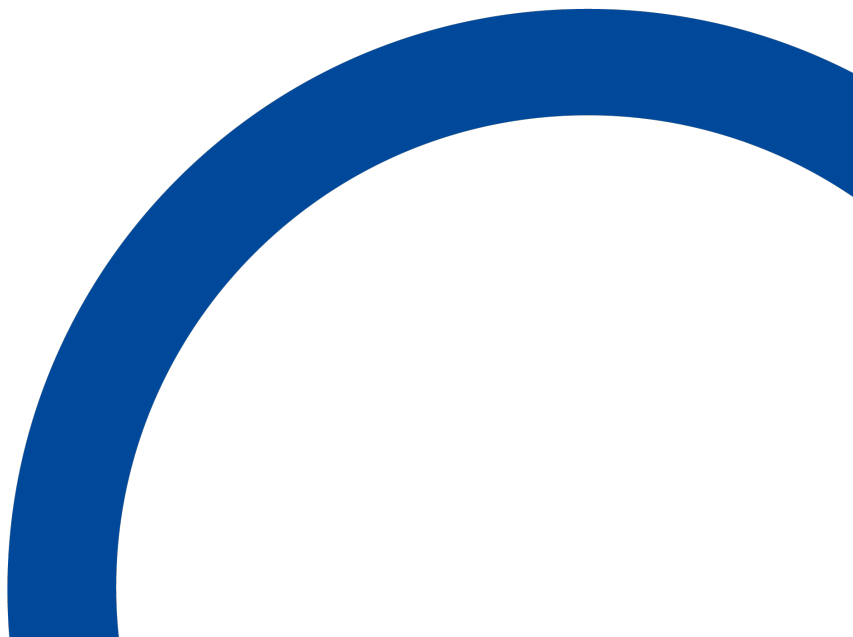




## CRA Performance Evaluation



# **PUBLIC DISCLOSURE**

**November 30, 2020**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**First Horizon Bank  
RSSD #485559**

**165 Madison  
Memphis, Tennessee 38103**

**Federal Reserve Bank of St. Louis**

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

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

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## INSTITUTION RATING

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

<b>First Horizon Bank</b>			
	<b>Performance Tests</b>		
<b>Performance Levels</b>	<b>Lending Test*</b>	<b>Investment Test</b>	<b>Service Test</b>
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
<b>OVERALL RATING</b>	<b>SATISFACTORY</b>		

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

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

- The bank’s lending levels reflect good responsiveness to the credit needs of its assessment areas.
- A high percentage of loans are made within the bank’s assessment areas.
- The distribution of loans by borrower’s income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good penetration throughout the bank’s assessment areas.
- The bank is a leader in making community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes an excellent level of community development investments and grants and is often in a leadership position.
- Service delivery systems are reasonably accessible to the bank’s assessment areas, and the bank’s record of opening and closing branches has improved the accessibility of its service delivery systems.
- The bank provides a relatively high level of community development services.

## INSTITUTION

### DESCRIPTION OF INSTITUTION

First Horizon Bank is a large, interstate retail bank headquartered in Memphis, Tennessee. The bank is a wholly owned subsidiary of First Horizon National Corporation (FHN), also headquartered in Memphis, Tennessee. First Horizon Bank's subsidiaries and affiliates are not engaged in lending, rather in offering wealth management services, along with fixed-income products and services under the FHN brand. In October 2019, First Horizon Bank converted from a national banking charter to a state bank chartered to the Tennessee Department of Financial Institutions. Simultaneously, the bank was approved by the Board of Governors to become a state member bank, switching its prudential regulator from the Office of the Comptroller of the Currency (OCC) to this Reserve Bank. At the time of the conversion, the bank also changed its name to First Horizon Bank. Formerly, the bank was known as First Tennessee Bank, National Association, and was branded as Capital Bank throughout Florida, North Carolina, and South Carolina. As of July 1, 2020, before the merger-of-equals with IBERIABANK, the bank operated 271 retail branches across seven states in the southeastern United States. Based on this branch network and other service delivery systems, such as extended banking hours of operation and full-service online banking capabilities, the bank is well positioned to deliver financial services to the entirety of its assessment areas.

Since the previous evaluation on July 10, 2017, the institution has experienced substantial growth through merger and acquisition activity, expanding its geographical footprint. A summary of this activity is as follows:

- On November 20, 2017, the organization completed the acquisition of Capital Bank Financial Corporation (Capital Bank). The acquisition raised First Horizon Bank's, at the time known as First Tennessee's, asset size to approximately \$40.0 billion in assets, and increased its banking network to 350 branches across the Southeast United States. As part of this acquisition, the bank also expanded its previously limited mortgage offerings to include government-backed loans, affordable housing products, and escrow services.
- In December 2019, FHN and IBERIABANK Corporation—which wholly owned IBERIABANK, a state member bank with \$30.7 billion in total assets—applied for a merger-of-equals. At the time of the application, IBERIABANK had 189 branch offices across ten states. This application was approved, and the merger-of-equals consummated on July 2, 2020. The merger resulted in First Horizon Bank operations totaling 488 branch locations across 12 states.<sup>1</sup>
- First Horizon Bank purchased a total of 30 bank branches in North Carolina, Virginia, and Georgia divested by Branch Banking & Trust Company and SunTrust Bank<sup>2</sup> as part of the merger-of-equals between the two banks, which was finalized July 17, 2020.

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<sup>1</sup> The rated areas in this Performance Evaluation will rely upon the geographical footprint prior to the merger-of-equals, as of July 1, 2020. Given the recency of the merger-of-equals, this approach will best assess the institution's performance in meeting the needs of its assessment areas during the review period.

<sup>2</sup> The institution is currently named Truist Bank.



In total, the bank has designated 37 separate assessment areas (AAs). For the purposes of this review, several of these assessment areas were analyzed as combined statistical areas (CSAs) in instances where contiguous metropolitan statistical area (MSA) or nonmetropolitan statistical area (nonMSA) assessment areas shared similar economic and demographic characteristics. The composition of each assessment area, including assessment areas that were combined for analysis, is detailed in the *General Demographics* section for each separate assessment area. For the purposes of this evaluation, 22 assessment areas were included for analysis, as listed below:

- Nashville-Davidson–Murfreesboro, Tennessee CSA (Nashville)
- Knoxville-Morrisstown-Sevierville, Tennessee CSA (Knoxville)
- Johnson City-Kingsport-Bristol, Tennessee-Virginia CSA (Johnson City)
- Clarksville, Tennessee-Kentucky MSA (Clarksville)
- Jackson, Tennessee MSA (Jackson)
- NonMSA Tennessee
- Memphis, Tennessee-Mississippi-Arkansas Multistate MSA (Memphis)
- Greensboro–Winston-Salem–High Point, North Carolina CSA (Greensboro)
- Raleigh-Durham-Cary, North Carolina CSA (Raleigh-Durham)
- Hickory-Lenoir-Morganton, North Carolina MSA (Hickory)
- Asheville, North Carolina MSA (Asheville)
- Fayetteville, North Carolina MSA (Fayetteville)
- NonMSA North Carolina
- Chattanooga-Cleveland-Dalton, Tennessee-Georgia Multistate CSA (Chattanooga)
- Miami-Port St. Lucie-Fort Lauderdale, Florida CSA (Miami)
- Cape Coral-Fort Myers-Naples, Florida CSA (Cape Coral)
- North Port-Sarasota-Bradenton, Florida MSA (Sarasota)
- Charlotte-Concord, North Carolina-South Carolina Multistate MSA (Charlotte)
- Greenville-Spartanburg-Anderson, South Carolina CSA (Greenville)
- Charleston-North Charleston, South Carolina MSA (Charleston)
- Columbia, South Carolina MSA (Columbia)
- Houston-The Woodlands-Sugar Land, Texas MSA (Houston)

The following table details the changes in the bank’s branch network in the legacy First Horizon assessment areas since the previous evaluation on July 10, 2017. While excluding assessment areas gained through the merger-of-equals with IBERIABANK, this table captures the acquired IBERIABANK branches in the legacy First Horizon assessment areas, along with all other branches acquired during the review period in these assessment areas.

<b>First Horizon Bank Branch Activity July 10, 2017 through November 29, 2020</b>					
<b>Assessment Area</b>	<b>Total Branches (Previous Evaluation)</b>	<b>Closed Branches</b>	<b>New Branches Opened</b>	<b>Acquired Branches</b>	<b>Current Branch Total</b>
<b>Tennessee</b>					
Nashville CSA	44	(17)	0	18	45
Knoxville CSA	37	(10)	0	9	36
Johnson City CSA	11	(7)	0	8	12
Clarksville MSA	0	(1)	0	4	3
Jackson MSA	2	0	0	0	2
NonMSA Tennessee	6	(4)	0	6	8
<b>North Carolina</b>					
Greensboro CSA	1	(6)	0	37	32
Raleigh-Durham CSA	4	(5)	1	18	18
Hickory MSA	0	(3)	0	11	8
Asheville MSA	0	0	0	3	3
Fayetteville MSA	0	(1)	0	3	2
NonMSA North Carolina	0	(4)	0	9	5
<b>Florida</b>					
Miami CSA	0	(3)	1	41	39
Cape Coral CSA	0	0	0	23	23
Sarasota MSA	0	0	0	6	6
<b>South Carolina</b>					
Greenville CSA	0	(1)	0	6	5
Charleston MSA	1	(1)	0	1	1
Columbia MSA	0	0	0	4	4
<b>Texas</b>					
Houston MSA	1	0	0	7	8
<b>Multistate AAs</b>					
Memphis TN-MS MSA	38	(2)	0	7	43
Chattanooga TN-GA CSA	21	(2)	0	2	21
Charlotte NC-SC MSA	0	(4)	2	15	13
<b>TOTAL</b>	<b>166</b>	<b>(71)</b>	<b>4</b>	<b>238</b>	<b>337</b>

In addition to the branch location shown in the table above, the two legacy brands operate over 650 automated teller machines (ATMs) throughout its assessment areas. Clients of both legacy brands are able to use all of the organization’s ATMs free of charge. Moreover, the bank is part of the Allpoint and Presto! ATM networks, allowing for surcharge-free access to over 56,000 ATMs worldwide.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank is considered capable of meeting the credit needs of its assessment areas based on its available resources and financial products. As of September 30, 2020, the bank reported total assets of \$82.7 billion. As

of the same date, loans and leases outstanding were \$60.8 billion (73.5 percent of total assets), and deposits totaled \$69.9 billion. The bank’s loan portfolio composition by credit category is displayed in the following table:

<b>Distribution of Total Loans as of September 30, 2020</b>		
<b>Credit Category</b>	<b>Amount (\$000s)</b>	<b>Percentage of Total Loans</b>
Construction and Development	\$2,903,120	4.8%
Commercial Real Estate	\$14,219,291	23.4%
Multifamily Residential	\$1,951,219	3.2%
1–4 Family Residential	\$13,363,696	22.0%
Farmland	\$65,672	0.1%
Farm Loans	\$53,956	0.1%
Commercial and Industrial	\$16,645,307	27.4%
Loans to Individuals	\$789,762	1.3%
Total Other Loans	\$10,746,878	17.7%
<b>TOTAL</b>	<b>\$60,738,901</b>	<b>100%</b>

As indicated by the table above, a significant portion of the bank’s lending resources is directed to commercial and industrial loans, commercial real estate loans, and loans secured by 1–4 family residential properties. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table. For the years reviewed, the bank originated and subsequently sold 381 loans totaling \$54.5 million, 949 loans totaling \$165.8 million, and 935 loans totaling \$181.7 million in 2017, 2018, and 2019, respectively.

The bank, formerly First Tennessee, NA, received a Satisfactory rating at its previous CRA evaluation conducted by the OCC on July 10, 2017.

## **SCOPE OF EXAMINATION**

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) Interagency Large Institution CRA Examination Procedures. The large bank performance standards consist of three tests: Lending, Investment, and Service. The bank’s performance under these tests is rated at the institution level, as well as by multistate MSAs, and state levels. The bank maintains operations in five states and three multistate MSAs and received a rating for each of these areas, along with an overall institution rating. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. The rated areas are listed in order of significance toward the overall institution rating. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2020. Given the timing of

the July 2020 merger-of-equals with IBERIABANK, this data is based on legacy First Horizon Bank operations.

State/Multistate MSA	Offices		Deposits as of June 30, 2020		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full Scope	Limited Scope	TOTAL
Tennessee	106	39.1%	\$11,832	30.5%	3	3	<b>6</b>
Memphis MSA	36	13.3%	\$10,628	32.6%	1	0	<b>1</b>
North Carolina	56	20.7%	\$4,086	12.5%	3	3	<b>6</b>
Chattanooga CSA	21	7.7%	\$2,663	8.2%	1	0	<b>1</b>
Florida	29	10.7%	\$2,042	6.3%	2	1	<b>3</b>
Charlotte MSA	13	4.8%	\$833	2.6%	1	0	<b>1</b>
South Carolina	9	3.3%	\$417	1.3%	1	2	<b>3</b>
Texas	1	0.4%	\$114	0.3%	1	0	<b>1</b>
<b>OVERALL</b>	<b>271</b>	<b>100%</b>	<b>\$32,613</b>	<b>100%</b>	<b>13</b>	<b>9</b>	<b>22</b>

The bank’s overall institution rating is a composite of these eight rated areas, which are weighted based on the significance of the bank’s operations in each area. Based on the legacy First Horizon Bank—pre-merger-of-equals—branch structure and loan and deposit activity, primary emphasis (in order of significance) was placed on performance in Tennessee, the Memphis multistate MSA, and North Carolina, with the other rated areas receiving less weight toward the overall institution rating. As shown in the table above, Tennessee, the Memphis multistate MSA, and North Carolina account for a combined 73.1 percent of the bank’s total branches and 75.6 percent of total deposits. In total, 13 of the bank’s assessment areas were reviewed under full-scope examination procedures.

**Lending Test**

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

<b>Lending Test Performance Criterion</b>	<b>Products Selected for Review</b>	<b>Time Period</b>
Level of Lending Activity	<ul style="list-style-type: none"> <li>Loans reported under the Home Mortgage Disclosure Act (HMDA).</li> <li>Small business reported under the CRA.</li> </ul>	January 1, 2017 – December 31, 2019
Assessment Area Concentration		
Loan Distribution by Borrower’s Profile		
Geographic Distribution of Loans		
Community Development Lending Activities		January 1, 2017 – September 30, 2020
Product Innovation <sup>3</sup>		

Due to the timing of the bank’s acquisitions, the time periods in the above table applicable to the Lending Test performance criteria are further clarified as follows:

- Community development lending activities from acquired institutions were considered from the time period dating back to the respective institutions’ previous evaluation or from January 1, 2017, whichever came earlier, to avoid the duplication of past performance.
- IBERIABANK community development lending activities were only assessed in overlapping assessment areas, as this evaluation focused on the pre-merger-of-equals legacy First Horizon Bank geographical footprint given the recency of the merger.

As detailed in the preceding table, HMDA and small business loans were used to evaluate the bank’s lending performance, as these loans are considered the bank’s core business lines based on lending volume and the bank’s business strategy. Therefore, the loan activity represented by these credit products is deemed indicative of the bank’s overall lending performance. Across each of the assessment areas, HMDA lending carried more weight in the analysis over small business lending based on higher lending volume and credit needs identified through community contact interviews. In assessment areas in which the Lending Test analysis includes lending activity from 2017, 2018, and 2019, equal emphasis is placed on performance in 2018 and 2019 and less in 2017, as the bank had limited volume and lacked comprehensive mortgage product offerings prior to its acquisition of Capital Bank in November 2017.

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

<sup>3</sup> Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank’s performance negatively. These activities are largely used to augment consideration given to an institution’s performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

- Assessment area demographics are based on 2015 American Community Survey (ACS) data, and business demographics are based on 2017, 2018, and 2019 Dun & Bradstreet data.
- Median family incomes are based on the FFIEC's 2017, 2018, and 2019 annual estimates. These estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.
- Industry demographics are sourced from the 2017, 2018, and 2019 U.S. Census Bureau Business Patterns data, according to the North American Industry Classification System.
- Unemployment data are sourced from the U.S. Department of Labor, Bureau of Labor Statistics, and are not seasonally adjusted.
- In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses of different revenue sizes, the demographic figure refers to the percentage of families in that assessment area that are classified as either low- or moderate-income (LMI) or the percentage of businesses and farms with annual revenues of \$1 million or less.
- In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units in that assessment area that are in either LMI census tracts or the percentage of businesses and farms located in LMI census tracts.

When analyzing bank performance, greater emphasis is placed on annually updated aggregate lending data, which are expected to describe many factors impacting lenders and to predict more relevant comparisons.

### **Investment Test**

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

### **Service Test**

The review period for retail and community development services includes activity from the date of the bank's previous CRA evaluation to the date of the current evaluation. The Service Test considers the following criteria:

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

### **Community Contacts**

To augment this evaluation, interviews with 27 community contacts throughout the bank's assessment areas were utilized. These interviews helped to ascertain certain economic and demographic conditions, as well as credit needs and opportunities, in the bank's assessment areas, and provided context with which to evaluate the bank's responsiveness to these credit needs. Key details from these community contact interviews are included in the *Description of Assessment Area* section, applicable to the assessment area for which they were conducted.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

**LENDING TEST**

The bank’s performance under the Lending Test is rated high satisfactory. The rating reflects an aggregation of the ratings for each rated area shown in the table below, with Tennessee, Memphis multistate MSA, and North Carolina carrying the most weight toward the overall rating. The bank’s performance under each of the criteria of the Lending Test are shown in the tables that follow.

<b>Rated Area</b>	<b>Lending Test Rating</b>
Tennessee	High Satisfactory
Memphis Multistate MSA	Low Satisfactory
North Carolina	High Satisfactory
Chattanooga Multistate CSA	High Satisfactory
Florida	Low Satisfactory
Charlotte Multistate MSA	High Satisfactory
South Carolina	High Satisfactory
Texas	High Satisfactory
<b>OVERALL</b>	<b>HIGH SATISFACTORY</b>

**Assessment Area Concentration**

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans originated inside and outside the bank’s assessment areas for 2017, 2018, and 2019, combined.

<b>Lending Inside and Outside of Assessment Areas</b>						
<b>January 1, 2017 through December 31, 2019</b>						
<b>Loan Type</b>	<b>Inside Assessment Areas</b>		<b>Outside Assessment Areas</b>		<b>TOTAL</b>	
HMDA	11,519	88.2%	1,540	11.8%	<b>13,059</b>	<b>100%</b>
	\$3,085,680	83.6%	\$606,074	16.4%	<b>\$3,691,754</b>	<b>100%</b>
Small Business	7,549	90.0%	842	10.0%	<b>8,391</b>	<b>100%</b>
	\$1,617,470	87.1%	\$238,565	12.9%	<b>\$1,856,035</b>	<b>100%</b>
<b>TOTAL LOANS</b>	<b>19,068</b>	<b>88.9%</b>	<b>2,382</b>	<b>11.1%</b>	<b>21,450</b>	<b>100%</b>
	<b>\$4,703,150</b>	<b>84.8%</b>	<b>\$844,639</b>	<b>15.2%</b>	<b>\$5,547,789</b>	<b>100%</b>

A high percentage of loans were made inside the bank’s assessment areas. As shown above, 88.9 percent of the bank’s total HMDA and small business loans were made inside the bank’s combined assessment areas, representing 84.8 percent of loans by dollar volume.



**Lending Activity**

<b>Rated Area</b>	<b>Lending Activity</b>
Tennessee	Good
Memphis Multistate MSA	Adequate
North Carolina	Adequate
Chattanooga Multistate CSA	Good
Florida	Good
Charlotte Multistate MSA	Good
South Carolina	Good
Texas	Adequate
<b>OVERALL</b>	<b>GOOD</b>

Overall, lending levels reflect good responsiveness to the credit needs of the bank’s assessment areas. The total number and dollar amount of loans were considered in arriving at lending activity conclusions, along with competitive factors and the bank’s overall importance to the area. Additional details are discussed later for each assessment area reviewed under full-scope procedures.

**Borrower and Geographic Distribution**

Overall, the bank’s overall performance by borrower’s income or revenue profile is adequate, as shown in the following table.

<b>Rated Area</b>	<b>Loan Distribution by Borrower’s Profile</b>
Tennessee	Adequate
Memphis Multistate MSA	Adequate
North Carolina	Good
Chattanooga Multistate CSA	Adequate
Florida	Poor
Charlotte Multistate MSA	Good
South Carolina	Good
Texas	Excellent
<b>OVERALL</b>	<b>ADEQUATE</b>

The bank’s borrower distribution of loans varied only slightly between rated areas and is considered adequate overall. In Tennessee and the Memphis multistate MSA, which are the two highest weighted rated areas, performance was adequate, driving the overall conclusion.

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

Rated Area	Geographic Distribution of Loans
Tennessee	Adequate
Memphis Multistate MSA	Adequate
North Carolina	Adequate
Chattanooga Multistate CSA	Good
Florida	Poor
Charlotte Multistate MSA	Good
South Carolina	Good
Texas	Excellent
<b>OVERALL</b>	<b>ADEQUATE</b>

As with borrower distribution, performance in Tennessee and the Memphis multistate MSA carried the most weight in determining the overall performance conclusion.

**Community Development Lending Activity**

Overall, the bank is a leader in making community development loans, as noted in the following table:

Rated Area	Community Development Loans (\$)	Community Development Lending Activity
Tennessee	\$325.5 Million	Leader
Memphis Multistate MSA	\$240.1 Million	Leader
North Carolina	\$69.0 Million	Leader
Chattanooga Multistate CSA	\$119.0 Million	Leader
Florida	\$242.6 Million	Leader
Charlotte Multistate MSA	\$32.3 Million	Relatively High
South Carolina	\$38.2 Million	Leader
Texas	\$64.0 Million	Leader
<b>OVERALL</b>	<b>\$1.1 Billion</b>	<b>LEADER</b>

As shown in the previous table, the level of community development lending varied somewhat between the bank’s rated areas. Overall, the bank made 382 community development loans within its assessment areas totaling \$1.1 billion during the review period.

Included in the total, the bank received community development lending credit for certain loans originated under the Small Business Administration’s (SBA) Paycheck Protection Program (PPP). These loans made to small businesses impacted by the COVID-19 pandemic supported and retained LMI jobs, as outlined in the *Product Innovation* section below. Overall, the bank made 113 community development PPP loans totaling \$263.0 million in its assessment areas. Additionally, as discussed below, 16 community development PPP loans totaling \$34.6 were also

originated outside the bank's assessment areas, resulting in a total of 129 community development PPP loans for \$297.6 million.

As the bank met the community development lending needs of its own assessment areas, consideration was also given to community development loans made outside of the bank's rated areas.<sup>4</sup> As a result, the bank also received credit for 103 community development loans totaling \$194.5 million originated outside of any assessment or rated area, not included in the table above. A brief description of some of these loans is detailed below:

- Sixteen PPP loans totaling \$34.6 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving jobs in LMI geographies. These loans are responsive to the needs of businesses and residents considering the global pandemic.
- One \$5.0 million loan was provided to a nonprofit loan fund that distributes loans to low-income communities that otherwise would not qualify for market rate financing. More specifically, the nonprofit assists in developing affordable housing targeted to LMI communities, improving access to mortgages for LMI borrowers, as well as improving access to healthy food systems and education.
- Another \$6.0 million loan was made to a nonprofit charter school that primarily educates LMI students to construct a new building, which included a gymnasium and eight classrooms.
- One \$30.0 million line of credit was provided to fund the construction of a community center that primarily serves LMI residents. The complex provides affordable childcare and recreational facilities.

While the bank has experienced significant growth during the review period, overall community development lending is nevertheless substantially more than the \$455.8 million in community development loans made at the previous evaluation. This increase further supports that the bank is a leader in making community development loans.

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<sup>4</sup> Community development loans made outside of the bank's assessment areas, but within one of the bank's rated areas, are discussed under the *Community Development Lending* write-up for each applicable rated area.

**Product Innovation**

Overall, the bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas. As shown in the following table, the bank’s use of innovative and/or flexible lending practices varied slightly across the rated areas.

<b>Rated Area</b>	<b>Use of Product Innovation</b>
Tennessee	Extensive Use
Memphis Multistate MSA	Extensive Use
North Carolina	Extensive Use
Chattanooga Multistate CSA	Extensive Use
Florida	Extensive Use
Charlotte Multistate MSA	Use
South Carolina	Use
Texas	Extensive Use
<b>OVERALL</b>	<b>EXTENSIVE USE</b>

Detailed below are descriptions of each of the innovative and/or flexible lending options offered by the bank during the review period, listed in order of impact.

*Activities in Response to the COVID-19 Pandemic*

In accordance with Consumer Affairs (CA) Letters 20-10 and 21-5, “Consideration for Activities in Response to the Coronavirus,” additional consideration was given to the bank’s retail lending activities that were responsive to the needs of LMI individuals or small businesses that were impacted by the COVID-19 pandemic. These activities are considered particularly responsive given their impact in alleviating adverse effects of the pandemic on LMI individuals and small businesses, the speed and responsiveness with which they were developed, and the significant resources and planning required to implement these activities. A summary of each of the bank’s retail lending activities taken in response to the COVID-19 pandemic is as follows:

- ***SBA Paycheck Protection Program (PPP):*** PPP loans are available to businesses with less than 500 employees or businesses that meet SBA industry size standards. The program provides funds for payroll costs and other operational costs to businesses impacted by the COVID-19 pandemic in 2020 and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. From March 2020 through September 30, 2020, the bank originated 32,761 PPP loans totaling \$4.2 billion. As previously discussed in the *Community Development Lending Activities* section, a portion of these loans also received credit as qualified community development loans.
- ***Loan Forbearance:*** Outlined in the aforementioned CA Letters, consideration was given to financial institutions offering payment accommodations, such as loan forbearance, to consumer and commercial borrowers impacted by the pandemic. These activities had a

significant impact in helping borrowers avoid delinquencies or negative credit bureau reporting caused by hardships from pandemic-related issues, and eased cash flow pressures on businesses impacted by the pandemic. Across both legacy brands, the bank provided loan assistance to 914 customers, with balances exceeding \$210 million.

Consumer Real Estate

- ***First Tennessee Affordable Mortgage Program:*** This legacy First Horizon Bank affordable mortgage program provides assistance to eligible home-buyers purchasing a primary residence that are considered LMI, and/or where the subject property is in an LMI geography. Features include, but are not limited to, higher loan-to-value (LTV) limits, no private mortgage insurance (PMI), alternative credit references (e.g. cell phone, utilities, or insurance bills), and lower FICO score limits.
- ***IBERIABANK Home Start Mortgage:*** This is a portfolio CRA loan product that assists LMI borrowers and borrowers with properties in LMI census tracts through mortgage financing or refinancing of an owner-occupied residential property. The ISP Grant (see below) and First Responder Grant Program can be offered in conjunction with this product. Features include, but are not limited to, no PMI, 100 percent LTV with a minimum credit score requirement, and alternative credit references. This program required applicants to complete a home-buyer education course.
- ***CRA Home Ready:*** This internally developed product derives from Fannie Mae's Home Ready Mortgage. Features include lender paid PMI (LPMI), the interest rate does not need to be premium priced to cover the cost of the LPMI premium, and generally includes a reduced interest rate. The ISP Grant and First Responder Grant Programs can be offered in conjunction with this product. All other conditions defer to Fannie Mae guidelines.
- ***CRA Home Possible Advantage:*** This internally developed product derives from Freddie Mac's Home Possible Advantage Mortgage. Features include LPMI, the interest rate does not need to be premium priced to cover the cost of the LPMI premium, and it is generally offered at a reduced interest rate. The ISP Grant and First Responder Grant Programs may be offered in conjunction with this product. All other conditions are as determined by Freddie Mac guidelines.
- ***Fannie Mae Home Ready:*** This mortgage product through Fannie Mae targets LMI borrowers, and offers features, including but not limited to, low down payment options and lower credit score requirements. This product requires a home-buyer education course.
- ***Freddie Mac Home Possible:*** This mortgage product through Freddie Mac targets LMI borrowers, and offers features, including but not limited to, flexible down payment options, including sweat equity, and high LTV limits.

- ***IBERIABANK Subsidy Program Grant (ISP Grant):*** This program is an internally developed down payment assistance grant for consumers who are considered LMI, and/or where the subject property is in an LMI geography. Funds can be used for closing costs and/or down payment assistance. Under the ISP Grant, recipients can receive up to \$2,000 in grant assistance, and borrowers meeting both criteria can receive up to \$4,000 in assistance.
- ***First Responder Grant Program:*** This internal down payment assistance grant, introduced in 2018 prior to the COVID-19 pandemic, is considered for first responders, such as firefighters, police, military personnel, teachers, and healthcare workers. To qualify, borrowers must be considered LMI, and/or the subject property must be in an LMI geography. Grants may be up to \$5,000 in down payment assistance for those with income that does not exceed 50 percent of the area median income or who are purchasing a primary residence in a low income-census tract, or up to \$3,000 in down payment assistance for those with income that does not exceed 80 percent of the area median income or who are purchasing a primary residence in a moderate-census tract
- ***Federal Home Loan Bank (FHLB) of Dallas' Home Equity Leverage Partnership (HELP):*** Through this program, the bank provides up to \$5,000 in down payment and closing cost assistance to LMI first-time home-buyers.

#### Small Business

- Along with traditional SBA 7(a) and 504 loans, the organization offers no documentation/low documentation loan processing, developed by the legacy IBERIABANK brand, for unsecured term and business line of credit requests up to \$50,000, utilizing a credit scoring model for quick turnaround for small businesses. During the review period, the bank originated 370 microloans totaling \$12.3 million through this program to small businesses with revenues less than or equal to \$1.0 million.
- Beyond traditional lending, both legacy brands foster relationships with community development financial institutions (CDFIs) within its geographical footprint that provide small business lending. The bank refers small business consumers and applicants who need alternative financing and technical assistance to these CDFIs when they are unable to meet the bank's underwriting standards. Moreover, the bank contributes to loan funds at multiple CDFIs to facilitate this lending.

INVESTMENT TEST

Overall, the bank is rated outstanding under the Investment Test. The bank makes an excellent level of community development investments and grants throughout its assessment areas and is often in a leadership position. These investments and grants exhibit excellent responsiveness to credit and community development needs throughout the bank’s assessment areas, at the same time making significant use of innovative and/or complex investments to support these initiatives. The table below provides details on the total dollar amount of qualified community development investments and grants, along with the overall Investment Test rating for each rated area.

Rated Area	Investment/Grants (\$)	Donations (\$)	Investment Test Rating
Tennessee	\$178.4 Million	\$6.1 Million	Outstanding
Memphis Multistate MSA	\$81.5 Million	\$5.9 Million	Outstanding
North Carolina	\$41.6 Million	\$2.3 Million	Outstanding
Chattanooga Multistate CSA	\$16.7 Million	\$1.5 Million	Outstanding
Florida	\$55.3 Million	\$10.9 Million	Outstanding
Charlotte Multistate MSA	\$10.3 Million	\$722,925	Outstanding
South Carolina	\$20.7 Million	\$439,978	Outstanding
Texas	\$31.2 Million	\$454,790	Outstanding
<b>OVERALL</b>	<b>\$619.6 Million</b>	<b>\$28.4 Million</b>	<b>OUTSTANDING</b>

As shown above, the bank made total investments and grants of \$619.6 million and total donations of \$28.4 million. This performance significantly exceeds the total investments (\$135.5 million) made by the bank at the previous evaluation. Of the bank’s total qualified investments, \$525.4 million were made during the current review period, while \$94.1 million were made prior to this review period but were still outstanding as of the start date of this evaluation. The bank’s investment and grant activity consisted of mortgage-backed securities (MBS), which are investments in pools of loans made up of affordable housing loans to LMI borrowers; low-income housing tax credits (LIHTCs) to aid in constructing, acquiring, or rehabilitating substantial multifamily affordable housing developments; equity investments and equity equivalents in minority depository institutions (MDIs) and CDFIs that serve the LMI population; limited partnership interest in a fund used to construct affordable multifamily housing for LMI households; a bond to improve public infrastructure in moderate-income geographies; as well as a new market tax credit.

Related to COVID-19 and captured in the table above, the bank contributed \$2.3 million to community development organizations and food banks throughout its assessment areas that was directly tied to the pandemic. At the beginning of the pandemic, bank staff met with community organizations and assessment area subject matter experts to identify areas and organizations in the most need. These donations were used to assist LMI residents experiencing hardships pertaining to the pandemic, including food, shelter, financial assistance, and other community services.

While not included in the totals above, the bank also made \$84.1 million in investments and \$1.9 million in donations benefitting areas outside of its rated areas. As with investments within the bank’s rated areas, the pool of investments and grant activity included a variety of instruments, including MBS, LIHTCs, equity investments and equity equivalents in community development funds and CDFIs, municipal bonds, investments in small business investment companies, and deposits at MDIs.

**SERVICE TEST**

The bank’s performance is rated high satisfactory under the Service Test, which includes four components: accessibility, changes in branch locations, reasonableness of hours and services, and community development services. The bank’s Service Test rating by rated area is shown in the table below, with performance under each of the four Service Test criteria detailed in the tables that follow.

<b>Rated Area</b>	<b>Service Test Rating</b>
Tennessee	High Satisfactory
Memphis Multistate MSA	High Satisfactory
North Carolina	High Satisfactory
Chattanooga Multistate CSA	High Satisfactory
Florida	High Satisfactory
Charlotte Multistate MSA	Low Satisfactory
South Carolina	Low Satisfactory
Texas	High Satisfactory
<b>OVERALL</b>	<b>HIGH SATISFACTORY</b>

As shown above, the bank is rated high satisfactory in each rated area except for the Charlotte multistate MSA and South Carolina, where it is rated low satisfactory. Consequently, the bank’s overall performance under the Service Test is high satisfactory.

**Accessibility of Delivery Systems**

As shown in the following table, the bank’s delivery systems are reasonably accessible to the geographies and individuals of different income levels in the bank’s assessment areas. Moreover, the bank’s website, telephone banking, and mobile application allow for full-service functionality, along with its Allpoint and Presto! partnerships that grant customers access to a nationwide network of surcharge-free standalone ATMs, in and outside of its geographic footprint.

In response to the COVID-19 pandemic, the bank promptly adjusted a number of in-person delivery systems, such as offering many services through the drive-through that normally require entrance to the lobby, and offering fully virtual mortgage closings in light of the public health landscape. Furthermore, the bank kept its lobbies open at most locations throughout the pandemic to best serve its customers.



Rated Area	Accessibility of Delivery Systems
Tennessee	Readily Accessible
Memphis Multistate MSA	Reasonably Accessible
North Carolina	Reasonably Accessible
Chattanooga Multistate CSA	Readily Accessible
Florida	Reasonably Accessible
Charlotte Multistate MSA	Reasonably Accessible
South Carolina	Unreasonably Inaccessible to Portions Of
Texas	Reasonably Accessible
<b>OVERALL</b>	<b>REASONABLY ACCESSIBLE</b>

The bank’s delivery systems are reasonably accessible overall, with five of the eight rated areas being reasonably accessible and two readily accessible. While Tennessee, which carries the most weight, is readily accessible, performance is reduced to reasonably accessible overall given the performance in most rated areas.

**Changes in Branch Locations**

The bank’s record of opening and closing branches has improved the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.

Rated Area	Changes in Branch Locations
Tennessee	Improved Accessibility
Memphis Multistate MSA	Improved Accessibility
North Carolina	Improved Accessibility
Chattanooga Multistate CSA	Improved Accessibility
Florida	Improved Accessibility
Charlotte Multistate MSA	Improved Accessibility
South Carolina	Not Adversely Affected
Texas	Improved Accessibility
<b>OVERALL</b>	<b>IMPROVED</b>

When evaluating this performance criteria, the bank’s acquisition activity was only considered in assessment areas where the bank already maintained operations. In new assessment areas that the bank entered through acquisition, only subsequent branch openings or closings were considered when evaluating the bank’s performance. As shown above, the bank’s record of opening and closing branches improved accessibility for all but one of its rated areas, with that area being not adversely affected. Rated areas that improved accessibility were driven by acquisition activity, including the IBERIABANK merger-of-equals.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank’s hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent throughout assessment areas and drive-through facilities, extended hours on Fridays, and Saturday lobby hours that are offered at numerous branch locations, including those in LMI census tracts. Finally, the bank offers the same suite of products throughout its entire branch network.

<b>Rated Area</b>	<b>Reasonableness of Business Hours and Services</b>
Tennessee	Do Not Vary in a Way That Inconveniences
Memphis Multistate MSA	Do Not Vary in a Way That Inconveniences
North Carolina	Do Not Vary in a Way That Inconveniences
Chattanooga Multistate CSA	Do Not Vary in a Way That Inconveniences
Florida	Do Not Vary in a Way That Inconveniences
Charlotte Multistate MSA	Do Not Vary in a Way That Inconveniences
South Carolina	Do Not Vary in a Way That Inconveniences
Texas	Do Not Vary in a Way That Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

Along with traditional metrics to assess the reasonableness of business hours and services, additional consideration was given to measures related to retail banking hours and services implemented in response to the COVID-19 pandemic. For example, in March 2020, the bank looked at common fees that could cause financial hardships. Consumers were then allowed to opt-in to the following waivers and deferments:

- ***Nonsufficient funds (NSF)/overdraft (OD)-related waivers and reversals:*** 45,186 fees totaling \$2.4 million.
- ***Credit card payment deferments:*** 200 totaling \$1.6 million.
- ***Monthly deposit service charge reversals:*** 195,799 charges totaling \$1.5 million.
- ***Certificate of deposit early withdrawal waivers:*** 157 fees totaling \$244,138.
- ***Foreign ATM and surcharge reversals:*** 266,669 totaling \$800,007.

**Community Development Services**

Overall, the bank provides a relatively high level of community development services throughout its assessment areas, as displayed in the following table:

<b>Rated Area</b>	<b>Community Development Services</b>
Tennessee	Relatively High Level
Memphis Multistate MSA	Leader
North Carolina	Relatively High Level
Chattanooga Multistate CSA	Relatively High Level
Florida	Leader
Charlotte Multistate MSA	Adequate Level
South Carolina	Relatively High Level
Texas	Leader
<b>OVERALL</b>	<b>RELATIVELY HIGH LEVEL</b>

As shown above, the bank provides at least a relatively high level of community development services in two of the top three rated areas, being a leader in the third. Overall, the bank was relatively high in four and a leader in three rated areas. During the review period, 5,014 community development services, accounting for 17,424 hours, were provided to various organizations throughout the bank’s assessment areas. While the bank has experienced significant growth both organically and through merger and acquisition activity, this represents a significant increase in overall community development services provided, compared to the bank’s previous evaluation.

Pertaining to the COVID-19 pandemic, the bank promptly adjusted its community development services strategy. Activities included, but are not limited to, the following:

- Financial literacy training was moved to a virtual platform, which included webinars and virtual presentations. This training was provided through multiple organizations and channels.
- Bank employees with board of directors (board) and committee representation provided financial expertise to community development-focused organizations, aiding them in navigating PPP loans and financial constraints presented by the pandemic.
- Other bank representatives, including market presidents, participated in chamber of commerce panels in multiple assessment areas on navigating the PPP loan process for small businesses.

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

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

## TENNESSEE

### CRA RATING FOR TENNESSEE:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

**SATISFACTORY**

**High Satisfactory**

**Outstanding**

**High Satisfactory**

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

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

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Tennessee assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank's ratings in the state of Tennessee reflect a composite of the bank's performance in all six of its assessment areas throughout the state. The bank operates in five CSA or MSA assessment areas, along with three noncontiguous nonMSA portions of the state. Performance in the nonMSA portions of the state was combined for analysis, resulting in one set of performance conclusions for all of nonMSA Tennessee and six evaluated assessment areas in total. Performance in the Nashville, Knoxville, and Johnson City assessment areas was reviewed under full-scope

examination procedures. Based on the bank’s branch structure and loan and deposit activity, CRA performance in the Nashville assessment area received primary consideration when determining statewide performance conclusions.

To augment the evaluation of the full-scope review assessment areas in Tennessee, six community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. Three of the interviews were with representatives from government or nonprofit agencies focusing on affordable housing, two were with individuals specializing in economic development, and the remaining contact represented a CDFI. Details from these interviews are included in the *Description of Institution’s Operations* sections, as applicable to the assessment areas for which the community contacts were made.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN TENNESSEE

First Horizon Bank operates 106 offices (39.1 percent of total branches) throughout the six CRA assessment areas in the state of Tennessee. The following table gives additional detail regarding the bank’s operations within Tennessee.

Assessment Area	Offices		Deposits As of June 30, 2020		Review Procedures
	#	%	\$	%	
Nashville CSA	45	42.5%	\$5,499	46.5%	Full Scope
Knoxville CSA	36	34.0%	\$3,882	32.8%	Full Scope
Johnson City CSA	12	11.3%	\$1,333	11.3%	Full Scope
Clarksville MSA	3	2.8%	\$86	0.7%	Limited Scope
Jackson MSA	2	1.9%	\$219	1.8%	Limited Scope
NonMSA Tennessee	8	7.5%	\$813	6.9%	Limited Scope
<b>TOTAL</b>	<b>106</b>	<b>100%</b>	<b>\$11,832</b>	<b>100%</b>	<b>3 – Full Scope</b>

During the review period, the bank acquired 45 and closed 39 branches in the six assessment areas, resulting in a net addition of 6 new branches since the previous evaluation. None of these branches was the result of the merger-of-equals with IBERIABANK. Tennessee branches from this merger were exclusively within the Memphis multistate MSA assessment area. The information in the above table is discussed in more detail within each of the respective assessment area sections.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE**

**LENDING TEST**

The bank’s Lending Test performance in Tennessee is rated high satisfactory. The test considers the following criteria.

