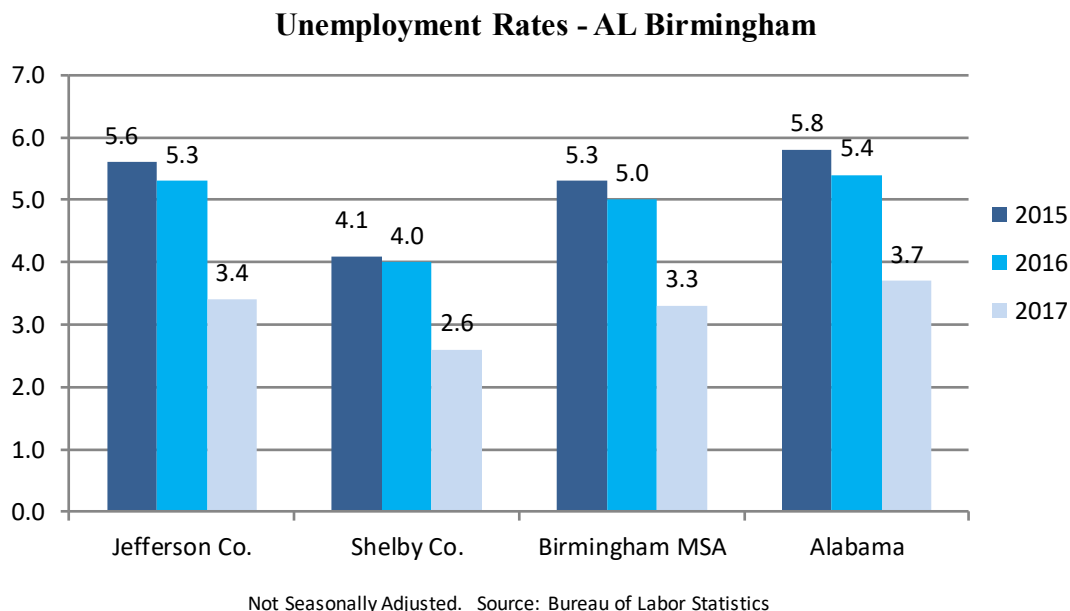
¹⁶ Precis U.S. Metro. Birmingham-Hoover AL. Moody's Analytics, Dec. 2017. Web. 5 Feb. 2019.
<<https://www.moodyanalytics.com>>.

¹⁷ "2017-18 Metropolitan Birmingham Major Employers." Birmingham Business Alliance, n.d. Web. 31 May 2019.
<<https://birminghambusinessalliance.com/major-employers>>.

¹⁸ Precis U.S. Metro. Birmingham-Hoover AL. Moody's Analytics, Feb. 2018. Web. 3 Apr. 2018.
<<https://www.moodyanalytics.com>>

¹⁹ "Birmingham assessment area (CRA data)." *GIS Mapping and Geographic Information System Data*, n.d. Web. 31 May 2019.
<<https://www.policymap.com/>>.

The following chart shows the unemployment rates for 2015 through 2017 for the two counties in the bank's assessment area, the Birmingham MSA, and the state of Alabama. The unemployment rate has been falling in both counties since peaking in 2009, and the unemployment rate in each county has remained below the statewide unemployment rate.



Competition

Financial institutions in the Birmingham assessment area include a number of community banks with competition from large regional and money-center banks. According to the FDIC Deposit Market Share Report as of June 30, 2017, 37 financial institutions operated 260 offices inside the assessment area. Citizens Trust Bank ranked 26th in deposit market share with \$54.7 million, or 0.2 percent of total deposits. With 65 offices in the assessment area, Regions Bank held the largest deposit market share with 31.3 percent followed by Compass Bank (26 offices) with 22.8 percent, and Wells Fargo Bank (34 offices) with 10.9 percent.

Credit and Community Development Needs

Contacts made with individuals familiar with the assessment area and community development activities were used to help examiners better understand local community development and economic conditions. These individuals discussed the various opportunities and challenges in the area and how financial institutions can be responsive to local community development needs. Numerous opportunities are available in the assessment area for banks to partner with nonprofit organizations, developers, and others to engage in a wide range of community development activities, including affordable housing development, workforce development, neighborhood revitalization, small business lending, financial education, or provision of technical assistance to nonprofit organizations and their constituencies.