**Lending Activity**

<b>Full-Scope Review Areas</b>	<b>Lending Activity</b>
Nashville CSA	Excellent
Knoxville CSA	Good
Johnson City CSA	Good
<b>OVERALL</b>	<b>GOOD</b>

<b>Limited-Scope Review Areas</b>	<b>Lending Activity</b>
Clarksville MSA	Below
Jackson MSA	Below
NonMSA Tennessee	Below

The bank’s overall level of lending reflects good responsiveness to the credit needs of the Tennessee assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank’s overall importance to each assessment area.

**Borrower and Geographic Distribution**

As displayed in the following tables, the bank’s performance by borrower’s income and revenue profile is adequate in Tennessee, as is displayed in the following tables.

<b>Full-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Nashville CSA	Adequate
Knoxville CSA	Adequate
Johnson City CSA	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

<b>Limited-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Clarksville MSA	Exceeds
Jackson MSA	Below
NonMSA Tennessee	Exceeds

Overall, the bank’s geographic distribution of loans reflects adequate penetration throughout Tennessee.

Full-Scope Review Areas	Geographic Distribution of Loans
Nashville CSA	Adequate
Knoxville CSA	Good
Johnson City CSA	Poor
<b>OVERALL</b>	<b>ADEQUATE</b>

Limited-Scope Review Areas	Geographic Distribution of Loans
Clarksville MSA	Exceeds
Jackson MSA	Consistent
NonMSA Tennessee	Exceeds

**Community Development Lending Activities**

Overall, the bank was a leader in making community development loans in its Tennessee assessment areas, as displayed below.

Full-Scope Review Areas	Community Development Lending Activities
Nashville CSA	Leader
Knoxville CSA	Leader
Johnson City CSA	Leader
<b>OVERALL</b>	<b>LEADER</b>

Limited-Scope Review Areas	Community Development Lending Activities
Clarksville MSA	Below
Jackson MSA	Consistent
NonMSA Tennessee	Below

During the review period, the bank originated or renewed 89 community development loans in its Tennessee assessment areas totaling \$325.5 million, which represents an increase from the \$213.0 million in qualified community development loans at the bank’s previous evaluation. These loans included those used for the development of LIHTC multifamily affordable housing projects in LMI geographies; a line of credit to a nonprofit historically black college and university (HBCU) medical school located in a low-income census tract, which provides free healthcare to local LMI residents; and loans to finance the renovation of commercial properties projected to create over 550 jobs near LMI census tracts. Additionally, this total includes 43 community development PPP loans totaling \$112.7 million in the bank’s assessment areas that were in response to the COVID-19 pandemic.

Furthermore, as the bank met the community development lending needs of its own assessment areas in the state, consideration was also given to community development loans made outside of the bank’s rated areas. In the broader statewide and regional area, the bank made 16 loans totaling \$65.6 million. This total included three community development PPP loans for \$8.7 million.

**Product Innovation**

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

- Under the bank’s Affordable Housing Program, the bank originated 48 loans totaling \$5.9 million for home-buyers purchasing a primary residence that are considered LMI, and/or where the subject property is in an LMI geography.
- Through the bank’s ISP Grant and First Responder Grant Program, the bank provided down payment assistance to six borrowers totaling \$20,000. This down payment assistance is seen as responsive given the need identified through community contact interviews.
- As noted in the *Community Development Lending Activities* section above, the bank also originated community development PPP loans to businesses in LMI geographies in the state’s assessment areas, using this flexible and innovative product to provide emergency relief to those adversely affected by the COVID-19 pandemic.

**INVESTMENT TEST**

Overall, the bank’s performance in Tennessee is rated outstanding under the Investment Test. The following tables display investment and grant activity performance in Tennessee.

<b>Full-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Nashville CSA	Excellent Level
Knoxville CSA	Excellent Level
Johnson City CSA	Excellent Level
<b>OVERALL</b>	<b>EXCELLENT LEVEL</b>

<b>Limited-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Clarksville MSA	Consistent
Jackson MSA	Below
NonMSA Tennessee	Consistent



As shown in the following table, the bank made a total of \$178.4 million in qualified community development investments and \$6.1 million in donations and grants in the Tennessee assessment areas. In addition, the bank made \$42.8 million in qualified community development investments and \$9,750 in donations and grants in the broader statewide area outside of its assessment areas for a total of \$221.2 million and \$6.1 million, respectively. These investments primarily consisted of MBS and LIHTCs, while the bank’s donations were made to various affordable housing, community service, and economic development organizations throughout the state. Of the total statewide investments, \$167.9 million were made in the current review period, while \$53.3 million were made prior to the review period but were still outstanding.

Tennessee Assessment Area	Investments	Donations/Grants
Nashville CSA	\$120.1 Million	\$2.8 Million
Knoxville CSA	\$35.7 Million	\$1.6 Million
Johnson City CSA	\$6.0 Million	\$876,685
Clarksville MSA	\$10.5 Million	\$206,549
Jackson MSA	\$367,732	\$324,117
NonMSA Tennessee	\$5.7 Million	\$301,287
Statewide (Outside AA)	\$42.8 Million	\$9,750
<b>TOTAL</b>	<b>\$221.2 Million</b>	<b>\$6.1 Million</b>

**SERVICE TEST**

The bank’s performance in Tennessee is rated high satisfactory under the Service Test. This test considers the following criteria.

**Accessibility of Delivery Systems**

As displayed in the following tables, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels in Tennessee.

Full-Scope Review Areas	Accessibility of Delivery Systems
Nashville CSA	Accessible
Knoxville CSA	Readily Accessible
Johnson City CSA	Readily Accessible
<b>OVERALL</b>	<b>READILY ACCESSIBLE</b>

Limited-Scope Review Areas	Accessibility of Delivery Systems
Clarksville MSA	Below
Jackson MSA	Below
NonMSA Tennessee	Below

**Changes in Branch Locations**

The bank’s record of opening and closing branches in the Tennessee assessment areas has improved the accessibility of its service delivery systems, as shown in the tables below.

<b>Full-Scope Review Areas</b>	<b>Changes in Branch Locations</b>
Nashville CSA	Improved
Knoxville CSA	Improved
Johnson City CSA	Not Adversely Affected
<b>OVERALL</b>	<b>IMPROVED</b>

<b>Limited-Scope Review Areas</b>	<b>Changes in Branch Locations</b>
Clarksville MSA	Consistent
Jackson MSA	Below
NonMSA Tennessee	Below

**Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs**

Business hours and banking services do not vary in a way that inconveniences certain portions of the Tennessee assessment areas, particularly LMI geographies and individuals, as displayed in the following tables:

<b>Full-Scope Review Areas</b>	<b>Reasonableness of Business Hours and Services</b>
Nashville CSA	Do Not Vary in a Way That Inconveniences
Knoxville CSA	Do Not Vary in a Way That Inconveniences
Johnson City CSA	Do Not Vary in a Way That Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

<b>Limited-Scope Review Areas</b>	<b>Reasonableness of Business Hours and Services</b>
Clarksville MSA	Consistent
Jackson MSA	Consistent
NonMSA Tennessee	Consistent

**Community Development Services**

The bank provides a relatively high level of community development services in the Tennessee assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Tennessee assessment areas.

<b>Full-Scope Review Areas</b>	<b>Community Development Services</b>
Nashville CSA	Relatively High
Knoxville CSA	Relatively High
Johnson City CSA	Relatively High
<b>OVERALL</b>	<b>RELATIVELY HIGH</b>

<b>Limited-Scope Review Areas</b>	<b>Community Development Services</b>
Clarksville MSA	Below
Jackson MSA	Consistent
NonMSA Tennessee	Below

During the review period, 1,052 community development services were provided to 135 different organizations, accounting for 2,646 service hours. Bank employees served on the board and provided expertise and financial assistance to various organizations promoting community development initiatives throughout the Tennessee assessment areas.

**NASHVILLE-DAVIDSON–MURFREESBORO,  
TENNESSEE CSA**  
*(Full-Scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NASHVILLE  
ASSESSMENT AREA**

**Bank Structure**

The bank currently operates 45 branches in the Nashville assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, this represented 16.6 percent of all bank branches. This percentage, however, was reduced to 9.0 percent following the merger-of-equals, as this was not an overlapping assessment area, resulting in no additional branches. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>				
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>Unknown</b>
3	10	14	17	1

While not impacted by the merger-of-equals, through other merger and acquisition activity during the review period, the bank acquired 18 and closed 17 branches, for a net addition of 1 branch. In addition to its branches, the bank also operates eight stand-alone, deposit-taking ATMs, two of which are in LMI census tracts, and eight stand-alone, cash-only ATMs, one of which is in a low-income census tract. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to the entire Nashville assessment area.

**General Demographics**

The bank’s Nashville assessment area consists of Davidson, Maury, Rutherford, Sumner, Williamson, Wilson, Macon, Marshall, and Lawrence Counties, 9 of the 16 counties in the full Nashville-Davidson–Murfreesboro CSA, which combines the Nashville-Davidson–Murfreesboro-Franklin MSA and three surrounding nonMSA counties. While the bank has designated these as separate assessment areas, they are combined as the Nashville assessment area for purposes of this evaluation. The assessment area has a total population of 1.6 million, with the most populous county being Davidson County (658,506), which contains the city of Nashville. The city of Nashville serves as an important regional hub for commercial and banking activity to the surrounding counties, and the overall assessment area contains several large universities with substantial enrollments, including Middle Tennessee State (21,631 students), Vanderbilt University (13,537 students), Belmont University (8,440 students), and Tennessee State University (8,081 students).

The assessment area hosts a competitive banking market, with 65 FDIC-insured depository institutions operating 533 branches throughout the assessment area. Of these institutions, First Horizon Bank ranks fifth in deposit market share with 8.2 percent of all assessment area deposit

dollars, representing 16.9 percent of total bank deposits prior to the merger-of-equals. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 790 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 23<sup>rd</sup> with 1.3 percent of total loan activity. Of the 166 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 13<sup>th</sup> with 1.2 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the Nashville assessment area include home purchase loans, home improvement loans, and down payment assistance programs. Moreover, community contacts stated there are ample opportunities for financial institutions’ involvement in community development efforts, specifically investing or lending to local CDFIs, investing in tax credit programs, working with local organizations to preserve and expand affordable housing, and provide financial literacy education to LMI residents.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	33	9.5%	23,595	5.9%
<b>Moderate</b>	78	22.4%	81,743	20.5%
<b>Middle</b>	133	38.2%	161,333	40.4%
<b>Upper</b>	99	28.5%	132,534	33.2%
<b>Unknown</b>	5	1.4%	319	0.1%
<b>TOTAL</b>	<b>348</b>	<b>100%</b>	<b>399,524</b>	<b>100%</b>

As displayed in the table above, 31.9 percent of census tracts in the assessment area are LMI, though only 26.4 percent of assessment area families reside in those census tracts. The majority of these LMI census tracts are concentrated around the city of Nashville’s central business district, particularly north and east Nashville. A community contact specializing in affordable housing further specified the neighborhoods of Antioch, Murrysville, and Pike, as well as the city of Madison, as areas with high concentrations of LMI residents.

According to 2015 ACS data, the median family income for the Nashville assessment area was \$66,861, while the same figure for the state of Tennessee as a whole was \$56,110. More recently, the FFIEC estimates the median family income for the Nashville-Davidson–Murfreesboro-Franklin MSA to be \$73,100 in 2019.

The following table displays the distribution of assessment area families by income level compared to all Tennessee families.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>Tennessee</b>	
<b>Low</b>	80,617	20.2%	363,187	21.8%
<b>Moderate</b>	68,913	17.2%	288,774	17.3%
<b>Middle</b>	80,245	20.1%	326,437	19.6%
<b>Upper</b>	169,749	42.5%	687,047	41.3%
<b>TOTAL</b>	<b>399,524</b>	<b>100%</b>	<b>1,665,445</b>	<b>100%</b>

Based on the data in the preceding table, 37.4 percent of families in the assessment area are considered LMI compared to 39.1 percent for the entire state of Tennessee. When compared with the first table in this section, the percentage of families who are LMI is much higher than the percentage of families who reside in LMI census tracts (26.4 percent). Additionally, similar to the percentage of LMI families, the percentage of families below the poverty level in the assessment area (10.1 percent) is below the statewide poverty level (13.2 percent). Based on these demographics and income levels, the Nashville assessment area is more affluent than the state of Tennessee as a whole.

**Housing Demographics**

The following table displays key housing demographics for the assessment area and state of Tennessee. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area.

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$177,477	30.7%	\$872
Tennessee	\$142,100	31.8%	\$764

As shown in the table above, housing in the assessment area is less affordable than the state of Tennessee as a whole. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. When accounting for income levels, affordability pertaining to homeownership in Davidson County (28.5 percent), the most populous county that includes the city of Nashville, is below the assessment area average and statewide affordability ratios of 30.7 and 31.8 percent, respectively. Compounding this issue is the median age of the housing stock in Davidson County (37 years), which is the highest in the assessment area. As noted by the community contact specializing in affordable housing, one of the most pressing credit needs is home improvement loans, as most of the affordable housing stock is older and in need of repairs for safety and energy efficiency. Moreover, only 19.9 percent of owner-occupied housing units in the assessment area are in LMI census tracts. Furthermore, 59.2 percent of housing units in low-income census tracts and 48.6

percent in moderate-income census tracts are rental units. Considering these factors, opportunities for HMDA lending in LMI census tracts are likely limited.

As shown in the table, median gross rent in the assessment area is higher than the state of Tennessee. Even so, the percentage of renters with rental costs exceeding 30.0 percent of their income (43.5 percent) is similar to the figure for Tennessee as a whole (43.2 percent). However, Davidson County has the highest percentage of renters with rental costs exceeding 30.0 percent of their income (45.0 percent). Additionally, 76.2 percent of low-income renters in the assessment area and 42.2 percent of moderate-income renters have rental costs exceeding 30.0 percent of their income, which greatly hinders the ability to save for a down payment on a home purchase. This data represents additional obstacles to homeownership for many LMI residents specifically in Davidson County, where the majority of the assessment area population resides.

### **Industry and Employment Demographics**

The Nashville assessment area economy is diverse and hosts corporations, universities, and small businesses. County business patterns indicate that there are 961,037 paid employees in the assessment area, the majority of which are employed in the healthcare and social assistance (12.5 percent), governmental (11.6 percent), and accommodation and food services (10.4 percent) industries. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 90.9 percent of businesses reported annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Tennessee.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Tennessee</b>
2017	2.9%	3.8%
2018	2.8%	3.5%
2019	2.6%	3.4%

As shown in the table above, unemployment levels in the assessment area were extremely low and trended downward during the review period, below statewide levels. This is consistent with information gleaned from community contact interviews, who noted that economic conditions in the Nashville assessment area are strong and growing, due to a variety of growing industries and a diverse economic base. While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Nashville assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a CDFI specializing in small business development and affordable housing, while the other contact represented a nonprofit organization specializing in affordable housing.

In terms of economic conditions, both contacts described the assessment area as strong and growing during the review period. The individuals attributed the booming economy of the area to a vibrant music scene and a diverse economic base, including higher education institutions, and growing service, technology, and healthcare industries. Although economic conditions are strong, both contacts indicated the area has several low-income communities and areas of disinvestment. The CDFI contact specifically referenced the Nashville Promise Zone in Davidson County as an area experiencing disinvestment, including the neighborhoods south, east, and north of Nashville's central business district. The housing contact indicated that north and east Nashville contain the majority of LMI neighborhoods, in areas like Antioch, Murrysville Pike, and the city of Madison. Both contacts noted that gentrification was raising housing prices, which has displaced many LMI individuals and families who have historically resided in those areas. The affordable housing contact stated most affordable housing stock is old, and many homes and rental properties need repairs and updates for safety and fuel efficiency. Furthermore, there is currently no affordable housing stock available in the downtown Nashville area.

Both contacts stated that COVID-19 has negatively impacted area businesses and individuals. The CDFI contact specified that residents working in the service industry, especially in Davidson and Rutherford Counties, have been most affected. Moreover, temporary shutdowns impacted manufacturing plants in the assessment area. The individual specializing in affordable housing noted the pandemic also affected LMI individuals who were ready to transition to homeownership. Due to temporary, and permanent, shutdowns, many LMI individuals depleted their savings earmarked toward their first home. Furthermore, many were forced to take on additional debt to survive the current pandemic.

Pertaining to access to bank branches, products, and services, both contacts attributed a competitive banking environment in the area to favorable conditions for residents. Despite these conditions, the affordable housing contact noted there are many residents who remain unbanked or underbanked in north and northeast areas of Nashville, utilizing alternative financial service providers. The contact attributed this to faster access to funds and a lack of financial education. Credit needs were said to be home purchase loans, home improvement loans, and down payment assistance programs. Both contacts noted opportunities for participation by local financial institutions, including investing or lending to local CDFIs, purchasing investments through the Tennessee Housing Development Agency's Community Investment Tax Credit Program, funding down payment assistance programs, working with local organizations to help preserve affordable housing, and engaging in financial literacy programs.



**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NASHVILLE ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect excellent responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank was a leader in making community development loans in the assessment area.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Nashville assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	1,183	28.4%	\$600,434	48.4%
Refinance	1,091	26.2%	\$303,533	24.4%
Home Improvement	548	13.1%	\$61,879	5.0%
Multifamily Housing	6	0.1%	\$27,790	2.2%
<b>Total HMDA</b>	<b>2,828</b>	<b>67.8%</b>	<b>\$993,636</b>	<b>80.0%</b>
<b>Small Business</b>	<b>1,344</b>	<b>32.2%</b>	<b>\$247,925</b>	<b>20.0%</b>
<b>TOTAL LOANS</b>	<b>4,172</b>	<b>100%</b>	<b>\$1,241,561</b>	<b>100%</b>

The bank’s lending activity represents excellent responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 29.2 and 17.8 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. Moreover, by dollar volume, this accounts for 34.4 and 15.3 percent of lending across the assessment areas, respectively. Of note, HMDA lending represents the majority of lending, which was the primary credit need in the assessment area identified by community contacts. When compared to the bank’s branching footprint, this level of lending greatly exceeds the percentage of total branches in the assessment area (16.6 percent). Furthermore, this level of lending, particularly HMDA lending, is largely above the percentage of total bank deposits held in the assessment area (16.9 percent). Most recently in 2019, the bank ranked 23<sup>rd</sup> out of 790 reporters in HMDA lending by number, with primarily much larger banks ranking higher, and the remaining entities being mortgage companies. In terms of small business loans, the bank ranked 13<sup>th</sup> out of 166 reporters in CRA lending in the same year, also facing significant competition from larger, nationwide financial institutions.

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### **Loan Distribution by Borrower's Profile**

Overall, the bank's borrower distribution of loans in the Nashville assessment area is adequate. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is adequate. Lending to low-income borrowers in each of the years reviewed (5.7 percent in 2017, 5.9 percent in 2018, and 4.0 percent in 2019) was consistently in line with aggregate lending levels for each year (4.8 percent in 2017, 5.9 percent in 2018, and 4.7 percent in 2019). Despite being similar to aggregate levels, the bank's performance was well below the demographic figures (20.2 percent for each of the years). As such, the bank's HMDA lending to low-income borrowers during the review period is adequate for each of the years reviewed.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance was highest in 2017 (14.4 percent), when it slightly trailed the aggregate lending level (15.9 percent), as well as the demographic figure (17.2 percent) by a larger margin, representing adequate performance for 2017. In the other two years in the review period, the bank's performance (12.2 percent in 2018 and 10.9 percent in 2019) was worse compared to the aggregate lending levels (17.7 percent in 2018 and 16.2 percent in 2019). Similarly, performance was also below the demographic figure of 17.2 percent in both years. As such, the bank's HMDA lending to moderate-income borrowers during 2018 and 2019 is poor.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is adequate overall. In two of the years where data was reviewed, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (45.4 percent in 2018 and 45.0 percent in 2019) was in line with aggregate lending levels (45.9 percent in 2018 and 48.8 percent in 2019), representing adequate performance. In 2017, however, the bank's performance (36.3 percent) was significantly below the aggregate level (52.3 percent), representing poor performance. Compared to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 90.0 percent across the review period, the bank's lending levels were well below this figure in each of the three years.

### **Geographic Distribution of Loans**

Overall, the bank's geographic distribution of loans in the Nashville assessment area is adequate. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is adequate. In two of the years where data was reviewed, the bank's percentage of HMDA loans in low-income census tracts (4.1 percent in 2018 and 4.5 percent in 2019) was in line with aggregate lending levels (4.5 percent in 2018 and 4.7 percent in 2019), but above the demographic figure of 3.5 percent in both years, representing adequate performance. In 2017, however, the bank's lending levels in low-income census tracts (5.5 percent) was above both aggregate (4.5 percent) and demographic (3.5 percent) figures, representing good performance.

The bank's HMDA lending in moderate-income census tracts was highest in 2017 (16.4 percent), when it exceeded both the aggregate lending level (15.1 percent) and the demographic figure (16.2 percent), representing good performance. In the other two years in the review period, the bank's performance (10.0 percent in 2018 and 9.8 percent in 2019) was below aggregate lending levels (14.9 percent in 2018 and 14.3 percent in 2019) and the demographic figures of 16.2 and 16.4 percent, respectively, representing poor performance.

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is good. In two of the years where data was reviewed, the bank's percentage of small business loans in low-income census tracts (10.7 percent in 2017 and 11.8 percent in 2018) was well above aggregate levels on a percentage basis (8.1 percent in 2017 and 8.2 percent in 2018), reflecting excellent performance. This margin was even larger when compared to demographic figures in the same years, which were 7.9 and 7.8 percent, respectively. In 2019, the bank's lending levels in low-income census tracts (8.8 percent), was also above the aggregate (8.5 percent) and demographic (7.9 percent) figures, but to a lesser degree, indicative of good performance.

Pertaining to the percentage of small business loans in moderate-income census tracts, the bank showed the strongest performance in 2019 (24.4 percent), where it greatly exceeded both aggregate (18.1 percent) and demographic (20.2 percent) figures, representing excellent performance. In the remaining two years, the bank's small business lending levels (22.7 percent in 2017 and 20.8 percent in 2018) were above aggregate (19.0 percent in 2017 and 18.5 percent in 2018) and demographic (20.7 percent in 2017 and 20.2 percent in 2018) figures by a smaller margin, representing good performance.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During the review period, the percentage of census tracts with loan activity was relatively consistent, averaging 86.4 percent, with the lowest year being 2017 (79.9 percent) when the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. Enhancements to the bank's mortgage offerings followed the November 2017 Capital Bank acquisition. Pertaining to penetration of LMI census tracts, performance increased after this acquisition (76.6 percent in 2017, 81.1 percent in 2018, and 79.3 percent in 2019). In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. Moreover, the bank's overall penetration and penetration of LMI geographies were generally aligned, with LMI penetration being just slightly lower, and did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Nashville assessment area. During the review period, the bank originated 36 community development loans totaling \$162.9 million. These loans supported economic development (14), affordable housing (9), revitalization and stabilization of LMI or distressed middle-income geographies (7), and community services (6). Some of the most impactful loans are described below:

- Fourteen PPP loans totaling \$32.9 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 2,600 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.
- Two loans totaling \$27.4 million were made to provide construction and bridge loan financing for an affordable 290-unit LIHTC multifamily project in a low-income census tract, with 100 percent of units reserved exclusively for LMI residents. This development will increase the amount of affordable housing in the assessment area, a need identified by community contacts. Moreover, as previously noted, a substantial portion of renters in these areas have rental costs exceeding 30.0 percent of their income, and these community development loans help address the need for affordable rental housing.
- Another loan for \$19.6 million was made to finance the development of an affordable 267-unit LIHTC multifamily project in a moderate-income census tract, with 100 percent of units reserved exclusively for LMI individuals. As with the previous loan, this increases the amount of affordable housing in the assessment area.
- A \$10 million line of credit was provided to a nonprofit HBCU medical school located in a low-income census tract, which provides free healthcare to local LMI residents.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 40 qualified community development investments totaling \$120.1 million, 35 accounting for \$103.2 million were made in the current review period, and 5 totaling \$16.9 million were made in the prior period but remain outstanding. Most of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area and LIHTCs, along with a single certificate of deposit at an MDI that primarily serves the minority and LMI community within the assessment area. The non-MBS investments help facilitate large-scale affordable housing initiatives for LMI families, as well as support the country's oldest continuously operating MDI, with three locations in LMI census tracts in the assessment area. Moreover, the MBS and LIHTC investments directly address affordable housing, which community contacts noted as the most urgent credit need. In addition to these investments, the bank also made 172 donations totaling \$2.8 million. These donations benefitted various organizations including, but not limited to, those dedicated to affordable housing, homeownership counseling for LMI residents, assisting ex-offenders who are LMI to decrease recidivism, providing support to LMI residents diagnosed with AIDS/HIV, financial literacy education, and homeless shelter programs.

SERVICE TEST

The bank’s service delivery systems are accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 45 branches in the Nashville assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	3 6.8%	10 18.2%	14 29.5%	17 43.2%	1 2.3%	<b>45</b> <b>100%</b>
Census Tracts	9.5%	22.4%	38.2%	28.4%	1.4%	<b>100%</b>
Household Population	7.1%	22.9%	39.5%	30.4%	0.1%	<b>100%</b>

Based on data in the preceding table, the bank operates 25.0 percent of its assessment area branches in LMI census tracts. This distribution is slightly below both the percentage of assessment area census tracts that are LMI (31.9 percent) and the household population in LMI census tracts (30.0 percent). However, the bank also operates 13 branches in non-LMI census tracts that border or are close to LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates two stand-alone, deposit-taking ATMs and one stand-alone, cash-only ATM in LMI census tracts, which further increases the accessibility of the bank’s services to LMI residents. Therefore, the bank’s service delivery systems are accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>						
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>Unknown-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	3	8	13	19	1	<b>44</b>
Acquired Branches	1	5	6	6	0	<b>18</b>
Opened Branches	0	0	0	0	0	<b>0</b>
Closed Branches	(1)	(3)	(5)	(8)	0	<b>(17)</b>
<b>OVERALL</b>	<b>3</b>	<b>10</b>	<b>14</b>	<b>17</b>	<b>1</b>	<b>45</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. As shown above, the bank acquired 18 and closed 17 branches in the Nashville assessment area during the review period. While four of the closures were in LMI geographies, six of the acquired branches were in LMI census tracts, resulting in a net addition of two LMI branches during the review period. Consequently, this activity resulted in the number of locations in LMI geographies to rise from 11 to 13 branches during the review period.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank’s hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at 36 branch locations, including 10 in LMI census tracts. Moreover, 41 of the offices operate drive-through facilities, 11 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at 28 branches, 8 of which are in LMI census tracts.

**Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 332 community development services, totaling 871 hours, were provided to 44 different organizations. Bank employees’ activities included administering financial literacy training to schools that primarily serve LMI children and to small businesses, teaching home-buyer education courses, providing financial expertise to a small business incubation center, and serving on the board of various organizations in the assessment area. Organizations with board representation include, but are not limited to, those serving individuals recently released from prison without income or job prospects, providing early education to children who are primarily LMI, and providing affordable housing to LMI residents in the Nashville assessment area. The affordable housing-related services are particularly responsive given the affordable housing needs identified through community contact interviews.

**KNOXVILLE-MORRISTOWN-SEVIERVILLE,  
TENNESSEE CSA**  
*(Full-Scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE KNOXVILLE  
ASSESSMENT AREA**

**Bank Structure**

As shown in the table below, the bank operates 36 of its branches in the Knoxville assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, this represented 13.3 percent of all bank branches. This percentage, however, was reduced to 7.4 percent following the merger-of-equals, as this was not an overlapping assessment area, resulting in no additional branches. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>			
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
2	12	13	9

While not impacted by the merger-of-equals, through other merger and acquisition activity during the review period, the bank acquired nine and closed ten branches, for a net reduction of one branch. In addition to its branches, the bank also operates nine stand-alone, deposit-taking ATMs, three of which are in moderate-income census tracts, and 20 stand-alone, cash-only ATMs, one of which is in a moderate-income census tract. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Knoxville assessment area. Challenges may be encountered in reaching the entirety of the larger, rural counties surrounding the Knoxville MSA. These rural areas, however, are primarily middle- and upper-income, and the branches in these counties are in or near LMI census tracts.

**General Demographics**

The bank’s Knoxville assessment area consists of Blount, Cocke, Grainger, Hamblen, Jefferson, Knox, Loudon, Roane, and Sevier Counties, 9 of the 13 counties in the Knoxville-Morristown-Sevierville CSA, which combines the Knoxville MSA, Morristown MSA, and two surrounding nonMSA counties. While the bank has designated these as separate assessment areas, they are combined as the Knoxville assessment area for purposes of this evaluation. The assessment area has a total population of 940,090, the majority of which is concentrated in Knox County (444,348), which contains the city of Knoxville. Knoxville serves as an important regional hub for commercial and banking activity to the surrounding counties and contains the University of Tennessee, a large university with a total enrollment of approximately 30,559 students.

The assessment area hosts a competitive banking market, with 39 FDIC-insured depository institutions operating 299 branches throughout the assessment area. Of these institutions, First

Horizon Bank ranks first in deposit market share with 18.1 percent of all assessment area deposit dollars, representing 11.9 percent of total bank deposits. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 651 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 15<sup>th</sup> with 1.8 percent of total loan activity. Of the 118 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 13<sup>th</sup> with 2.2 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the assessment area include small dollar home purchase loans, home improvement loans, down payment assistance programs, and small dollar business loans in amounts less than \$100,000. Community contacts also stated that there are ample opportunities for financial institutions to get involved in community development efforts, such as collaborating with local organizations to provide financial literacy education, including homeownership education; collaborating with local organizations to assist LMI communities through workforce development and housing; and aiding LMI individuals with down payment assistance through internal or external programs.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	12	5.6%	9,131	3.7%
<b>Moderate</b>	38	17.8%	35,590	14.4%
<b>Middle</b>	104	48.6%	134,194	54.4%
<b>Upper</b>	53	24.8%	67,820	27.5%
<b>Unknown</b>	7	3.3%	14	0.0%
<b>TOTAL</b>	<b>214</b>	<b>100%</b>	<b>246,749</b>	<b>100%</b>

As displayed in the table above, 23.4 percent of census tracts in the assessment area are LMI, though only 18.1 percent of assessment area families reside in those census tracts. The majority of these LMI census tracts are concentrated around the inner core of the city of Knoxville, along with the eastern portion of the city, as also noted by community contacts. As previously noted, the Knoxville assessment area includes the University of Tennessee, a large, public university located in downtown Knoxville. The university borders or is near the LMI census tracts in Knoxville, which hinders opportunities for HMDA lending given the lack of nonstudent housing.

According to 2015 ACS data, the median family income for the Knoxville assessment area was \$57,481, while the same figure for the state of Tennessee as a whole was \$56,110. More recently, the FFIEC estimates the median family income for the Knoxville MSA to be \$65,000 and the Morristown MSA to be \$53,400 in 2019.



The following table displays the distribution of assessment area families by income level compared to all Tennessee families.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>Tennessee</b>	
<b>Low</b>	51,645	20.9%	363,187	21.8%
<b>Moderate</b>	41,212	16.7%	288,774	17.3%
<b>Middle</b>	49,575	20.1%	326,437	19.6%
<b>Upper</b>	104,317	42.3%	687,047	41.3%
<b>TOTAL</b>	<b>246,749</b>	<b>100%</b>	<b>1,665,445</b>	<b>100%</b>

Based on the data in the preceding table, 37.6 percent of families in the assessment area are considered LMI compared to 39.1 percent for the entire state of Tennessee. When compared with the first table in this section, the percentage of families who are LMI is much higher than the percentage of families who reside in LMI census tracts (18.1 percent). Additionally, the percentage of families below the poverty level in the assessment area (12.1 percent) is slightly below the statewide poverty level (13.2 percent). Based on these demographics and income levels, the Knoxville assessment area is slightly more affluent than the state of Tennessee as a whole.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$152,522	29.6%	\$744
Tennessee	\$142,100	31.8%	\$764

As shown in the table above, housing in the assessment area is slightly less affordable than the state of Tennessee as a whole. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. Compounding this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 58.3 percent of housing units in low-income census tracts and 42.6 percent of housing in moderate-income census tracts are rental units. Additionally, 2.2 percent and 12.4 percent of owner-occupied housing units in the assessment area are in LMI census tracts, respectively, which further places homeownership out of reach for many LMI residents. Moreover, as noted above, many of these LMI census tracts surround the University of Tennessee, which caters to student housing.

Median gross rent is slightly lower than the state of Tennessee as a whole. Similarly the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (41.9 percent) is slightly below the same figure for the state of Tennessee (43.2 percent), indicating that rental costs in the assessment area are more affordable. Despite more affordable rental units, the cost of homeownership is higher than the state of Tennessee based on higher median housing

values, as well as the lower affordability ratio in the assessment area (29.6 percent) compared to the state of Tennessee as a whole (31.8 percent). Considering this data and the proximity of the University of Tennessee, opportunities for HMDA lending in LMI census tracts are likely limited.

### **Industry and Employment Demographics**

The Knoxville assessment area economy is diverse and hosts numerous small businesses and a large university. County business patterns indicate that there are 432,427 paid employees in the assessment area, the majority of which are employed in the governmental (13.7 percent), retail trade (13.1 percent), accommodation and food services (12.8 percent), and healthcare and social assistance (11.7 percent) industries. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 90.6 percent of businesses reported annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Tennessee.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Tennessee</b>
2017	3.6%	3.8%
2018	3.3%	3.5%
2019	3.2%	3.4%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and were slightly below statewide levels. Unemployment levels were consistent across all counties, with a slightly higher level in Cocke County (4.5 percent in 2019). This is consistent with information gleaned from community contacts, who noted that this rural county is more stagnant in terms of growth, compared to Knox County, which contains the city of Knoxville, and had the lowest unemployment level at the same point in time (2.9 percent). While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Knoxville assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One contact represented a nonprofit organization specializing in affordable housing, while the other contact represented a governmental agency specializing in small business development.

In terms of economic conditions, both contacts characterized the assessment area as stable to growing during the review period. Pertaining to housing, the individual specializing in affordable housing indicated the housing market in the city of Knoxville's downtown is very competitive. Additionally, while eastern Knoxville has historically housed the majority of LMI neighborhoods, several years of gentrification have led to older housing stock being replaced with more expensive renovated homes. Consequently, many LMI residents moved farther from the city due to the subsequent lack of affordable housing. Moreover, the contact stated the current affordable housing stock needs updates and repairs, especially for energy efficiency. In terms of businesses, the small business contact noted most industry in the area is concentrated in Knox and Blount Counties, which have experienced consistent growth. More rural areas, such as Sevier, Jefferson, and Cocke Counties, were said to be stagnant pertaining to growth patterns.

According to the contacts, COVID-19 has had varying effects on individuals and businesses in the area. Both contacts noted the counties most affected by the pandemic were Blount, Cocke, and Sevier Counties. The representative specializing in affordable housing noted that while several manufacturers and businesses shut down early during the pandemic, many have reopened. Pertaining to growth, the small business contact stated several small businesses have opened in the area during the pandemic. The contact went on to indicate that during the pandemic, banks were slow to get on board with providing PPP loans to local area small businesses, especially those that did not already have established banking relationships.

While there is a high degree of banking competition in the area, the affordable housing contact noted several banks have closed branches in LMI neighborhoods, especially in Knox and Blount Counties. The contact attributed the closures to advances in technology, as well as merger and acquisition activity. Credit needs identified by both individuals were said to be home purchase loans, home improvement loans, down payment assistance programs, and small dollar business loans in amounts less than \$100,000. Moreover, the small business contact stated that very few banks are serving the needs of LMI small business clients. Both contacts noted opportunities for participation by local financial institutions, such as collaborating with local organizations to provide financial literacy education, including homeownership education; collaborating with local organizations to assist LMI communities through workforce development and housing; and aiding LMI individuals with down payment assistance through internal or external programs.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KNOXVILLE ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. The geographic distribution of loans reflects good penetration throughout the assessment area. Finally, the bank was a leader in making community development loans in the assessment area.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Knoxville assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	517	22.6%	\$208,244	38.2%
Refinance	499	21.9%	\$115,639	21.2%
Home Improvement	287	12.6%	\$24,471	4.5%
Multifamily Housing	1	0.0%	\$500	0.1%
<b>Total HMDA</b>	<b>1,304</b>	<b>57.1%</b>	<b>\$348,854</b>	<b>63.9%</b>
<b>Small Business</b>	<b>979</b>	<b>42.9%</b>	<b>\$196,816</b>	<b>36.1%</b>
<b>TOTAL LOANS</b>	<b>2,283</b>	<b>100%</b>	<b>\$545,670</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 13.7 and 13.0 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. Moreover, by dollar volume, this accounts for 12.4 and 12.2 percent of lending across the assessment areas, respectively. Of note, HMDA lending represents a significant portion of lending, which was the primary credit need in the assessment area identified by community contacts. While holding the largest deposit market share in the assessment area, this level of lending exceeds the percentage of total bank deposits held in the assessment area (11.9 percent) by both number and dollar, although the bank faces significant competition from mortgage companies and larger financial institutions, presenting challenges when matching its leadership in deposit market share. Most recently in 2019, the bank ranked 15<sup>th</sup> out of 651 reporters in HMDA lending by number and 13<sup>th</sup> out of 118 reporters in CRA lending in the same year.

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### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Knoxville assessment area is adequate. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is adequate. In two of the years where data was reviewed, the bank's percentage of HMDA loans to low-income borrowers (4.4 percent in 2017 and 4.6 percent in 2019) was slightly below aggregate lending levels (5.7 percent in 2017 and 5.5 percent in 2019) and much lower than demographic figures (20.8 percent), representing adequate performance. In contrast, performance in 2018 (9.6 percent) was above the aggregate figure (6.3 percent) but still below the demographic figure, representing good performance.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, performance was highest in 2017 (22.5 percent), when it exceeded both the aggregate lending level (15.9 percent) and demographic figure (16.6 percent), representing good performance. Performance dipped in 2018 to 9.8 percent, well below both the aggregate (15.6 percent) and demographic (16.6 percent) figures, representing poor performance. In 2019, however, the bank's percentage of lending trended back upward to 15.9 percent, slightly above the aggregate lending level (15.3 percent) and below the demographic figure (16.7 percent), representing adequate performance.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is poor for 2017 and 2018, and adequate for 2019. In each of the three years where data was reviewed, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (38.1 percent in 2017, 34.5 percent in 2018, and 34.9 percent in 2019) was below aggregate lending levels in 2017 and 2018 (51.1 percent in 2017 and 47.1 percent in 2018) and slightly below for 2019 (45.2 percent). Similarly, the bank's lending levels were well below the demographic figure in each of the three years reviewed, which averaged 89.9 percent across the review period. Consequently, the bank's small business lending during the review period is poor given this performance.

### **Geographic Distribution of Loans**

Overall, the bank's geographic distribution of loans in the Knoxville assessment area is good. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is adequate. In 2017, the bank's percentage of HMDA loans in low-income census tracts (2.4 percent) was above both the aggregate lending level (1.6 percent) and demographic figure (2.3 percent), representing good performance. Performance declined to poor in 2018 (0.2 percent), where it was below both figures of 1.7 and 2.3 percent, respectively. During 2019, the level of HMDA lending in low-income geographies (1.6 percent) increased, slightly trailing the aggregate level (1.7 percent), and falling below the demographic figure (2.2 percent), representing adequate performance.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's performance was highest in 2017 (8.4 percent), when it slightly trailed the aggregate lending level (9.7 percent), as well as the demographic figure (11.8 percent) by a larger margin, representing adequate performance. In the other two years in the review period, the bank's performance (5.9 percent in 2018 and 6.7 percent in 2019) was poor when compared to the aggregate lending levels (9.4 percent in 2018 and 9.9 percent in 2019) and demographic figures (11.8 percent in 2018 and 12.4 percent in 2019).

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is excellent. In two of the years where data was reviewed, the bank's percentage of small business loans in low-income census tracts (5.5 percent in 2017 and 8.1 percent in 2019) was well above aggregate levels (3.6 percent in 2017 and 3.2 percent in 2019) and above demographic figures in the same years (4.5 and 4.3 percent, respectively), representing excellent performance. In 2018, the bank's lending levels in low-income census tracts (4.6 percent), was also above the aggregate (3.8 percent) and demographic (4.4 percent) figures, but to a lesser degree, indicative of good performance.

Pertaining to the percentage of small business loans in moderate-income census tracts, similarly, in two of the years the bank's performance (18.9 percent in 2018 and 21.6 percent in 2019) was well above aggregate levels (12.6 percent in both 2018 and 2019) and above demographic figures in the same years (14.4 and 14.6 percent, respectively), representing excellent performance. In 2017, the bank's lending levels in moderate-income census tracts (14.6 percent) was also above the aggregate level (12.7 percent), but slightly below the demographic figure (14.7 percent), representing good performance.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During the review period, the percentage of census tracts with loan activity was relatively consistent, averaging 83.6 percent, with the lowest year being 2017 (77.6 percent), when the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. As previously noted, enhancements to the bank's mortgage offerings followed the November 2017 Capital Bank acquisition. Pertaining to penetration of LMI census tracts, performance increased greatly after this acquisition (68.0 percent in 2017, 78.0 percent in 2018, and 86.0 percent in 2019). In general, the bank's loans were most concentrated in the census tracts

located near branch locations, including LMI tracts. Moreover, the bank's overall penetration and penetration of LMI geographies were generally aligned, with LMI penetration being slightly lower, and did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Knoxville assessment area. During the review period, the bank originated 34 community development loans totaling \$102.1 million. These loans supported revitalization and stabilization of LMI or distressed middle-income geographies (13), economic development (9), community services (7), and affordable housing (5). Some of the most impactful loans are described below:

- Eighteen PPP loans totaling \$43.1 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 5,800 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.
- One \$23.0 million renewal of a term loan was made that originally funded a municipal bond to support the revitalization and stabilization of an LMI area that was impacted by wildfires and was subsequently designated as a federally declared natural disaster.
- One \$15.4 million loan was made to finance and renovate a large industrial property near LMI census tracts that attracted 250 jobs for LMI residents.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 38 qualified community development investments totaling \$35.7 million, 32 accounting for \$24.0 million were made in the current review period and 6 totaling \$11.7 million were made in the prior period but remain outstanding. These investments were a mix of MBS providing affordable home loans to LMI borrowers in the assessment area and LIHTCs. The LIHTCs helped acquire and rehabilitate substantial multifamily affordable housing developments, as well as a new multifamily affordable housing complex in an upper-income census tract, supporting mixed-income housing. These rehabilitation projects are particularly responsive to assessment area needs, as community contacts noted that the current affordable housing stock needs updates and repairs. Moreover, regardless of the investment type, all of these investments pertain to affordable housing, which community contacts noted as one of the most urgent credit needs in the assessment area. In addition to these investments, the bank also made 103 donations totaling \$1.6 million. These donations benefitted various organizations including, but not limited to, those who have provided meals to LMI residents in response to the COVID-19 pandemic, fostered economic and business development, and provided community services to LMI families and children in the assessment area.

SERVICE TEST

Service delivery systems are readily accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly to LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 36 branches in the Knoxville assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	2 5.6%	12 33.3%	13 36.1%	9 25.0%	0 0.0%	<b>36</b> <b>100%</b>
Census Tracts	5.6%	17.8%	48.6%	24.8%	3.3%	<b>100%</b>
Household Population	4.5%	16.7%	53.2%	25.6%	0.0%	<b>100%</b>

Based on data in the preceding table, the bank operates 38.9 percent of its assessment area branches in LMI census tracts. This distribution is well above both the percentage of assessment area census tracts that are LMI (23.4 percent) and the household population in LMI census tracts (21.2 percent). Additionally, the bank operates seven branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates nine stand-alone, deposit-taking ATMs, three of which are in LMI geographies, and four that border or are near LMI census tracts. This further increases the accessibility of the bank’s services to LMI residents. Therefore, the bank’s service delivery systems are readily accessible to individuals and geographies of different income levels.



**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Middle- Income</b>	<b>Upper- Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	2	10	15	10	<b>37</b>
Acquired Branches	1	5	2	1	<b>9</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	(1)	(3)	(4)	(2)	<b>(10)</b>
<b>OVERALL</b>	<b>2</b>	<b>12</b>	<b>13</b>	<b>9</b>	<b>36</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. As shown above, the bank acquired nine and closed ten branches in the Knoxville assessment area during the review period. While four of the closures were in LMI geographies, six of the acquired branches were in LMI census tracts, resulting in a net addition of two LMI branches during the review period. Consequently, this activity resulted in the number of locations in LMI geographies to rise from 12 to 14 branches during the review period.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank’s hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at 27 branch locations, including 10 in LMI census tracts. Moreover, 36 of the offices operate drive-through facilities, 10 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at 15 branches, 4 of which are in LMI census tracts.

**Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 444 community development services, totaling 1,151 hours, were provided to 44 different organizations. Bank employees’ activities included administering financial literacy training to LMI children and adults; providing financial expertise to community development-focused nonprofits, affordable housing organizations and a hospital that primarily serves LMI children; and serving on the board of various organizations in the assessment area. Organizations with board representation include, but are not limited to, those that serve LMI children and provide shelter and food to the area’s homeless population. The affordable housing-related services are particularly responsive given the affordable housing needs identified through community contact interviews.

## **JOHNSON CITY-KINGSPORT-BRISTOL, TENNESSEE- VIRGINIA CSA**

*(Full-Scope Review)*

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

#### **Bank Structure**

As shown in the table below, the bank operates 12 branches in the Johnson City assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, this represented 4.4 percent of all bank branches. This percentage, however, was reduced to 2.5 percent following the merger-of-equals, as this was not an overlapping assessment area, resulting in no additional branches. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>			
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
0	4	5	3

While not impacted by the merger-of-equals, through other merger and acquisition activity during the review period, the bank acquired eight and closed seven branches, for a net addition of one branch. In addition to its branches, the bank operates three stand-alone, deposit-taking ATMs, one of which is in a moderate-income census tract, and 30 stand-alone, cash-only ATMs, four of which are in moderate-income census tracts. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Johnson City assessment area.

#### **General Demographics**

The bank's Johnson City assessment area consists of Hawkins, Sullivan, Unicoi, and Washington Counties, four of the eight counties in the Johnson City-Kingsport-Bristol CSA, which combines the Johnson City MSA and Kingsport-Bristol MSA. Despite the broader Kingsport-Bristol MSA spanning the states of Tennessee and Virginia, the bank does not have a branching presence in the state of Virginia, nor does the delineated assessment area cross state lines. While the bank has designated these as separate assessment areas, they are combined as the Johnson City assessment area for purposes of this evaluation. The assessment area has a total population of 356,733, the majority of which is split between Sullivan County (156,752) and Washington County (125,317), which contains the majorities of the cities of Johnson City, Kingsport, and Bristol. The tri-city area serves as an important regional hub for commercial and banking activity for the surrounding counties and contains East Tennessee State University, located in Johnson City, which has a total enrollment of approximately 15,000 students.

The assessment area hosts a competitive banking market, with 23 FDIC-insured depository institutions operating 95 branches throughout the assessment area. Of these institutions, First Horizon Bank has the largest deposit market share with 28.5 percent of all assessment area deposit dollars. Deposits held in branches in the assessment area represented 4.1 percent of total bank deposits, prior to the merger-of-equals with IBERIABANK. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 307 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked ninth with 2.5 percent of total HMDA-reportable loan activity. Of the 71 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked ninth with 3.2 percent of all CRA-reportable loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, more specific credit needs in the assessment area include affordable home purchase loans, which are the highest need, followed by small dollar home improvement loans and refinance products, as well as small dollar business loans. Community contacts also stated that there are ample opportunities for financial institutions to get involved in community development efforts, especially through collaborating with local organizations to provide financial literacy education, assisting nonprofits to encourage greater participation in financial education and asset building courses targeted to LMI residents, providing financing to improve broadband services in rural areas, and developing small dollar mortgage and business loans.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	0	0.0%	0	0.0%
<b>Moderate</b>	18	22.8%	18,834	19.2%
<b>Middle</b>	42	53.2%	53,652	54.8%
<b>Upper</b>	18	22.8%	25,435	26.0%
<b>Unknown</b>	1	1.3%	0	0.0%
<b>TOTAL</b>	<b>79</b>	<b>100%</b>	<b>97,921</b>	<b>100%</b>

As displayed in the table above, 22.8 percent of census tracts in the assessment area are moderate-income census tracts, though only 19.2 percent of assessment area families reside in those census tracts. The assessment area contains no low-income census tracts. The majority of the moderate-income census tracts are concentrated around the downtowns of Johnson City, Kingsport, and Bristol, along with large moderate-income census tracts in the rural counties of Unicoi and Hawkins.

According to 2015 ACS data, the median family income for the Johnson City assessment area was \$51,858, while the same figure for the state of Tennessee as a whole was \$56,110. More recently, the FFIEC estimates the median family income for the Johnson City MSA to be \$53,900 and the Kingsport-Bristol MSA to be \$55,100 in 2019.

The following table displays the distribution of assessment area families by income level compared to all Tennessee families.

Family Population by Income Level				
	Assessment Area		Tennessee	
<b>Low</b>	20,091	20.5%	363,187	21.8%
<b>Moderate</b>	17,343	17.7%	288,774	17.3%
<b>Middle</b>	20,076	20.5%	326,437	19.6%
<b>Upper</b>	40,411	41.3%	687,047	41.3%
<b>TOTAL</b>	<b>97,921</b>	<b>100%</b>	<b>1,665,445</b>	<b>100%</b>

Based on the data in the preceding table, 38.2 percent of families in the assessment area are considered LMI compared to 39.1 percent for the entire state of Tennessee. When compared with the first table in this section, the percentage of families who are LMI is much higher than the percentage of families who reside in LMI census tracts (19.2 percent). Additionally, the percentage of families below the poverty level in the assessment area (13.5 percent) is similar to the statewide poverty level (13.2 percent). Based on these demographics and income levels, the Johnson City assessment area is similarly affluent than the state of Tennessee as a whole.

**Housing Demographics**

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

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$127,612	31.7%	\$639
Tennessee	\$142,100	31.8%	\$764

As shown in the table above, when adjusting for income using the affordability ratio, the assessment area (31.7 percent) is similarly affordable compared to the state as a whole (31.8 percent). As noted by community contacts, however, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. The median age of housing stock in the assessment area (43 years) is notably higher than the state as a whole (33 years). As noted by the community contact specializing in affordable housing, one of the most pressing credit needs is home improvement loans, as most affordable housing stock is older and in need of repairs.

Specific to rental units in the assessment area, median gross rent is slightly lower than the state of Tennessee, along with the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (40.9 percent) being slightly below the same figure for Tennessee as a whole (43.2 percent). Despite these favorable conditions, low-income residents face challenges when saving for homeownership. To illustrate this challenge, 68.9 percent of low-income renters in the assessment area have rental costs exceeding 30.0 percent of their income. This data represents additional obstacles to homeownership for many LMI residents.

### **Industry and Employment Demographics**

As previously noted, the assessment area supports a large and diverse economy, including a strong small business sector. County business patterns indicate that there are 146,704 paid employees in the assessment area, the majority of which are employed in the governmental (15.4 percent), manufacturing (15.1 percent), healthcare and social assistance (14.8 percent), and retail trade (12.5 percent) industries. Lastly, assessment area demographics show that 91.1 percent of all businesses in the assessment area have annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Tennessee.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Tennessee</b>
2017	4.1%	3.8%
2018	3.8%	3.5%
2019	3.7%	3.4%

As shown in the table above, unemployment levels in the assessment area were low during the review period, but slightly higher than statewide levels. More specifically, unemployment was highest in the more rural counties of Hawkins and Unicoi, with unemployment rates of 4.1 and 5.0 percent, respectively, in 2019. This is consistent with information gleaned from community contacts, who noted these rural counties as facing the most economic challenges, which they attributed to a lack of employment opportunities. Unemployment rates were as low as 3.5 percent in the remaining counties, which contain the cities of Johnson City, Bristol, and the majority of Kingsport. While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Johnson City assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a governmental organization specializing in small business development, while the other contact represented a nonprofit organization specializing in affordable housing.

Economic conditions of the area during the review period were characterized as stable by both contacts. While stable overall, the affordable housing specialist noted that over the last several years, area population has been declining, with younger residents moving out of the urban areas. Related to the location of LMI areas, the housing specialist went on to state that in all three of the largest cities in the assessment area (Johnson City, Kingsport, and Bristol), low-income areas are in and around their respective downtown areas. Of the four counties in the area, Hawkins and Unicoi were noted as the most financially challenged, as well as the most rural. The contact attributed the economic challenges these areas face to a lack of employment opportunities. In terms of housing, the affordable housing contact noted that workforce housing is in high demand but short supply. Furthermore, most affordable housing stock needs repairs. Additionally, the small business specialist noted the need for redevelopment to encourage business growth in distressed areas of the cities. Overall, however, the contact indicated that small business activity in the area is on the rise.

Pertaining to COVID-19, the contacts stated that the pandemic has had varying effects on individuals and businesses in the area. The housing contact noted that several restaurants and retail stores have closed during the pandemic. Similarly, the small business specialist stated the businesses most affected were area retailers. However, the small business contact stated that the area, and Kingsport specifically, was not affected as much as major metropolitan areas within the state of Tennessee, such as Nashville and Memphis. Beyond business closures, the housing contact indicated that a reduced workforce was another effect of the pandemic, as many parents have had to stay home to care for their children. Furthermore, working from home has been a major issue in rural areas of the assessment area due to a lack of adequate broadband connectivity.

Contacts described access to banking branches and services in the area as good overall, although the housing contact specialist noted that rural areas had limited accessibility. The contact further indicated many branches in rural areas have closed due to merger and acquisition activities. Credit needs identified by the contacts included affordable home purchase loans, which are the highest need, followed by small dollar home improvement loans and refinance products, as well as small dollar business loans. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including collaborating with local organizations to provide financial literacy education, assisting nonprofits to encourage greater participation in financial education and asset-building courses targeted to LMI residents, providing financing to improve broadband services in rural areas, and developing small dollar mortgage and business loans.

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

**LENDING TEST**

The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. The geographic distribution of loans reflects poor penetration throughout the assessment area. Finally, the bank was a leader in making community development loans in the assessment area.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Johnson City assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	289	27.0%	\$88,852	42.9%
Refinance	259	24.2%	\$39,052	18.9%
Home Improvement	106	9.9%	\$7,914	3.8%
Multifamily Housing	3	0.3%	\$1,192	0.6%
<b>Total HMDA</b>	<b>657</b>	<b>61.4%</b>	<b>\$137,010</b>	<b>66.2%</b>
<b>Small Business</b>	<b>413</b>	<b>38.6%</b>	<b>\$69,972</b>	<b>33.8%</b>
<b>TOTAL LOANS</b>	<b>1,070</b>	<b>100%</b>	<b>\$206,982</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 6.6 and 5.5 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. Moreover, by dollar volume, this accounts for 4.8 and 4.3 percent of lending across the assessment areas, respectively. Of note, HMDA lending represents a significant portion of lending, which was the primary credit need in the assessment area identified by community contacts. When compared to the bank’s branching footprint, this level of lending exceeds the percentage of total branches in the assessment area (4.4 percent) by number for both HMDA and CRA lending, and by number for CRA loans. Finally, this level of lending, particularly HMDA lending, is above the percentage of total bank deposits held in the assessment area (4.1 percent). Most recently in 2019, the bank ranked ninth out of 307 reporters in HMDA lending by number, with only much larger banks ranking higher and the remaining entities being mortgage companies. Similarly, the bank ranked ninth out of 71 reporters in CRA lending in the same year, also facing significant competition from larger, nationwide financial institutions.

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### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Johnson City assessment area is adequate. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is adequate. Lending to low-income borrowers in each of the years reviewed (8.3 percent in 2017, 8.0 percent in 2018, and 7.2 percent in 2019) was consistently above the aggregate lending levels for each year (6.9 percent in 2017, 7.1 percent in 2018, and 6.1 percent in 2019). Despite outpacing aggregate levels, the bank's performance was well below demographic figures (20.5 percent for each of the years). Consequently, the bank's HMDA lending to low-income borrowers for each year in the review period is good.

Regarding the percentage of HMDA loans to moderate-income borrowers, the bank's performance increased year over year during the review period (9.8 percent in 2017, 11.4 percent in 2018, and 13.6 percent in 2019). Nonetheless, 2017 and 2018 performance trailed aggregate lending levels (16.2 percent in 2017 and 2018) and demographic comparisons (17.7 percent), representing poor performance. Performance in 2019 lagged aggregate and demographic figures (17.7 percent for each), albeit to a lesser degree in previous years, representing adequate performance.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is poor overall, with poor performance noted in all three years in the review period. In each of the three years where data was reviewed, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (32.8 percent in 2017, 28.7 percent in 2018, and 30.7 percent in 2019) was below aggregate lending levels (53.3 percent in 2017, 50.8 percent in 2018, and 45.6 percent in 2019). Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 90.6 percent across the review period, the bank's lending levels were well below this figure in each of the three years.

### **Geographic Distribution of Loans**

Overall, the bank's distribution of loans by geography income level in the Johnson City assessment area is poor. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity. Conclusions were determined by performance in moderate-income geographies, as the assessment area does not contain low-income census tracts.



### *HMDA Lending*

The bank's distribution of HMDA loans by geography income level during the review period is poor. In all three years reviewed, bank performance in moderate-income census tracts (9.1 percent in 2017, 9.0 percent in 2018, and 11.4 percent in 2019) trailed both aggregate performance (16.0 percent in 2017 and 2018, and 16.3 percent in 2019) and demographic levels (17.5 percent for all three years), reflecting poor performance in each of the years reviewed.

### *Small Business Lending*

The bank's distribution of small business loans by geography income level during the review period is poor. In 2019, the bank's percentage of small business loans in moderate-income census tracts (21.6 percent) was the strongest, exceeding the aggregate lending level (20.1 percent) and trailing the demographic figure (24.4 percent) by a small margin, representing good performance. Performance was weaker in the preceding years (16.0 percent in 2017 and 14.7 percent in 2018), compared to aggregate lending levels (21.9 percent in 2017 and 21.1 percent in 2018). Similarly, 2017 and 2018 lending levels were also below demographic figures of 24.4 and 24.3 percent, respectively. Consequently, performance in 2017 and 2018 is poor, resulting in the overall level of lending in moderate-income geographies to be poor.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During the review period, the percentage of census tracts with loan activity was relatively consistent, averaging 90.3 percent, with the lowest year being 2017 (84.8 percent), when the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. As previously noted, enhancements to the bank's mortgage offerings followed the November 2017 Capital Bank acquisition. Pertaining to penetration of LMI census tracts, performance increased greatly after this acquisition (77.8 percent in 2017, 94.4 percent in 2018, and 88.9 percent in 2019). In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. Moreover, the bank's overall penetration and penetration of LMI geographies were generally aligned, with LMI penetration being slightly lower, and did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Johnson City assessment area. During the review period, the bank originated ten community development loans totaling \$21.8 million. These loans supported revitalization and stabilization of LMI or distressed middle-income geographies (six), affordable housing (three), and economic development (one). Some of the most impactful loans are described below:

- Four PPP loans totaling \$11.4 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving jobs in moderate-income geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

- One \$7.6 million loan was made to renovate an abandoned mill for office and retail space that is adjacent and near other moderate-income census tracts. This development is projected to create over 300 permanent jobs near these moderate-income geographies.

## INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 15 qualified community development investments totaling \$6.0 million, 14 accounting for \$3.8 million were made in the current review period, and 1 totaling \$2.2 million was made in the prior period but remains outstanding. Most of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area and LIHTCs. The LIHTCs helped acquire and rehabilitate large-scale affordable housing developments for LMI families. Moreover, the MBS and LIHTC investments directly address affordable housing, including rehabilitation of the current affordable housing stock that needs repair, which community contacts noted as an urgent need in the assessment area. Additionally, the pool of investments included a bond to improve public infrastructure in Unicoi County, of which most census tracts are moderate-income. Community contacts noted Unicoi County specifically as being one of the most financially challenged portions of the assessment area. In addition to these investments, the bank also made 52 donations totaling \$876,685. These donations benefitted various organizations including, but not limited to, those dedicated to affordable housing, homeless shelter programs, providing dental healthcare to LMI residents, funding food banks, and administering financial literacy education.

## SERVICE TEST

The bank's service delivery systems are readily accessible in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

### **Accessibility of Delivery Systems**

The bank operates 12 branches in the Johnson City assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	0 0.0%	4 33.3%	5 41.7%	3 25.0%	0 0.0%	<b>12</b> <b>100%</b>
Census Tracts	0.0%	22.8%	53.2%	22.8%	1.3%	<b>100%</b>
Household Population	0.0%	21.6%	53.7%	24.7%	0.0%	<b>100%</b>

Based on data in the preceding table, the bank operates 33.3 percent of its assessment area branches in LMI census tracts. This distribution is well above both the percentage of assessment area census tracts that are LMI (22.8 percent) and the household population in LMI census tracts (21.6 percent). Additionally, the bank operates three branches in non-LMI census tracts that border or are close to LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates three stand-alone, deposit-taking ATMs, one of which is in an LMI census tract, and two stand-alone, cash-only ATMs adjacent to LMI census tracts. This further increases the accessibility of the bank’s services to LMI residents. Therefore, the bank’s service delivery systems are readily accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	4	4	3	<b>11</b>
Acquired Branches	0	1	6	1	<b>8</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	(1)	(5)	(1)	<b>(7)</b>
<b>OVERALL</b>	<b>0</b>	<b>4</b>	<b>5</b>	<b>3</b>	<b>12</b>

The bank’s record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals. As shown above, the bank acquired eight and closed seven branches in the Johnson City assessment area during the review period. While one of the acquired branches was in a moderate-income census tract, so was one of the closures. Consequently, this activity resulted in the number of branches in LMI geographies remaining consistent since the previous evaluation.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at eight branch locations, including two in moderate-income census tracts. Moreover, all 12 offices operate drive-through facilities, including the 4 branches in moderate-income census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at six branches, one of which is in a moderate-income census tract.

### **Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 173 community development services, totaling 369 hours, were provided to 24 different organizations. Bank employees' activities included administering financial literacy training to schools that primarily serve LMI children and women who have previously been incarcerated, providing financial expertise to food banks and homeless shelters, and serving on the board or committees of various organizations in the assessment area. Organizations with board or committee representation include, but are not limited to, those providing after-school care to children who are predominately LMI, administering free dental care to LMI individuals, and providing financial assistance and resources to small businesses. The small business-related services are particularly responsive given the need identified through community contact interviews.

## CLARKSVILLE, TENNESSEE-KENTUCKY MSA (Limited-Scope Review)

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CLARKSVILLE ASSESSMENT AREA

This assessment area includes the entirety of Montgomery County, one of the four counties that make up the Clarksville, Tennessee-Kentucky MSA. The bank operates three offices in this assessment area, which the bank entered through the acquisition of Capital Bank in November 2017. No new branches were opened, and one acquired branch was closed in a middle-income census tract during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	9,612	8,760	11,048	22,026	<b>51,446</b>
	18.7%	17.0%	21.5%	42.8%	<b>100%</b>
Household Population	14,474	11,186	14,029	31,676	<b>71,365</b>
	20.3%	15.7%	19.7%	44.4%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	1	8	23	8	4	<b>44</b>
	2.3%	18.2%	52.3%	18.2%	9.1%	<b>100%</b>
Family Population	447	6,100	33,538	11,259	102	<b>51,446</b>
	0.9%	11.9%	65.2%	21.9%	0.2%	<b>100%</b>
Household Population	923	9,810	45,020	15,131	481	<b>71,365</b>
	1.3%	13.8%	63.1%	21.2%	0.7%	<b>100%</b>
Business Institutions	281	808	3,091	1,643	264	<b>6,087</b>
	4.6%	13.3%	50.8%	27.0%	4.3%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CLARKSVILLE ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending performance in this assessment area is consistent with the Lending Test performance in the Tennessee full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Below
Distribution of Loans by Borrower’s Profile	Exceeds
Geographic Distribution of Loans	Exceeds
Community Development Lending Activity	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

The bank did not make any community development loans in the assessment area during the review period.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is consistent with the investment performance in the Tennessee full-scope assessment areas. During the review period, the bank made one qualified community development investment totaling \$10.5 million. This investment was a LIHTC used to fund the construction of an affordable multifamily development for LMI families. In addition to this investment, the bank also made four community development donations totaling \$206,549. These donations supported a nonprofit, which delivers financial education, credit and money management, and financial products to unbanked and underbanked LMI individuals, with the goal of bringing them into mainstream banking.

**SERVICE TEST**

The bank’s service performance in this assessment area is below the service performance in the Tennessee full-scope assessment areas, as detailed in the following table:

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

During the review period, one community development service, totaling two hours, was provided to a single organization. The bank employee provided financial literacy training to a school that primarily serves LMI children.

## JACKSON, TENNESSEE MSA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE JACKSON ASSESSMENT AREA

This assessment area includes the entirety of Madison County, one of the four counties that make up the Jackson, Tennessee MSA. The bank operates two offices in this assessment area. No branches were opened or closed during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	4,999	4,071	4,428	11,184	<b>24,682</b>
	20.3%	16.5%	17.9%	45.3%	<b>100%</b>
Household Population	8,696	5,412	6,123	16,535	<b>36,766</b>
	23.7%	14.7%	16.7%	45.0%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	3	6	8	9	1	<b>27</b>
	11.1%	22.2%	29.6%	33.3%	3.7%	<b>100%</b>
Family Population	1,533	5,102	7,167	10,756	124	<b>24,682</b>
	6.2%	20.7%	29.0%	43.6%	0.5%	<b>100%</b>
Household Population	2,602	8,293	10,399	14,931	541	<b>36,766</b>
	7.1%	22.6%	28.3%	40.6%	1.5%	<b>100%</b>
Business Institutions	109	994	1,138	1,272	312	<b>3,825</b>
	2.8%	26.0%	29.8%	33.3%	8.2%	<b>100%</b>



**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSON ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending performance in this assessment area is consistent with the Lending Test performance in the Tennessee full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Below
Distribution of Loans by Borrower’s Profile	Below
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

The bank made five community development loans totaling \$30.0 million in the assessment area during the review period. One loan was used to finance infrastructure enhancements in an LMI area, while the remaining loans were PPP loans to small businesses, a HBCU in an LMI area, and a medical clinic.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is below the investment performance in the Tennessee full-scope assessment areas. During the review period, the bank made five qualified community development investments totaling \$367,732. All of these investments were made in MBS providing affordable home loans to LMI borrowers in the assessment area. In addition to these investments, the bank also made 12 community development donations totaling \$324,117. These donations supported two community service organizations: the aforementioned nonprofit focused on financial literacy and converting the unbanked and underbanked to traditional financial institutions and a food bank serving low-income residents.

SERVICE TEST

The bank’s service performance in this assessment area is consistent with the service performance in the Tennessee full-scope assessment areas, as detailed in the following table:

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

During the review period, 43 community development services, totaling 104 hours, were provided to 7 different organizations. Bank employees provided financial literacy training to LMI children, assisted with fundraising for community service organizations, provided grant and lending expertise to community development organizations, and served on the board of various organizations in the assessment area. Bank employees served on the board for affordable housing organizations, as well as an African American chamber of commerce focused on LMI youth and a food bank.

## NONMSA TENNESSEE

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMSA TENNESSEE

The bank’s nonMSA Tennessee assessment area is composed of Greene, Humphreys, Putnam, and White Counties. Greene and White Counties comprise two separate nonMSA Tennessee assessment areas, while Putnam and White Counties comprise an additional nonMSA Tennessee assessment area as the two counties are geographically contiguous. These three assessment areas have been combined for this analysis. The bank operates eight offices across the nonMSA counties in this assessment area. The tables below detail key demographics relating to this assessment area.

<b>Assessment Area Demographics by Population Income Level</b>					
<b>Demographic Type</b>	<b>Population Income Level</b>				<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	
Family Population	10,443	8,984	9,674	20,211	<b>49,312</b>
	21.2%	18.2%	19.6%	41.0%	<b>100%</b>
Household Population	18,653	12,163	13,342	30,389	<b>74,637</b>
	25.0%	16.3%	18.0%	40.7%	<b>100%</b>

<b>Assessment Area Demographics by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown-</b>	
Census Tracts	0	7	26	8	0	<b>41</b>
	0.0%	17.1%	63.4%	19.5%	0.0%	<b>100%</b>
Family Population	0	7,563	33,321	8,428	0	<b>49,312</b>
	0.0%	15.3%	67.6%	17.1%	0.0%	<b>100%</b>
Household Population	0	13,038	49,104	12,495	0	<b>74,637</b>
	0.0%	17.5%	65.8%	16.7%	0.0%	<b>100%</b>
Business Institutions	0	1,296	3,822	1,690	0	<b>6,808</b>
	0.0%	19.0%	56.1%	24.8%	0.0%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMSA  
TENNESSEE**

**LENDING TEST**

The bank’s lending performance in this assessment area is consistent with the Lending Test performance in the Tennessee full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Below
Distribution of Loans by Borrower’s Profile	Exceeds
Geographic Distribution of Loans	Exceeds
Community Development Lending Activity	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

The bank made three community development loans totaling \$8.7 million in the assessment area during the review period. One loan was used to finance a new headquarters for a business located in a moderate-income census tract, another was to a university that primarily serves LMI students, and the final loan was a PPP loan to a business located in a moderate-income census tract.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is consistent with the investment performance in the Tennessee full-scope assessment areas. During the review period, the bank made qualified community development investments totaling \$5.7 million. All of these investments were made in MBS providing affordable home loans to LMI borrowers and a LIHTC in the assessment area. In addition to these investments, the bank also made 21 community development donations totaling \$301,287. These donations supported various community service organizations, including homeless shelters, a food bank, and several organizations serving senior citizens and children.

SERVICE TEST

The bank’s service performance in this assessment area is below the service performance in the Tennessee full-scope assessment areas, as detailed in the following table:

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

During the review period, 31 community development services, totaling 86 hours, were provided to 8 different organizations. Bank employees administered financial literacy training to LMI children and homeless residents, provided financial expertise to an affordable housing organization, and served on the board of various organizations in the assessment area. Bank employees served on the board for affordable housing organizations, a homeless shelter, a university primarily serving LMI students, and a children’s service organization.

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## MEMPHIS, TENNESSEE-MISSISSIPPI-ARKANSAS MULTISTATE MSA<sup>5</sup>

**MULTISTATE MSA RATING:**

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated**

**SATISFACTORY**

**Low Satisfactory**

**Outstanding**

**High Satisfactory**

Major factors supporting the institution's Memphis assessment area rating include the following:

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

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Memphis assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Performance in the Memphis assessment area was reviewed under full-scope examination procedures. To augment the evaluation, two community contact interviews were conducted to

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<sup>5</sup> This rating reflects performance within the multistate MSA. The Tennessee statewide evaluation is adjusted and does not reflect performance in the multistate MSA.

ascertain specific community credit needs, community development opportunities, and local economic conditions. One of the interviews was with a representative from a local governmental agency specializing in housing, and the other contact represented an organization specializing in economic development. Details from these interviews are included in the *Description of Institution's Operations* section that follows.

## **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MEMPHIS ASSESSMENT AREA**

### **Bank Structure**

The bank currently operates 43 branches in the Memphis assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, the bank operated 36 branches in the assessment area, representing 13.3 percent of all bank branches at the time. Through the July 2020 merger-of-equals with IBERIABANK, however, the bank added 7 offices to the assessment area, increasing its branching footprint to 43 locations, representing 8.8 percent of branches in the combined institution. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>			
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
8	4	6	25

Outside of the merger-of-equals, the bank closed two branches in non-LMI census tracts. No other branches were opened. In addition to its branches, the bank also operates 19 stand-alone, deposit-taking ATMs, 8 of which are in LMI census tracts, and 33 stand-alone, cash-only ATMs, 8 of which are in LMI census tracts. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Memphis assessment area. However, challenges may exist in serving the more rural southern portion of DeSoto County, as well as the portions of Tate County beyond those which surround the sole branch in this county, given the limited branching presence in both counties. Despite this limited presence, the bank operates its sole branch in Tate County within one of the two LMI census tracts in the county, and DeSoto County branches can reasonably reach LMI geographies.

### **General Demographics**

The bank's Memphis assessment area consists of DeSoto, Shelby, and Tate Counties, three of the eight counties in the Memphis MSA. Tate and DeSoto Counties are located in the state of Mississippi, while Shelby County is in Tennessee. None of the counties within the bank's delineated Memphis assessment area are in the Arkansas portion of the Memphis multistate MSA. The assessment area has a total population of 1.1 million, with the most populous county being Shelby County (937,750), which contains the city of Memphis. The city of Memphis serves as an important regional hub for commercial and banking activity to the surrounding counties, as well as containing the University of Memphis, with an enrollment of over 17,000 students.

The assessment area hosts a competitive banking market, with 43 FDIC-insured depository institutions operating 295 branches throughout the assessment area. Prior to the merger-of-equals, the bank had the largest deposit market share, with 40.9 percent of all deposit dollars in the assessment area, representing 32.6 percent of total bank deposits at the time. Following the July 2020 IBERIABANK merger, the bank’s deposit market share increased even further, resulting in the combined organization holding 42.1 percent of all deposit dollars in the assessment area. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 541 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 38<sup>th</sup> with 0.6 percent of total loan activity. Of the 121 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 20<sup>th</sup> with 0.7 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the Memphis assessment area include home purchase loans with down payment assistance, small dollar home improvement loans, and financial literacy programs. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically investing in local CDFIs, participating in financial literacy programs, and collaborating with area organizations to provide more affordable housing.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	65	25.1%	44,349	16.3%
<b>Moderate</b>	55	21.2%	53,126	19.5%
<b>Middle</b>	52	20.1%	56,769	20.9%
<b>Upper</b>	81	31.3%	117,233	43.1%
<b>Unknown</b>	6	2.3%	404	0.2%
<b>TOTAL</b>	<b>259</b>	<b>100%</b>	<b>271,881</b>	<b>100%</b>

As displayed above, 46.3 percent of census tracts in the assessment area are designated as LMI, while 35.8 percent of assessment area families reside within those census tracts. These LMI geographies are primarily located in the western half of Shelby County and in western portions of DeSoto and Tate Counties. Moreover, low-income geographies largely surround the urban core of the city of Memphis.

According to 2015 ACS data, the median family income for the assessment area (\$59,268) is above the same figure for both the states of Tennessee (\$56,110) and Mississippi (\$49,274) as a whole. More recently, the FFIEC estimates the median family income for the entire Memphis MSA to be \$63,700 in 2019.



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

<b>Family Population by Income Level</b>						
	Assessment Area		Tennessee		Mississippi	
<b>Low</b>	66,241	24.4%	363,187	21.8%	175,205	23.4%
<b>Moderate</b>	42,252	15.5%	288,774	17.3%	124,309	16.6%
<b>Middle</b>	46,623	17.2%	326,437	19.6%	134,771	18.0%
<b>Upper</b>	116,765	42.9%	687,047	41.3%	314,836	42.0%
<b>TOTAL</b>	<b>271,881</b>	<b>100%</b>	<b>1,665,445</b>	<b>100%</b>	<b>749,121</b>	<b>100%</b>

Based on the data in the preceding table, 39.9 percent of families in the assessment area are considered LMI, compared to 39.1 percent for the entire state of Tennessee and 40.0 for the entire state of Mississippi. When compared with the first table in this section, the percentage of families who are LMI is higher than the percentage of families who reside in LMI census tracts (35.8 percent). Additionally, the percentage of families below the poverty level in the assessment area (15.0 percent) is above the statewide poverty level of Tennessee (13.2 percent), but below that of Mississippi (17.6 percent). Based on these demographics and income levels, the Memphis assessment area is slightly less affluent than the state of Tennessee, but more affluent than the state of Mississippi as a whole.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (Monthly)</b>
Assessment Area	\$134,842	35.7%	\$867
Tennessee	\$142,100	31.8%	\$764
Mississippi	\$103,100	38.5%	\$717

Based on the data in the preceding table, housing in the assessment area is more affordable than in the state of Tennessee, but less affordable than Mississippi as a whole. Adjusting for income levels, the assessment area’s affordability ratio (35.7 percent) is above Tennessee (31.8 percent) and below Mississippi (38.5 percent), with median housing values falling between the two states. More specifically, Shelby County is the least affordable county in the assessment area, with an affordability ratio of 35.3 percent. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. Contributing to this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 48.9 percent of housing units in low-income census tracts and 42.0 percent of housing units in moderate-income census tracts are rental units. Moreover, just 27.9 percent of owner-occupied housing units in the assessment area are in LMI census tracts. Additionally, the median age of housing stock in the assessment area (43 years) is notably higher than that of both states as a whole

(33 years). As noted by the community contacts, one of the most pressing housing-related needs is home improvement loans, as most of the affordable housing stock is older and in need of repairs. Considering these factors, opportunities for HMDA lending in LMI census tracts are likely limited.

Specific to rental units in the assessment area, median gross rent is higher than that of both Tennessee and Mississippi. Affordable rental options are also scarce, as assessment area demographics indicate that 78.9 percent of low-income and 55.7 percent of moderate-income renters in the assessment area have rental costs exceeding 30.0 percent of their income. With such a large percentage of LMI residents' income allocated to rent, saving for a down payment on the purchase of a home is likely challenging. As such, homeownership may be out of reach for many LMI residents in the assessment area.

### **Industry and Employment Demographics**

As previously noted, the assessment area supports a large and diverse economy, including a strong small business sector. County business patterns indicate that there are 566,017 paid employees in the assessment area, the majority of which are employed in the healthcare and social assistance (13.9 percent), government (12.6 percent), and transportation and warehousing (12.4 percent) industries. Lastly, assessment area demographics show that 89.9 percent of all businesses in the assessment area have annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area, the state of Tennessee, and the state of Mississippi.

<b>Unemployment Levels for the Assessment Area</b>			
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Tennessee</b>	<b>Mississippi</b>
2017	4.3%	3.8%	5.1%
2018	4.1%	3.5%	4.8%
2019	4.1%	3.4%	5.4%

As shown above, unemployment levels in the assessment area remained relatively low and stable throughout the review period, decreasing slightly since 2017. Assessment area unemployment levels are between that of the states of Tennessee, which was below the assessment area level, and Mississippi, which was above. This is consistent with county-level data, as the two Mississippi counties in the assessment area, Tate and DeSoto, have the highest unemployment rates, at 5.6 and 4.4 percent in 2019, respectively. The sole Tennessee county, Shelby, however, has the lowest unemployment rate (4.0 percent). While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Memphis assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a local governmental agency specializing in housing, while the other contact represented a nonprofit organization specializing in economic development.

Although the area has experienced some economic wins, the housing specialist stated some neighborhoods remain impoverished and in need of more opportunities. Neighborhoods specifically mentioned by the contact included North and South Memphis, Orange Mound, Frayser, and Hickory Hill. Similarly, the economic development contact indicated the economy is slow growing, attributing this partly to high levels of poverty and lack of investment in LMI areas. Moreover, affordable housing stock in the area was noted to be in short supply and of poor quality.

Pertaining to COVID-19, both contacts indicated the pandemic has had significant negative impacts on the area. More specifically, the economic development representative stated entrepreneurs and residents in LMI neighborhoods were struggling economically because of the pandemic. Echoing this, the housing specialist also noted that LMI families have been significantly affected by the pandemic in terms of housing and employment. According to the contact, many evictions have occurred in the area, and there is concern that LMI individuals are unable to pay for basic necessities, such as housing and utilities. The pandemic has exacerbated issues in the area, as the housing contact noted the pandemic slowed conversations with relevant stakeholders regarding improvements to the quality of LMI-focused housing stock in the area.

While there is a high degree of banking competition in the area, both contacts noted access to credit and other banking services differ throughout the area. Furthermore, they went on to state banking deserts exist in some LMI areas within the assessment area, leading to the presence of check-cashing and payday lenders in these areas, and result in LMI families utilizing them as alternatives to traditional bank services. Credit needs were identified as home purchase loans with down payment assistance, small dollar home improvement loans, and financial literacy programs. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including investing in local CDFIs, participating in financial literacy programs, and collaborating with area organizations to provide more affordable housing.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS ASSESSMENT AREA**

**LENDING TEST**

The bank’s Lending Test performance in the Memphis assessment area is rated low satisfactory. The bank’s lending levels reflect adequate responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects adequate penetration throughout the assessment area. The bank is a leader in making community development loans and makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the assessment area.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Memphis assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	409	17.3%	\$134,250	22.6%
Refinance	495	20.9%	\$88,583	14.9%
Home Improvement	251	10.6%	\$15,782	2.7%
Multifamily Housing	2	0.1%	\$36,422	6.1%
<b>Total HMDA</b>	<b>1,157</b>	<b>48.8%</b>	<b>\$275,037</b>	<b>46.2%</b>
<b>Small Business</b>	<b>1,212</b>	<b>51.2%</b>	<b>\$319,999</b>	<b>53.8%</b>
<b>TOTAL LOANS</b>	<b>2,369</b>	<b>100%</b>	<b>\$595,036</b>	<b>100%</b>

The bank’s loan activity in this assessment area represents 12.4 and 16.1 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. Moreover, by dollar volume, this accounts for 9.9 and 19.8 percent of lending across the assessment areas, respectively. Additionally, the level of lending slightly trails by number and exceeds by dollar the percentage of total branches in the assessment area (13.3 percent). This level of lending, however, is below the percentage of deposits held in this assessment area (32.6 percent). Although a higher percentage of deposits across the bank is held in this assessment area as it is where the bank is headquartered, this significant level of deposits relative to the percentage of loans originated results in the bank’s level of lending to exhibit adequate responsiveness to the assessment area credit needs. Most recently in 2019, the bank ranks 18<sup>th</sup> out of 531 reporters for HMDA lending, and 12<sup>th</sup> out of 131 reporters for CRA lending, with those ranked higher primarily consisting of larger financial institutions and mortgage companies.

### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Memphis assessment area is adequate. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is good. Lending to low-income borrowers in each of the years reviewed (5.3 percent in 2017, 4.7 percent in 2018, and 5.9 percent in 2019) was consistently above the aggregate lending levels for each year (3.6 percent in 2017, 4.5 percent in 2018, and 3.7 percent in 2019). Despite exceeding aggregate levels, the bank's performance was well below the demographic figures, which were consistent and averaged 24.3 percent. Consequently, the bank's HMDA lending to low-income borrowers during the review period is good in each of the years reviewed given this performance and context.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance was highest in 2017 (22.5 percent), when it significantly exceeded the aggregate lending level (11.8 percent), as well as the demographic figure (15.5 percent), reflecting excellent performance. In the other two years in the review period, the bank's performance (13.1 percent in 2018 and 12.8 percent in 2019) was lower, but in line with the aggregate lending levels (13.1 percent in 2018 and 11.8 percent in 2019), indicative of adequate performance. In terms of demographic figures (15.5 percent in both years), the bank was below these benchmarks by a larger margin.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is poor overall. In each of the three years reviewed, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (31.7 percent in 2017, 29.7 percent in 2018, and 26.5 percent in 2019) was significantly below aggregate lending levels (46.9 percent in 2017, 41.4 percent in 2018, and 40.7 percent in 2019), representing poor performance. Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 88.7 percent across the review period, the bank's lending levels were well below this figure in each of the three years.

### **Geographic Distribution of Loans**

Overall, the bank's distribution of loans by geography income level in the Memphis assessment area is adequate. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area's credit needs and the bank's lending activity. Furthermore, more weight was given to performance in low-income tracts compared to moderate-income tracts, given that there are more low-income geographies in the assessment area.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is adequate.

In two of the years where data was reviewed, the bank's percentage of HMDA loans in low-income census tracts (2.9 percent in 2017 and 3.1 percent in 2019) was in line with aggregate lending levels (3.6 percent in 2017 and 3.9 percent in 2019), but well below the demographic figure of 11.0 percent in both years, reflecting adequate performance. In 2018, the bank's lending levels in low-income census tracts (2.1 percent) was lower compared to the other two years, falling further below both aggregate (3.9 percent) and demographic (11.0 percent) figures, falling to a poor level.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's performance (9.6 percent) was highest in 2017, when it was in line with the aggregate lending level (10.2 percent), and trailed the demographic figure (16.7 percent), representing adequate performance. In the other two years in the review period, the bank's performance (7.0 percent in 2018 and 5.5 percent in 2019) was worse compared to aggregate lending levels (10.3 percent in 2018 and 10.5 percent in 2019). Moreover, performance was even further below the demographic figures of 16.7 and 16.9 percent, respectively, reflecting poor performance.

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is good. In each of the years where data was reviewed, the bank's percentage of small business loans in low-income census tracts (14.5 percent in 2017, 13.7 percent in 2018, and 14.8 percent in 2019) was above aggregate levels (9.9 percent in 2017, 10.3 percent in 2018, and 10.0 percent in 2019). This margin was slightly smaller, but still above demographic figures in the same years, which were 12.9 percent, 12.7 percent, and 12.9 percent, respectively. Consequently, the bank's small business lending in low-income census tracts was good in each of the years reviewed.

Pertaining to the percentage of small business loans in moderate-income census tracts, in each of the years, the bank's performance (19.5 percent in 2017, 19.5 percent in 2018, and 18.2 percent in 2019) was above the aggregate lending levels (16.1 percent in 2017, 15.0 percent in 2018, and 15.1 percent in 2019), as well as the demographic figures (16.0 percent in 2017, 16.2 percent in 2018, and 16.5 percent in 2019). This is reflective of good performance for each of years reviewed.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During the review period, the percentage of census tracts with loan activity was relatively consistent, averaging 73.7 percent, with the lowest year being 2017 (69.9 percent), when the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. As previously noted, enhancements to the bank's mortgage offerings followed the November 2017 Capital Bank acquisition. Pertaining to penetration of LMI census tracts, performance increased after this acquisition (55.0 percent in 2017, 59.2 percent in 2018, and 58.3 percent in 2019). In general, the bank's loans were most concentrated in the census tracts near branch locations, including LMI tracts. While LMI penetration is relatively low, as noted above,

there are numerous challenges in lending in LMI census tracts in the Memphis assessment area. As such, this lending pattern did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Memphis assessment area. During the review period, the bank originated 69 community development loans totaling \$240.1 million. These loans supported community services (28), revitalization and stabilization of LMI or distressed middle-income geographies (18), economic development (16), and affordable housing (7). Some of the most impactful loans are described below:

- Nineteen PPP loans totaling \$40.4 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 3,700 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.
- One \$6.0 million loan was made to finance the development of an affordable 77-unit LIHTC multifamily project in a low-income census tract, with 100 percent of units reserved exclusively for LMI individuals. This development will increase the amount of affordable housing in the assessment area, a need identified by community contacts. Moreover, as previously noted, a substantial portion of renters in the assessment area have rental costs exceeding 30.0 percent of their income, and this development would help address this issue.
- Another \$15.6 million loan was made to provide construction and bridge loan financing for an affordable 126-unit LIHTC multifamily project in a low-income census tract, reserved for LMI residents. As with the previous loan, this increases the amount of affordable housing in the assessment area.
- One \$6.9 million loan was made to construct a facility in a low-income census tract that provides food, shelter, and other services to the area's homeless population.
- A total of \$1.2 million in lines of credit were provided to a nonprofit that provides early childhood education, short-term respite care, day care, and social services to AIDS/HIV-affected children and their families, all of which are LMI.

### **Product Innovation**

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

- Under the bank's various affordable housing lending programs, the bank originated 41 loans totaling \$5.2 million: 12 Affordable Housing Program loans for \$1.5 million; 8 CRA Home Ready loans for \$919,738; 6 CRA Home Possible Advantage loans for \$616,265; 14 Fannie Mae Home Ready loans for \$2.1 million; and 1 Freddie Mac Home Possible loan for \$130,625. These loans are provided to home-buyers who are considered LMI, and/or the subject property is in an LMI geography.
- As noted in the *Community Development Lending Activity* section above, the bank also originated community development PPP loans to businesses in LMI geographies, using this flexible and innovative product to provide emergency relief to those adversely affected by the COVID-19 pandemic.

## INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 52 qualified community development investments totaling \$81.5 million, 41 accounting for \$58.7 million were made in the current review period, and 11 totaling \$22.8 million were made in the prior period but remain outstanding. Most of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area and LIHTCs. The LIHTCs helped develop or acquire and rehabilitate large-scale affordable housing developments for LMI families. Moreover, the MBS and LIHTC investments directly address affordable housing, including rehabilitation of the current affordable housing stock that needs repair, which community contacts noted as a need in the assessment area. Additionally, the pool of investments included equity investments and equity equivalents in an MDI and a CDFI that serve the LMI population, as well as those to facilitate redevelopment initiatives in and near LMI geographies and provide capital to small businesses in LMI areas.

In addition to these investments, the bank also made 199 donations totaling \$5.9 million. These donations benefitted various organizations including, but not limited to, providing funds for an individual development account (IDA) program that matches savings for graduates of a financial literacy program, contributing to a home repair fund for IDA participants, funding an after-school computer coding program for LMI children, donating to a down payment assistance fund for the Frayser neighborhood that was noted by community contacts as being in need of community development efforts, those that administer financial literacy education, as well as support workforce development for the formerly incarcerated to reduce recidivism.

## SERVICE TEST

The bank's service delivery systems are reasonably accessible in the assessment area, and the bank's record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.



**Accessibility of Delivery Systems**

The bank operates 43 branches in the Memphis assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	8 18.6%	4 9.3%	6 14.0%	25 58.1%	0 0.0%	<b>43</b> <b>100%</b>
Census Tracts	25.1%	21.2%	20.1%	31.3%	2.3%	<b>100%</b>
Household Population	18.2%	20.0%	20.8%	40.8%	0.2%	<b>100%</b>

Based on data in the preceding table, the bank operates 27.9 percent of its assessment area branches in LMI census tracts. This distribution is below the percentage of assessment area census tracts that are LMI (46.3 percent) and the household population in LMI census tracts (38.2 percent). However, the bank also operates five branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates 19 stand-alone, deposit-taking ATMs, 8 of which are in LMI geographies and 8 that border or are near LMI census tracts, and 33 stand-alone, cash-only ATMs, eight of which are in LMI geographies and 16 that border or are near LMI census tracts. This further increases the accessibility of the bank’s services to LMI residents. Therefore, the bank’s service delivery systems are reasonably accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	7	3	6	22	<b>38</b>
Acquired Branches	1	1	1	4	<b>7</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	0	(1)	(1)	<b>(2)</b>
<b>OVERALL</b>	<b>8</b>	<b>4</b>	<b>6</b>	<b>25</b>	<b>43</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. As shown above, the bank acquired seven and closed two branches in the Memphis assessment area during the review period. Two of the branch acquisitions and none of the closures were in LMI geographies, resulting in a net addition of two LMI branches during the review period. Consequently, this activity resulted in the number of locations in LMI geographies to rise from 10 to 12 branches during the review period.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at 24 branch locations, including 5 in LMI census tracts. Moreover, 38 of the offices operate drive-through facilities, 6 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at 17 branches, 4 of which are in LMI census tracts.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 1,144 community development services, totaling 3,283 hours, were provided to 117 different organizations. Bank employees' activities included administering financial literacy training to schools that primarily serve LMI children; providing financial expertise to organizations that provide free tax-preparation services, provide free healthcare to LMI residents, and support affordable housing initiatives; as well as serving on the board of various organizations in the assessment area. Organizations with board and committee representation include, but are not limited to, those with the mission of transitioning the unbanked to a traditional financial institution, providing services to LMI children, aiding the homeless population, and providing affordable healthcare to LMI residents. The affordable housing-related services are particularly responsive given the affordable housing needs identified through community contact interviews.

## NORTH CAROLINA

### CRA RATING FOR NORTH CAROLINA:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

**SATISFACTORY**

**High Satisfactory**

**Outstanding**

**High Satisfactory**

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

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

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of North Carolina assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank's ratings in the state of North Carolina reflect a composite of the bank's performance in all six of its assessment areas throughout the state. The bank operates in five CSA or MSA assessment areas, along with three noncontiguous nonMSA portions of the state. Performance in the nonMSA portions of the state was combined for analysis, resulting in one set of performance conclusions for all of nonMSA North Carolina, and six evaluated assessment areas. Performance in the Greensboro, Raleigh-Durham, and Hickory assessment areas was reviewed

under full-scope examination procedures. Based on the bank’s branch structure and loan and deposit activity, CRA performance in the Greensboro assessment area received primary consideration when determining statewide performance conclusions.

To augment the evaluation of the full-scope review assessment areas in North Carolina, six community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. Three of the interviews were with representatives from government or nonprofit agencies focusing on affordable housing, two were with individuals specializing in economic development, and the remaining contact represented a CDFI. Details from these interviews are included in the *Description of Institution’s Operations* sections, as applicable to the assessment areas for which the community contacts were made.

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN NORTH CAROLINA

Prior to the merger-of-equals with IBERIABANK, First Horizon Bank operated 56 offices (20.7 percent of total branches) throughout the six CRA assessment areas in the state of North Carolina. The following table gives additional detail regarding the legacy First Horizon Bank operations within North Carolina, which drove the assessment area determination and weighting for the state.

Assessment Area	Offices		Deposits As of June 30, 2020		Review Procedures
	#	%	\$	%	
Greensboro CSA	24	42.9%	\$1,484	36.3%	Full Scope
Raleigh-Durham CSA	14	25.0%	\$1,307	32.0%	Full Scope
Hickory MSA	8	14.3%	\$694	17.0%	Full Scope
Fayetteville MSA	2	3.6%	\$116	2.8%	Limited Scope
Asheville MSA	3	5.4%	\$187	4.6%	Limited Scope
NonMSA North Carolina	5	8.9%	\$297	7.3%	Limited Scope
<b>TOTAL</b>	<b>56</b>	<b>100%</b>	<b>\$4,086</b>	<b>100%</b>	<b>3 – Full Scope</b>

During the entire review period, including the merger-of-equals, the bank acquired 81, opened 1, and closed 19 branches in the six assessment areas, resulting in a net addition of 63 branches since the previous evaluation. While the table above focuses on legacy First Horizon Bank operations, as of November 29, 2020, in the combined organization, the bank operates 68 branches throughout the assessment areas. These changes are discussed in more detail in each of the respective assessment area sections.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA**

**LENDING TEST**

The bank’s Lending Test performance in North Carolina is rated high satisfactory. The test considers the following criteria.

**Lending Activity**

<b>Full-Scope Review Areas</b>	<b>Lending Activity</b>
Greensboro CSA	Good
Raleigh-Durham CSA	Adequate
Hickory MSA	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

<b>Limited-Scope Review Areas</b>	<b>Lending Activity</b>
Asheville MSA	Below
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

The bank’s overall level of lending reflects adequate responsiveness to the credit needs of the North Carolina assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank’s overall importance to each assessment area.

**Borrower and Geographic Distribution**

As displayed in the following tables, the bank’s performance by borrower’s income and revenue profile is good in North Carolina.

<b>Full-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Greensboro CSA	Good
Raleigh-Durham CSA	Good
Hickory MSA	Good
<b>OVERALL</b>	<b>GOOD</b>

<b>Limited-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Asheville MSA	Below
Fayetteville MSA	Below
NonMSA North Carolina	Consistent

Overall, the bank’s geographic distribution of loans reflects adequate penetration in the state of North Carolina, as is displayed in the following tables.

Full-Scope Review Areas	Geographic Distribution of Loans
Greensboro CSA	Adequate
Raleigh-Durham CSA	Good
Hickory MSA	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

Limited-Scope Review Areas	Geographic Distribution of Loans
Asheville MSA	Below
Fayetteville MSA	Consistent
NonMSA North Carolina	Exceeds

**Community Development Lending Activities**

Overall, the bank was a leader in making community development loans in its North Carolina assessment areas, as displayed below.

Full-Scope Review Areas	Community Development Lending Activities
Greensboro CSA	Leader
Raleigh-Durham CSA	Leader
Hickory MSA	Leader
<b>OVERALL</b>	<b>LEADER</b>

Limited-Scope Review Areas	Community Development Lending Activities
Asheville MSA	Consistent
Fayetteville MSA	Below
NonMSA North Carolina	Below

During the review period, the bank originated or renewed 64 community development loans in the its North Carolina assessment areas totaling \$69.0 million, which represents an increase from the \$28.0 million in qualified community development loans at the bank’s previous evaluation. This includes multiple loans for the development of LIHTC multifamily affordable housing projects to primarily benefit LMI residents, and a loan to finance the renovation of a commercial property projected to create over 200 jobs in a moderate-income census tract. Additionally, this total included nine community development PPP loans totaling \$16.5 million in the bank’s assessment areas that were in response to the COVID-19 pandemic.

Furthermore, as the bank met the community development lending needs of its own assessment areas in the state, consideration was also given to community development loans made outside of the bank’s rated areas. In the broader statewide and regional area, the bank made seven loans totaling \$7.9 million. This total included one community development PPP loan for \$1.1 million.

**Product Innovation**

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

- Under the bank’s Affordable Housing Program, the bank originated 48 loans totaling \$6.3 million. Additionally, the bank originated two loans for \$251,000 under the legacy Capital Bank affordable housing product that was offered during the review period. These loans are provided to home-buyers purchasing a primary residence that are considered LMI, and/or the subject property is in an LMI geography.
- As noted in the *Community Development Lending Activities* section above, the bank also originated community development PPP loans to businesses in LMI geographies in the state’s assessment areas, using this flexible and innovative product to provide emergency relief to those adversely affected by the COVID-19 pandemic.

**INVESTMENT TEST**

Overall, the bank’s performance in North Carolina is rated outstanding under the Investment Test. The following tables display investment and grant activity performance in North Carolina.

<b>Full-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Greensboro CSA	Excellent Level
Raleigh-Durham CSA	Excellent Level
Hickory MSA	Significant Level
<b>OVERALL</b>	<b>EXCELLENT LEVEL</b>

<b>Limited-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Asheville MSA	Below
Fayetteville MSA	Below
NonMSA North Carolina	Below

As shown in the following table, the bank made a total of \$41.6 million in qualified community development investments and \$2.3 million in donations and grants in the North Carolina assessment areas. In addition, the bank made \$11.3 million in qualified community development investments and \$91,000 in donations and grants in the broader statewide area outside of its

assessment areas for a total of \$52.9 million and \$2.4 million, respectively. These investments primarily consisted of MBS, along with LIHTCs and an equity equivalent, while the bank’s donations were made to various affordable housing, community service, and economic development organizations throughout the state. Of the total statewide investments, \$52.8 million were made in the current review period, while \$145,645 were made prior to the review period but were still outstanding.

North Carolina Assessment Area	Investments	Donations/Grants
Greensboro CSA	\$16.5 Million	\$649,621
Raleigh-Durham CSA	\$21.9 Million	\$716,553
Hickory MSA	\$1.5 Million	\$305,079
Asheville MSA	\$1.6 Million	\$125,575
Fayetteville MSA	\$0	\$346,696
NonMSA North Carolina	\$170,748	\$162,219
Statewide (Outside AA)	\$11.3 Million	\$91,000
<b>TOTAL</b>	<b>\$52.9 Million</b>	<b>\$2.4 Million</b>

**SERVICE TEST**

The bank’s performance in North Carolina is rated high satisfactory under the Service Test, based on the criteria in the following tables.

**Accessibility of Delivery Systems**

As displayed in the following tables, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels in North Carolina.

Full-Scope Review Areas	Accessibility of Delivery Systems
Greensboro CSA	Reasonably Accessible
Raleigh-Durham CSA	Reasonably Accessible
Hickory MSA	Reasonably Accessible
<b>OVERALL</b>	<b>REASONABLY ACCESSIBLE</b>

Limited-Scope Review Areas	Accessibility of Delivery Systems
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Exceeds



**Changes in Branch Locations**

The bank’s record of opening and closing branches in the North Carolina assessment areas has improved the accessibility of its service delivery systems, as shown in the tables below.

<b>Full-Scope Review Areas</b>	<b>Changes in Branch Locations</b>
Greensboro CSA	Improved
Raleigh-Durham CSA	Improved
Hickory MSA	Improved
<b>OVERALL</b>	<b>IMPROVED</b>

<b>Limited-Scope Review Areas</b>	<b>Changes in Branch Locations</b>
Asheville MSA	Below
Fayetteville MSA	Below
NonMSA North Carolina	Below

**Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs**

Business hours and banking services do not vary in a way that inconveniences certain portions of the North Carolina assessment areas, particularly LMI geographies and individuals. The bank’s performance under this criterion is displayed by assessment area in the following tables:

<b>Full-Scope Review Areas</b>	<b>Reasonableness of Business Hours and Services</b>
Greensboro CSA	Do Not Vary in a Way That Inconveniences
Raleigh-Durham CSA	Do Not Vary in a Way That Inconveniences
Hickory MSA	Do Not Vary in a Way That Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

<b>Limited-Scope Review Areas</b>	<b>Reasonableness of Business Hours and Services</b>
Asheville MSA	Consistent
Fayetteville MSA	Consistent
NonMSA North Carolina	Consistent

**Community Development Services**

Overall, the bank provides a relatively high level of community development services in the North Carolina assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the North Carolina assessment areas.

<b>Full-Scope Review Areas</b>	<b>Community Development Services</b>
Greensboro CSA	Leader
Raleigh-Durham CSA	Relatively High
Hickory MSA	Relatively High
<b>OVERALL</b>	<b>RELATIVELY HIGH</b>

<b>Limited-Scope Review Areas</b>	<b>Community Development Services</b>
Asheville MSA	Consistent
Fayetteville MSA	Below
NonMSA North Carolina	Consistent

During the review period, 399 community development services were provided to 63 different organizations, accounting for 988 service hours. Bank employees served on the board and provided expertise and financial assistance to various organizations, promoting community development initiatives throughout the North Carolina assessment areas.

## **GREENSBORO–WINSTON-SALEM–HIGH POINT, NORTH CAROLINA CSA**

*(Full-Scope Review)*

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE GREENSBORO ASSESSMENT AREA**

#### **Bank Structure**

The bank currently operates 32 branches in the Greensboro assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK and acquisition of Truist Bank branches, the bank operated 24 branches in the assessment area, representing 8.9 percent of all bank branches at the time. Through the merger and acquisition activity, however, the bank added 8 offices to the assessment area, increasing its branching footprint to 32 locations, representing 6.6 percent of branches in the combined institution. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>			
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
2	7	13	10

In total during the review period, the bank acquired 37 branches, including the activity discussed above. Additionally, the bank closed 6 branches, for a net addition of 31 locations since the last evaluation, where the bank had 1 location. In addition to its branches, the bank also operates four stand-alone, deposit-taking ATMs and three standalone, cash-only ATMs, one of which is in a moderate-income census tract. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to the entire Greensboro assessment area.

#### **General Demographics**

The bank’s Greensboro assessment area consists of Alamance, Forsyth, Guilford, Randolph, Stokes, Surry, and Yadkin Counties, seven of the ten counties in the Greensboro–Winston-Salem–High Point CSA, which combines the Greensboro-High-Point MSA, Winston-Salem MSA, Burlington MSA, and one surrounding nonMSA county. While the bank has designated these as separate assessment areas, they are combined as the Greensboro assessment area for purposes of this evaluation. The assessment area has a total population of 1.3 million, the majority of which is concentrated in Guilford County (506,673), which contains the city of Greensboro. Greensboro serves as an important regional hub for commercial and banking activity to the surrounding counties, and the overall assessment area contains several large universities with substantial enrollments including, but not limited to, the University of North Carolina at Greensboro (20,196 students), North Carolina Agricultural and Technical State University (12,753 students), Wake Forest University (8,789 students), and Elon University (7,088 students).

The assessment area hosts a competitive banking market, with 30 FDIC-insured depository institutions operating 312 branches throughout the assessment area. Prior to the merger-of-equals, the bank ranked sixth in deposit market share with 5.4 percent of all deposit dollars in the assessment area, representing 4.6 percent of total bank deposits at the time. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 541 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 38<sup>th</sup> with 0.6 percent of total loan activity. Of the 121 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 20<sup>th</sup> with 0.7 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the assessment area include small dollar mortgage products, which the affordable housing specialist noted as the greatest need in the area, small dollar home improvement loans, and small dollar business loans. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically investing in affordable housing developments offering tax incentives, as well as fostering relationships with community colleges that provide workforce development through investments and loans.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	23	7.3%	16,743	4.9%
<b>Moderate</b>	74	23.6%	75,973	22.4%
<b>Middle</b>	118	37.6%	136,659	40.3%
<b>Upper</b>	96	30.6%	109,908	32.4%
<b>Unknown</b>	3	1.0%	242	0.1%
<b>TOTAL</b>	<b>314</b>	<b>100%</b>	<b>339,525</b>	<b>100%</b>

As displayed in the table above, 30.9 percent of census tracts in the assessment area are LMI, though only 27.3 percent of assessment area families reside in those census tracts. The assessment area’s LMI census tracts are concentrated around the cities of Greensboro, Winston-Salem, Burlington, and High Point, along with portions of the more rural areas of the assessment area within Surry, Stokes, Yadkin, and Randolph Counties. Additionally, as noted above, the assessment area includes the University of North Carolina at Greensboro, a large, public university located in downtown Greensboro, which borders and is near LMI census tracts. Furthermore, Wake Forest University, another large university in the assessment area, located in Winston-Salem, also borders and is near LMI census tracts. Consequently, opportunities for HMDA lending are limited in these geographies given the lack of nonstudent housing.

According to 2015 ACS data, the median family income for the Greensboro assessment area was \$55,711, while the same figure for the state of North Carolina as a whole was \$57,856. More recently, the FFIEC estimates the median family income for the Greensboro-High Point MSA to be \$59,900, the Winston-Salem MSA to be \$61,500, and the Burlington MSA to be \$61,600 in 2019.

The following table displays the distribution of assessment area families by income level compared to all North Carolina families.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>North Carolina</b>	
<b>Low</b>	74,227	21.9%	547,541	21.9%
<b>Moderate</b>	59,784	17.6%	436,977	17.5%
<b>Middle</b>	61,880	18.2%	478,449	19.2%
<b>Upper</b>	143,634	42.3%	1,035,026	41.4%
<b>TOTAL</b>	<b>339,525</b>	<b>100%</b>	<b>2,497,993</b>	<b>100%</b>

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.5 percent) than reside in LMI geographies (27.3 percent). When compared to the family income distribution for the state of North Carolina as a whole, the percentage of LMI families in the assessment area is in line with the statewide figure (39.4 percent). Similarly, the percentage of families below the poverty level in the assessment area (13.7 percent) and in North Carolina as a whole (12.8 percent) are closely aligned. Based on the distribution of families by income, as well as income and poverty levels, the assessment area is similarly affluent to North Carolina as a whole.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$143,301	30.5%	\$734
North Carolina	\$154,900	30.3%	\$797

As shown in the table above, housing in the assessment area is similarly affordable to the state of North Carolina as a whole. As noted by community contacts, however, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. Compounding this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 61.7 percent of housing units in low-income census tracts and 42.5 percent of housing in moderate-income census tracts are rental units. Moreover, 2.4 percent of owner-occupied housing units in the assessment area are in low-income census tracts. Additionally, the median age of housing stock in the assessment area (40 years) is notably higher than the state as a whole

(29 years). As noted by the community contact specializing in affordable housing, one of the most pressing credit needs is home improvement loans, as most affordable housing stock is older and in need of repairs. Considering these factors, opportunities for HMDA lending in LMI census tracts are likely limited.

Specific to rental units in the assessment area, median gross rent is slightly lower than the state of North Carolina, while the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (44.4 percent) is in line with the same figure for North Carolina as a whole (43.9 percent). Specific to LMI residents, 74.9 percent of low-income and 44.1 percent of moderate-income renters in the assessment area have rental costs exceeding 30.0 percent of their income, making saving for a home purchase challenging. As such, homeownership may be out of reach for many LMI residents.

**Industry and Employment Demographics**

The Greensboro assessment area economy is diverse and hosts several large corporations and universities. County business patterns indicate that there are 630,997 paid employees in the assessment area, the majority of which are employed in the healthcare and social assistance (15.0 percent), manufacturing (12.7 percent), governmental (11.5 percent), and retail trade (11.2 percent) industries. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 91.2 percent of businesses reported annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of North Carolina.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>North Carolina</b>
2017	4.4%	4.5%
2018	4.0%	4.0%
2019	3.9%	3.9%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and were in line with statewide levels. Unemployment levels were consistent across all counties, with a slightly higher level in Guilford County (4.1 percent in 2019), which contains the city of Greensboro and portions of High Point. While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Greensboro assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a governmental agency specializing in small business and technology development, while the other contact represented a nonprofit organization specializing in affordable housing.

Economic conditions in the area were characterized as favorable during the review period by both contacts, with the area's population increasing primarily due to growth of the medical technology industry and expansion of a major hospital. Despite the benefits of this growth, the small business development specialist indicated this has also resulted in housing shortages across all price points due to high demand. These sentiments were echoed by the contact specializing in affordable housing, who noted the supply of affordable housing stock was low. Additionally, much of the affordable housing stock needs structural and air-system updates, which can prevent LMI individuals from taking advantage of the Low-Income Home Energy Assistance Program (LIEHEAP), as funding is denied if major structural repairs are needed for the home.

Pertaining to COVID-19, the contacts stated the pandemic has had varying effects on the population. The affordable housing specialist noted much of the workforce remained unemployed while receiving federal benefits, but now that funding has expired, many are returning to the workforce. From a business standpoint, the small business development representative noted that although conditions were uncertain during the pandemic, a limited number of businesses closed. Furthermore, the contact went on to indicate that while businesses with pre-existing banking relationships were able to take advantage of PPP lending programs, many small businesses without strong banking relationships were left out of borrowing opportunities from traditional banks, and only benefitted when PPP lending was made available through area CDFIs.

Access to banking branches and services in the area is generally good, with contacts noting that services were limited in Stokes and Yadkin Counties compared to Forsyth County. Credit needs were identified to be small dollar mortgage products, which the affordable housing specialist noted as the greatest need in the area, small dollar home improvement loans to assist current LMI homeowners to take advantage of the LIHEAP, and small dollar business loans. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including investing in affordable housing developments offering tax incentives, as well as fostering relationships with community colleges that provide workforce development through investments and loans.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREENSBORO ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank is a leader in making community development loans in the assessment area.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Greensboro assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	251	25.8%	\$73,596	36.8%
Refinance	211	21.7%	\$32,786	16.4%
Home Improvement	62	6.4%	\$4,785	2.4%
Multifamily Housing	0	0.0%	\$0	0.0%
<b>Total HMDA</b>	<b>524</b>	<b>53.9%</b>	<b>\$111,167</b>	<b>55.6%</b>
<b>Small Business</b>	<b>448</b>	<b>46.1%</b>	<b>\$88,703</b>	<b>44.4%</b>
<b>TOTAL LOANS</b>	<b>972</b>	<b>100%</b>	<b>\$199,870</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 5.0 and 5.9 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. Moreover, by dollar volume, this accounts for 3.8 and 5.5 percent of lending across the assessment areas, respectively. When compared to the bank’s branching footprint, this level of lending is below the percentage of total branches in the assessment area (8.9 percent) for both HMDA and CRA lending. Although when compared to deposits, this level of lending is above the percentage of total bank deposits held in the assessment area (4.6 percent). Most recently in 2019, the bank ranked 38<sup>th</sup> out of 541 reporters in HMDA lending by number, and 20<sup>th</sup> out of 121 reporters in CRA lending in the same year. Peers who rank higher are often mortgage companies and larger financial institutions.

**Loan Distribution by Borrower’s Profile**

The bank’s distribution of loans by income or revenue profile in the Greensboro assessment area is good. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank’s lending activity. Moreover, less weight is given to



2017 performance, as the bank substantially increased its branching footprint following the November 2017 Capital Bank acquisition. Prior to this acquisition, and for the vast majority of 2017, the bank operated a single branch in the assessment area. This single branch was in the Winston-Salem MSA and, as such, the Greensboro-High Point MSA and Burlington MSA, which contain numerous LMI census tracts in the combined assessment area used for this analysis, were not part of the bank's footprint until after the acquisition.

### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is good. In two of the three years reviewed, the bank exhibited good performance in lending to low-income borrowers. In 2018, the bank's level of lending (10.0 percent) was highest, greatly exceeding the aggregate lending level (5.8 percent). Performance in 2019 (9.1 percent) also exceeded the aggregate level (5.2 percent), but by a smaller margin. Despite exceeding aggregate lending performance, both years were much lower than demographic figures, which were consistently 21.9 percent during the review period. Lending levels were much lower in 2017 (1.6 percent), representing poor performance; however, as noted above, this year contributed little weight to the overall rating given the limited branch presence.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance was highest in 2019 (17.2 percent), slightly exceeding both the aggregate lending level (16.5 percent) and demographic figure (17.6 percent), reflecting a good level of lending. Performance in 2018 (17.0 percent) was lower, falling slightly below both the aggregate (17.3 percent) and demographic (17.6 percent) figures, representing adequate performance. Lending levels were much lower in 2017 (9.7 percent), well below the aggregate level of lending (16.2 percent) and demographic figure (17.6 percent), representing poor performance.

### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is adequate overall. In two of the years where data was reviewed, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (48.2 percent in 2018 and 38.3 percent in 2019) was below aggregate lending levels (49.2 percent in 2018 and 46.8 percent in 2019), indicative of adequate performance. In 2017, however, the bank's performance (28.1 percent) was further below the aggregate level (52.7 percent) when compared to the other two years, reflecting poor performance. Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 90.5 percent across the review period, the bank's lending levels were well below this figure in each of the three years. Nonetheless, the bank's small business lending during the review period is adequate.

### **Geographic Distribution of Loans**

Overall, the bank's distribution of loans by geography income level in the Greensboro assessment area is adequate. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit

needs and the bank's lending activity. Emphasis was given to moderate-income census tract lending, as these census tracts comprise 76.3 percent of LMI geographies. Moreover, less weight is provided to 2017 performance, as the bank substantially increased its branching footprint following the November 2017 Capital Bank acquisition. Prior to this acquisition, and for the vast majority of 2017, the bank operated a single branch in the assessment area. This single branch was in the Winston-Salem MSA and, as such, the Greensboro-High Point MSA and Burlington MSA, which contain numerous LMI census tracts in the combined assessment area used for this analysis, were not part of the bank's footprint until after the acquisition.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is adequate. In two of the years where data was reviewed, the bank's percentage of HMDA loans in low-income census tracts (1.3 percent in 2018 and 0.9 percent in 2019) was in line with aggregate lending levels (1.3 percent in both 2018 and 2019), and slightly below the demographic figure of 2.4 percent in both years, reflecting adequate performance. In 2017, performance was poor, where the bank originated no loans in low-income census tracts. Despite originating no loans, there were very low aggregate (1.3 percent) and demographic (2.4 percent) figures, indicating a limited level of lending opportunities in these geographies. As noted above, 2017 carried little weight given the bank's single branch in the expansive broader assessment area used for this evaluation.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's lending levels were the highest in 2018 (16.5 percent), exceeding the aggregate lending level (14.5 percent), but remaining slightly below the demographic figure (18.5 percent), representing good performance. In 2019, the other year when the bank had a meaningful branching presence throughout the assessment area, the bank's performance (12.1 percent) trailed the aggregate lending level slightly (14.7 percent), as well as the demographic figure to a larger margin (18.5 percent), reflecting adequate performance. While little emphasis is placed on 2017 lending, performance was slightly higher than 2019 (12.9 percent), compared to aggregate (14.7 percent) and demographic (18.5 percent) figures, thus also indicative of adequate performance.

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is good. This determination is largely driven by the performance in moderate-income geographies, as they are the vast majority of LMI census tracts in the assessment area.

For 2017 and 2018, performance is poor and very poor, respectively, as the bank's performance (0.0 percent in 2017 and 2.3 percent in 2018) was below aggregate lending levels (3.6 percent in 2017 and 3.4 percent in 2018). Moreover, small business lending was also below the demographic figure in both years (4.1 and 4.0 percent, respectively). In 2019, the bank's percentage of small business loans in low-income census tracts (3.1 percent) was in line with the aggregate level (3.4 percent) and the demographic figure (4.1 percent), reflecting adequate performance.

Pertaining to the percentage of small business loans in moderate-income census tracts, the bank showed excellent performance in 2018 (34.1 percent), where it greatly exceeded both aggregate

(20.5 percent) and demographic (21.1 percent) figures. In the remaining two years, the bank's small business lending levels (25.0 percent in 2017 and 27.0 percent in 2019) were above aggregate (19.4 percent in 2017 and 20.2 percent in 2019) and demographic (20.9 percent in 2017 and 21.0 percent in 2019) figures, but by a smaller margin, representing good performance.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During the review period, the percentage of census tracts with loan activity averaged 41.5 percent, with the lowest year being 2017 (15.6 percent). The bank operated a single branch in the assessment area until the November 2017 acquisition of Capital Bank. Prior to the same acquisition, the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. Specific to the latter two years in the review period, the bank averaged 54.5 percent overall penetration of assessment area census tracts. Pertaining to penetration of LMI census tracts, performance increased significantly after this acquisition (9.3 percent in 2017, 44.3 percent in 2018, and 39.2 percent in 2019). In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. While LMI penetration, along with overall penetration, is relatively low, this lending pattern did not reflect evidence of arbitrarily excluding LMI geographies given the bank's branching footprint in this large assessment area.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Greensboro assessment area. During the review period, the bank originated 42 community development loans totaling \$16.4 million. These loans supported affordable housing (37), economic development (3), and revitalization and stabilization of LMI or distressed middle-income geographies (2). Some of the most impactful loans are described below:

- One loan for \$4.0 million was made to finance the development of an affordable 88-unit LIHTC multifamily project in an upper-income census tract, with 100 percent of units reserved exclusively for LMI individuals. This increases the amount of affordable housing in the assessment area, and addresses the need for greater access to affordable housing for LMI individuals in the assessment area as noted by community contacts. Moreover, as previously noted, a substantial portion of renters in the assessment area have rental costs exceeding 30.0 percent of their income, and this development would help address this issue.
- Four PPP loans totaling \$7.9 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 500 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 14 qualified community development investments totaling \$16.5 million, all were made during the current review period. Most of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area, along with one LIHTC.

The LIHTC funded the construction of a large-scale, affordable housing development for LMI families, including a portion earmarked for mobility-impaired LMI residents. Moreover, the MBS and LIHTC investments directly address affordable housing, which community contacts noted as an urgent need in the assessment area. In addition to these investments, the bank also made 38 donations totaling \$649,621. These donations benefitted various organizations including, but not limited to, those dedicated to affordable housing, providing healthcare to LMI residents without health insurance, and a CDFI, along with in-kind donations for allowing a nonprofit to use bank facilities to deliver financial education, credit and money management, and financial products to unbanked and underbanked LMI residents.

**SERVICE TEST**

The bank’s service delivery systems are reasonably accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly to LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 32 branches in the Greensboro assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	2 6.3%	7 21.9%	13 40.6%	10 31.3%	0 0.0%	<b>32</b> <b>100%</b>
Census Tracts	7.3%	23.6%	37.6%	30.6%	1.0%	<b>100%</b>
Household Population	5.5%	23.5%	40.2%	30.7%	0.2%	<b>100%</b>

Based on data in the preceding table, the bank operates 28.2 percent of its assessment area branches in LMI census tracts. This distribution is slightly similar to both the percentage of assessment area census tracts that are LMI (30.9 percent) and the household population in LMI census tracts (29.0 percent). However, the bank also operates four branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates four stand-alone, deposit-taking ATMs, one of which is near LMI geographies, and three stand-alone, cash-only ATMs, one of which is in an LMI census tract. This further increases the accessibility of the bank’s services to LMI residents. Therefore, the bank’s service delivery systems are reasonably accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Middle- Income</b>	<b>Upper- Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	0	1	0	<b>1</b>
Acquired Branches	2	8	15	12	<b>37</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	(1)	(3)	(2)	<b>(6)</b>
<b>OVERALL</b>	<b>2</b>	<b>7</b>	<b>13</b>	<b>10</b>	<b>32</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. As shown above, the bank acquired 37 and closed 6 branches in the Greensboro assessment area during the review period. Ten of the branch acquisitions and one of the closures were in LMI geographies, resulting in a net addition of nine LMI branches during the review period. Despite the branch closure in a moderate-income census tract in Asheboro, the bank operates a branch in another moderate-income geography near the closed location. Overall, this activity resulted in the number of locations in LMI geographies to rise from zero to nine branches during the review period.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank’s hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at all branch locations. Moreover, 24 of the offices operate drive-through facilities, 7 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at seven branches, one of which is in a moderate-income census tract.

**Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 143 community development services, totaling 506 hours, were provided to 20 different organizations. Bank employees’ activities included administering financial literacy training to the incarcerated prior to their release from prison, providing financial expertise to an organization that builds affordable housing, and serving on the board and committees of various organizations in the assessment area. Organizations with board and committee representation include, but are not limited to, those dedicated to small business development, providing housing for LMI families with children staying at local hospitals, distributing nutritious meals to LMI seniors, building affordable housing, and providing shelter and services to the homeless. The affordable housing-related services are particularly responsive given the affordable housing needs identified through community contact interviews.

**RALEIGH-DURHAM-CARY, NORTH CAROLINA CSA**  
*(Full-Scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE RALEIGH-DURHAM ASSESSMENT AREA**

**Bank Structure**

The bank currently operates 18 branches in the Raleigh-Durham assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK and acquisition of Truist Bank branches, the bank operated 14 branches in the assessment area, representing 5.2 percent of all bank branches at the time. Through the merger and acquisition activity, the bank added 4 offices to the assessment area, increasing its branching footprint to 18 locations, representing 3.7 percent of branches in the combined institution. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>			
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
0	3	7	8

In addition to the acquisition activity noted above, the bank opened 1 and acquired 14 other branches, for a total of 19 additions during the review period. Additionally, the bank closed 5 branches, for a net addition of 14 locations. Outside of ATMs at each full-service branch, the bank does not operate any stand-alone ATMs in the assessment area. However, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Raleigh-Durham assessment area. Challenges may be encountered in serving Durham County, where the bank does not operate any branches, as well as the more rural LMI areas of Granville and Chatham Counties, as the bank operates a single branch in each of these larger counties.

**General Demographics**

The bank’s Raleigh-Durham assessment area consists of Chatham, Durham, Granville, Orange, and Wake Counties, five of the nine counties in the full Raleigh-Durham-Cary CSA, which combines the Durham-Chapel Hill MSA, Raleigh-Cary MSA, and one surrounding nonMSA county. While the bank has designated these as separate assessment areas, they are combined as the Raleigh-Durham assessment area for purposes of this evaluation. The assessment area has a total population of 1.5 million, with the most populous county being Wake County (976,019), which contains the cities of Raleigh and Cary. As the most populous city, Raleigh serves as an important regional hub for commercial and banking activity to the surrounding counties. Additionally, the overall assessment area contains several large universities with substantial enrollments, including North Carolina State University (35,000 students), University of North Carolina at Chapel Hill (30,101 students), and Duke University (15,551 students), that are located in the cities of Raleigh, Chapel Hill, and Durham, respectively. These institutions form what is

referred to as “The Research Triangle,” known to be a home of research facilities, numerous technology companies, and an educated workforce.