According to a community contact representing an organization that provides assistance to small businesses, the Birmingham area has been slower to recover from the 2008 recession than most large metropolitan areas in the South. Area industries are heavily reliant on workers without a college education, and those workers are vulnerable to losing their jobs to automation. New and smaller businesses are in need of counseling to assist with business development and financing needs, and entrepreneurial efforts have been hindered by a lack of senior business leaders to help guide the new businesses and expand them as they grow. Banks can assist by providing business and financial expertise. The contact also identified a need for more government- and state-guaranteed small business loans, such as SBA loan programs.

Another contact with an organization that provides credit and other services to small businesses that do not have access to financing from traditional lending sources has noticed an increase in new service-oriented small businesses and online small businesses and a decrease in traditional brick and mortar businesses. The contact named access to capital and technical assistance as the greatest financial needs of local small businesses. In addition, small businesses would benefit from more flexible underwriting criteria. Unfortunately, online predatory lenders and payday lenders have become sources of financing for small business owners.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BIRMINGHAM ASSESSMENT AREA

LENDING TEST

Overview

The bank's lending performance is satisfactory. The review included 15 small business loans made in the assessment area. Loans made in 2015 and 2016 were analyzed using 2016 FFIEC census data and 2016 D&B information, while loans made in 2017 were analyzed using 2017 FFIEC census data and 2017 D&B information. Therefore, in the discussions of the geographic distribution of loans and lending to businesses of different sizes, separate tables are presented depicting lending in 2015 and 2016 and lending in 2017.

Geographic Distribution of Loans

For this analysis, the geographic distribution of small business loans was compared to available demographic information. Performance context issues were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects reasonable dispersion throughout the assessment area.

The following table shows the geographic distribution of small business loans made in the Birmingham assessment area in 2015 and 2016.

Geographic Distribution of Small Business Loans

Assessment Area: AL Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	5	45.5%	\$1,112	14.8%	8.6%
Moderate	5	45.5%	\$2,666	35.4%	15.3%
Middle	1	9.1%	\$3,758	49.9%	27.9%
Upper	0	0.0%	\$0	0.0%	48.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$7,535</i>	<i>100.0%</i>	<i>100.0%</i>

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

As can be seen in the table, the proportion of the bank's loans made in low-income tracts (45.5 percent) significantly exceeded the proportion of small businesses located in those tracts (8.6 percent). The proportion of loans made in moderate-income census tracts, also at 45.5 percent, also exceeded the proportion of small businesses located in those tracts, at 15.3 percent. The bank made one loan to a business in a middle-income tract and no loans to businesses in upper-income tracts.

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

Geographic Distribution of Small Business Loans

Assessment Area: AL Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	7.4%
Moderate	2	50.0%	\$629	28.2%	17.7%
Middle	2	50.0%	\$1,600	71.8%	26.1%
Upper	0	0.0%	\$0	0.0%	47.4%
Unknown	0	0.0%	\$0	0.0%	1.4%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$2,229</i>	<i>100.0%</i>	<i>100.0%</i>

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

Of the bank's four small business loans, none were made in low-income tracts, where 7.4 percent of the small businesses in the assessment area are located. Two of the bank's four loans were made in moderate-income census tracts, which contain 17.7 percent of the small businesses; the other two loans were made in middle-income tracts where a higher percentage of small businesses are located.

Lending to Businesses of Different Sizes

For this analysis, the distribution of small business loans across business revenue sizes was compared to demographic information. Performance context issues were taken into consideration. Considering all of these factors, the bank's distribution of loans reflects excellent penetration among businesses of different sizes.