The assessment area hosts a competitive banking market, with 36 FDIC-insured depository institutions operating 352 branches throughout the assessment area. Of these institutions, First Horizon Bank ranks seventh in deposit market share with 2.7 percent of all assessment area deposit dollars, representing 16.9 percent of total bank deposits prior to the merger-of-equals. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 673 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 94<sup>th</sup> with 0.1 percent of total loan activity. Of the 125 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 22<sup>nd</sup> with 0.5 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the Raleigh-Durham assessment area include low interest rate loans with longer maturities, small dollar business loans, and revolving lines of credit for small businesses. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically investing in local CDFIs, educating small businesses regarding lending criteria at area events, and collaborating with organizations to build and preserve affordable housing units in downtown Raleigh and Durham.

**Income and Wealth Demographics**

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

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
<b>Low</b>	23	7.6%	19,500	5.2%
<b>Moderate</b>	64	21.3%	77,189	20.5%
<b>Middle</b>	89	29.6%	127,641	34.0%
<b>Upper</b>	117	38.9%	151,556	40.3%
<b>Unknown</b>	8	2.7%	75	0.0%
<b>TOTAL</b>	<b>301</b>	<b>100%</b>	<b>375,961</b>	<b>100%</b>

As displayed in the table above, 28.9 percent of census tracts in the assessment area are LMI, though only 25.7 percent of assessment area families reside in those census tracts. The assessment area’s LMI census tracts are concentrated around the cities of Raleigh, Durham, and Siler City. Additionally, as noted above, the assessment area includes North Carolina State University, a large, public university located outside downtown Raleigh, which borders and is near LMI census tracts. Additionally, North Carolina Central University, another university located in Durham, is in a moderate-income census tract and borders other LMI census tracts. Consequently, opportunities for HMDA lending are likely limited in these geographies given the lack of nonstudent housing.

According to 2015 ACS data, the median family income for the Raleigh-Durham assessment area was \$78,812, while the same figure for the state of North Carolina as a whole was \$57,856. More recently, the FFIEC estimates the median family income for the Raleigh MSA to be \$93,100 and the Durham-Chapel Hill MSA to be \$75,100 in 2019. The Raleigh MSA figure indicated a rapid rise in incomes over the past several years, with the FFIEC estimating the median family income for the MSA to be \$84,300 in 2018 and \$80,200 in 2017.

The following table displays the distribution of assessment area families by income level compared to all North Carolina families.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>North Carolina</b>	
<b>Low</b>	78,099	20.8%	547,541	21.9%
<b>Moderate</b>	60,873	16.2%	436,977	17.5%
<b>Middle</b>	69,331	18.4%	478,449	19.2%
<b>Upper</b>	167,658	44.6%	1,035,026	41.4%
<b>TOTAL</b>	<b>375,961</b>	<b>100%</b>	<b>2,497,993</b>	<b>100%</b>

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (37.0 percent) than reside in LMI geographies (25.7 percent). When compared to the family income distribution for the state of North Carolina as a whole, the percentage of LMI families in the assessment area is in line with the statewide figure (39.4 percent). The percentage of families below the poverty level in the assessment area (9.0 percent), however, is well below the state of North Carolina (12.8 percent). Based on the distribution of families by income, as well as income and poverty levels, the assessment area is more affluent than North Carolina as a whole.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$221,574	28.1%	\$926
North Carolina	\$154,900	30.3%	\$797

As shown in the table above, housing in the assessment area is less affordable than the state of North Carolina as a whole. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. More specifically, the assessment area’s affordability ratio (28.1 percent) is below the state as a whole (30.3 percent), along with median housing values being 43.0 percent higher than that of the state of North Carolina. Compounding this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 69.3 percent of housing units in low-income census tracts and 44.4 percent



of housing in moderate-income census tracts are rental units. Moreover, only 2.3 percent of owner-occupied housing units in the assessment area are in low-income census tracts. Considering these factors, opportunities for HMDA lending in LMI census tracts are likely limited.

Specific to rental units in the assessment area, median gross rent is above the state of North Carolina, while the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (43.2 percent) is similar to the same figure for North Carolina as a whole (43.9 percent). Specific to challenges faced by LMI residents, however, 79.3 percent of low-income and 37.1 percent of moderate-income renters in the assessment area have rental costs exceeding 30.0 percent of their income, hindering the ability to save for a down payment on a home purchase. As such, homeownership may be out of reach for many LMI residents.

### **Industry and Employment Demographics**

As previously noted, the assessment area supports a large and diverse economy, including a strong small business sector and several large universities. County business patterns indicate that there are 866,062 paid employees in the assessment area, the majority of which are employed in the governmental (13.2 percent), healthcare and social assistance (12.6 percent), and professional and technical services (11.1 percent) industries. Lastly, assessment area demographics show that 92.6 percent of all businesses in the assessment area have annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of North Carolina.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>North Carolina</b>
2017	3.9%	4.5%
2018	3.4%	4.0%
2019	3.4%	3.9%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and below statewide levels. Unemployment levels were consistent across all counties. While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Raleigh-Durham assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a CDFI, while the other contact represented a nonprofit organization specializing in affordable housing.

Economic conditions of the area during the review period were characterized as good by both contacts, noting a growing population, primarily due to the increasing number of jobs in medical research. The CDFI representative noted that the growth, especially in Raleigh, has had adverse effects on LMI individuals and small business start-ups in the form of unaffordable housing and commercial spaces. These sentiments were echoed by the contact specializing in affordable housing, who stated that housing prices in Durham have risen over the past several years to levels unattainable for LMI residents. The contact went on to state that gentrification is moving many LMI homeowners farther out from the urban cores due to rising and unaffordable property taxes. Negative effects are exacerbated by limited public transportation outside of the urban cores, leading to further adverse impacts and barriers for area LMI residents.

Pertaining to COVID-19, the contacts stated that the pandemic has had varying effects on the area. The affordable housing specialist indicated that many small businesses dependent on downtown foot traffic permanently closed due to the pandemic. Additionally, LMI individuals working for small businesses in service industries are struggling financially. Related to variances within the broader assessment area, the CDFI representative noted that the city of Raleigh experienced the highest unemployment rate, going further to state that the businesses most affected by the pandemic are in Granville and Orange Counties.

Contacts described access to banking branches and services in the area as generally favorable. While favorable overall, a credit need identified by the affordable housing specialist included small dollar loan products with less restrictive underwriting standards, as many LMI residents often resort to payday lenders for their financial needs, partially due to lack of financial literacy and the need for fast access to funds. Additionally, the contact representing a CDFI expressed the need for small dollar business loans under \$50,000, low interest rate loans with longer maturities, and revolving lines of credit for small businesses. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including investing in local CDFIs, educating small businesses regarding lending criteria at area events, and collaborating with organizations to build and preserve affordable housing units in downtown Raleigh and Durham.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RALEIGH-DURHAM ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect adequate responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects good penetration throughout the assessment area. Finally, the bank is a leader in making community development loans in the assessment area.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Raleigh-Durham assessment area by number and dollar volume.

<b>Summary of Lending Activity</b>				
<b>January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	131	18.3%	\$44,164	25.4%
Refinance	107	14.9%	\$29,657	17.1%
Home Improvement	46	6.4%	\$4,763	2.7%
Multifamily Housing	1	0.1%	\$357	0.2%
<b>Total HMDA</b>	<b>285</b>	<b>39.8%</b>	<b>\$78,941</b>	<b>45.5%</b>
<b>Small Business</b>	<b>431</b>	<b>60.2%</b>	<b>\$94,636</b>	<b>54.5%</b>
<b>TOTAL LOANS</b>	<b>716</b>	<b>100%</b>	<b>\$173,577</b>	<b>100%</b>

The bank’s lending activity represents adequate responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 2.7 and 5.7 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. Moreover, by dollar volume, this accounts for 2.7 and 5.9 percent of lending across the assessment areas, respectively. Small business lending in particular was noted by community contacts as a credit need in the assessment area. When compared to the bank’s branching footprint, this level of small business lending is above the percentage of total branches in the assessment area (5.2 percent), while HMDA lending is below this figure. Similarly, while HMDA lending trails the percentage of total bank deposits held in the assessment area (4.0 percent), small business lending exceeds this metric by a larger margin, driving the conclusion. Most recently in 2019, the bank ranked 22<sup>nd</sup> out of 125 reporters in CRA lending by number, and 94<sup>th</sup> out of 673 reporters in HMDA lending in the same year.

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### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Raleigh-Durham assessment area is good. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is good. In two of the years where data was reviewed, the bank's percentage of HMDA loans to low-income borrowers (4.8 percent in 2017 and 5.9 percent in 2019) was slightly below or in line with aggregate lending levels (5.5 percent in 2017 and 5.9 percent in 2019), reflecting adequate performance. In contrast, performance was good in 2018 (9.8 percent), when it was well above the aggregate figure (5.9 percent). Performance was much lower than demographic figures, which were consistent and averaged 20.7 percent.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, performance was highest in 2017 (32.3 percent), when it greatly exceeded both the aggregate lending level (15.6 percent) and demographic figure (16.2 percent), representing an excellent level of lending. Performance dipped to an adequate level in 2018 to 13.9 percent, below both the aggregate (15.6 percent) and demographic (16.2 percent) figures. In 2019, however, the bank's percentage of lending trended back upward to 21.8 percent, once again exceeding the aggregate lending level (16.6 percent) and demographic figure (16.2 percent), reflecting good performance.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is adequate overall. In two of the years where data was reviewed, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (37.8 percent in both 2018 and 2019) was below aggregate lending levels (48.9 percent in 2018 and 48.4 percent in 2019), although not by a large margin, indicative of adequate performance. In 2017, however, the bank's performance was poor (28.2 percent), where it was significantly below the aggregate level (54.8 percent) when compared to the other two years. Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 91.8 percent across the review period, the bank's lending levels were well below this figure in each of the three years.

### **Geographic Distribution of Loans**

Overall, the bank's distribution of loans by geography income level in the Raleigh-Durham assessment area is good. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is good. In two of the years where data was reviewed, the bank's percentage of HMDA loans in low-income census tracts (8.1 percent in 2017 and 4.1 percent in 2018) was well above aggregate lending levels (2.5 percent in 2017 and 2.4 percent in 2018) and the demographic figures (2.3 percent in both 2017 and 2018), reflecting excellent performance. In 2019, performance was good, as the bank's lending levels in low-income census tracts (3.0 percent) was also above both aggregate (2.5 percent) and demographic (2.3 percent) figures, but by a smaller margin.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, lending was highest in 2017 (27.4 percent), when it was significantly above both aggregate (16.2 percent) and demographic (16.5 percent) figures, representing excellent performance. The bank's performance was adequate in the two subsequent years (16.4 percent in 2018 and 16.8 percent in 2019), as it was slightly above aggregate lending levels (15.6 percent in 2018 and 15.3 percent in 2019) and slightly below the demographic figures of 16.5 and 18.2 percent, respectively.

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is adequate. In two of the years where data was reviewed, the bank's percentage of small business loans in low-income census tracts (3.0 percent in 2018 and 3.1 percent in 2019) was slightly below aggregate levels (4.5 percent in 2017 and 4.3 percent in 2019), as well as demographic figures (4.6 percent in both years), indicative of adequate performance. In 2017, however, performance was very poor, as the bank did not originate any loans in low-income geographies, well below the aggregate (4.4 percent) and demographic (4.5 percent) figures.

Pertaining to the percentage of small business loans in moderate-income census tracts, the bank showed excellent performance in 2017 (22.5 percent), where it greatly exceeded both aggregate (16.0 percent) and demographic (17.5 percent) figures. In the remaining two years, the bank's small business lending levels (17.7 percent in 2018 and 18.9 percent in 2019) were above aggregate lending levels (15.8 percent in 2018 and 16.8 percent in 2019), but slightly below demographic figures (17.9 percent in 2018 and 19.1 percent in 2019), reflecting adequate performance.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During the review period, the percentage of census tracts with loan activity averaged 42.3 percent, with the lowest year being 2017 (28.2 percent). Following the November 2017 acquisition of Capital Bank, the bank expanded its branching presence, contributing to the upward trend in loan activity. Moreover, prior to the same acquisition, the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. Pertaining to penetration of LMI census tracts, performance increased after this acquisition (35.6 percent in 2017 and 40.2 percent in both 2018 and 2019). In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. The bank's overall penetration and penetration of LMI geographies were generally aligned, with LMI penetration being slightly lower, and did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Raleigh-Durham assessment area. During the review period, the bank originated 10 community development loans totaling \$26.2 million. These loans supported affordable housing (five), revitalization and stabilization of LMI or distressed middle-income geographies (two), community services (two), and economic development (one). Some of the most impactful loans are described below:

- One \$19.6 million loan was made to finance the construction of an affordable 69-unit LIHTC multifamily project targeted to LMI seniors. This development increases the amount of affordable housing in the assessment area. Moreover, as previously noted, a substantial portion of renters in the assessment area have rental costs exceeding 30.0 percent of their income, and this development would help address this issue.
- Another loan for \$4.0 million was made to finance the construction of an affordable 72-unit LIHTC multifamily project in a low-income census tract, with 100 percent of units reserved exclusively for LMI seniors. As with the previous loan, this increases the amount of affordable housing in the assessment area.
- Three PPP loans totaling \$5.3 million were made to two businesses and an HBCU to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 500 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 24 qualified community development investments totaling \$21.9 million, 23 accounting for \$21.8 million were made in the current review period and 1 for \$145,645 was made in the prior period but remains outstanding. Each of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area. These investments directly address affordable housing, which community contacts noted as an urgent need in the assessment area. In addition to these investments, the bank also made 32 donations totaling \$716,553. These donations benefitted various organizations including, but not limited to, those dedicated to affordable housing, food banks, and providing financial literacy education to LMI children, along with in-kind donations for allowing a nonprofit's use of bank facilities to deliver financial education, credit and money management, and financial products to unbanked and underbanked LMI residents.

### **SERVICE TEST**

The bank's service delivery systems are reasonably accessible in the assessment area, and the bank's record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly to LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 18 branches in the Raleigh-Durham assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	0 0.0%	3 16.7%	7 38.9%	8 44.4%	0 0.0%	<b>18</b> <b>100%</b>
Census Tracts	7.6%	21.3%	29.6%	38.9%	2.7%	<b>100%</b>
Household Population	6.4%	22.2%	33.8%	37.6%	0.0%	<b>100%</b>

Based on data in the preceding table, the bank operates 16.7 percent of its assessment area branches in LMI census tracts. This distribution is below both the percentage of assessment area census tracts that are LMI (28.9 percent) and the household population in LMI census tracts (28.6 percent). However, the bank also operates three branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Therefore, the bank’s service delivery systems are reasonably accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	1	1	2	<b>4</b>
Acquired Branches	0	3	9	6	<b>18</b>
Opened Branches	0	0	0	1	<b>1</b>
Closed Branches	0	(1)	(3)	(1)	<b>(5)</b>
<b>OVERALL</b>	<b>0</b>	<b>3</b>	<b>7</b>	<b>8</b>	<b>18</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. As shown above, the bank acquired 18, opened 1, and closed 5 branches in the Raleigh-Durham assessment area during the review period. Three of the branch acquisitions and one of the closures were in LMI geographies. Despite the closure in the moderate-income census tract, the bank continues to operate another branch on the same block as the closed location. Consequently, this closure did not impact accessibility for area residents. Overall, this activity resulted in the number of locations in LMI geographies to rise from one to three branches during the review period.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at all branch locations. Moreover, 13 of the offices operate drive-through facilities, 3 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at four branches, one of which is in a LMI census tract.

### **Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 63 community development services, totaling 208 hours, were provided to 16 different organizations. Bank employees' activities included administering financial literacy training to children who are predominately LMI, providing financial expertise to an organization focused on small business development and another that builds affordable housing, along with serving on the board and committees of various organizations in the assessment area. Organizations with board and committee representation include, but are not limited to, those dedicated to providing financing and capital to small business, as well as distributing nutritious meals to LMI seniors. The affordable housing-related services are particularly responsive given the affordable housing needs identified through community contact interviews.



## **HICKORY-LENOIR-MORGANTON, NORTH CAROLINA MSA** *(Full-Scope Review)*

### **DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HICKORY ASSESSMENT AREA**

#### **Bank Structure**

As shown in the table below, the bank operates eight of its branches in the Hickory assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, this represented 3.0 percent of all bank branches. This percentage, however, was reduced to 1.6 percent following the merger-of-equals, as this was not an overlapping assessment area, resulting in no additional branches. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>			
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
0	1	6	1

The bank entered the assessment area in November 2017 with the Capital Bank acquisition that included 11 branches. Subsequently, the bank closed three branches during the review period, none of which were in LMI census tracts. Additionally, the bank operates two stand-alone, deposit-taking ATMs, one of which is in a moderate-income census tract. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Hickory assessment area. Challenges may be encountered in serving the more rural portions of the assessment area, outside of the cities of Hickory, Lenoir, and Morganton. The bank has branches near the border of the LMI census tracts in these rural areas, although given their size, challenges in reaching the entirety of these census tracts remain.

#### **General Demographics**

The bank’s Hickory assessment area consists of Burke, Caldwell, and Catawba Counties, three of the four counties in the Hickory-Lenoir-Morganton MSA. The assessment area has a total population of 325,916, with the most populous county being Catawba County (154,610), which contains most of the city of Hickory. Portions of the city extend into both Burke and Caldwell Counties. While located near the larger regional hub of Charlotte, North Carolina, which is outside this assessment area, the city of Hickory serves as a hub for commercial and banking activity in the assessment area’s three counties.

The assessment area hosts a competitive banking market, with 15 FDIC-insured depository institutions operating 64 branches throughout the assessment area. Of these institutions, First Horizon Bank ranks fifth in deposit market share with 13.3 percent of all assessment area deposit dollars, representing 3.0 percent of total bank deposits prior to the merger-of-equals. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows

that 348 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 24<sup>th</sup> with 0.9 percent of total loan activity. Of the 83 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 11<sup>th</sup> with 2.0 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the assessment area include home purchase, home improvement, and consumer loans, as well as small business loans, especially microloans of \$15,000 or less. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically administering financial literacy programs and collaborating with affordable housing organizations to renovate older housing stock and build new affordable housing for LMI residents.

### **Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	0	0.0%	0	0.0%
<b>Moderate</b>	10	15.2%	11,417	13.7%
<b>Middle</b>	44	66.7%	54,372	65.0%
<b>Upper</b>	12	18.2%	17,839	21.3%
<b>Unknown</b>	0	0.0%	0	0.0%
<b>TOTAL</b>	<b>66</b>	<b>100%</b>	<b>83,628</b>	<b>100%</b>

As displayed in the table above, 15.2 percent of census tracts in the assessment area are moderate-income census tracts, with 13.7 percent of assessment area families residing in those census tracts. The assessment area contains no low-income census tracts. The majority of the moderate-income census tracts are concentrated around the city of Hickory in Catawba and Burke Counties, along with large moderate-income census tracts in the rural portions of Caldwell and Burke Counties.

According to 2015 ACS data, the median family income for the Hickory assessment area (\$51,262) is below the same figure for the state of North Carolina as a whole (\$57,856). More recently, the FFIEC estimates the median family income for the Hickory-Lenoir-Morganton MSA to be \$55,100 in 2019.

The following table displays the percentages of assessment area families by income level compared to North Carolina as a whole.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>North Carolina</b>	
<b>Low</b>	17,355	20.8%	547,541	21.9%
<b>Moderate</b>	14,868	17.8%	436,977	17.5%
<b>Middle</b>	17,752	21.2%	478,449	19.2%
<b>Upper</b>	33,653	40.2%	1,035,026	41.4%
<b>TOTAL</b>	<b>83,628</b>	<b>100%</b>	<b>2,497,993</b>	<b>100%</b>

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (38.6 percent) than reside in LMI geographies (13.7 percent). When compared to the family income distribution for the state of North Carolina as a whole, the percentage of LMI families in the assessment area is slightly below the statewide figure (39.4 percent). Conversely, the percentage of families below the poverty level in the assessment area (13.3 percent) is slightly above the state of North Carolina as a whole (12.8 percent). Based on the distribution of families by income, as well as income and poverty levels, the assessment area is similarly affluent to North Carolina as a whole.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$120,647	33.6%	\$637
North Carolina	\$154,900	30.3%	\$797

As shown in the table above, housing in the assessment area is more affordable than the state of North Carolina as a whole. More specifically, the assessment area’s affordability ratio (33.6 percent) is above the state as a whole (30.3 percent), along with median housing values being 22.1 percent lower than that of the state of North Carolina. Despite these favorable conditions, there is a lack of owner-occupied affordable housing in LMI census tracts, as only 11.7 percent of owner-occupied housing units are in these geographies. Considering these factors, opportunities for HMDA lending in LMI tracts are likely limited.

Specific to rental units in the assessment area, median gross rent is below the state of North Carolina. Similarly, the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (40.4 percent) is below the same figure for North Carolina as a whole (43.9 percent). Specific to challenges faced by LMI residents, however, 71.5 percent of low-income renters in the assessment area and 34.1 percent of moderate-income renters have rental costs exceeding 30.0 percent of their income, hindering their ability to save for a down payment on a home purchase. As such, homeownership may be out of reach for many LMI residents.

### **Industry and Employment Demographics**

As previously noted, the assessment area supports a large and diverse economy, including a strong small business sector. County business patterns indicate that there are 122,429 paid employees in the assessment area, the majority of which are employed in the manufacturing (30.9 percent), healthcare and social assistance (14.4 percent), and retail trade (13.4 percent) industries. Lastly, assessment area demographics show that 89.9 percent of all businesses in the assessment area have annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of North Carolina.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>North Carolina</b>
2017	4.2%	4.5%
2018	3.7%	4.0%
2019	3.7%	3.9%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and slightly below statewide levels. Unemployment levels were consistent across the three counties, with a slightly higher rate in the more rural Caldwell County (4.1 percent in 2019), which contains the city of Lenoir. While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Hickory assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a governmental organization specializing in economic development, while the other contact represented a local governmental housing agency specializing in affordable housing.

Economic conditions in the area during the review period were characterized as favorable by both community contacts. However, both individuals noted the area was suffering from population loss of younger residents, resulting in the elderly representing a larger proportion of the population. These demographic changes are most noticeable in Burke and Caldwell Counties, when compared to Catawba County, which includes the city of Hickory. Economic growth in Catawba County, according to the affordable housing specialist, is mostly attributed to business tax incentives offered by the state, lower cost of business relative to the nearby city of Charlotte, as well as proximity to the Charlotte Douglas International Airport. Moreover, the contact specializing in economic development indicated that the economic growth in the area has created more need for homes, rentals, and senior housing in the Hickory area.

Pertaining to COVID-19, contacts noted that the pandemic has had varying effects on the area residents. The affordable housing specialist stated that Catawba County experienced the highest rate of unemployment, as it had the highest percentage of individuals working in service industries, such as restaurants and hotels. Additionally, downtown Hickory has experienced business closures since the beginning of the pandemic. Similarly, the economic development specialist expressed the pandemic caused both temporary and permanent job losses in the area. In particular, many furniture factories closed due to safety precautions and, since reopening, are struggling to fill back orders due to fewer employees returning. Furthermore, the contact indicated many residents remained on unemployment because they need to stay home and care for children.

Contacts described access to banking branches and services in the area as generally favorable. Credit needs identified by the contacts included home purchase, home improvement, and consumer loans, as well as small business loans, especially microloans of \$15,000 or less. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including administering financial literacy programs and collaborating with affordable housing organizations to renovate older housing stock and build new affordable housing for LMI residents.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HICKORY ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect adequate responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. The geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank is a leader in making community development loans in the assessment area.

As previously noted, the bank entered this assessment area in November 2017 through the Capital Bank acquisition. Given the limited amount of time when the bank operated in this assessment area, coupled with low volume, 2017 lending data was not considered in the borrower and geographic distribution review, as it would not result in meaningful analyses.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Hickory assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	50	12.6%	\$10,239	16.2%
Refinance	83	20.9%	\$9,543	15.1%
Home Improvement	45	11.3%	\$2,826	4.5%
Multifamily Housing	1	0.3%	\$1,004	1.6%
<b>Total HMDA</b>	<b>179</b>	<b>45.1%</b>	<b>\$23,612</b>	<b>37.5%</b>
<b>Small Business</b>	<b>218</b>	<b>54.9%</b>	<b>\$39,403</b>	<b>62.5%</b>
<b>TOTAL LOANS</b>	<b>397</b>	<b>100%</b>	<b>\$63,015</b>	<b>100%</b>

The bank’s lending activity represents adequate responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 1.7 and 2.9 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. When compared to the bank’s branching footprint, this level of lending is below the percentage of total branches in the assessment area (3.0 percent) for both HMDA and CRA lending by number and dollar volume. Although compared to deposit volume, the level of small business lending is above the percentage of total bank deposits held in the assessment area (2.1 percent). Pertaining to HMDA lending, the bank is slightly below the percentage of deposits by number. Most recently in 2019, the bank ranked 24<sup>th</sup> out of 348 reporters in HMDA lending by number, and 11<sup>th</sup> out of 83 reporters in CRA lending in the same year.

### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Hickory assessment area is good. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is good.

In 2019, the bank's level of lending to low-income borrowers (8.1 percent) exceeded the aggregate lending level (4.5 percent), reflecting good performance. In 2018, the level of lending was the highest (8.6 percent), also exceeding the aggregate level (5.6 percent) representing good performance. Performance was much lower than demographic figures, which were consistently 20.8 percent during the review period.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, performance was excellent in 2019 (25.6 percent), when it greatly exceeded both the aggregate lending level (16.8 percent) and demographic figure (17.8 percent). In 2018, the bank's level of lending (17.2 percent) was slightly above the aggregate level (16.8 percent), but slightly below the demographic figure (17.8 percent), indicative of adequate performance.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is adequate overall. In 2019, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (45.5 percent) was above the aggregate level (40.8 percent). In 2018, the bank's performance (34.4 percent) was below aggregate lending levels (44.4 percent), although not by a large margin. The demographic estimate of assessment area businesses with annual revenues of \$1 million or less remained consistent and averaged 89.7 percent across the review period. The bank's lending levels were well below this figure in both years. Even so, the bank's lending levels were adequate for each of the years reviewed.

### **Geographic Distribution of Loans**

Overall, the bank's distribution of loans by geography income level in the Hickory assessment area is adequate. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity. Conclusions were determined by performance in moderate-income geographies, as the assessment area does not contain low-income census tracts.

#### *HMDA Lending*

The bank's distribution of HMDA loans by geography income level during the review period is adequate. In 2018, the bank's percentage of HMDA loans in moderate-income census tracts

(10.8 percent) was slightly above the aggregate level (10.4 percent) and slightly below the demographic figure (11.7 percent). Similarly, in 2019, the bank's performance (10.5 percent) fell slightly below both the aggregate lending level (10.7 percent) and demographic figure (11.7 percent). As such, the bank's HMDA lending in moderate-income geographies during 2018 and 2019 is adequate.

### *Small Business Lending*

The bank's distribution of small business loans by geography income level during the review period is good. Performance in 2018 (19.8 percent) exceeded both aggregate (17.2 percent) and demographic (16.1 percent) figures, reflecting good performance. In 2019, performance (15.2 percent) was below aggregate (16.5 percent) and demographic (16.4 percent), indicative of adequate performance. This level of lending in 2019, however, is below these figures by a smaller margin than 2018 levels exceeded the same metrics.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During 2018 and 2019, the percentage of census tracts with loan activity averaged 90.9 percent. Pertaining to penetration of LMI census tracts, performance trended upward during the review period (80.0 percent in 2018 and 90.0 percent 2019). In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. Moreover, the bank's overall penetration and penetration of LMI geographies were generally aligned, with LMI penetration being slightly lower, and did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Hickory assessment area. During the review period, the bank originated five community development loans totaling \$17.4 million. These loans supported community services (two), economic development (one), affordable housing (one), and revitalization and stabilization of LMI or distressed middle-income geographies (one). Some of the most impactful loans are described below:

- One \$10.3 million loan was made to purchase and renovate a vacant manufacturing and office facility located in a moderate-income census tract, which brought a major furniture company to the area and created over 200 jobs.
- One PPP loan for \$2.1 million was made to a business to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 200 jobs in a moderate-income geography. This loan is responsive to the needs of area businesses and residents considering the global pandemic.

### INVESTMENT TEST

First Horizon Bank makes a significant level of qualified community development investments and grants in the assessment area. The bank made one qualified community development investment for \$1.5 million, which was made during the current review period. This investment



was to a LIHTC to fund a large-scale affordable housing development for LMI families, improving the quality of the affordable housing stock. This is responsive to needs of the assessment area, as community contacts noted the need for new affordable housing development. Additionally, the bank made 17 donations totaling \$305,079. These donations benefitted various organizations including, but not limited to, those dedicated to affordable housing and food banks; the purchase of Internet hot spots for LMI students that do not have Internet access at their residence; and an in-kind donation for allowing a nonprofit to use bank facilities to deliver financial education, credit and money management, and financial products to unbanked and underbanked LMI residents.

**SERVICE TEST**

The bank’s service delivery systems are reasonably accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly to LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

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

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	0 0.0%	1 12.5%	6 75.0%	1 12.5%	0 0.0%	<b>8</b> <b>100%</b>
Census Tracts	0.0%	15.2%	66.7%	18.2%	0.0%	<b>100%</b>
Household Population	0.0%	14.7%	65.1%	20.2%	0.0%	<b>100%</b>

Based on data in the preceding table, the bank operates 12.5 percent of its assessment area branches in LMI census tracts. This distribution is below both the percentage of assessment area census tracts that are LMI (15.2 percent) and the household population in LMI census tracts (14.7 percent). However, the bank also operates four branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates two stand-alone, deposit-taking ATMs, one of which is in a moderate-income census tract. Therefore, the bank’s service delivery systems are reasonably accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Middle- Income</b>	<b>Upper- Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	0	0	0	<b>0</b>
Acquired Branches	0	1	8	2	<b>11</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	0	(2)	(1)	<b>(3)</b>
<b>OVERALL</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>1</b>	<b>8</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. First Horizon Bank entered this assessment area in November 2017 through the Capital Bank acquisition. As shown above, the bank acquired 11 branches, 1 of which in a moderate-income census tract, and closed 3 branches in the Hickory assessment area during the review period. None of these closures, however, were in LMI census tracts.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank’s hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at all branch locations. Moreover, each office operates drive-through facilities. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at two branches, one of which is in a moderate-income census tract.

**Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 34 community development services, totaling 58 hours, were provided to 9 different organizations. Bank employees’ activities included administering financial literacy training to children who are predominately LMI, teaching home-buyer education courses to LMI residents, providing financial expertise during an affordable housing forum, along with serving on the board of several organizations in the assessment area. Organizations with board representation include economic development organizations and a homeless shelter. The affordable housing and financial literacy-related services are particularly responsive given that these needs were identified through community contact interviews.

## ASHEVILLE, NORTH CAROLINA MSA

*(Limited-Scope Review)*

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

This assessment area includes the entirety of Buncombe County, one of the four counties that make up the Asheville, North Carolina MSA. The bank operates three offices in this assessment area, which the bank entered through the acquisition of Capital Bank in November 2017. No branches were opened or closed during the review period. The tables below detail key demographics relating to this assessment area

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	11,727	11,213	11,900	25,134	<b>59,974</b>
	19.6%	18.7%	19.8%	41.9%	<b>100%</b>
Household Population	23,372	16,358	19,080	43,050	<b>101,860</b>
	23.0%	16.1%	18.7%	42.3%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	1	7	35	13	0	<b>56</b>
	1.8%	12.5%	62.5%	23.2%	0.0%	<b>100%</b>
Family Population	486	6,183	40,092	13,213	0	<b>59,974</b>
	0.8%	10.3%	66.8%	22.0%	0.0%	<b>100%</b>
Household Population	1,396	11,921	64,889	23,654	0	<b>101,860</b>
	1.4%	11.7%	63.7%	23.2%	0.0%	<b>100%</b>
Business Institutions	571	2,189	8,486	5,530	0	<b>16,776</b>
	3.4%	13.0%	50.6%	33.0%	0.0%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ASHEVILLE ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending performance in this assessment area is below the Lending Test performance in the North Carolina full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Below
Distribution of Loans by Borrower’s Profile	Below
Geographic Distribution of Loans	Below
Community Development Lending Activity	Consistent
<b>OVERALL</b>	<b>BELOW</b>

The bank made three community development loans totaling \$7.8 million in the assessment area during the review period. One loan was used to revitalize an LMI area, while the remaining two were provided to a small business to stimulate economic growth and job creation.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is below the investment performance in the North Carolina full-scope assessment areas. During the review period, the bank made qualified community development investments totaling \$1.6 million. These investments were primarily made in MBS providing affordable home loans to LMI borrowers, as well as an equity equivalent in a CDFI in the assessment area. In addition to these investments, the bank also made 16 community development donations totaling \$125,575. These donations supported various causes, including a homeless shelter, food bank, financial literacy and counseling organization, community COVID-19 response fund, economic development organizations, and an LMI free legal aid nonprofit.

SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance in the North Carolina full-scope assessment areas, as detailed in the following table:

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

During the review period, 38 community development services, totaling 81 hours, were provided to 5 different organizations. Bank employees' activities included administering financial literacy training to a homeless shelter, providing financial expertise to a CDFI and affordable housing organizations, and serving on the board of various organizations in the assessment area. One bank employee served on the board and provided financial expertise as a committee member pertaining to fundraising events, financial analyses, and COVID-19 efforts for an organization with the mission of ending homelessness in the assessment area.

## FAYETTEVILLE, NORTH CAROLINA MSA

*(Limited-Scope Review)*

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

This assessment area includes the entirety of Cumberland County, one of the three counties that make up the Fayetteville, North Carolina MSA. The bank operates two offices in this assessment area, which the bank entered through the acquisition of Capital Bank in November 2017. No new branches were opened, and one acquired branch was closed in a moderate-income census tract during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	17,437	14,313	15,940	32,653	<b>80,343</b>
	21.7%	17.8%	19.8%	40.6%	<b>100%</b>
Household Population	27,868	21,272	22,841	50,662	<b>122,643</b>
	22.7%	17.3%	18.6%	41.3%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	2	16	38	8	4	<b>68</b>
	2.9%	23.5%	55.9%	11.8%	5.9%	<b>100%</b>
Family Population	1,047	12,704	52,420	14,172	0	<b>80,343</b>
	1.3%	15.8%	65.2%	17.6%	0.0%	<b>100%</b>
Household Population	2,063	20,556	81,278	18,746	0	<b>122,643</b>
	1.7%	16.8%	66.3%	15.3%	0.0%	<b>100%</b>
Business Institutions	321	2,312	7,380	2,382	12	<b>12,407</b>
	2.6%	18.6%	59.5%	19.2%	0.1%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending performance in this assessment area is below the Lending Test performance in the North Carolina full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Below
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Below
<b>OVERALL</b>	<b>BELOW</b>

The bank made two community development loans totaling \$5.6 million in the assessment area during the review period. One loan was used to finance the construction of an addition to a school that primarily serves LMI students, and the other was a PPP loan to a business in the food industry.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is below the investment performance in the North Carolina full-scope assessment areas. During the review period, the bank made no qualified community development investments; however, the bank made 11 community development donations totaling \$346,696. These donations supported various community service organizations, including a nonprofit focused on financial literacy and converting the unbanked and underbanked to traditional financial institutions, homeless shelters, a food bank, affordable housing organizations, and an organization providing hurricane disaster relief.

**SERVICE TEST**

The bank’s service performance in this assessment area is consistent with the service performance in the North Carolina full-scope assessment areas, as detailed in the following table:

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

During the review period, two community development services, totaling four hours, were provided to a single organization. The bank employee provided financial expertise to a community service organization that provides food, household goods, and clothing to LMI individuals.



## NONMSA NORTH CAROLINA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN NONMSA NORTH CAROLINA

The bank’s nonMSA North Carolina assessment area is composed of Lee, Moore, Richmond, Watauga, and Wilkes Counties. Lee, Moore, and Richmond Counties are contiguous and comprise one nonMSA North Carolina assessment area. Watauga and Wilkes Counties are also contiguous and comprise another of the bank’s nonMSA North Carolina assessment areas. These two assessment areas have been combined for this analysis. The bank operates five office across the nonMSA counties in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	15,754	13,065	14,724	37,140	<b>80,683</b>
	19.5%	16.2%	18.2%	46.0%	<b>100%</b>
Household Population	30,226	17,098	20,015	56,889	<b>124,228</b>
	24.3%	13.8%	16.1%	45.8%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	15	28	26	0	<b>69</b>
	0.0%	21.7%	40.6%	37.7%	0.0%	<b>100%</b>
Family Population	0	14,913	35,331	30,439	0	<b>80,683</b>
	0.0%	18.5%	43.8%	37.7%	0.0%	<b>100%</b>
Household Population	0	23,384	53,396	47,448	0	<b>124,228</b>
	0.0%	18.8%	43.0%	38.2%	0.0%	<b>100%</b>
Business Institutions	0	2,584	5,468	5,749	0	<b>13,801</b>
	0.0%	18.7%	39.6%	41.7%	0.0%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMSA NORTH CAROLINA**

**LENDING TEST**

The bank’s lending performance in this assessment area is consistent with the Lending Test performance in the North Carolina full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Above
Community Development Lending Activity	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

The bank made three community development loans totaling \$78,376 in the assessment area during the review period. These three loans were all to the same nonprofit organization that provides emergency shelter, transitional housing, and food security to LMI residents.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is below the investment performance in the North Carolina full-scope assessment areas. During the review period, the bank made qualified community development investments totaling \$170,748. All of these investments were made in MBS providing affordable home loans to LMI borrowers in the assessment area. In addition to these investments, the bank also made 10 community development donations totaling \$162,219. These donations supported various community service organizations, including a nonprofit focused on financial literacy and converting the unbanked and underbanked to traditional financial institutions, a homeless shelter, and children’s service organizations.

**SERVICE TEST**

The bank’s service performance in this assessment area is consistent with the service performance in the North Carolina full-scope assessment areas, as detailed in the following table:

<b>Service Test Criteria</b>	<b>Performance</b>
Accessibility of Delivery Systems	Above
Changes in Branch Locations	Below
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, 22 community development services, totaling 37 hours, were provided to 5 different organizations. Bank employees administered financial literacy training to LMI children, provided financial expertise to a children's services organization and an economic development organization, and served on the board of various organizations in the assessment area. Bank employees served on the board for an economic development organization and another specializing in providing community services to LMI residents.

## **CHATTANOOGA-CLEVELAND-DALTON, TENNESSEE-GEORGIA MULTISTATE CSA<sup>6</sup>**

**MULTISTATE CSA RATING:**

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated**

**SATISFACTORY**

**High Satisfactory**

**Outstanding**

**High Satisfactory**

Major factors supporting the institution's Chattanooga assessment area rating include the following:

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

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<sup>6</sup> This rating reflects performance within the multistate CSA. The Tennessee statewide evaluation is adjusted and does not reflect performance in the multistate CSA.

## SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Chattanooga assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Performance in the Chattanooga assessment area was reviewed under full-scope examination procedures. To augment the evaluation, two community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. One of the interviews was with an individual representing a CDFI, and the other contact represented a nonprofit organization specializing in housing. Details from these interviews are included in the *Description of Institution's Operations* section that follows.

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

### Bank Structure

As shown in the table below, the bank operates 21 of its branches in the Chattanooga assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, this represented 7.7 percent of all bank branches. This percentage, however, was reduced to 4.3 percent following the merger-of-equals, as this was not an overlapping assessment area, resulting in no additional branches. The table below displays the distribution of these offices by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
3	6	8	4

While not impacted by the merger-of-equals, through other merger and acquisition activity during the review period, the bank acquired two and closed two other branches. In addition to its branches, the bank also operates three stand-alone, deposit-taking ATMs and nine stand-alone, cash-only ATMs, one of which is in a low-income census tract. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Chattanooga assessment area. Challenges may be encountered in serving the more rural portions of the assessment area, although the bank has branches located in or near all LMI geographies in these rural areas.

### General Demographics

The bank's Chattanooga assessment area consists of Bradley, Catoosa, Hamilton, and McMinn Counties, 4 of the 14 counties in the Chattanooga-Cleveland-Dalton CSA, which combines the Chattanooga MSA, Cleveland MSA, Dalton MSA, and four surrounding nonMSA counties. The bank's assessment area, however, does not include the Dalton MSA. While the bank has designated these as separate assessment areas, they are combined as the Chattanooga assessment area for purposes of this evaluation. The assessment area has a total population of 568,064, with the most populous county being Hamilton County (348,121), which contains most of the city of Chattanooga. Chattanooga serves as an important regional hub for commercial and banking

activity to the surrounding counties and contains the University of Tennessee at Chattanooga, a large university with a total enrollment of approximately 11,638 students.

The assessment area hosts a competitive banking market, with 27 FDIC-insured depository institutions operating 152 branches throughout the assessment area. Of these institutions, First Horizon Bank has the largest deposit market share with 23.4 percent of all assessment area deposit dollars, representing 8.2 percent of total bank deposits prior to the merger-of-equals. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 492 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 18<sup>th</sup> with 1.7 percent of total loan activity. Of the 97 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 11<sup>th</sup> with 3.2 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the assessment area include low-interest/low-fee small dollar consumer loans, down payment assistance for first-time home-buyers, small dollar home improvement loans, and small dollar business loans. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically investing in local CDFIs, participating in financial literacy programs, and collaborating with area organizations to provide more affordable housing.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	13	10.7%	9,050	6.2%
<b>Moderate</b>	17	13.9%	17,023	11.7%
<b>Middle</b>	54	44.3%	64,504	44.3%
<b>Upper</b>	36	29.5%	55,176	37.9%
<b>Unknown</b>	2	1.6%	0	0.0%
<b>TOTAL</b>	<b>122</b>	<b>100%</b>	<b>145,753</b>	<b>100%</b>

As displayed above, 24.6 percent of census tracts in the assessment area are designated as LMI, while 17.9 percent of assessment area families reside within those census tracts. These LMI geographies are primarily located near the cities of Chattanooga, Cleveland, and Athens. More specifically, LMI census tracts are largely to the south and east of Chattanooga, and south of Cleveland.

According to 2015 ACS data, the median family income for the assessment area (\$58,481) is above the same figure for the state of Tennessee (\$56,110), but below the state of Georgia (\$59,410) as a whole. More recently, the FFIEC estimates the median family income for the Chattanooga MSA to be \$70,100 and the Cleveland MSA to be \$57,700 in 2019. The Chattanooga MSA figure indicated a rapid rise in incomes over the past several years, with the FFIEC estimating the median family income to be \$61,700 in 2018 and \$59,500 in 2017.

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

<b>Family Population by Income Level</b>						
	Assessment Area		Tennessee		Georgia	
<b>Low</b>	29,549	20.3%	363,187	21.8%	560,372	23.1%
<b>Moderate</b>	24,422	16.8%	288,774	17.3%	405,470	16.7%
<b>Middle</b>	28,683	19.7%	326,437	19.6%	447,771	18.5%
<b>Upper</b>	63,099	43.3%	687,047	41.3%	1,009,922	41.7%
<b>TOTAL</b>	<b>145,753</b>	<b>100%</b>	<b>1,665,445</b>	<b>100%</b>	<b>2,423,535</b>	<b>100%</b>

Based on the data in the preceding table, 37.1 percent of families in the assessment area are considered LMI, compared to 39.1 percent for the entire state of Tennessee and 39.8 percent for the entire state of Georgia. When compared with the first table in this section, the percentage of families who are LMI is higher than the percentage of families who reside in LMI census tracts (17.9 percent). Additionally, the percentage of families below the poverty level in the assessment area (12.1 percent) is below the statewide poverty level of Tennessee (13.2 percent) and Georgia (14.2 percent). Based on these demographics and income levels, the Chattanooga assessment area is more affluent than the states of Tennessee and Georgia as a whole.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (Monthly)</b>
Assessment Area	\$148,855	31.3%	\$735
Tennessee	\$142,100	31.8%	\$764
Georgia	\$148,100	33.5%	\$879

Based on the data in the preceding table, housing in the assessment area is as affordable as the state of Tennessee but less affordable than Georgia. Adjusting for income levels, this is shown as the assessment area’s affordability ratio (31.3 percent) is similar to Tennessee (31.8 percent), but lower than Georgia (33.5 percent) as a whole. Further median housing values are above the same figure for Tennessee and above Georgia. More specifically, Bradley County, which includes the city of Cleveland, is the least affordable county in the assessment area, with an affordability ratio of 28.8 percent. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. Contributing to this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 56.6 percent of housing units in low-income census tracts and 40.6 percent of housing in moderate-income census tracts are rental units. Moreover, 3.4 percent and 10.5 percent of owner-occupied housing units in the assessment area are in LMI census tracts, respectively. Considering these factors, opportunities for HMDA lending in LMI census tracts are likely limited.

Specific to rental units in the assessment area, despite the lowest affordability ratio and highest median housing values, median gross rent is below both Tennessee and Georgia as a whole. Affordable rental options, however, are scarce, as assessment area demographics indicate that 75.5 percent of low-income and 44.6 percent of moderate-income renters in the assessment area have rental costs exceeding 30.0 percent of their income. High rental rates compared to incomes also affect LMI renters' ability to save for a down payment on a home purchase. As such, homeownership may be out of reach for many LMI residents in the assessment area.

### **Industry and Employment Demographics**

As previously noted, the assessment area supports a large and diverse economy, including a strong small business sector and several universities. County business patterns indicate that there are 285,999 paid employees in the assessment area, the majority of which are employed in the manufacturing (14.7 percent), governmental (13.3 percent), healthcare and social assistance (10.8 percent), and retail trade (10.7 percent) industries. Lastly, assessment area demographics show that 91.4 percent of all businesses in the assessment area have annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area, the state of Tennessee, and the state of Georgia.

<b>Unemployment Levels for the Assessment Area</b>			
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Tennessee</b>	<b>Georgia</b>
2017	3.8%	3.8%	4.7%
2018	3.5%	3.5%	4.0%
2019	3.3%	3.4%	3.4%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and were in line with Tennessee statewide levels and below Georgia statewide levels. Unemployment levels were consistent across all counties in the assessment area. While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Chattanooga assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a CDFI, while the other contact represented a nonprofit organization specializing in housing.



Economic conditions in the area were described as favorable during the review period by both contacts. The CDFI representative attributed the positive economic trends to a flourishing job market, which has further improved since a major automotive company moved into the area. Additionally, the area has a thriving tourism industry due to the city's proximity to the Smokey Mountains and Blue Ridge Mountains. Pertaining to real estate, the housing specialist stated construction for both rental and single-family housing units is booming, and incomes have risen. Despite the benefits associated with this growth, several of the impacted neighborhoods are LMI, including neighborhoods on the south and north sides of the city of Chattanooga, leading residents to be priced out of the areas they have historically occupied. Furthermore, a declining number of organizations focused on improving the current housing stock, coupled with rising housing costs, has decreased the amount of safe and affordable housing options for LMI individuals in the area.

Pertaining to COVID-19, both individuals indicated the pandemic has negatively impacted the area, with residents most heavily impacted being those in the food and hospitality industries in the city's urban core, many of whom are still out of work. While the pandemic adversely affected the assessment area, both representatives noted it has fared better than the surrounding area, attributing the lesser impact to the substantial number of healthcare jobs in the area.

Both contacts noted a high degree of banking competition in the area. Related to the unbanked and underbanked population, the housing specialist stated many LMI individuals do not have bank accounts due to unsteady incomes and prefer to utilize check-cashing facilities and payday lenders as an alternative. Credit needs in the area were identified as low-interest/low-fee small dollar consumer loans, down payment assistance for first-time home-buyers, small dollar home improvement loans, and small dollar business loans, under \$50,000. Additionally, both representatives noted opportunities for participation by local financial institutions from a community development perspective, including investing in local CDFIs, participating in financial literacy programs, and collaborating with area organizations to provide more affordable housing.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHATTANOOGA ASSESSMENT AREA**

**LENDING TEST**

The bank’s Lending Test performance in the Chattanooga assessment area is rated high satisfactory. The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. The geographic distribution of loans reflects good penetration throughout the assessment area. The bank is a leader in making community development loans and makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the assessment area.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Chattanooga assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	363	19.8%	\$139,458	29.0%
Refinance	321	17.5%	\$61,340	12.8%
Home Improvement	145	7.9%	\$11,837	2.5%
Multifamily Housing	6	0.3%	\$12,366	2.6%
<b>Total HMDA</b>	<b>835</b>	<b>45.6%</b>	<b>\$225,001</b>	<b>46.8%</b>
<b>Small Business</b>	<b>996</b>	<b>54.4%</b>	<b>\$255,553</b>	<b>53.2%</b>
<b>TOTAL LOANS</b>	<b>1,831</b>	<b>100%</b>	<b>\$480,554</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 8.8 and 13.2 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. When compared to the bank’s branching footprint, this level of lending exceeds the percentage of total branches in the assessment area (7.7 percent) for both HMDA and CRA lending. Similarly, HMDA lending is slightly above, and small business lending is well above, the percentage of total bank deposits held in the assessment area (8.2 percent). Most recently in 2019, the bank ranked 18th out of 492 reporters in HMDA lending by number, and 11th out of 97 reporters in CRA lending in the same year. Peers who rank higher are often mortgage companies and larger financial institutions.

**Loan Distribution by Borrower’s Profile**

Overall, the bank’s distribution of loans by income or revenue profile in the Chattanooga assessment area is adequate. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank’s lending activity.

### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is adequate. The bank's lending levels to low-income borrowers were adequate in each of the three years. This lending was highest in 2018 (6.7 percent), followed by 2017 (6.6 percent), both of which exceeded the aggregate lending levels (5.2 percent in 2018 and 5.5 percent in 2017). In 2019, the bank's performance trended downward to 5.3 percent, below the aggregate lending level (6.7 percent). Performance was much lower than demographic figures, which were consistently at 20.3 percent.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance was good in 2017 (18.7 percent), when it exceeded the aggregate lending level (14.9 percent), as well as the demographic figure (16.8 percent) by a smaller margin. In the other two years in the review period, the bank's performance (12.1 percent in 2018 and 15.5 percent in 2019) was lower, falling slightly below aggregate lending levels (15.9 percent in 2018 and 17.2 percent in 2019), indicative of adequate performance. In terms of demographic figures (16.8 percent in both years), the bank was also below this benchmark in the latter two years.

### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is poor overall. In each of the three years where data was reviewed, the bank's performance was poor, as the percentage of small business loans to businesses with annual revenues of \$1 million or less (27.4 percent in 2017, 32.0 percent in 2018, and 29.4 percent in 2019) was below aggregate lending levels (46.9 percent in 2017, 44.3 percent in 2018, and 43.4 percent in 2019). Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 90.7 percent across the review period, the bank's lending levels were well below this figure in each of the three years.

## **Geographic Distribution of Loans**

Overall, the bank's distribution of loans by geography income level in the Chattanooga assessment area is good. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is adequate. In two of the years where data was reviewed, the bank's percentage of HMDA loans in low-income census tracts (3.5 percent in 2017 and 3.4 percent in 2019) was above aggregate lending levels (2.9 percent in both 2017 and 2019), and slightly above or matching the demographic figure of 3.4 percent in both years, representing good performance. In 2018, however, the bank's lending levels in low-income census tracts (1.6 percent) was lower compared to the other two years, falling below both aggregate (2.9 percent) and demographic (3.4 percent) figures. Performance in this year is adequate, given the low aggregate and demographic levels, which indicate limited opportunity in these geographies.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's performance (8.1 percent) was highest in 2017, when it trailed the aggregate lending level (9.2 percent) and demographic figure (10.5 percent), but not by a significant margin, indicative of adequate performance. In the other two years in the review period, the bank's performance (6.4 percent in 2018 and 4.6 percent in 2019) was poor, as it was worse compared to the aggregate lending levels (9.6 percent in 2018 and 9.0 percent in 2019). Moreover, performance was even further below the demographic figure of 10.5 percent in both years.

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is excellent. In each of the years where data was reviewed, the bank's percentage of small business loans in low-income census tracts (15.5 percent in 2017, 13.6 percent in 2018, and 16.0 percent in 2019) was well above aggregate levels (7.3 percent in 2017, 7.8 percent in 2018, and 8.4 percent in 2019) and demographic levels (7.3 percent in 2017, 7.0 percent in 2018, and 7.1 percent in 2019), reflecting excellent performance.

Pertaining to the percentage of small business loans in moderate-income census tracts, the bank showed excellent performance in 2019 (20.5 percent), where it greatly exceeded both aggregate (13.2 percent) and demographic (14.8 percent) figures. In the remaining two years, the bank's small business lending levels (17.4 percent in 2017 and 18.1 percent in 2018) were above aggregate (13.1 percent in 2017 and 13.2 percent in 2018) and demographic (14.9 percent in 2017 and 14.6 percent in 2018) figures, but by a smaller margin, representing good performance.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During the review period, the percentage of census tracts with loan activity was relatively consistent, averaging 90.4 percent, with the lowest year being 2017 (84.4 percent) when the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. Pertaining to penetration of LMI census tracts, performance exceeded the overall penetration levels in each year (93.3 percent in 2017, 96.7 percent in 2018, and 93.3 percent in 2019). In general, the bank's loans were most concentrated in the census tracts near branch locations, including LMI tracts. Moreover, the bank's overall penetration and penetration of LMI geographies were aligned and did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Chattanooga assessment area. During the review period, the bank originated 28 community development loans totaling \$119.0 million. These loans supported revitalization and stabilization of LMI or distressed middle-income geographies (15), economic development (5), community services (5), and affordable housing (3). Some of the most impactful loans are described below:

- One \$50.0 million line of credit was provided to a regional hospital to serve as a source of emergency funds to bolster cash reserves, which became stressed as a result of the COVID-19 pandemic.
- Three loans totaling \$18.5 million were made to fund the redevelopment of a railroad terminal to be used for retail and multifamily housing, including a portion reserved for LMI residents. The project creates 350 permanent jobs, 90.0 percent of which are LMI, as well as contributes to Chattanooga's revitalization plan for the area.
- Thirteen PPP loans totaling \$26.3 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 3,700 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

### **Product Innovation**

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

- Under the bank's affordable housing loan programs, the bank originated 98 loans totaling \$12.4 million. Ninety-five of these loans were under the Affordable Housing Program, totaling \$12.1 million. Additionally, the bank originated three loans for \$247,400 under the legacy Capital Bank affordable housing product that was offered during the review period. These loans are provided to home-buyers purchasing a primary residence that are considered LMI, and/or the subject property is in an LMI geography.
- As noted in the *Community Development Lending Activity* section above, the bank also originated community development PPP loans to businesses in LMI geographies, using this flexible and innovative product to provide emergency relief to those adversely affected by the COVID-19 pandemic.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 27 qualified community development investments totaling \$16.7 million, 25 accounting for \$15.7 million were made in the current review period, and 2 totaling \$1.0 million were made in the prior period but remain outstanding. These investments were comprised of MBS providing affordable home loans to LMI borrowers in the assessment area and LIHTCs. The LIHTCs helped acquire and rehabilitate large-scale affordable housing developments for LMI families. Moreover, the MBS and LIHTC investments directly address affordable housing, including rehabilitation of the current affordable housing stock, which community contacts noted as a need in the assessment area. In addition to these investments, the bank also made 56 donations totaling \$1.5 million. These donations benefitted various

organizations including, but not limited to, those dedicated to affordable housing and down payment assistance programs, homeless shelter programs, administering financial literacy education, and providing technology for LMI children during the COVID-19 pandemic to facilitate online learning, along with an in-kind donation for allowing a nonprofit to use bank facilities to deliver financial education, credit and money management, and financial products to unbanked and underbanked LMI residents.

**SERVICE TEST**

The bank’s service delivery systems are readily accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 21 branches in the Chattanooga assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	3 14.3%	6 28.6%	8 38.1%	4 19.0%	0 0.0%	<b>21</b> <b>100%</b>
Census Tracts	10.7%	13.9%	44.3%	29.5%	1.6%	<b>100%</b>
Household Population	7.2%	13.1%	44.5%	35.2%	0.0%	<b>100%</b>

Based on data in the preceding table, the bank operates 42.9 percent of its assessment area branches in LMI census tracts. This distribution is well above both the percentage of assessment area census tracts that are LMI (24.6 percent) and the household population in LMI census tracts (20.3 percent). Additionally, the bank operates five branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates three stand-alone, deposit-taking ATMs, each of which border or are near LMI census tracts, and nine stand-alone, cash-only ATMs, one of which is in an LMI census tract and seven that border or are near LMI census tracts. Therefore, the bank’s service delivery systems are readily accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	3	5	8	5	<b>21</b>
Acquired Branches	0	1	1	0	<b>2</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	0	(1)	(1)	<b>(2)</b>
<b>OVERALL</b>	<b>3</b>	<b>6</b>	<b>8</b>	<b>4</b>	<b>21</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. As shown above, the bank acquired two and closed two branches in the Chattanooga assessment area during the review period. One of the branch acquisitions and none of the closures were in LMI geographies, resulting in a net addition of one LMI branch during the review period. Consequently, this activity resulted in the number of locations in LMI geographies to rise from eight to nine branches during the review period.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank’s hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at 15 branch locations, including 7 in LMI census tracts. Moreover, 17 of the offices operate drive-through facilities, 7 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at 11 branches, 5 of which are in LMI census tracts.

**Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 199 community development services, totaling 575 hours, were provided to 28 different organizations. Bank employees’ activities included, but were not limited to, providing financial expertise to an organization focused on developing affordable housing, giving the same expertise to another organization that serves LMI individuals with intellectual disabilities, administering financial literacy training to children who are predominately LMI, along with serving on the board and committees of various organizations in the assessment area. Organizations with board and committee representation include, but are not limited to, a CDFI and those dedicated to providing affordable healthcare to LMI families, developing affordable housing, and providing meals to LMI children. The affordable housing and financial literacy-related services are particularly responsive given these needs were identified through community contact interviews.

## FLORIDA

**CRA RATING FOR FLORIDA:**

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**SATISFACTORY**

**Low Satisfactory**

**Outstanding**

**High Satisfactory**

Major factors supporting the institution's Florida rating include the following.

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

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Florida assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in two CSAs and one MSA assessment area across the state. Performance in the Miami and Cape Coral assessment areas was reviewed under full-scope examination procedures, with the remaining assessment area reviewed under limited-scope examination procedures. Based on the bank's branch structure and loan and deposit activity, CRA performance in the Miami assessment area received primary consideration when determining statewide performance conclusions.



To augment the evaluation of the full-scope review assessment areas in Florida, four community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. Two of the interviews were with representatives specializing in economic development, another with a representative from a nonprofit agency focusing on affordable housing, and the remaining interview with a representative from a CDFI. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas for which the community contacts were made.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

Prior to the merger-of-equals with IBERIABANK, First Horizon Bank operated 29 offices (10.7 percent of total branches) throughout the three CRA assessment areas in the state of Florida. The following table gives additional detail regarding the legacy First Horizon Bank operations within Florida, which drove the assessment area determination and weighting for the state.

Assessment Area	Offices		Deposits As of June 30, 2020		Review Procedures
	#	%	\$	%	
Miami CSA	17	58.6%	\$1,239	60.7%	Full Scope
Caple Coral CSA	9	31.0%	\$632	31.0%	Full Scope
Sarasota MSA	3	10.3%	\$170	8.3%	Limited Scope
<b>TOTAL</b>	<b>29</b>	<b>100%</b>	<b>\$2,042</b>	<b>100%</b>	<b>2 – Full Scope</b>

During the entire review period, including the merger-of-equals, the bank acquired 70, opened 1, and closed 3 branches in the three assessment areas, resulting in a net addition of 68 branches since the previous evaluation. While the table above focuses on legacy First Horizon Bank operations, as of November 29, 2020, in the combined organization, the bank operates 68 branches throughout the three assessment areas. These changes are discussed in more detail in each of the respective assessment area sections.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA**

**LENDING TEST**

The bank’s Lending Test performance in Florida is rated low satisfactory. The test considers the following criteria.

**Lending Activity**

<b>Full-Scope Review Areas</b>	<b>Lending Activity</b>
Miami CSA	Good
Cape Coral CSA	Good
<b>OVERALL</b>	<b>GOOD</b>

<b>Limited-Scope Review Areas</b>	<b>Lending Activity</b>
Sarasota MSA	Consistent

The bank’s overall level of lending reflects good responsiveness to the credit needs of the Florida assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank’s overall importance to each assessment area.

**Borrower and Geographic Distribution**

As displayed in the following tables, the bank’s performance by borrower’s income and revenue profile is adequate in Florida.

<b>Full-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Miami CSA	Poor
Cape Coral CSA	Adequate
<b>OVERALL</b>	<b>POOR</b>

<b>Limited-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Sarasota MSA	Above

Overall, the bank’s geographic distribution of loans reflects poor penetration throughout the Florida assessment areas.

Full-Scope Review Areas	Geographic Distribution of Loans
Miami CSA	Poor
Cape Coral CSA	Poor
<b>OVERALL</b>	<b>POOR</b>

Limited-Scope Review Areas	Geographic Distribution of Loans
Sarasota MSA	Above

**Community Development Lending Activities**

Overall, the bank was a leader in making community development loans in its Florida assessment areas, as displayed below.

Full-Scope Review Areas	Community Development Lending Activities
Miami CSA	Leader
Cape Coral CSA	Leader
<b>OVERALL</b>	<b>LEADER</b>

Limited-Scope Review Areas	Community Development Lending Activities
Sarasota MSA	Below

During the review period, the bank originated or renewed 78 community development loans in the Florida assessment areas totaling \$242.6 million, which represents an increase from the \$3.2 million in qualified community development loans at the bank’s previous evaluation. These loans include those for the development of multifamily affordable housing projects that will primarily benefit LMI residents, fund the construction of a hotel and convention center that is surrounded by LMI census tracts and will create over 200 permanent jobs, and a loan to an organization that provides emergency shelter and social services to women and families affected by domestic violence and sexual assault, a majority of which are LMI. Additionally, this total includes 12 community development PPP loans totaling \$25.1 million in the bank’s assessment areas that were in response to the COVID-19 pandemic.

Furthermore, as the bank met the community development lending needs of its own assessment areas in the state, consideration was also given to community development loans made outside of the bank’s rated areas. In the broader statewide and regional area, the bank made six loans totaling \$14.8 million. This total included three community development PPP loans for \$5.7 million.

**Product Innovation**

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

- Under the bank’s various affordable housing lending programs, the bank originated 163 loans totaling \$28.8 million: 7 Affordable Housing Program loans for \$1.2 million; 57 CRA Home Ready loans for \$10.8 million; 10 CRA Home Possible Advantage loans for \$2.4 million; 67 Home Start loans for \$9.2 million; and 22 Fannie Mae Home Ready loans for \$5.3 million. These loans are provided to home-buyers who are considered LMI, and/or the subject property is in an LMI geography.
- Through the bank’s ISP Grant and First Responder Grant Program, the bank provided down payment assistance to 126 borrowers totaling \$366,227. This down payment assistance is seen as responsive given the need identified through community contact interviews.
- As part of the FHLB HELP grant program, the bank sponsored four grants totaling \$20,000 to LMI borrowers in the Cape Coral assessment area. As noted above, this directly addresses the need for down payment assistance.
- As noted in the *Community Development Lending Activities* section above, the bank also originated community development PPP loans to businesses in LMI geographies in the state’s assessment areas, using this flexible and innovative product to provide emergency relief to those adversely affected by the COVID-19 pandemic.

**INVESTMENT TEST**

Overall, the bank’s performance in Florida is rated outstanding under the Investment Test. The following tables display investment and grant activity performance in its Florida assessment areas.

<b>Full-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Miami CSA	Excellent Level
Cape Coral CSA	Excellent Level
<b>OVERALL</b>	<b>EXCELLENT LEVEL</b>

<b>Limited-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Sarasota MSA	Consistent

As shown in the following table, the bank made a total of \$55.3 million in qualified community development investments and \$10.9 million in donations and grants in the Florida assessment areas. In addition, the bank made \$30.5 million in qualified community development investments and \$51,500 in donations and grants in the broader statewide area outside of its assessment areas

for a total of \$85.8 million and \$10.9 million, respectively. These investments primarily consisted of MBS and LIHTCs, while the bank’s donations were made to various affordable housing, community service, and economic development organizations throughout the state. Of the total statewide investments, \$80.2 million were made in the current review period, while \$5.6 million were made prior to the review period but were still outstanding.

Assessment Area	Investments	Donations/Grants
Miami CSA	\$35.1 Million	\$7.4 Million
Cape Coral CSA	\$10.5 Million	\$3.4 Million
Sarasota MSA	\$9.7 Million	\$97,490
Statewide (Outside AA)	\$30.5 Million	\$51,500
<b>TOTAL</b>	<b>\$85.8 Million</b>	<b>\$10.9 Million</b>

**SERVICE TEST**

The bank’s performance in Florida is rated high satisfactory under the Service Test. This test considers the following criteria.

**Accessibility of Delivery Systems**

As displayed in the following tables, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels in its Florida assessment areas.

Full-Scope Review Areas	Accessibility of Delivery Systems
Miami CSA	Reasonably Accessible
Cape Coral CSA	Reasonably Accessible
<b>OVERALL</b>	<b>REASONABLY ACCESSIBLE</b>

Limited-Scope Review Areas	Accessibility of Delivery Systems
Sarasota MSA	Consistent

**Changes in Branch Locations**

The bank’s record of opening and closing branches in the Florida assessment areas has improved the accessibility of its service delivery systems, as shown in the tables below.

Full-Scope Review Areas	Changes in Branch Locations
Miami CSA	Improved
Cape Coral CSA	Improved
<b>OVERALL</b>	<b>IMPROVED</b>

Limited-Scope Review Areas	Changes in Branch Locations
Sarasota MSA	Consistent

**Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs**

Business hours and banking services do not vary in a way that inconveniences certain portions of the Florida assessment areas, particularly LMI geographies and individuals, as displayed in the following tables:

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Miami CSA	Do Not Vary in a Way That Inconveniences
Cape Coral CSA	Do Not Vary in a Way That Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Sarasota MSA	Consistent

**Community Development Services**

The bank is a leader in providing community development services in the Florida assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Florida assessment areas.

Full-Scope Review Areas	Community Development Services
Miami CSA	Leader
Cape Coral CSA	Leader
<b>OVERALL</b>	<b>LEADER</b>

Limited-Scope Review Areas	Community Development Services
Sarasota MSA	Consistent

During the review period, 1,858 community development services were provided to 258 different organizations, accounting for 7,960 service hours. Bank employees served on boards, provided financial assistance to various organizations, and administered financial literacy training, promoting community development initiatives throughout the Florida assessment areas.

**MIAMI-PORT ST. LUCIE-FORT LAUDERDALE,  
FLORIDA CSA**  
*(Full-Scope Review)*

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE MIAMI ASSESSMENT  
AREA**

**Bank Structure**

The bank currently operates 39 branches in the Miami assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, the bank operated 17 branches in the assessment area, representing 6.3 percent of all bank branches at the time. Through the merger-of-equals, the bank added 22 offices to the assessment area, increasing its branching footprint to 39 locations, representing 8.0 percent of branches in the combined institution. The table below displays the distribution of these offices by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
2	5	4	28

The bank entered the assessment area in November 2017 with the Capital Bank acquisition, which added 19 branches to the assessment area. Subsequently, the bank opened one and closed three branches during the review period. This merger and acquisition activity is in addition to the 22 branches acquired through the merger-of-equals. Additionally, the bank operates one stand-alone, cash-only ATM. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to the entire Miami assessment area.

**General Demographics**

The bank’s Miami assessment area consists of Broward, Miami-Dade, and Monroe Counties, three of the seven counties in the Miami-Port St. Lucie-Fort Lauderdale CSA, which combines the Miami-Fort Lauderdale-Pompano Beach MSA, Port St. Lucie MSA, Sebastian-Vero Beach MSA, and one nonMSA county encompassing the Florida Keys. While the bank has designated these as separate assessment areas, they are combined as the Miami assessment area for purposes of this evaluation. The assessment area has a total population of 4,558,095, with the most populous county being Miami-Dade County (2,639,042), which contains the city of Miami. Broward County, which includes the city of Fort Lauderdale, also contains a significant amount of the population (1,843,152). The city of Miami serves as an important regional hub for commercial and banking activity to the surrounding counties, and the overall assessment area contains several large universities with substantial enrollments including, but not limited to, Florida International University (58,787 students) and the University of Miami (17,811 students).

The assessment area hosts a competitive banking market, with 69 FDIC-insured depository institutions operating 1,098 branches throughout the assessment area. Prior to the merger-of-



equals, the bank ranked 26<sup>th</sup> in deposit market share with 0.5 percent of all deposit dollars in the assessment area, representing 3.8 percent of total bank deposits at the time. Following the July 2020 IBERIABANK merger, deposit market share increased, resulting in the combined organization ranking ninth, and increasing the deposit market share to 2.8 percent of all deposit dollars in the assessment area. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 934 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 73<sup>rd</sup> with 0.2 percent of total loan activity. Of the 214 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 47<sup>th</sup> with 0.1 percent of all loan activity.

The assessment area population is diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the assessment area include home purchase loans similar to a Federal Housing Administration (FHA) 203(k), which funds the purchase and rehabilitation of the home; low-cost small dollar home improvement loans; down payment assistance programs; small business operating lines of credit; and small dollar business loans. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically investing in, or lending to, local CDFIs, becoming more involved in area workforce development efforts, being active in financial education efforts, developing mortgage products targeted to LMI individuals, and investing in Community Development Housing Organizations.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	50	5.5%	46,959	4.6%
<b>Moderate</b>	251	27.5%	280,698	27.7%
<b>Middle</b>	271	29.7%	318,971	31.4%
<b>Upper</b>	317	34.8%	366,436	36.1%
<b>Unknown</b>	23	2.5%	1,484	0.2%
<b>TOTAL</b>	<b>912</b>	<b>100%</b>	<b>1,014,548</b>	<b>100%</b>

As displayed in the table above, 33.0 percent of census tracts in the assessment area are designated as LMI, and 32.3 percent of assessment area families reside within those census tracts. These LMI geographies are located throughout the assessment area, particularly near the eastern coast and the cities of Miami and Fort Lauderdale.

According to 2015 ACS data, the median family income for the assessment area (\$54,789) is below the same figure for the state of Florida as a whole (\$57,504). More recently, the FFIEC estimates the median family income for the Miami-Miami Beach-Kendall metropolitan division (MD) to be \$54,900 and the Fort Lauderdale-Pompano Beach-Sunrise MD to be \$68,600 in 2019.

The following table displays the distribution of assessment area families by income level compared to all Florida families.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>Florida</b>	
<b>Low</b>	234,149	23.1%	1,010,745	21.5%
<b>Moderate</b>	170,332	16.8%	839,152	17.9%
<b>Middle</b>	179,015	17.6%	910,313	19.4%
<b>Upper</b>	431,052	42.5%	1,939,678	41.3%
<b>TOTAL</b>	<b>1,014,548</b>	<b>100%</b>	<b>4,699,888</b>	<b>100%</b>

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.9 percent) than reside in LMI geographies (32.3 percent). When compared to the family income distribution for the state of Florida as a whole, the percentage of LMI families in the assessment area is in line with the statewide figure (39.4 percent). However, the percentage of families below the poverty level in the assessment area (14.4 percent) is above the state of Florida as a whole (12.0 percent). Based on the distribution of families by income, as well as income and poverty levels, the assessment area is slightly less affluent than Florida as a whole.

### **Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$198,125	23.9%	\$1,147
Florida	\$159,000	29.9%	\$1,002

As shown in the table above, housing in the assessment area is less affordable than the state of Florida as a whole. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. More specifically, the assessment area’s affordability ratio (23.9 percent) is below the state as a whole (29.9 percent), along with median housing values being 24.6 percent higher than the state of Florida. Compounding this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 61.9 percent of housing units in low-income census tracts and 45.5 percent of housing in moderate-income census tracts are rental units. Moreover, just 2.3 percent of owner-occupied housing units in the assessment area are in low-income census tracts. Considering these factors, opportunities for HMDA lending in LMI census tracts are likely limited.

Specific to rental units in the assessment area, median gross rent is above the state of Florida, and the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (58.2 percent) is also above the same figure for Florida as a whole (52.0 percent). Specific

to challenges faced by LMI residents, 82.1 percent of low-income and 67.6 percent of moderate-income renters in the assessment area have rental costs exceeding 30.0 percent of their income. While limiting LMI renters' cash flow, high rental rates compared to incomes also hinders their ability to save for a down payment on a home purchase. As such, homeownership may be out of reach for many LMI residents.

### **Industry and Employment Demographics**

The Miami assessment area economy is diverse and hosts several large corporations, universities, and a strong small business sector. County business patterns indicate that there are 961,037 paid employees in the assessment area, the majority of which are employed in the governmental (12.5 percent), retail trade (12.3 percent), healthcare and social assistance (12.2 percent), and accommodation and food services (11.1 percent) industries. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 92.9 percent of businesses reported annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Florida.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Florida</b>
2017	4.3%	4.2%
2018	3.4%	3.6%
2019	2.7%	3.1%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and were slightly below statewide levels, except 2017 when assessment area unemployment was just slightly above the statewide level. Unemployment levels were largely consistent throughout the assessment area, with a slightly higher level in Broward County (3.1 percent in 2019), which contains the city of Fort Lauderdale. Monroe County, which includes the Florida Keys and is comprised of nearly all upper-income census tracts, with only one LMI census tract, had the lowest unemployment level (2.1 percent in 2019). While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Miami assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a CDFI specializing in providing homeownership services to assist potential home-buyers, while the other contact represented a nonprofit organization specializing in economic development.

Economic conditions of the area during the review period were characterized as growing by both contacts. Growth was attributed by the CDFI specialist to proactiveness by local government in attracting technology sector jobs to the area, as well as inward migration and more permanent relocations to the area. Additionally, the economic development contact attributed the growth to the expansion of current healthcare providers, as well as a leading e-commerce distribution company increasing its warehouse activity. In terms of housing, both contacts noted that gentrification of LMI neighborhoods is negatively impacting the LMI population. Specific areas mentioned were Little Haiti, Little Havana, and the 79<sup>th</sup> Street corridor, which are located to the north and northwest of downtown Miami. The CDFI contact went on to note that the majority of affordable housing inventory is distant from the urban core, mostly in south Miami-Dade County or North Miami, as well as substandard and in limited supply.

Pertaining to COVID-19, the contacts stated that the pandemic has had negative impacts on the area, with many businesses closing either temporarily or permanently, particularly restaurants in the area. Additionally, rental assistance has spiked in both Miami-Dade and Broward Counties. The CDFI contact attributed the spike to the high number of LMI individuals employed by restaurants and hotels, who are out of work. Similarly, the economic development specialist indicated that food service accommodation businesses were struggling, as well as the tourism industry. The contact went on to state that businesses in the Bayside Market and downtown Miami areas are particularly struggling, as patronage has significantly fallen, resulting in layoffs and reduced hours for employees living in nearby LMI neighborhoods.

Contacts described access to banking branches and services in the area as favorable, attributable to a competitive banking environment in the area. While positive overall, both individuals noted that LMI neighborhoods have limited access to banking branches. Additionally, many LMI individuals rely on services from alternative financial service providers, rather than from traditional financial institutions. The affordable housing contact noted most of the population served by banks in the area is composed of middle- and upper-income residents. Credit needs identified by the contacts included home purchase loans similar to an FHA 203(k), which funds the purchase and rehabilitation of the home; low-cost small dollar home improvement loans; down payment assistance programs; small business operating lines of credit; and small dollar business loans. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including investing in, or lending to, local CDFIs; becoming more involved in area workforce development efforts; being active in financial education efforts; developing mortgage products targeted to LMI individuals; and investing in Community Development Housing Organizations.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MIAMI ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects poor penetration among customers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans also reflects poor penetration throughout the assessment area. Despite this poor performance, the bank was a leader in making community development loans in the assessment area, with a particular strategic focus placed on affordable housing, which was identified as a significant need by community contacts.

As previously noted, the bank entered this assessment area in November 2017 through the Capital Bank acquisition. Given the limited amount of time when the bank operated in this assessment area, coupled with low volume, 2017 lending data was not considered in the borrower and geographic distribution review, as it would not result in meaningful analyses.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Miami assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	317	40.2%	\$136,145	46.7%
Refinance	146	18.5%	\$85,511	29.3%
Home Improvement	62	7.9%	\$9,734	3.3%
Multifamily Housing	3	0.4%	\$4,958	1.7%
<b>Total HMDA</b>	<b>528</b>	<b>66.9%</b>	<b>\$236,348</b>	<b>81.1%</b>
<b>Small Business</b>	<b>261</b>	<b>33.1%</b>	<b>\$55,069</b>	<b>18.9%</b>
<b>TOTAL LOANS</b>	<b>789</b>	<b>100%</b>	<b>\$291,417</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 4.8 percent and 3.5 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. When compared to the bank’s branching footprint, this level of lending is below the percentage of total branches in the assessment area (6.3 percent). Although when compared to deposits, HMDA lending is above, and small business lending is in line with, the percentage of total bank deposits held in the assessment area (3.8 percent). Most recently in 2019, the bank ranked 73<sup>rd</sup> out of 934 reporters in HMDA lending by number, and 47<sup>th</sup> out of 214 reporters in CRA lending in the same year. This assessment area includes a significant amount of competition from mortgage companies and other financial institutions.

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### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Miami assessment area is poor. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is poor.

In both years reviewed, lending to low-income borrowers (0.4 percent in both 2018 and 2019) was below the aggregate lending levels on a percentage basis (2.1 percent in 2018 and 2.5 percent in 2019), and significantly below demographic figures (23.1 percent in both years), reflecting poor performance each year.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance was highest in 2018 (6.2 percent), when it trailed the aggregate lending level (8.0 percent), as well as the demographic figure (16.8 percent) by a larger margin, indicative of adequate performance. The bank's performance declined in 2019 (5.2 percent) compared to the aggregate lending levels (8.0 percent) and the demographic figure (16.8 percent), representing poor performance.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is adequate overall, with adequate performance in each year. In both years where data was reviewed, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (40.2 percent in 2018 and 40.3 percent in 2019) was below aggregate lending levels (46.3 percent in 2018 and 48.5 percent in 2019). Of this lending to business with annual revenues of \$1 million or less, a majority were in loan amounts of \$100,000 or less across the review period (75.6 percent in 2018 and 73.3 percent in 2019). Small dollar business loans such as these were identified by community contacts as a credit need in the assessment area. Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 92.8 percent across the review period, the bank's lending levels were well below this figure in both years.

### **Geographic Distribution of Loans**

Overall, the bank's geographic distribution in the Miami assessment area is poor. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is poor.

In 2018, the bank's percentage of HMDA loans in low-income census tracts (1.5 percent) was slightly below the aggregate lending level (1.9 percent), as well as the demographic figure (2.3 percent). However, at a product level, the bank's level of home purchase loans (2.6 percent) exceeded the aggregate and demographic of 2.1 percent and 2.3 percent, respectively, for the same year. Home purchase loans were identified as a credit need in the assessment area by community contacts. As such, performance in low-income census tracts for 2018 is adequate. Performance declined slightly in 2019 (0.4 percent), again falling below both the aggregate (2.0 percent) and demographic (2.3 percent) figures, reflective of poor performance.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, performance was highest in 2019 (14.9 percent), but below aggregate (20.0 percent) and demographic (22.7 percent) figures indicative of poor performance. In 2018, lending was slightly lower (14.2 percent), compared to the same aggregate and demographic benchmarks of 20.5 and 22.7 percent, respectively, representing poor performance.

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is adequate. In 2019, the bank's percentage of small business loans in low-income census tracts (4.7 percent) was the strongest, outperforming both the aggregate level and demographic figure (4.0 percent for each), reflecting good performance. Performance in 2018 (2.0 percent), however, was below the aggregate lending level (3.9 percent) and demographic figure (4.0 percent), representing poor performance.

Pertaining to the percentage of small business loans in moderate-income census tracts, in both years, the bank's performance (16.7 percent in 2018 and 16.8 percent in 2019) was below the aggregate lending levels (21.3 percent in 2018 and 21.8 percent in 2019) and demographic figures (22.9 percent in both 2018 and 2019), but not by a large margin, indicative of adequate performance.

Lastly, while the bank had a relatively low penetration rate across all census tracts, no lending gaps reflecting evidence of arbitrary exclusion of LMI geographies were identified in the distribution of the bank's loans in the assessment area, factoring in the bank's branching presence during the review period, as well as the highly competitive banking market. During 2018 and 2019, the percentage of census tracts with loan activity across the assessment area averaged just 20.0 percent. Pertaining to penetration of LMI census tracts, performance was slightly lower than the overall penetration and trended upward (16.6 percent in 2018 and 17.9 percent 2019). While not indicative of arbitrary exclusion, the gaps that are present across the assessment area support the conclusion that the bank's overall geographic distribution is poor.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Miami assessment area. During the review period, the bank originated 57 community development loans totaling \$198.3 million. These loans supported affordable housing (30), revitalization and stabilization of LMI or distressed middle-income geographies (13), economic development (9), and community services (5). Some of the most impactful loans are described below:

- Two loans totaling \$7.0 million were made to fund the purchase and rehabilitation of an affordable 76-unit LIHTC multifamily project in a low-income census tract, with 100 percent of units reserved exclusively for LMI residents. This development will increase the amount of affordable housing in the assessment area, a need identified by community contacts. Moreover, as previously noted, a substantial portion of renters in these areas have rental costs exceeding 30.0 percent of their income, and these community development loans help address the need for affordable rental housing.
- One \$23.7 million loan was made to build a multifamily apartment complex located in a moderate-income census tract that is designated as a brownfield site. This loan helps to clean up the contaminated area, while simultaneously attracting new residents and businesses to this moderate-income geography.
- Nine PPP loans totaling \$20.4 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 2,100 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 23 qualified community development investments totaling \$35.1 million, 22 accounting for \$32.0 million were made in the current review period and 1 for \$3.1 million was made in the prior period but remains outstanding. These investments were comprised of MBS providing affordable home loans to LMI borrowers in the assessment area and LIHTCs. The LIHTCs helped construct and acquire and rehabilitate large-scale affordable housing developments for LMI families. Moreover, the MBS and LIHTC investments directly address affordable housing, including rehabilitation of the current affordable housing stock, which community contacts noted as a need in the assessment area. In addition to these investments, the bank also made 236 donations totaling \$7.4 million. These donations benefitted various organizations, including, but not limited to, those dedicated to affordable housing, providing services to LMI seniors and children, administering financial literacy and small business education, and revitalize areas impacted by hurricanes. Additionally, the bank made an in-kind donation for allowing a nonprofit to use bank facilities to deliver financial education, credit and money management, and financial products to unbanked and underbanked LMI residents, as well as another in-kind donation to a domestic abuse shelter for use of bank facilities after the organization's office was destroyed by a hurricane.