The following table shows, by business revenue and loan size, the number and dollar volume of small business loans made in the Birmingham assessment area in 2015 and 2016.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Birmingham

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2015, 2016				
		Bank				Total Businesses
		Count		\$ (000s)		%
		#	%	\$	%	
BUSINESS REVENUE	\$1million or Less	10	90.9%	\$5,505	73.1%	88.5%
	Over \$1 Million	1	9.1%	\$2,030	26.9%	10.7%
	<i>Total Rev. available</i>	11	100.0%	\$7,535	100.0%	99.2%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.8%
	<i>Total</i>	11	100.0%	\$7,535	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	4	36.4%	\$200	2.7%	
	\$100,001 - \$250,000	3	27.3%	\$445	5.9%	
	\$250,001 - \$1 Million	2	18.2%	\$1,102	14.6%	
	Over \$1 Million	2	18.2%	\$5,788	76.8%	
	<i>Total</i>	11	100.0%	\$7,535	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	4	40.0%	\$200	3.6%	
	\$100,001 - \$250,000	3	30.0%	\$445	8.1%	
	\$250,001 - \$1 Million	2	20.0%	\$1,102	20.0%	
	Over \$1 Million	1	10.0%	\$3,758	68.3%	
	<i>Total</i>	10	100.0%	\$5,505	100.0%	

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

Of the 11 small business loans included in the analysis, 10 (90.9 percent) were extended to businesses with revenues of \$1 million or less, which was greater than the percentage of businesses in the assessment area that were considered small businesses (88.5 percent). While a direct comparison is not used in this evaluation, a review of aggregate data from CRA reporters in the assessment area shows that the bank's performance in lending to small businesses compares very favorably to the other lenders. The bank made 63.7 percent of its small business loans in amounts of \$250,000 or less, which represent loan amounts typically requested by small businesses.

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Birmingham

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2017				
		Bank		Total		Businesses
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	4	100.0%	\$2,229	100.0%	87.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	12.1%
	<i>Total Rev. available</i>	4	100.0%	\$2,229	100.0%	99.1%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.9%
	<i>Total</i>	4	100.0%	\$2,229	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	2	50.0%	\$358	16.1%	
	\$250,001 - \$1 Million	1	25.0%	\$521	23.4%	
	Over \$1 Million	1	25.0%	\$1,350	60.6%	
	<i>Total</i>	4	100.0%	\$2,229	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	2	50.0%	\$358	16.1%	
	\$250,001 - \$1 Million	1	25.0%	\$521	23.4%	
	Over \$1 Million	1	25.0%	\$1,350	60.6%	
	<i>Total</i>	4	100.0%	\$2,229	100.0%	

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

All four (100 percent) of the small business loans included in the analysis were extended to businesses with revenues of \$1 million or less, exceeding the 87.0 percent of businesses in the assessment area that are considered small businesses. Again, the bank's performance in lending to small businesses compares very favorably to CRA reporters in the assessment area. The bank made 50.0 percent of its small business loans in amounts of \$250,000 or less, which represent loan amounts typically requested by small businesses.

COMMUNITY DEVELOPMENT TEST

The bank's community development performance is satisfactory. Considering the bank's asset size, capacity, and the availability of community development opportunities in the assessment area, the bank demonstrates adequate responsiveness to community development needs through a combination of community development loans, qualified investments or contributions, and community development services.

During the review period, Citizens Trust Bank made two community development loans totaling \$3.5 million in the Birmingham assessment area. The loans were made to the City of Birmingham and were responsive to the City's energy efficiency and neighborhood revitalization efforts.

The bank made a \$500 contribution to an economic development agency working to revitalize a downtown business district.

During the review period, bank staff used their financial and technical expertise to contribute 198 hours of qualified community development services that benefited the assessment area. Activities involved service on the boards of organizations that provide assistance to small businesses, organizations dedicated to revitalization and stabilization efforts, an organization that assists low-income elderly and disabled residents, and an organization working to eliminate economic inequality.

NONMETROPOLITAN AREA – EUTAW, ALABAMA

LIMITED-SCOPE REVIEW

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EUTAW ASSESSMENT AREA

The assessment area consists of Greene County, Alabama, which is not part of an MSA. Eutaw is the county seat. The bank operates one branch office with an ATM in the Eutaw assessment area. According to the FDIC Deposit Market Share Report as of June 30, 2017, the bank had total deposits of \$9.8 million, representing a market share of 16.2 percent. Only one other bank operates in the assessment area: Merchants & Farmers Bank of Greene County, which had a deposit market share of 83.8 percent.

According to 2017 FFIEC census data, Greene County consists of two moderate-income tracts and one low-income tract. Of the families in the assessment area, 60.6 percent are low- or moderate-income, and 35.3 percent live below the poverty level. As mentioned earlier, Greene County and adjacent Hale County have been designated as persistent poverty counties, meaning that 20.0 percent or more of each county's population has been living in poverty over the past 30 years. Greene County is the least populous county in Alabama. Fewer than half of the housing units in the assessment area are owner-occupied, and a large proportion (35.9 percent) of housing units are vacant.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Performance in the assessment area was evaluated and compared with the bank's performance in the state. For the state of Alabama, Citizens Trust Bank received a satisfactory rating for the lending test. The bank made only three small business loans in the assessment area during the review period. Performance in the Eutaw assessment area was inconsistent with the bank's performance in the state.

Citizens Trust Bank received a satisfactory rating for the community development test for the state of Alabama. The bank's performance in the Eutaw assessment area was consistent with performance in the state. The bank made two community development loans totaling \$3.55 million to the county hospital board during the review period. The loans allow for continuous operation of the only hospital in Greene County. The bank made a contribution of approximately \$2,700 to provide training materials for financial literacy courses and maintains a prior period investment of approximately \$77,200 in a minority-owned CDFI credit union that primarily provides financial services in low- and moderate-income areas. The bank did not provide any community development services during the review period.

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

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
Lending: January 1, 2015, through December 31, 2017			
Community development activities: January 1, 2016, through December 31, 2018			
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Citizens Trust Bank, Atlanta, Georgia			Small business loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Atlanta, Georgia (MSA 12060)	Full-scope	None	None
Columbus, Georgia (MSA 17980)	Limited-scope	None	None
Birmingham, Alabama (MSA 13820)	Full-scope	None	None
Eutaw, Alabama (Non-MSA)	Limited-scope	None	None

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

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

Rounding Convention

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

General Information

The CRA requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Citizens Trust Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of May 20, 2019. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

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

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

APPENDIX C – GLOSSARY (Continued)

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): An 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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

APPENDIX C – GLOSSARY (Continued)

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate MA. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate MA, the institution will receive a rating for the multistate MA.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Call Report and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS

Combined Demographics Report

Assessment Area: GA Columbus

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	17	4,386	9.4	2,109	48.1	10,752	23
Moderate-income	16	30.2	9,873	21.1	2,346	23.8	8,056	17.2
Middle-income	15	28.3	15,652	33.4	1,593	10.2	8,720	18.6
Upper-income	12	22.6	16,891	36.1	880	5.2	19,274	41.2
Unknown-income	1	1.9	0	0	0	0	0	0
Total Assessment Area	53	100.0	46,802	100.0	6,928	14.8	46,802	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,138	1,277	3.1	12.6	6,514	64.3	2,347	23.2
Moderate-income	19,900	7,480	18.4	37.6	9,174	46.1	3,246	16.3
Middle-income	25,617	15,020	36.9	58.6	8,097	31.6	2,500	9.8
Upper-income	26,522	16,913	41.6	63.8	7,613	28.7	1,996	7.5
Unknown-income	36	0	0	0	36	100	0	0
Total Assessment Area	82,213	40,690	100.0	49.5	31,434	38.2	10,089	12.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	597	9	525	8.8	64	10.3	8	18.2
Moderate-income	1,691	25.4	1,499	25	180	28.8	12	27.3
Middle-income	2,046	30.7	1,863	31.1	173	27.7	10	22.7
Upper-income	2,328	34.9	2,108	35.1	206	33	14	31.8
Unknown-income	4	0.1	3	0.1	1	0.2	0	0
Total Assessment Area	6,666	100.0	5,998	100.0	624	100.0	44	100.0
	Percentage of Total Businesses:			90.0		9.4		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	2.7	1	2.9	0	0	0	0
Moderate-income	5	13.5	4	11.8	1	33.3	0	0
Middle-income	8	21.6	8	23.5	0	0	0	0
Upper-income	23	62.2	21	61.8	2	66.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	37	100.0	34	100.0	3	100.0	0	.0
	Percentage of Total Farms:			91.9		8.1		.0