**SERVICE TEST**

The bank’s service delivery systems are reasonably accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank was a leader in providing community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 39 branches in the Miami assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	2 5.1%	5 12.8%	4 10.3%	28 71.8%	0 0.0%	<b>39</b> <b>100%</b>
Census Tracts	5.5%	27.5%	29.7%	34.8%	2.5%	<b>100%</b>
Household Population	5.3%	28.2%	31.5%	34.7%	0.3%	<b>100%</b>

Based on data in the preceding table, the bank operates 17.9 percent of its assessment area branches in LMI census tracts. This distribution is below both the percentage of assessment area census tracts that are LMI (33.0 percent) and the household population in LMI census tracts (33.5 percent). However, the bank also operates 15 branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Therefore, the bank’s service delivery systems are reasonably accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>						
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>Unknown-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	0	0	0	0	<b>0</b>
Acquired Branches	2	6	5	27	1	<b>41</b>
Opened Branches	0	0	0	1	0	<b>1</b>
Closed Branches	0	(1)	(1)	0	(1)	<b>(3)</b>
<b>OVERALL</b>	<b>2</b>	<b>5</b>	<b>4</b>	<b>28</b>	<b>0</b>	<b>39</b>

The bank's record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. First Horizon Bank entered this assessment area in November 2017 through the Capital Bank acquisition. As shown above, the bank acquired 41 and closed 3 branches in the Miami assessment area during the review period. One of these branch closures was in a moderate-income census tract; however, it was in the same moderate-income census tract and near one of branches acquired through the merger-of-equals with IBERIABANK. As such, this closure did not reduce the accessibility in the assessment area. Moreover, the bank's changes in branch locations during the review period resulted in seven new LMI branches.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area, with 17 branches offering extended hours until 6 p.m. Monday through Friday, including three in LMI census tracts. Moreover, 22 of the offices operate drive-through facilities, 5 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at four branches, two of which are in moderate-income census tracts.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 1,025 community development services, totaling 4,260 hours, were provided to 172 different organizations. Bank employees' activities included, but were not limited to, providing financial expertise to organizations focused on affordable housing and a CDFI, providing expertise related to their role at the bank to give pro-bono legal assistance to LMI clients, administering financial literacy training to children who are predominately LMI and to small businesses, along with serving on the board and committees of various organizations in the assessment area. Organizations with board and committee representation include, but are not limited to, those dedicated to developing small businesses in an LMI geography, providing financial support to LMI families with children who have disabilities, transitioning LMI residents who are unbanked or underbanked to traditional financial institutions, placing LMI families into affordable housing, and operating shelters for the homeless population. The affordable housing and financial literacy-related services are particularly responsive given these needs were identified through community contact interviews. Moreover, the initiative to transition the unbanked and underbanked from alternative financial providers to traditional financial institutions was another need noted by community contacts.

## CAPE CORAL-FORT MYERS-NAPLES, FLORIDA CSA (Full-Scope Review)

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CAPE CORAL ASSESSMENT AREA

#### **Bank Structure**

The bank currently operates 23 branches in the Cape Coral assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, the bank operated nine branches in the assessment area, representing 3.3 percent of all bank branches at the time. Through the merger-of-equals, the bank added 14 offices to the assessment area, increasing its branching footprint to 23 locations, representing 4.7 percent of branches in the combined institution. The table below displays the distribution of these offices by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	4	9	10

The bank entered the assessment area in November 2017 with the Capital Bank acquisition, which added nine branches to the assessment area. This merger and acquisition activity is in addition to the 14 branches acquired through the merger-of-equals. Additionally, the bank operates one stand-alone, deposit-taking ATM. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Cape Coral assessment area. Challenges may be presented in serving the more rural areas of Collier County, inland from the coast and part of the Big Cypress National Preserve, where the bank does not have a branching presence.

#### **General Demographics**

The bank's Cape Coral assessment area consists of Collier and Lee Counties, two of the three counties in the Cape Coral-Fort Myers-Naples CSA, which combines the Cape Coral-Fort Myers MSA, Naples-Marco Island MSA, and one surrounding nonMSA county. While the bank has designated these as separate assessment areas, they are combined as the Cape Coral assessment area for purposes of this evaluation. The assessment area has a total population of 1,004,766, with the most populous county being Lee County (663,675), which contains the cities of Cape Coral and Fort Myers. Both cities serve as an important regional hub for commercial and banking activity to the surrounding counties and contain Florida Gulf Coast University, a large university with a total enrollment of approximately 15,329 students.

The assessment area hosts a competitive banking market, with 38 FDIC-insured depository institutions operating 324 branches throughout the assessment area. Prior to the merger-of-equals, the bank ranked 14<sup>th</sup> in deposit market share with 1.7 percent of all deposit dollars in the assessment area, representing 1.9 percent of total bank deposits at the time. Following the July

2020 IBERIABANK merger, deposit market share increased, resulting in the combined organization ranking fifth, and increasing the deposit market share to 7.1 percent of all deposit dollars in the assessment area. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 1,020 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 73<sup>rd</sup> with 0.2 percent of total loan activity. Of the 171 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 24<sup>th</sup> with 0.4 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs in the assessment area include home purchase loans similar to an FHA 203(k), which funds the purchase and rehabilitation of the home; home improvement loans; consumer personal loans; debt-consolidation; and home equity lines of credit. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically partnering with local CDFIs; being more active in financial education efforts; developing, or participating in, revolving loan funds offering reasonable interest rates with longer terms to new and existing small businesses; and offering products to assist the unbanked, underbanked, and those in need of second chance checking accounts.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	13	5.4%	10,016	4.0%
<b>Moderate</b>	57	23.7%	55,044	21.7%
<b>Middle</b>	86	35.7%	106,716	42.1%
<b>Upper</b>	82	34.0%	81,524	32.2%
<b>Unknown</b>	3	1.2%	0	0.0%
<b>TOTAL</b>	<b>241</b>	<b>100%</b>	<b>253,300</b>	<b>100%</b>

As displayed in the table above, 29.1 percent of census tracts in the assessment area are LMI, though only 25.7 percent of assessment area families reside within those census tracts. These LMI geographies are located throughout the assessment area, particularly in the eastern portion of Lee County and northeast of downtown Fort Myers, as well as east and south of downtown Naples in Collier County. Moreover, as noted above, the assessment area also includes Florida Gulf Coast University, a large, public university located in Fort Myers. The university is located inside of a moderate-income census tract and is near other LMI census tracts, which likely hinders opportunities for HMDA given the lack of nonstudent housing in each of these geographies, as well as small business lending in the moderate-income census tract in which the university is located.

According to 2015 ACS data, the median family income for the Cape Coral assessment area (\$60,503) is above the same figure for the state of Florida as a whole (\$57,504). More recently, the FFIEC estimates the median family income for the Cape Coral-Fort Myers MSA to be \$67,100 and the Naples-Marco Island MSA to be \$78,300 in 2019.

The following table displays the distribution of assessment area families by income level compared to all Florida families.

Family Population by Income Level				
	Assessment Area		Florida	
<b>Low</b>	52,649	20.8%	1,010,745	21.5%
<b>Moderate</b>	46,099	18.2%	839,152	17.9%
<b>Middle</b>	49,464	19.5%	910,313	19.4%
<b>Upper</b>	105,088	41.5%	1,939,678	41.3%
<b>TOTAL</b>	<b>253,300</b>	<b>100%</b>	<b>4,699,888</b>	<b>100%</b>

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.0 percent) than reside in LMI geographies (25.7 percent). When compared to the family income distribution for the state of Florida as a whole, the percentage of LMI families in the assessment area is similar to statewide figure (39.4 percent). However, the percentage of families below the poverty level in the assessment area (10.4 percent) is below the state of Florida (12.0 percent). Given these factors, the assessment area is slightly more affluent than Florida as a whole.

### Housing Demographics

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

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$186,956	27.6%	\$980
Florida	\$159,000	29.9%	\$1,002

As shown in the table above, housing in the assessment area is less affordable than the state of Florida as a whole. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. Compounding this issue is the lack of owner-occupied affordable housing in LMI census tracts, as just 28.3 percent of housing units in low-income census tracts and 40.9 percent of housing in moderate-income census tracts are owner-occupied. Additionally, 2.1 percent of owner-occupied housing units in the assessment area are in low-income census tracts. Moreover, as noted above, many of these LMI census tracts surround Florida Gulf Coast University, which caters to student housing. Considering these factors, opportunities for HMDA lending in LMI census tracts may be limited.

In comparison to owner-occupied housing, median gross rent is slightly lower than the state of Florida as a whole. Similarly, the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (48.4 percent) is below the same figure for the state of Florida (52.0 percent), indicating that rental costs in the assessment area are more affordable. Despite more affordable rental units, the cost of homeownership is higher than the state of Florida based on higher median housing values, as well as the lower affordability ratio in the assessment area (27.6 percent) compared to the state of Florida as a whole (29.9 percent). As such, homeownership may be out of reach for many LMI residents.

### **Industry and Employment Demographics**

The Cape Coral assessment area economy is diverse and hosts several universities and a strong small business sector. County business patterns indicate that there are 434,456 paid employees in the assessment area, the majority of which are employed in the retail trade (14.7 percent), accommodation and food services (14.0 percent), governmental (13.5 percent), and healthcare and social assistance (11.4 percent) industries. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 94.2 percent of businesses reported annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Florida.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Florida</b>
2017	4.1%	4.2%
2018	3.5%	3.6%
2019	3.1%	3.1%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and were in line with statewide levels. Unemployment levels were consistent across all counties in the assessment area. While 2020 data was unavailable at the start of this evaluation, as it commenced before year-end, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Cape Coral assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a governmental organization specializing in small business development, while the other contact represented a nonprofit organization specializing in affordable housing.

Economic conditions of the area during the review period were characterized as growing by both contacts, as well as better than the surrounding areas. The affordable housing contact attributed the growth to an influx of new businesses, inward migration of retirees from other states, and retention of college graduates who stay in the area and start families after graduating. These positions were echoed by the small business specialist, who also attributed the growth to organic business growth and inward migration from northern states. While the growth has been a positive, it has also led to an increasing population, resulting in limited housing options, especially affordable housing. The affordable housing specialist indicated that an influx of wealthier individuals into the area has increased median home prices, making it more difficult for LMI individuals to transition to homeownership. According to the same contact, the limited affordable housing units that are available are old, in need of repair, and often have four- to five-year waiting lists between the time of application and unit availability.

Pertaining to COVID-19, the contacts stated that the pandemic negatively impacted the area. The small business development contact noted many restaurants, and even large chains, laid off staff due to a decrease in business. Moreover, job loss in the area resulted in a higher number of requests for utility assistance. Furthermore, the affordable housing specialist noted that during the pandemic, LMI communities were particularly affected due to lack of Internet access.

Contacts described access to banking branches and services as competitive in most parts of Lee and Collier Counties, although access for LMI areas is very limited, with the affordable housing contact characterizing the LMI area of Immokalee as a banking desert. Additionally, many LMI individuals rely on services from alternative financial service providers, rather than traditional financial institutions. Credit needs identified by the contacts included home purchase loans similar to an FHA 203(k), which funds the purchase and rehabilitation of the home; home improvement loans; consumer personal loans; debt-consolidation; and home equity lines of credit. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including partnering with local CDFIs; being more active in financial education efforts; developing or participating in revolving loan funds offering reasonable interest rates with longer terms to new and existing small businesses; and offering products to assist the unbanked, underbanked, and those in need of second-chance checking accounts.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CAPE CORAL ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. The geographic distribution of loans reflects poor penetration throughout the assessment area. Finally, the bank was a leader in making community development loans in the assessment area.

As previously noted, the bank entered this assessment area in November 2017 through the Capital Bank acquisition. Given the limited amount of time when the bank operated in this assessment area, coupled with low volume, 2017 lending data was not considered in the borrower and geographic distribution review, as it would not result in meaningful analyses.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Cape Coral assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	81	18.5%	\$45,493	39.7%
Refinance	66	15.1%	\$22,208	19.4%
Home Improvement	52	11.9%	\$5,220	4.6%
Multifamily Housing	1	0.2%	\$525	0.5%
<b>Total HMDA</b>	<b>200</b>	<b>45.8%</b>	<b>\$73,446</b>	<b>64.1%</b>
<b>Small Business</b>	<b>237</b>	<b>54.2%</b>	<b>\$41,072</b>	<b>35.9%</b>
<b>TOTAL LOANS</b>	<b>437</b>	<b>100%</b>	<b>\$114,518</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 2.1 and 3.1 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. When compared to the bank’s branching footprint, this level of lending is slightly below the percentage of total branches in the assessment area (3.3 percent). Although when compared to total deposits, this level of HMDA and small business lending is above the percentage of total bank deposits held in the assessment area (1.9 percent). Most recently in 2019, the bank ranked 73<sup>rd</sup> out of 1,020 reporters in HMDA lending by number, and 24<sup>th</sup> out of 171 reporters in CRA lending in the same year. This assessment area includes a significant amount of competition from mortgage companies and other financial institutions.



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### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Cape Coral assessment area is adequate. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is adequate.

In 2019, the bank's percentage of HMDA loans to low-income borrowers (7.7 percent) was highest, well above the aggregate lending level (4.2 percent), but below the demographic figure (20.8 percent), representing good performance. Lending was lower in 2018 (4.6 percent) but was still above the aggregate (3.9 percent) and below the demographic (20.8 percent) figures, reflecting adequate performance.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, performance was highest in 2018 (14.8 percent), when it slightly exceeded the aggregate lending level (14.7 percent) and fell below the demographic figure (18.2 percent), indicative of adequate performance. In 2019, the bank's percentage of lending trended downward to 9.9 percent, while aggregate slightly increased (15.7 percent) and demographic remained the same (18.2 percent), representing poor performance.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is poor overall. In 2018, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (53.8 percent) was above the aggregate level (45.5 percent), reflecting adequate performance. In 2019, however, the bank's performance (29.6 percent) was poor, as it was below aggregate lending levels (46.1 percent). Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 94.1 percent across the review period, the bank's lending levels were well below this figure in both years.

### **Geographic Distribution of Loans**

Overall, the bank's geographic distribution in the Cape Coral assessment area is poor. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is poor. This conclusion is primarily driven by performance in moderate-income census tracts, given the limited opportunity in low-income census tracts, as discussed below.

In both 2018 and 2019, the bank originated no HMDA loans in low-income census tracts. While aggregate lending levels (1.5 percent in 2018 and 1.6 percent in 2019) and demographic figures (2.1 percent in both years) are low, indicating a lack of opportunity for lending in these geographies, performance in low-income census tracts is poor in both years.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's performance in 2018 (18.5 percent) was in line with the aggregate lending level (18.8 percent) but above the demographic figure (17.8 percent), reflecting an adequate level of lending. Performance declined to poor in 2019 to 12.1 percent, however, falling below both the aggregate level (18.0 percent), and the demographic figure (17.8 percent).

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is adequate. In 2019, the bank's percentage of small business loans in low-income census tracts (2.8 percent) was the strongest, outperforming the aggregate level (2.4 percent) and matching the demographic figure (2.8 percent), indicative of good performance. The bank's performance in 2018 (1.1 percent) was slightly below the aggregate lending level (2.4 percent) and demographic figure (2.8 percent), reflecting an adequate level of lending.

Pertaining to the percentage of small business loans in moderate-income census tracts, the bank's performance in both years (14.3 percent in 2018 and 14.1 percent in 2019) was below aggregate lending levels (17.7 percent in 2018 and 17.9 percent in 2019) and demographic figures (18.8 percent in 2018 and 19.1 percent in 2019), but not by a large margin, representing adequate performance

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During 2018 and 2019, the percentage of census tracts with loan activity averaged 42.7 percent. Pertaining to penetration of LMI census tracts, 25.7 percent of LMI census tracts were penetrated in both years. This percentage is significantly lower than overall penetration, although many of the assessment area's LMI census tracts are in more rural areas, outside of the urban areas where the bank's limited branching presence is located. In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. Some lending, however, reached outside of these areas, including more rural moderate-income census tracts. As such, the bank's overall penetration and penetration of LMI geographies did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Cape Coral assessment area. During the review period, the bank originated 21 community development loans totaling \$44.2 million. These loans supported community services (12), affordable housing (5), revitalization and stabilization of LMI or distressed middle-income geographies (3), and economic development (1). Some of the most impactful loans are described below:

- One \$15 million loan was made to fund the construction of a new hotel and redevelopment of a convention center that is surrounded by LMI census tracts. While located in a middle-income census tract, this loan will benefit the surrounding LMI geographies, as well as create over 200 LMI jobs for area residents.
- One \$2.9 million loan was made to purchase a 60-unit multifamily property targeted to LMI seniors that was subsequently converted to Section 8 subsidized housing. This loan helps to increase the amount of affordable housing in the assessment area.
- One \$1.9 million loan was made to an organization that provides emergency shelter and social services to women and families affected by domestic violence and sexual assault, a majority of which are LMI, thus providing essential community services to LMI residents.
- Three PPP loans totaling \$4.7 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 200 jobs in moderate-income geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 25 qualified community development investments totaling \$10.5 million, 22 accounting for \$9.4 million were made in the current review period and 3 totaling \$1.1 million were made in the prior period but remain outstanding. Each of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area. These investments directly address affordable housing, which community contacts noted as an urgent need in the assessment area. In addition to these investments, the bank also made 166 donations totaling \$3.4 million. These donations benefitted various organizations including, but not limited to, those dedicated to affordable housing, administering home-buyer education, domestic abuse shelters focused on LMI residents, and food banks.

**SERVICE TEST**

The bank’s service delivery systems are reasonably accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank was a leader in providing community development services in the assessment area.

**Accessibility of Delivery Systems**

The bank operates 23 branches in the Cape Coral assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	0 0.0%	4 17.4%	9 39.1%	10 43.5%	0 0.0%	<b>23</b> <b>100%</b>
Census Tracts	5.4%	23.7%	35.7%	34.0%	1.2%	<b>100%</b>
Household Population	4.2%	21.9%	41.6%	32.4%	0.0%	<b>100%</b>

Based on data in the preceding table, the bank operates 17.4 percent of its assessment area branches in LMI census tracts. This distribution is below both the percentage of assessment area census tracts that are LMI (29.1 percent) and the household population in LMI census tracts (26.1 percent). However, the bank also operates four branches in non-LMI census tracts that are near low-income census tracts, which are accessible to residents of those tracts. Therefore, the bank’s service delivery systems are reasonably accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Middle- Income</b>	<b>Upper- Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	0	0	0	<b>0</b>
Acquired Branches	0	4	9	10	<b>23</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	0	0	0	<b>0</b>
<b>OVERALL</b>	<b>0</b>	<b>4</b>	<b>9</b>	<b>10</b>	<b>23</b>

The bank's record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. First Horizon Bank entered this assessment area in November 2017 through the Capital Bank acquisition. As shown above, the bank acquired 23 branches, including 4 in moderate-income geographies, in the Cape Coral assessment area during the review period. No branches were closed over the same period.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at nine branch locations, including two in moderate-income census tracts. Moreover, 21 of the offices operate drive-through facilities, 4 of which are in moderate-income census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at two branches, although none are in LMI census tracts.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 627 community development services, totaling 3,153 hours, were provided to 43 different organizations. Bank employees' activities included, but were not limited to, providing financial expertise to an organization focused on serving those diagnosed with cancer who are primarily LMI, administering financial literacy training to children who are predominately LMI and domestic abuse survivors, along with serving on the board and committees of various organizations in the assessment area. Organizations with board and committee representation include, but are not limited to, those dedicated to providing protection and support to LMI survivors of domestic abuse and sexual abuse, developing affordable housing, providing affordable healthcare to LMI residents, and housing the homeless population. The affordable housing and financial literacy-related services are particularly responsive given these needs were identified through community contact interviews.

## NORTH PORT-SARASOTA-BRADENTON, FLORIDA MSA

*(Limited-Scope Review)*

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

This assessment area includes the entirety of Sarasota County, one of the two counties that make up the North Port-Sarasota-Bradenton, Florida MSA. The bank operates nine offices in this assessment area, which the bank entered through the acquisition of Capital Bank in November 2017. Moreover, the bank added three additional branches through the IBERIABANK merger-of-equals in July 2020. No other branches were opened or closed during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	18,615	20,470	23,308	44,079	<b>106,472</b>
	23.2%	16.7%	19.6%	40.4%	<b>100%</b>
Household Population	38,430	29,744	32,758	74,253	<b>175,185</b>
	21.9%	17.0%	18.7%	42.4%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	1	20	48	25	1	<b>95</b>
	1.1%	21.1%	50.5%	26.3%	1.1%	<b>100%</b>
Family Population	927	18,635	59,304	27,606	0	<b>106,472</b>
	0.9%	17.5%	55.7%	25.9%	0.0%	<b>100%</b>
Household Population	1,677	34,084	94,892	44,532	0	<b>175,185</b>
	1.0%	19.5%	54.2%	25.4%	0.0%	<b>100%</b>
Business Institutions	191	7,136	17,677	11,882	0	<b>36,886</b>
	0.5%	19.3%	47.9%	32.2%	0.0%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SARASOTA ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending performance in this assessment area is consistent with the Lending Test performance in the Florida full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Above
Geographic Distribution of Loans	Above
Community Development Lending Activity	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

The bank did not make any community development loans in the assessment area during the review period.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is consistent with the investment performance in the Florida full-scope assessment areas. During the review period, the bank had qualified community development investments totaling \$9.7 million, one of which for \$393,669 was made in the prior period but remained outstanding. These investments were primarily made in MBS providing affordable home loans to LMI borrowers, as well as an equity investment in a multifamily affordable housing property in the assessment area. In addition to these investments, the bank also made 37 community development donations totaling \$97,490. These donations supported various causes, including affordable housing organizations, a food bank in response to COVID-19, hurricane relief, and childhood financial literacy initiatives.

**SERVICE TEST**

The bank’s service performance in this assessment area is consistent with the service performance in the Florida full-scope assessment areas, as detailed in the following table:

<b>Service Test Criteria</b>	<b>Performance</b>
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, 206 community development services, totaling 547 hours, were provided to 43 different organizations. Bank employees' activities included administering financial literacy training to schools primarily serving LMI children, LMI communities, and inmates in a county jail; providing financial expertise to a homeless shelter; and serving on the board of organizations in the assessment area. Bank employees served on the board and provided financial expertise to organizations focused on breaking the cycle of poverty in the assessment area.



## CHARLOTTE-CONCORD-GASTONIA, NORTH CAROLINA-SOUTH CAROLINA MULTISTATE MSA<sup>7</sup>

**MULTISTATE MSA RATING:**

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated**

**SATISFACTORY**

**High Satisfactory**

**Outstanding**

**Low Satisfactory**

Major factors supporting the institution's Charlotte assessment area rating include the following:

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

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Charlotte assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Performance in the Charlotte assessment area was reviewed under full-scope examination procedures. To augment the evaluation, two community contact interviews were conducted to

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<sup>7</sup> This rating reflects performance within the multistate MSA. The North Carolina and South Carolina statewide evaluations are adjusted and do not reflect performance in the multistate MSA.

ascertain specific community credit needs, community development opportunities, and local economic conditions. One of the interviews was with an individual representing a CDFI, and the other contact represented a nonprofit organization specializing in affordable housing. Details from these interviews are included in the *Description of Institution’s Operations* section that follows.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CHARLOTTE ASSESSMENT AREA**

**Bank Structure**

As shown in the table below, the bank operates 13 of its branches in the Charlotte assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, this represented 4.8 percent of all bank branches. This percentage, however, was reduced to 2.7 percent following the merger-of-equals, as this was not an overlapping assessment area, resulting in no additional branches. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>				
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>Unknown</b>
0	4	4	4	1

The bank entered the assessment area in November 2017 with the Capital Bank acquisition, which included 15 branches in the assessment area. Subsequently, the bank also opened two and closed four branches during the review period. Additionally, the bank operates one stand-alone, deposit-taking ATMs, which is in a moderate-income census tract. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to substantially all of the Charlotte assessment area. Challenges may be encountered in serving the more rural portions of the assessment area, particularly York County, where the bank operates only one branch near the border of Mecklenburg County. Additionally, challenges may be present in the portions of Gaston and Rowan Counties, where the bank does not have a branching presence. Despite these challenges in reaching the entirety of these counties, the bank operates branches in and near LMI geographies in both Rowan and Gaston Counties.

**General Demographics**

The bank’s Charlotte assessment area consists of Gaston, Iredell, Mecklenburg, Rowan, and York Counties, 5 of the 11 counties in the Charlotte-Concord-Gastonia multistate MSA. All of these counties, apart from York County, which is in South Carolina, are in the state of North Carolina. Moreover, the bank’s assessment area does not include Cabarrus County, which includes the city of Concord. The assessment area has a total population of 1,743,598, with the most populous county being Mecklenburg County (990,288), which contains the city of Charlotte. Charlotte serves as an important regional hub for commercial and banking activity to the surrounding counties and contains the University of North Carolina at Charlotte, a large university with a total enrollment of approximately 30,146 students.

The assessment area hosts a competitive banking market, with 40 FDIC-insured depository institutions operating 397 branches throughout the assessment area. Of these institutions, First Horizon Bank ranks eighth in deposit market share with 0.3 percent of all assessment area deposit dollars, representing 2.6 percent of total bank deposits prior to the merger-of-equals. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 705 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 68<sup>th</sup> with 0.3 percent of total loan activity. Of the 165 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 24<sup>th</sup> with 0.4 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs include home purchase loans tailored to LMI individuals, home improvement loans, small dollar business loans, and better access to revolving credit for small businesses. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically investing in affordable housing developments offering LIHTCs and local CDFIs.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	40	9.6%	30,017	6.9%
<b>Moderate</b>	112	26.8%	104,640	24.2%
<b>Middle</b>	131	31.3%	143,837	33.2%
<b>Upper</b>	130	31.1%	154,362	35.7%
<b>Unknown</b>	5	1.2%	153	0.0%
<b>TOTAL</b>	<b>418</b>	<b>100%</b>	<b>433,009</b>	<b>100%</b>

As displayed above, 36.4 percent of census tracts in the assessment area are designated as LMI, while 31.1 percent of assessment area families reside within those census tracts. These LMI geographies are primarily located around the cities of Charlotte, China Grove, Gastonia, Rock Hill, Rowan, Statesville, and York, along with LMI tracts located throughout other rural portions of the assessment area. Moreover, as noted below by the community contacts, many LMI families live in the “crescent” around the city of Charlotte, which curves around the city’s core to the west, north, and east.

According to 2015 ACS data, the median family income for the assessment area (\$64,297) is above the same figure for both the states of North Carolina (\$57,856) and South Carolina (\$56,343) as a whole. More recently, the FFIEC estimates the median family income for the Charlotte-Concord-Gastonia MSA to be \$70,700 in 2019.

The following table displays population percentages of assessment area families by income level compared to the North Carolina and South Carolina family populations.

<b>Family Population by Income Level</b>						
	Assessment Area		North Carolina		South Carolina	
<b>Low</b>	99,487	23.0%	547,541	21.9%	274,132	22.6%
<b>Moderate</b>	72,626	16.8%	436,977	17.5%	210,406	17.4%
<b>Middle</b>	79,446	18.3%	478,449	19.2%	233,607	19.3%
<b>Upper</b>	181,450	41.9%	1,035,026	41.4%	494,500	40.8%
<b>TOTAL</b>	<b>433,009</b>	<b>100%</b>	<b>2,497,993</b>	<b>100%</b>	<b>1,212,645</b>	<b>100%</b>

Based on the data in the preceding table, 39.8 percent of families in the assessment area are considered LMI, compared to 39.4 percent for the entire state of North Carolina and 40.0 percent for the entire state of South Carolina. When compared with the first table in this section, the percentage of families who are LMI is higher than the percentage of families who reside in LMI census tracts (31.1 percent). Additionally, the percentage of families below the poverty level in the assessment area (11.7 percent) is below the statewide poverty level of North Carolina (12.8 percent) and South Carolina (13.5 percent). Based on these demographics and income levels, the Charlotte assessment area is similarly affluent to the states of North Carolina and South Carolina as a whole, with a smaller percentage of the population living below the poverty line.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (Monthly)</b>
Assessment Area	\$164,923	32.1%	\$878
North Carolina	\$154,900	30.3%	\$797
South Carolina	\$139,900	32.5%	\$790

Based on the data in the preceding table, housing in the assessment area is more affordable than in the state of North Carolina, but similarly affordable than South Carolina as a whole. Adjusting for income levels, this is shown as the assessment area’s affordability ratio (32.1 percent) is above North Carolina (30.3 percent) and similar to South Carolina (32.5 percent) as a whole. More specifically, Mecklenburg County, which includes the city of Charlotte, is the least affordable county in the assessment area, with an affordability ratio of 30.8 percent. As noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. Contributing to this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 61.5 percent of housing units in low-income census tracts and 42.3 percent of housing in moderate-income census tracts are rental units. Moreover, just 3.5 percent of owner-occupied housing units in the assessment area are in low-income census tracts. Additionally, the median age of housing stock in the assessment area (33 years) is higher

than that of both states as a whole (29 years). Considering these factors, opportunities for HMDA lending in LMI census tracts are likely limited. These factors further place homeownership out of reach for many LMI residents in the assessment area.

Specific to rental units in the assessment area, median gross rent is higher than that of both North Carolina and South Carolina. Affordable rental options are also scarce, as assessment area demographics indicate that 79.5 percent of low-income and 40.6 percent of moderate-income renters in the assessment area have rental costs exceeding 30.0 percent of their income. High rental rates hinder LMI residents’ ability to save for a down payment for a home purchase. As such, homeownership may be out of reach for many LMI residents.

**Industry and Employment Demographics**

The assessment area supports a large and diverse economy, including large corporations, a strong small business sector, and several universities. County business patterns indicate that there are 1,023,495 paid employees in the assessment area, the majority of which are employed in the governmental (11.6 percent), retail trade (9.8 percent), accommodation and food services (9.2 percent), and healthcare and social assistance (9.0 percent) industries. Lastly, assessment area demographics show that 91.3 percent of all businesses in the assessment area have annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of North Carolina and the state of South Carolina.

<b>Unemployment Levels for the Assessment Area</b>			
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>North Carolina</b>	<b>South Carolina</b>
2017	4.3%	4.5%	4.3%
2018	3.8%	4.0%	3.5%
2019	3.6%	3.9%	2.9%

As shown above, unemployment levels in the assessment area remained relatively low and stable throughout the review period, decreasing since 2017. Assessment area unemployment levels generally fall between that of the states of South Carolina and North Carolina. This is consistent with county-level data, as the single South Carolina county, York County, had the lowest unemployment level (2.8 percent in 2019) in the assessment area. Unemployment levels across the North Carolina counties were relatively consistent, with the highest levels in Rowan County (4.0 percent in 2019), which contains the cities of China Grove and Salisbury. While 2020 data was unavailable at the start of this evaluation, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Charlotte assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a CDFI, while the other contact represented a nonprofit organization specializing in affordable housing.

Both contacts characterized the economic conditions of the area as growing during the review period. The contact representing the CDFI indicated growth is mostly organic, and that the city of Charlotte put large tax incentives in place to attract businesses and boost expansion. Moreover, the representative went on to identify ecommerce as a significant driver of growth in the area, as an industry leader built its fourth-largest distribution center north of the Charlotte Douglas International Airport. According to the contact, this sector has particularly benefitted the northern counties of the Charlotte multistate MSA. Beyond this specific area, expansion has resulted in positive economic impacts on the city as a whole, including increases in the number of large businesses, as well as growth of small businesses that supply the larger businesses. Despite these benefits, this growth has led to housing shortages and rising real estate values, which have negative effects on LMI residents. The contact specializing in affordable housing noted the lack of housing has made it difficult for LMI individuals to compete for affordable housing stock.

According to the contact specializing in affordable housing, COVID-19 has negatively affected LMI residents employed in service-oriented jobs, who were among the first laid off at the start of the pandemic. Many of these LMI individuals remain unemployed. Moreover, even for those who have returned to the workforce, income disparities are more exacerbated than prior to the pandemic.

While banking is a major industry in the assessment area, one contact noted that banking deserts remain, specifically in the Brightwalk area. In terms of general banking needs, credit needs that were identified by the contacts included home purchase loans tailored to LMI individuals, home improvement loans, small dollar business loans, and better access to revolving credit for small businesses. Both contacts noted opportunities for participation by local financial institutions from a community development perspective, including investing in affordable housing developments offering LIHTCs and local CDFIs.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLOTTE ASSESSMENT AREA**

**LENDING TEST**

The bank’s Lending Test performance in the Charlotte assessment area is rated high satisfactory. The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects good penetration throughout the assessment area. The bank makes a relatively high level of community development loans and makes use of innovative and/or flexible lending practices in serving the credit needs of the assessment area.

As previously noted, the bank entered this assessment area in November 2017 through the Capital Bank acquisition. Given the limited amount of time when the bank operated in this assessment area, coupled with low volume, 2017 lending data was not considered in the borrower and geographic distribution review, as it would not result in meaningful analyses.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Charlotte assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	204	27.6%	\$61,178	29.6%
Refinance	134	18.1%	\$30,667	14.8%
Home Improvement	61	8.2%	\$6,537	3.2%
Multifamily Housing	2	0.3%	\$40,264	19.5%
<b>Total HMDA</b>	<b>401</b>	<b>54.2%</b>	<b>\$138,646</b>	<b>67.1%</b>
<b>Small Business</b>	<b>339</b>	<b>45.8%</b>	<b>\$68,103</b>	<b>32.9%</b>
<b>TOTAL LOANS</b>	<b>740</b>	<b>100%</b>	<b>\$206,749</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 4.0 and 4.5 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. When compared to the bank’s branching footprint, this level of lending is below the percentage of total branches in the assessment area (4.8 percent) by number. Although when compared to deposits, this level of lending is well above the percentage of total bank deposits held in the assessment area (2.6 percent). Most recently in 2019, the bank ranked 68<sup>th</sup> out of 705 reporters in HMDA lending by number, and 24<sup>th</sup> out of 165 reporters in CRA lending in the same year. This assessment area includes a significant amount of competition from mortgage companies and other financial institutions.

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### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Charlotte assessment area is good. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is good. In both years, the bank's level of lending to low-income borrowers (14.1 percent in 2018 and 9.3 percent in 2019) was good, significantly exceeding the aggregate lending levels (6.5 percent in 2018 and 5.0 percent in 2019), roughly double these metrics. This level of lending, however, was below demographic figures (23.4 percent in 2018 and 23.0 percent in 2019).

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance in both years (21.1 percent in 2018 and 24.9 percent in 2019) was excellent, well above both the aggregate lending levels (17.1 percent in 2018 and 14.8 percent in 2019) and the demographic figures (16.9 percent in 2018 and 16.8 percent in 2019).

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is adequate for both years reviewed. In 2018, the bank's percentage of small business loans to businesses with annual revenues of \$1 million or less (46.3 percent) was slightly above the aggregate level (46.1 percent). In 2019, the bank's performance (36.0 percent) was below aggregate lending levels (46.9 percent), although not by a large margin. Of this lending to business with annual revenues of \$1 million or less, a majority were in loan amounts of \$100,000 or less across the review period (72.5 percent in 2018 and 74.2 percent in 2019). Small dollar business loans such as these were identified by community contacts as a credit need in the assessment area. Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 91.0 percent across the review period, the bank's lending levels were well below this figure in both years.

### **Geographic Distribution of Loans**

The bank's distribution of HMDA loans by geography income level during the review period is good. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.



### *HMDA Lending*

Overall, the distribution of HMDA loans by geography income level during the review period is good. The bank's percentage of HMDA loans in low-income census tracts in 2018 (2.7 percent) was slightly below the aggregate lending level (3.6 percent), and further below the demographic figure of 4.0 percent, representing adequate performance. The bank's lending levels in low-income census tracts (1.0 percent) trended downward to poor in 2019, with both the aggregate (3.1 percent) and demographic (3.5 percent) figures decreasing as well.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's performance in both years (25.9 percent in 2018 and 26.3 percent in 2019) was well above the aggregate lending levels (19.8 percent in 2018 and 17.6 percent in 2019). Moreover, this performance was also above the demographic figures (23.3 percent in 2018 and 21.4 percent in 2019), reflecting good and excellent performance, respectively.

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is good. In 2019, the bank's percentage of small business loans in low-income census tracts (10.5 percent) was well above the aggregate level on a percentage basis (7.2 percent), indicative of excellent performance. This margin was slightly smaller, but still above the demographic figure in the same year, which was 7.5 percent. In 2018, the bank's lending levels in low-income census tracts (8.7 percent), was also above the aggregate (7.8 percent) and demographic (8.0 percent) figures, but to a lesser degree, representing good performance.

Pertaining to the percentage of small business loans in moderate-income census tracts, in both years, the bank's small business lending levels (26.2 percent in 2018 and 22.7 percent in 2019) were good, above aggregate (19.9 percent in 2018 and 18.3 percent in 2019) and demographic (22.8 percent in 2018 and 20.9 percent in 2019) figures.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During 2018 and 2019, the percentage of census tracts with loan activity averaged 45.7 percent. Pertaining to penetration of LMI census tracts, performance trended upward (34.2 percent in 2018 and 37.5 percent 2019). In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. While penetration is limited, the bank's overall penetration and penetration of LMI geographies did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank makes a relatively high level of community development loans in the Charlotte assessment area. During the review period, the bank originated 15 community development loans totaling \$32.3 million. These loans supported revitalization and stabilization of LMI or distressed middle-income geographies (seven), affordable housing (five), economic development (two), and community services (one). Some of the most impactful loans are described below:

- One \$8.7 million loan was made to refinance a large-scale retail shopping center in a moderate-income census tract, which houses discount retail businesses, a dental clinic, and tax preparation provider. The shopping center not only provides goods and services to an area that has seen disinvestment, but also provides job opportunities to the LMI residents. Funds were used to cover the cost of improvements to the building, aiding in attracting future tenants to this moderate-income geography.
- Another \$2.5 million loan was provided to refinance a retail shopping center located in a low-income census tract, allowing the 20 existing businesses to remain in this low-income geography and retain permanent jobs. Moreover, this shopping center provides goods and services to the surrounding LMI population.
- Six PPP loans totaling \$17.5 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 3,100 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

### **Product Innovation**

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

- Under the bank's Affordable Housing Program, the bank originated four loans totaling \$382,750. Additionally, the bank originated one loan for \$62,000 under the legacy Capital Bank affordable housing product that was offered during the review period. These loans are provided to LMI home-buyers purchasing a primary residence, and/or the subject property is in an LMI geography.
- As noted in the *Community Development Lending Activity* section above, the bank also originated community development PPP loans to businesses in LMI geographies, using this flexible and innovative product to provide emergency relief to those adversely affected by the COVID-19 pandemic.

**INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 20 qualified community development investments totaling \$10.3 million, all were made in the current review period. Most of these investments were comprised of MBS providing affordable home loans to LMI borrowers in the assessment area and LIHTCs, along with a single certificate of deposit at an MDI that primarily serves the minority and LMI community within the assessment area. The non-MBS helped construct a large-scale affordable housing development for LMI families, as well as support the MDI. Moreover, the MBS and LIHTC investments directly address affordable housing, which community contacts noted as a need in the assessment area. In addition to these investments, the bank made 34 donations totaling \$722,925. These donations benefitted various organizations including, but not limited to, those dedicated to home repair, healthcare for LMI residents, providing financial literacy education, and food banks. Additionally, the bank contributed to the purchase of Internet hot spots to be provided to LMI students in the assessment area, allowing for remote learning during the COVID-19 pandemic. Furthermore, activities included an in-kind donation for allowing a nonprofit to use bank facilities to deliver financial education, credit and money management, and financial products to unbanked and underbanked LMI residents.

**SERVICE TEST**

The bank’s service delivery systems are reasonably accessible in the assessment area, and the bank’s record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides an adequate level of community development services in the assessment area.