2016 FFIEC Census Data and 2016 D&B Information

**APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (Continued)**

Geographic Distribution of Small Business Loans

Assessment Area: GA Columbus

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	1	100.0%	\$14	100.0%	8.8%
Moderate	0	0.0%	\$0	0.0%	25.0%
Middle	0	0.0%	\$0	0.0%	31.1%
Upper	0	0.0%	\$0	0.0%	35.1%
Unknown	0	0.0%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	<i>100.0%</i>

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: GA Columbus

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2015, 2016				
		Count		Bank \$ (000s)		Total Businesses
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	1	100.0%	\$14	100.0%	90.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	9.4%
	<i>Total Rev. available</i>	1	100.0%	\$14	100.0%	99.4%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.7%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	1	100.0%	\$14	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%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	\$14	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%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$14</i>	<i>100.0%</i>	

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

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report

Assessment Area: GA Columbus

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	18.9	4,573	9.9	2,373	51.9	11,048	23.8
Moderate-income	16	30.2	11,127	24	2,219	19.9	8,049	17.4
Middle-income	15	28.3	14,625	31.5	1,634	11.2	8,366	18
Upper-income	11	20.8	16,060	34.6	1,110	6.9	18,922	40.8
Unknown-income	1	1.9	0	0	0	0	0	0
Total Assessment Area	53	100.0	46,385	100.0	7,336	15.8	46,385	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,732	1,630	4.5	15.2	7,076	65.9	2,026	18.9
Moderate-income	21,794	8,869	24.5	40.7	9,397	43.1	3,528	16.2
Middle-income	25,648	11,076	30.5	43.2	11,776	45.9	2,796	10.9
Upper-income	25,289	14,688	40.5	58.1	8,231	32.5	2,370	9.4
Unknown-income	40	3	0	7.5	14	35	23	57.5
Total Assessment Area	83,503	36,266	100.0	43.4	36,494	43.7	10,743	12.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	577	9.6	492	9.2	75	11.9	10	24.4
Moderate-income	1,261	21	1,130	21.2	129	20.4	2	4.9
Middle-income	2,163	36.1	1,907	35.8	237	37.5	19	46.3
Upper-income	1,989	33.2	1,789	33.6	190	30.1	10	24.4
Unknown-income	4	0.1	3	0.1	1	0.2	0	0
Total Assessment Area	5,994	100.0	5,321	100.0	632	100.0	41	100.0
	Percentage of Total Businesses:			88.8		10.5		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	3	8.8	3	9.7	0	0	0	0
Middle-income	8	23.5	7	22.6	1	33.3	0	0
Upper-income	23	67.6	21	67.7	2	66.7	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	34	100.0	31	100.0	3	100.0	0	.0
	Percentage of Total Farms:			91.2		8.8		.0

**APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (Continued)**

Geographic Distribution of Small Business Loans

Assessment Area: GA Columbus

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	9.2%
Moderate	0	0.0%	\$0	0.0%	21.2%
Middle	0	0.0%	\$0	0.0%	35.8%
Upper	0	0.0%	\$0	0.0%	33.6%
Unknown	0	0.0%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: GA Columbus

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2017				
		Count		Bank \$ (000s)		Total Businesses
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	0	0.0%	\$0	0.0%	88.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	10.5%
	<i>Total Rev. available</i>	0	0.0%	\$0	0.0%	99.3%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.7%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$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%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	
LOAN SIZE & Rev \$1 Mill 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	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	

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

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report

Assessment Area: AL Eutaw

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	836	37.8
Moderate-income	2	66.7	1,133	51.3	260	22.9	239	10.8
Middle-income	1	33.3	1,077	48.7	290	26.9	439	19.9
Upper-income	0	0	0	0	0	0	696	31.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3	100.0	2,210	100.0	550	24.9	2,210	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	2,935	1,442	57.6	49.1	343	11.7	1,150	39.2
Middle-income	2,116	1,063	42.4	50.2	674	31.9	379	17.9
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	5,051	2,505	100.0	49.6	1,017	20.1	1,529	30.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	80	33.9	67	33.8	2	14.3	11	45.8
Middle-income	156	66.1	131	66.2	12	85.7	13	54.2
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	236	100.0	198	100.0	14	100.0	24	100.0
	Percentage of Total Businesses:			83.9		5.9		10.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0	0	0	0	0	0	0
Moderate-income	14	50	14	51.9	0	0	0	0
Middle-income	14	50	13	48.1	1	100	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	28	100.0	27	100.0	1	100.0	0	.0
	Percentage of Total Farms:			96.4		3.6		.0

2016 FFIEC Census Data and 2016 D&B Information

**APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (Continued)**

Geographic Distribution of Small Business Loans

Assessment Area: AL Eutaw

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2015, 2016				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	33.8%
Middle	2	100.0%	\$152	100.0%	66.2%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$152</i>	<i>100.0%</i>	<i>100.0%</i>

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Eutaw

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2015, 2016				
		Count		Bank \$ (000s)		Total Businesses
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	2	100.0%	\$152	100.0%	83.9%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.9%
	<i>Total Rev. available</i>	2	100.0%	\$152	100.0%	89.8%
	Rev. Not Known	0	0.0%	\$0	0.0%	10.2%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$152</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	1	50.0%	\$51	33.4%	
	\$100,001 - \$250,000	1	50.0%	\$101	66.6%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$152</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	1	50.0%	\$51	33.4%	
	\$100,001 - \$250,000	1	50.0%	\$101	66.6%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%	
	Over \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$152</i>	<i>100.0%</i>	

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

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report

Assessment Area: AL Eutaw

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	33.3	722	38.1	332	46	810	42.7
Moderate-income	2	66.7	1,175	61.9	337	28.7	339	17.9
Middle-income	0	0	0	0	0	0	324	17.1
Upper-income	0	0	0	0	0	0	424	22.4
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	3	100.0	1,897	100.0	669	35.3	1,897	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,921	766	33.7	39.9	357	18.6	798	41.5
Moderate-income	3,073	1,509	66.3	49.1	569	18.5	995	32.4
Middle-income	0	0	0	0	0	0	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	4,994	2,275	100.0	45.6	926	18.5	1,793	35.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	44	20	34	18.5	3	23.1	7	30.4
Moderate-income	176	80	150	81.5	10	76.9	16	69.6
Middle-income	0	0	0	0	0	0	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	220	100.0	184	100.0	13	100.0	23	100.0
	Percentage of Total Businesses:			83.6		5.9		10.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7	29.2	7	30.4	0	0	0	0
Moderate-income	17	70.8	16	69.6	1	100	0	0
Middle-income	0	0	0	0	0	0	0	0
Upper-income	0	0	0	0	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	24	100.0	23	100.0	1	100.0	0	.0
	Percentage of Total Farms:			95.8		4.2		.0

2017 FFIEC Census Data and 2017 D&B Information

**APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (Continued)**

Geographic Distribution of Small Business Loans

Assessment Area: AL Eutaw

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	18.5%
Moderate	1	100.0%	\$75	100.0%	81.5%
Middle	0	0.0%	\$0	0.0%	0.0%
Upper	0	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$75</i>	<i>100.0%</i>	<i>100.0%</i>

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Eutaw

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2017				
		Count		Bank \$ (000s)		Total Businesses
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	1	100.0%	\$75	100.0%	83.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.9%
	<i>Total Rev. available</i>	1	100.0%	\$75	100.0%	89.5%
	Rev. Not Known	0	0.0%	\$0	0.0%	10.5%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$75</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	1	100.0%	\$75	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%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$75</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	\$75	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%	
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$75</i>	<i>100.0%</i>	

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