**Accessibility of Delivery Systems**

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

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	0 0.0%	4 30.8%	4 30.8%	4 30.8%	1 7.7%	<b>13</b> <b>100%</b>
Census Tracts	9.6%	26.8%	31.3%	31.1%	1.2%	<b>100%</b>
Household Population	7.8%	25.5%	32.5%	34.2%	0.1%	<b>100%</b>

Based on data in the preceding table, the bank operates 30.8 percent of its assessment area branches in LMI census tracts. This distribution is below both the percentage of assessment area census tracts that are LMI (36.4 percent) and the household population in LMI census tracts (33.3 percent). However, the bank also operates four branches in non-LMI census tracts that border or are near LMI census tracts, which are accessible to residents of those tracts. Moreover, the bank operates one stand-alone, deposit-taking ATM located in a moderate-income census tract. Therefore, the bank’s service delivery systems are reasonably accessible to individuals and geographies of different income levels.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>						
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>Unknown-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	0	0	0	0	<b>0</b>
Acquired Branches	0	5	5	4	1	<b>15</b>
Opened Branches	0	0	0	2	0	<b>2</b>
Closed Branches	0	(1)	(1)	(2)	0	<b>(4)</b>
<b>OVERALL</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>1</b>	<b>13</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems, particularly to LMI geographies and individuals. First Horizon Bank entered this assessment area in November 2017 through the Capital Bank acquisition. As shown above, the bank acquired 15, opened 2, and closed 4 branches in the Charlotte assessment area during the review period. One of the four closures was in a moderate-income census tract in the city of Salisbury, North Carolina. Despite this reduction in locations, one branch remains in Salisbury in another moderate-income census tract, although it is not near the former branch. Absent this closure, however, during the review period, the bank’s changes in branch locations resulted in four additional LMI branches.

**Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank’s hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at all branch locations. Moreover, 12 of the offices operate drive-through facilities, 4 of which are in LMI census tracts. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at five branches, one of which is in a moderate-income census tract.

### **Community Development Services**

The bank provides an adequate level of community development services in the assessment area. During the review period, 42 community development services, totaling 107 hours, were provided to 13 different organizations. Bank employees' activities included administering financial literacy training to LMI children, providing expertise to an affordable housing organization, teaching home-buyer education courses to LMI residents, and serving on the board and committees of various organizations in the assessment area. Organizations with board and committee representation include an affordable housing organization, another focused on serving LMI individuals recovering from drug and alcohol addiction, as well as an entity that provides housing and job training to the homeless and LMI families in the assessment area. The affordable housing-related services are particularly responsive given the affordable housing needs identified through community contact interviews.

## **SOUTH CAROLINA**

**CRA RATING FOR SOUTH CAROLINA:**

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**SATISFACTORY**

**High Satisfactory**

**Outstanding**

**Low Satisfactory**

Major factors supporting the institution's South Carolina rating include the following.

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

### **SCOPE OF EXAMINATION**

Scoping considerations applicable to the review of South Carolina assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. The bank operates in one CSA and two MSA assessment areas across the state. Performance in the Greenville assessment area was reviewed under full-scope examination procedures, while the remaining two assessment areas were reviewed under limited-scope examination procedures. Consequently, CRA performance in the Greenville assessment area received primary consideration when determining statewide performance conclusions.

To augment the evaluation of the full-scope review assessment areas in South Carolina, two community contact interviews were conducted to ascertain specific community credit needs, community development opportunities, and local economic conditions. One of the interviews was with a representative from a nonprofit agency focusing on affordable housing, and the remaining contact represented a CDFI. Details from these interviews are included in the Greenville assessment area's *Description of Institution's Operations* section.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN SOUTH CAROLINA

Prior to the merger-of-equals with IBERIABANK, First Horizon Bank operated nine offices (3.3 percent of total branches) throughout the three CRA assessment areas in the state of South Carolina. The following table gives additional detail regarding the legacy First Horizon Bank operations within South Carolina, which drove the assessment area determination and weighting for the state.

Assessment Area	Offices		Deposits As of June 30, 2020		Review Procedures
	#	%	\$	%	
Greenville CSA	4	44.4%	\$211	50.5%	Full Scope
Charleston MSA	1	11.1%	\$93	22.3%	Limited Scope
Columbia MSA	4	44.4%	\$114	27.2%	Limited Scope
<b>TOTAL</b>	<b>9</b>	<b>100%</b>	<b>\$417</b>	<b>100%</b>	<b>1 – Full Scope</b>

During the entire review period, including the merger-of-equals, the bank acquired 11 and closed 2 branches in the 3 assessment areas, resulting in a net addition of 9 branches since the previous evaluation. While the table above focuses on legacy First Horizon Bank operations, as of November 29, 2020, in the combined organization, the bank operates ten branches throughout the assessment areas. These changes are discussed in more detail in each of the respective assessment area sections.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA**

**LENDING TEST**

The bank’s Lending Test performance in South Carolina is rated high satisfactory. The test considers the following criteria.

**Lending Activity**

<b>Full-Scope Review Areas</b>	<b>Lending Activity</b>
Greenville CSA	Good
<b>OVERALL</b>	<b>GOOD</b>

<b>Limited-Scope Review Areas</b>	<b>Lending Activity</b>
Charleston MSA	Above
Columbia MSA	Consistent

The bank’s overall level of lending reflects good responsiveness to the credit needs of the South Carolina assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank’s overall importance to each assessment area.

**Borrower and Geographic and Distribution**

As displayed in the following tables, the bank’s performance by borrower’s income and revenue profile is good in South Carolina, as is displayed in the following tables.

<b>Full-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Greenville CSA	Good
<b>OVERALL</b>	<b>GOOD</b>

<b>Limited-Scope Review Areas</b>	<b>Loan Distribution by Borrower’s Profile</b>
Charleston MSA	Below
Columbia MSA	Below



Overall, the bank’s geographic distribution of loans reflects good penetration throughout South Carolina.

Full-Scope Review Areas	Geographic Distribution of Loans
Greenville CSA	Good
<b>OVERALL</b>	<b>GOOD</b>

Limited-Scope Review Areas	Geographic Distribution of Loans
Charleston MSA	Below
Columbia MSA	Below

**Community Development Lending Activities**

Overall, the bank was a leader in making community development loans in the state of South Carolina, as displayed below.

Full-Scope Review Areas	Community Development Lending Activities
Greenville CSA	Leader
<b>OVERALL</b>	<b>LEADER</b>

Limited-Scope Review Areas	Community Development Lending Activities
Charleston MSA	Consistent
Columbia MSA	Below

During the review period, the bank originated or renewed 11 community development loans in its South Carolina assessment areas totaling \$38.2 million, which represents a substantial increase from the bank’s previous evaluation where the bank had no qualified community development loans. These loans include those for the development of LIHTC multifamily affordable housing projects that will primarily benefit LMI residents, and a loan to finance the renovation of an abandoned textile mill in a low-income census tract to be used as a coworking space for small businesses and community groups. Additionally, this total includes three community development PPP loans totaling \$4.1 million in the bank’s assessment areas that were in response to the COVID-19 pandemic.

Furthermore, as the bank met the community development lending needs of its own assessment areas in the state, consideration was also given to community development loans made outside of the bank’s rated areas. In the broader statewide and regional area, the bank made 42 loans totaling \$40.6 million. This total included one community development PPP loan for \$1.2 million. All but three of these loans were made in the Columbia MSA, but in counties outside the bank’s delineated assessment area. Similarly, the remaining three loans were originated in the Charlotte-Concord-Gastonia Multistate MSA, but outside the bank’s delineated assessment area in this MSA.

Some of the most impactful loans are described below:

- One \$30.0 million line of credit was extended to a health-focused nonprofit that provides community services, primarily to LMI families. This funding was used to construct a new facility for the organization.
- One PPP loan for \$1.2 million was made to a public health-related business to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving 242 jobs in a moderate-income geography. This loan is responsive to the needs of area businesses and residents considering the global pandemic.

### **Product Innovation**

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

- Under the bank's Affordable Housing Program, the bank originated two loans totaling \$274,500. Additionally, the bank originated two loans for \$182,000 under the legacy Capital Bank affordable housing product that was offered during the review period. These loans are provided to LMI home-buyers purchasing a primary residence, and/or where the subject property is in an LMI geography.
- Through the bank's ISP Grant and First Responder Grant Program, the bank provided down payment assistance to one borrower totaling \$3,000. This down payment assistance is seen as responsive given the need identified through community contact interviews.
- As noted in the *Community Development Lending Activities* section above, the bank also originated community development PPP loans to businesses in LMI geographies in the state's assessment areas, using this flexible and innovative product to provide emergency relief to those adversely affected by the COVID-19 pandemic.

**INVESTMENT TEST**

Overall, the bank’s performance in South Carolina is rated outstanding under the Investment Test. The following tables display investment and grant activity performance in South Carolina.

<b>Full-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Greenville CSA	Excellent
<b>OVERALL</b>	<b>EXCELLENT</b>

<b>Limited-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Charleston MSA	Consistent
Columbia MSA	Below

As shown in the following table, the bank made a total of \$20.7 million in qualified community development investments and \$439,978 in donations and grants in the South Carolina assessment areas. In addition, the bank made \$2.9 million in qualified community development investments and \$13,500 in donations and grants in the broader statewide area outside of its assessment areas for a total of \$23.6 million and \$453,478, respectively. These investments included MBS, LIHTCs, and an equity investment and new market tax credit, while the bank’s donations were made to various affordable housing, community service, and economic development organizations throughout the state. Of the total statewide investments, \$23.3 million were made in the current review period, while \$326,458 were made prior to the review period but were still outstanding.

<b>South Carolina Assessment Area</b>	<b>Investments</b>	<b>Donations/Grants</b>
Greenville CSA	\$17.8 Million	\$154,000
Charleston MSA	\$2.1 Million	\$113,500
Columbia MSA	\$839,079	\$172,478
Statewide (Outside AA)	\$2.9 Million	\$13,500
<b>TOTAL</b>	<b>\$23.6 Million</b>	<b>\$453,478</b>

**SERVICE TEST**

The bank’s performance in South Carolina is rated low satisfactory under the Service Test. This test considers the following criteria.

**Accessibility of Delivery Systems**

As displayed in the following tables, the bank’s service delivery systems are unreasonably inaccessible to portions of the assessment areas in South Carolina.

<b>Full-Scope Review Areas</b>	<b>Accessibility of Delivery Systems</b>
Greenville CSA	Unreasonably Inaccessible to Portions Of
<b>OVERALL</b>	<b>UNREASONABLY INACCESSIBLE TO PORTIONS OF</b>

<b>Limited-Scope Review Areas</b>	<b>Accessibility of Delivery Systems</b>
Charleston MSA	Consistent
Columbia MSA	Above

**Changes in Branch Locations**

The bank’s record of opening and closing branches in the South Carolina assessment areas has not adversely affected the accessibility of its service delivery systems, as shown in the tables below.

<b>Full-Scope Review Areas</b>	<b>Changes in Branch Locations</b>
Greenville CSA	Not Adversely Affected
<b>OVERALL</b>	<b>NOT ADVERSELY AFFECTED</b>

<b>Limited-Scope Review Areas</b>	<b>Changes in Branch Locations</b>
Charleston MSA	Consistent
Columbia MSA	Consistent

**Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs**

Business hours and banking services do not vary in a way that inconveniences certain portions of the South Carolina assessment areas, particularly LMI geographies and individuals, as displayed in the following tables:

<b>Full-Scope Review Areas</b>	<b>Reasonableness of Business Hours and Services</b>
Greenville CSA	Do Not Vary in a Way That Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

<b>Limited-Scope Review Areas</b>	<b>Reasonableness of Business Hours and Services</b>
Charleston MSA	Consistent
Columbia MSA	Consistent

**Community Development Services**

The bank is a leader is providing community development services in the South Carolina assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the South Carolina assessment areas.

<b>Full-Scope Review Areas</b>	<b>Community Development Services</b>
Greenville CSA	Leader
<b>OVERALL</b>	<b>LEADER</b>

<b>Limited-Scope Review Areas</b>	<b>Community Development Services</b>
Charleston MSA	Below
Columbia MSA	Below

During the review period, 105 community development services were provided to 18 different organizations, accounting for 251 service hours. Bank employees served on boards, provided financial assistance to various organizations, and administered financial literacy training, promoting community development initiatives throughout the South Carolina assessment areas.

## **GREENVILLE-SPARTANBURG-ANDERSON, SOUTH CAROLINA CSA**

*(Full-Scope Review)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREENVILLE ASSESSMENT AREA**

#### **Bank Structure**

The bank currently operates five branches in the Greenville assessment area. Prior to the July 2020 merger-of-equals with IBERIABANK, the bank operated four branches in the assessment area, representing 1.5 percent of all bank branches at the time. Through the merger-of-equals, the bank added one branch to the assessment area, increasing its branching footprint to five locations, representing 1.0 percent of branches in the combined institution. The table below displays the distribution of these offices by census tract income level.

<b>Branch Locations by Census Tract Income Level</b>			
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
0	0	0	5

The bank entered the assessment area in November 2017 with the Capital Bank acquisition, which added five branches to the assessment area. This merger and acquisition activity is in addition to the single branch acquired through the merger-of-equals. During the review period, the bank also closed one of the former Capital Bank branches. Additionally, the bank operates one stand-alone, deposit-taking ATM. Moreover, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services in the Greenville assessment area. Challenges may be presented in serving the entirety of both Greenville and Spartanburg Counties given the limited branching presence in this assessment area, particularly in clusters of LMI census tracts to the west of downtown Greenville, as well east and north of downtown Spartanburg. While the bank operates multiple locations that border LMI geographies, it would be difficult to reach the numerous LMI census tracts across both counties with its branching footprint.

#### **General Demographics**

The bank's Greenville assessment area consists of Greenville and Spartanburg Counties, two of the nine counties in the Greenville-Spartanburg-Anderson CSA, which combines the Greenville-Anderson MSA, Spartanburg MSA, and four surrounding nonMSA counties. While the bank has designated these as separate assessment areas, they are combined as the Greenville assessment area for purposes of this evaluation. The assessment area has a total population of 766,143, the majority of which is concentrated in Greenville County (474,903), which contains the city of Greenville. Greenville serves as an important hub for commercial and banking activity to the surrounding area.

The assessment area hosts a competitive banking market, with 31 FDIC-insured depository institutions operating 210 branches throughout the assessment area. Prior to the merger-of-equals, the bank ranked 16<sup>th</sup> in deposit market share with 1.1 percent of all deposit dollars in the assessment area, representing 0.6 percent of total bank deposits at the time. Following the July 2020 IBERIABANK merger, deposit market share increased, resulting in the combined organization ranking 15<sup>th</sup>, and increasing the deposit market share to 1.3 percent of all deposit dollars in the assessment area. Competition for HMDA and CRA loans is similarly high. An analysis of 2019 HMDA-reportable loans shows that 531 financial institutions had loan activity in the assessment area, of which First Horizon Bank ranked 105<sup>th</sup> with 0.1 percent of total loan activity. Of the 104 financial institutions with CRA loan activity in the assessment area, First Horizon Bank ranked 29<sup>th</sup> with 0.3 percent of all loan activity.

The assessment area population is relatively diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, other credit needs include home purchase loans, home improvement loans, and small dollar mortgage, consumer, and business loans. Moreover, community contacts stated there are ample opportunities for financial institutions to get involved in community development efforts, specifically collaborating with organizations to provide financial literacy education, developing bank products that incentivize completing these financial literacy programs, and investing in New Market Tax Credits that benefit the area.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	17	9.4%	10,651	5.4%
<b>Moderate</b>	42	23.3%	33,393	16.9%
<b>Middle</b>	66	36.7%	78,003	39.6%
<b>Upper</b>	55	30.6%	75,027	38.1%
<b>Unknown</b>	0	0.0%	0	0.0%
<b>TOTAL</b>	<b>180</b>	<b>100%</b>	<b>197,074</b>	<b>100%</b>

As displayed in the table above, 32.7 percent of census tracts in the assessment area are LMI, though only 22.3 percent of assessment area families reside within those census tracts. These LMI geographies are located throughout the assessment area, particularly surrounding the cities of Greenville and Spartanburg.

According to 2015 ACS data, the median family income for the Greenville assessment area was \$59,840, while the same figure for the state of South Carolina as a whole was \$56,343. More recently, the FFIEC estimates the median family income for the Greenville-Anderson MSA to be \$67,800 and the Spartanburg MSA to be \$62,100 in 2019.

The following table displays the distribution of assessment area families by income level compared to all South Carolina families.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>South Carolina</b>	
<b>Low</b>	42,022	21.3%	274,132	22.6%
<b>Moderate</b>	32,036	16.3%	210,406	17.4%
<b>Middle</b>	36,314	18.4%	233,607	19.3%
<b>Upper</b>	86,702	44.0%	494,500	40.8%
<b>TOTAL</b>	<b>197,074</b>	<b>100%</b>	<b>1,212,645</b>	<b>100%</b>

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (37.6 percent) than reside in LMI geographies (22.3 percent). When compared to the family income distribution for the state of South Carolina as a whole, the percentage of LMI families in the assessment area is below the statewide figure (40.0 percent). Similarly, the percentage of families below the poverty level in the assessment area (12.5 percent) is below the state of South Carolina (13.5 percent). Based on the distribution of families by income, as well as income and poverty levels, the assessment area overall is more affluent than South Carolina as a whole.

**Housing Demographics**

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

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$143,718	33.3%	\$748
South Carolina	\$139,900	32.5%	\$790

As shown in the table above, housing in the assessment area is similarly affordable as compared to the state of South Carolina as a whole. More specifically, the assessment area’s affordability ratio (33.3 percent), which adjusts for income levels, is similar to the state as a whole (32.5 percent). However, there is a lack of owner-occupied affordable housing in LMI census tracts, as 53.4 percent of housing units in low-income census tracts and 41.8 percent of housing in moderate-income census tracts are rental units. Moreover, just 3.2 percent and 14.5 percent of owner-occupied housing units in the assessment area are in LMI census tracts, respectively. Considering these factors, opportunities for HMDA lending in LMI tracts are likely limited.

Specific to rental units in the assessment area, median gross rent is below the state of South Carolina. Similarly, the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (41.6 percent) is below the same figure for South Carolina as a whole (43.9 percent). Specific to challenges faced by LMI residents, however, 71.7 percent of low-income renters and 39.0 percent of moderate-income renters in the assessment area have rental



costs exceeding 30.0 percent of their income, making saving for a down payment on a home purchase challenging. As such, homeownership may be out of reach for many LMI residents.

### **Industry and Employment Demographics**

The Greenville assessment area economy is diverse and hosts a strong small business sector. County business patterns indicate that there are 425,876 paid employees in the assessment area, the majority of which are employed in the manufacturing (15.2 percent), governmental (13.6 percent), retail trade (10.4 percent), and administrative and waste service (10.3 percent) industries. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 90.2 percent of businesses reported annual revenues of \$1 million or less.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of South Carolina.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>South Carolina</b>
2017	3.8%	4.3%
2018	3.0%	3.5%
2019	2.5%	2.9%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and were consistently below statewide levels. Unemployment levels were also consistent across both counties in the assessment area. While 2020 data was unavailable at the start of this evaluation, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Greenville assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One of these individuals represented a CDFI, while the other contact represented a nonprofit organization specializing in affordable housing.

Economic conditions of the area during the review period were characterized as favorable by both contacts, with the CDFI representative attributing the positive economic conditions to robust manufacturing companies, robust infrastructure for the transportation of goods, a growing warehousing industry, and increasing construction projects. Despite the positives of these economic conditions, the contact went on to state the growth has resulted in a shortage of affordable housing in the city of Greenville. This was reiterated by the affordable housing specialist, who stated the growth has resulted in increased home and land values, which often sell

at a premium. Additionally, the contact indicated there are high concentrations of poverty in the communities of Sterling, Nicholtown, Sullivan, and Judson, all of which are in the area south of downtown Greenville, attributable to inadequate access to public transportation and low area wages.

Pertaining to COVID-19, the contacts stated that the pandemic has had varying effects on the area. The affordable housing specialist stated the area was negatively impacted less than other parts of the country, and there were only a few permanent store closures, primarily in the restaurant industry. Moreover, the CDFI contact indicated that many restaurants and retail stores closed temporarily. While there have been a limited number of permanent closures, the CDFI representative noted there was a shortage of workers to fill minimum-wage jobs, and construction projects have slowed due to a limited workforce and difficulty obtaining materials.

Contacts described access to banking branches and services in the area as generally favorable. While favorable overall, the affordable housing specialist indicated there are very few branches in the low-income neighborhoods in the area, resulting in LMI residents often resorting to payday lenders to get fast access to funds. Credit needs in the area identified by these individuals included home purchase loans, home improvement loans, and small dollar mortgage, consumer, and business loans. Moreover, both contacts noted opportunities for participation by local financial institutions from a community development perspective, including collaborating with organizations to provide financial literacy education, developing bank products that incentivize completing these financial literacy programs, and investing in New Market Tax Credits that benefit the area.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREENVILLE ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect good responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Similarly, the geographic distribution of loans reflects good penetration throughout the assessment area. Finally, the bank was a leader in making community development loans in the assessment area.

As previously noted, the bank entered this assessment area in November 2017 through the Capital Bank acquisition. Given the limited amount of time when the bank operated in this assessment area, coupled with low volume, 2017 lending data was not considered in the borrower and geographic distribution review, as it would not result in meaningful analyses.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Greenville assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	27	18.5%	\$9,141	24.7%
Refinance	14	9.6%	\$4,954	13.4%
Home Improvement	14	9.6%	\$692	1.9%
Multifamily Housing	0	0.0%	\$0	0.0%
<b>Total HMDA</b>	<b>55</b>	<b>37.7%</b>	<b>\$14,787</b>	<b>40.0%</b>
<b>Small Business</b>	<b>91</b>	<b>62.3%</b>	<b>\$22,181</b>	<b>60.0%</b>
<b>TOTAL LOANS</b>	<b>146</b>	<b>100%</b>	<b>\$36,968</b>	<b>100%</b>

The bank’s lending activity represents good responsiveness to the credit needs of the assessment area. The bank’s loan activity in this assessment area represents 0.5 and 1.2 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. When compared to the bank’s branching footprint, this level of lending is below the percentage of total branches in the assessment area (1.5 percent) for both HMDA and CRA lending. Although when compared to the percentage of total bank deposits held in the assessment area (0.6 percent), HMDA lending is in line with, and small business lending is well above, this metric. Most recently in 2019, the bank ranked 105<sup>th</sup> out of 531 reporters in HMDA lending by number, and 29<sup>th</sup> out of 104 reporters in CRA lending in the same year. This assessment area includes a significant amount of competition from mortgage companies and other financial institutions.

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### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Greenville assessment area is good. Primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

#### *HMDA Lending*

Overall, the distribution of HMDA loans by borrower's income level during the review period is good.

In 2019, the bank's level of lending to low-income borrowers (8.7 percent) was highest, exceeding the aggregate lending level (5.6 percent), but falling beneath the demographic figure (21.3 percent), reflecting a good level of lending. Performance in 2018 (6.7 percent) also exceeded the aggregate level (5.9 percent), but by a smaller margin, and was below the demographic figure (21.1 percent), indicative of adequate performance.

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance in both years (23.3 percent in 2018 and 34.8 percent in 2019) was well above both the aggregate lending levels (18.3 percent in 2018 and 18.4 percent in 2019) and the demographic figures (16.1 percent in 2018 and 16.3 percent in 2019). Performance in 2019 roughly doubled both aggregate and demographic. Consequently, 2018 performance is good, and 2019 performance is excellent.

#### *Small Business Lending*

The bank's distribution of small business loans by business revenue profile across the review period is adequate overall. In both years, the bank's performance (45.2 percent in 2018 and 48.8 percent in 2019) was adequate, as it was in line with aggregate lending levels (46.4 percent in 2018 and 47.6 percent in 2019). Pertaining to the demographic estimate of assessment area businesses with annual revenues of \$1 million or less, which remained consistent and averaged 91.0 percent across the review period, the bank's lending levels were well below this figure in both years.

### **Geographic Distribution of Loans**

Overall, the bank's distribution of loans by geography income level in the Greenville assessment area is good. As with the analysis of the bank's borrower distribution of loans, primary emphasis was placed on HMDA lending performance given the identified assessment area credit needs and the bank's lending activity.

### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is good.

The bank's percentage of HMDA loans in low-income census tracts in 2018 (10.0 percent) was significantly above the aggregate lending level (2.3 percent) and demographic figure of 3.2 percent, representing excellent performance. In 2019, however, the bank did not originate any loans in low-income geographies, falling below the relatively low aggregate (2.4 percent) and demographic (3.2 percent) figures, reflecting very poor performance of these years.

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's performance in both years (13.3 percent in 2018 and 13.0 percent in 2019) was good, above the aggregate lending levels (11.0 percent in 2018 and 10.2 percent in 2019), and slightly below the demographic figures (14.5 percent in both years).

### *Small Business Lending*

Overall, the bank's distribution of small business loans by geography income level during the review period is good. In 2018, the bank's percentage of small business loans in low-income census tracts ( 7.1 percent) was well above the aggregate level on a percentage basis (4.9 percent). This margin was similar when compared to the demographic figure in the same year, which was 5.1 percent, representing excellent performance. In 2019, the bank's level of lending in low-income census tracts (4.7 percent) was adequate, slightly below the aggregate (5.1 percent) and demographic (5.2 percent) figures.

Pertaining to the percentage of small business loans in moderate-income census tracts, in each of the years, the bank's performance (14.3 percent in 2018 and 14.0 percent in 2019) was in line with the aggregate lending levels (14.5 percent in 2018 and 14.3 percent in 2019), and below the demographic figures (16.9 percent in both 2018 and 2019). As such, performance was adequate in each of the three years.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. During 2018 and 2019, the percentage of census tracts with loan activity averaged 25.6 percent. Pertaining to penetration of LMI census tracts, during the same period, the bank averaged 16.1 percent. In general, the bank's loans were most concentrated in the census tracts located near branch locations, including LMI tracts. Moreover, the bank's overall penetration and penetration of LMI geographies did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Greenville assessment area. During the review period, the bank originated eight community development loans totaling \$15.6 million. These loans supported affordable housing (four), revitalization and stabilization of LMI or distressed middle-income geographies (three), and economic development (one). Some of the most impactful loans are described below:

- Three loans totaling \$5.6 million were made to finance the renovation of an abandoned textile mill in a low-income census tract to be used as a coworking space for small businesses and community groups. Additionally, this project supports local plans to revitalize this LMI area.
- Two loans totaling \$8.7 million were made to provide construction and bridge loan financing for an affordable 57-unit LIHTC multifamily project in a moderate-income census tract, with 100 percent of units reserved exclusively for LMI residents. This development will increase the amount of affordable housing in the assessment area, a need identified by community contacts. Moreover, as previously noted, a substantial portion of renters in these areas have rental costs exceeding 30.0 percent of their income, and these community development loans help address the need for affordable rental housing.
- One PPP loan for \$1.2 million was made to a business to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving 110 jobs in a moderate-income geography. This loan is responsive to the needs of area businesses and residents considering the global pandemic.

### **INVESTMENT TEST**

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 14 qualified community development investments totaling \$17.8 million, all were made during the current review period. Most of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area. The investments also included a LIHTC funding the construction of a large-scale affordable housing development for LMI seniors in a non-LMI census tract, facilitating mixed-income housing in the census tract. The MBS and LIHTC investments directly address affordable housing, which community contacts noted as an urgent need in the assessment area. Additionally, the bank made a certificate of deposit in a CDFI located in a low-income census tract, as well as provided equity capital to a new market tax credit project to revitalize and stabilize a low-income geography. In addition to these investments, the bank also made 25 donations totaling \$154,000. These donations benefitted various organizations, including but not limited to, those dedicated to administering small business and financial literacy education, providing down payment assistance funds, food banks, and homeless shelter programs.

**SERVICE TEST**

The bank’s service delivery systems are unreasonably inaccessible to portions of the assessment area, and the bank’s record of opening and closing branches has not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank was a leader in providing community development services in the assessment area.

**Accessibility of Delivery Systems**

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

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	0 0.0%	0 0.0%	0 0.0%	5 100%	0 0.0%	<b>5</b> <b>100%</b>
Census Tracts	9.4%	23.3%	36.7%	30.6%	0.0%	<b>100%</b>
Household Population	5.9%	18.9%	39.1%	36.1%	0.0%	<b>100%</b>

Based on data in the preceding table, the bank operates none of its assessment area branches in LMI census tracts. This distribution is well below both the percentage of assessment area census tracts that are LMI (32.7 percent) and the household population in LMI census tracts (24.8 percent). Therefore, the bank’s service delivery systems are unreasonably inaccessible to portions of the assessment area.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Middle- Income</b>	<b>Upper- Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	0	0	0	<b>0</b>
Acquired Branches	0	0	1	5	<b>6</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	0	(1)	0	<b>(1)</b>
<b>OVERALL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>5</b>

The bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals. First Horizon Bank entered this assessment area in November 2017 through the Capital Bank acquisition. As shown above, the bank acquired six branches and closed one branch in the Greenville assessment area during the review period. This closure was not located in an LMI census tract, though it bordered one moderate-income census tract. Through the merger-of-equals, however, the bank acquired a branch that is in closer proximity to a low-income census tract and near other LMI geographies.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Business hours and banking services are relatively consistent with standard business hours Monday through Friday throughout the assessment area. Extended hours until 6 p.m. are offered on Fridays at four branch locations. Moreover, four of the offices operate drive-through facilities. Finally, Saturday lobby hours from 9 a.m.–1 p.m. are offered at one branch.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 84 community development services, totaling 208 hours, were provided to 13 different organizations. Bank employees' activities included administering financial literacy training to schools that primarily serve LMI children, providing financial mentorship to LMI students, and serving on the board of various organizations in the assessment area. Organizations with board representation include a technical college that primarily teaches LMI residents, as well as an organization that provides housing and job training to the homeless and LMI families in the assessment area.



## CHARLESTON-NORTH CHARLESTON, SOUTH CAROLINA MSA *(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE CHARLESTON ASSESSMENT AREA

This assessment area includes the entirety of Charleston County, one of the three counties that make up the Charleston-North Charleston, South Carolina MSA. The bank operates one office in this assessment area, which the bank acquired through the acquisition of Capital Bank in November 2017. Following the addition of this branch, the bank subsequently closed a private client office in an upper-income census tract, which was the only other office in the assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	19,861	13,211	15,391	38,751	<b>87,214</b>
	22.8%	15.2%	17.6%	44.4%	<b>100%</b>
Household Population	38,505	22,169	24,238	63,106	<b>148,018</b>
	26.0%	15.0%	16.4%	42.6%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	14	15	23	31	3	<b>86</b>
	16.3%	17.4%	26.7%	36.0%	3.5%	<b>100%</b>
Family Population	9,808	14,909	26,166	35,672	659	<b>87,214</b>
	11.2%	17.1%	30.0%	40.9%	0.8%	<b>100%</b>
Household Population	17,561	25,553	45,475	57,599	1,830	<b>148,018</b>
	11.9%	17.3%	30.7%	38.9%	1.2%	<b>100%</b>
Business Institutions	2,661	3,765	5,954	10,573	505	<b>23,458</b>
	11.3%	16.0%	25.4%	45.1%	2.2%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLESTON ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending performance in this assessment area is below the Lending Test performance in the Greenville full-scope assessment area, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Above
Distribution of Loans by Borrower’s Profile	Below
Geographic Distribution of Loans	Below
Community Development Lending Activity	Consistent
<b>OVERALL</b>	<b>BELOW</b>

The bank made two community development loans totaling \$21.6 million in the assessment area during the review period. One loan was to a small business to stimulate economic growth and job creation, and the other was a PPP loan to a manufacturing company located in a moderate-income census tract.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is consistent with the investment performance in the Greenville full-scope assessment area. During the review period, the bank made qualified community development investments totaling \$2.1 million. Each of these investments was made in MBS providing affordable home loans to LMI borrowers in the assessment area. In addition to these investments, the bank also made 16 community development donations totaling \$113,500. These donations supported various community service organizations, including academic mentorship organizations, food banks in response to COVID-19, a medical clinic primarily serving LMI patients, and a loan fund focused on providing affordable housing and healthy food, as well as creating jobs for LMI residents.

**SERVICE TEST**

The bank's service performance in this assessment area is below the service performance in the Greenville full-scope assessment area, as detailed in the following table:

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

During the review period, 17 community development services, totaling 32 hours, were provided to 1 organization. A single bank employee served on the board, provided financial expertise in fundraising efforts, and administered financial literacy training at an organization focused on providing academic mentoring and college preparation to LMI youth in the assessment area.

## COLUMBIA, SOUTH CAROLINA MSA

*(Limited-Scope Review)*

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

This assessment area includes the entirety of Richland County, one of the six counties that make up the Columbia, South Carolina MSA. The bank operates four offices in this assessment area, which the bank entered through the acquisition of Capital Bank in November 2017. No branches were opened or closed during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	20,577	14,042	16,054	37,623	<b>88,296</b>
	23.3%	15.9%	18.2%	42.6%	<b>100%</b>
Household Population	35,890	23,562	25,996	59,621	<b>145,069</b>
	24.7%	16.2%	17.9%	41.1%	<b>100%</b>

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	15	22	21	27	4	<b>89</b>
	16.9%	24.7%	23.6%	30.3%	4.5%	<b>100%</b>
Family Population	7,844	18,448	23,987	38,013	4	<b>88,296</b>
	8.9%	20.9%	27.2%	43.1%	0.0%	<b>100%</b>
Household Population	16,158	35,037	36,747	57,115	12	<b>145,069</b>
	11.2%	24.2%	25.3%	39.4%	0.0%	<b>100%</b>
Business Institutions	2,654	3,553	3,945	6,819	107	<b>17,078</b>
	15.5%	20.8%	23.1%	39.9%	0.6%	<b>100%</b>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBIA ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending performance in this assessment area is below the Lending Test performance in the Greenville full-scope assessment area, as displayed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in Appendix C.

<b>Lending Test Criteria</b>	<b>Performance</b>
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Below
Geographic Distribution of Loans	Below
Community Development Lending Activity	Below
<b>OVERALL</b>	<b>BELOW</b>

The bank made a single community development loan totaling \$1.0 million in the assessment area during the review period. The loan was made to a nonprofit real estate developer to build single family affordable housing rental units targeted to LMI residents.

**INVESTMENT TEST**

The bank’s investment performance in this assessment area is below the investment performance in the Greenville full-scope assessment area. During the review period, the bank made qualified community development investments totaling \$839,079, one of which for \$326,458 was made in the prior period but remained outstanding. These investments included MBS providing affordable home loans to LMI borrowers, an equity investment in a multifamily affordable housing development, and a deposit in a CDFI. In addition to these investments, the bank also made five community development donations totaling \$172,478. These donations supported a nonprofit focused on financial literacy and converting the unbanked and underbanked to traditional financial institutions, a food bank, and an organization focused on financial literacy for LMI youth.

**SERVICE TEST**

The bank’s service performance in this assessment area is consistent with the service performance in the Greenville full-scope assessment area, as detailed in the following table:

<b>Service Test Criteria</b>	<b>Performance</b>
Accessibility of Delivery Systems	Above
Changes in Branch Locations	Above
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, 4 community development services, totaling 11 hours, were provided to 4 different organizations. Bank employees’ activities included administering financial literacy training to LMI residents and serving on the board of two organizations in the assessment area. Bank employees served on the board and provided financial expertise to an economic development organization and another dedicated to the education of LMI youth.

## TEXAS

**CRA RATING FOR TEXAS:**

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**SATISFACTORY**

**High Satisfactory**

**Outstanding**

**High Satisfactory**

Factors supporting the ratings for the state of Texas include:

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

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Texas assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. Based on assessment area credit needs and the bank's lending activity, HMDA lending carried more weight in the analysis of the bank's lending performance in Texas. Given the bank's limited operations in the state, performance in Texas carried little weight toward the bank's overall rating.

The bank’s single assessment area in Texas, the Houston assessment area, was reviewed under full-scope examination procedures. To augment this evaluation, three community contact interviews were conducted with individuals with knowledge of the assessment area’s economic conditions and credit needs. These interviews were used to ascertain specific credit and community development needs and provided context with which to evaluate the bank’s responsiveness to these needs. Key details from these community contact interviews are included in the next section.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE HOUSTON ASSESSMENT AREA**

**Bank Structure**

The bank currently operates eight branches in the Houston assessment area. Through the July 2020 merger-of-equals with IBERIABANK, the bank added seven offices to the assessment area, increasing to eight from the single private client office prior to the merger. During the Lending Test review period (2017–2019), this single branch represented just 0.4 percent of all bank offices. The bank did not open or close any other branches in the assessment area. The table below displays the distribution of these offices by census tract income level post-merger-of-equals.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	1	1	6

The bank’s sole branch in the assessment area was located in southwest Harris County. In addition to office locations, bank account holders have access to the Allpoint and Presto! ATM networks, allowing for surcharge-free access to ATMs throughout the assessment area. Given that the assessment area is large, densely populated, and supports a highly competitive banking market, the bank’s limited office presence likely inhibited the bank from serving the entirety of the assessment area.

**General Demographics**

The bank’s Texas assessment area is composed of the entirety of Harris County, one of the nine counties in the Houston-The Woodlands-Sugar Land, Texas MSA. The Woodlands and Sugar Land are not included in the bank’s assessment area, located within Montgomery and Fort Bend Counties, respectively. Harris County, although, which comprises the entirety of the assessment area, is the most populous county in Texas and the third most populous in the United States, with a total population of 4,356,362.

The assessment area has experienced growth driven by the energy and medical sector, as pointed out by community contacts. The assessment area hosts a competitive banking market, with 79 FDIC-insured depository institutions operating 933 branches throughout the assessment area. Prior to the merger-of-equals, the bank ranked 46<sup>th</sup> in deposit market share with 0.1 percent of all deposit dollars in the assessment area, representing 0.3 percent of total bank deposits at the time. Following the July 2020 IBERIABANK merger, deposit market share substantially increased, resulting in the combined organization ranking 20<sup>th</sup> in deposit market share with 0.6 percent of all deposit dollars in the assessment area.



Competition for HMDA and CRA loans in the assessment area is similarly high. Of the 818 financial institutions with HMDA loan activity in 2019, First Horizon Bank ranked 213<sup>rd</sup> with approximately 0.01 percent of all HMDA loan activity. An analysis of reported 2019 CRA loans reveals that there were 217 financial institutions with loan activity in the assessment area, of which First Horizon Bank ranked 96<sup>th</sup> with less than 0.01 percent of all loan activity.

The assessment area population is diverse and, as such, credit needs in the assessment area are also diverse and include a blend of consumer and commercial loan and deposit products. As noted by community contacts, new affordable housing development and home-buyer education counseling are pressing needs in the assessment area. Furthermore, Houston offers opportunity for community development involvement, with several community development, nonprofit, and government assistance entities operating throughout the assessment area.

**Income and Wealth Demographics**

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

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
<b>Low</b>	147	18.7%	149,367	14.6%
<b>Moderate</b>	250	31.8%	299,321	29.2%
<b>Middle</b>	167	21.2%	264,767	25.8%
<b>Upper</b>	216	27.5%	309,207	30.2%
<b>Unknown</b>	6	0.8%	2,305	0.2%
<b>TOTAL</b>	<b>786</b>	<b>100%</b>	<b>1,024,967</b>	<b>100%</b>

As displayed above, 50.5 percent of census tracts in the assessment area are designated as LMI, while 43.8 percent of assessment area families reside within those census tracts. These LMI geographies are located throughout the assessment area except in the northeast and west portions, which are primarily middle- and upper-income geographies.

According to 2015 ACS data, the median family income for the assessment area (\$62,210) is similar to the same figure for the state of Texas as a whole (\$62,717). More recently, the FFIEC estimates the median family income for the Houston-The Woodlands-Sugar Land MSA to be \$77,100 in 2019.

The following table displays the percentages of assessment area families by income level compared to Texas as a whole.

<b>Family Population by Income Level</b>				
	Assessment Area		Texas	
<b>Low</b>	284,253	27.7%	1,474,125	23.2%
<b>Moderate</b>	175,776	17.2%	1,068,177	16.8%
<b>Middle</b>	174,162	17.0%	1,162,520	18.3%
<b>Upper</b>	390,776	38.1%	2,659,282	41.8%
<b>TOTAL</b>	<b>1,024,967</b>	<b>100%</b>	<b>6,364,104</b>	<b>100%</b>

When compared with the data in the first table in this section, a slightly higher percentage of families in the assessment area are LMI (44.9 percent) than reside in LMI geographies (43.8 percent). When compared to the family income distribution for the state of Texas as a whole, the percentage of LMI families in the assessment area is slightly above the statewide figure (40.0 percent). Similarly, the percentage of families below the poverty level in the assessment area (14.9 percent) is slightly above Texas as a whole (13.5 percent). Based on the distribution of families by income, as well as income and poverty levels, the assessment area is less affluent than Texas as a whole.

**Housing Demographics**

The following table displays housing demographics for the assessment area and the state of Texas as a whole.

<b>Housing Demographics</b>			
<b>Dataset</b>	<b>Median Housing Value</b>	<b>Affordability Ratio</b>	<b>Median Gross Rent (monthly)</b>
Assessment Area	\$137,844	39.7%	\$906
Texas	\$136,000	39.1%	\$882

Based on the data in the preceding table, housing in the assessment area is similarly affordable to the state of Texas as a whole. Despite being comparable, as noted by community contacts, affordable housing is a need in the assessment area, and access to affordable housing is a challenge for many LMI residents. Contributing to this issue is the lack of owner-occupied affordable housing in LMI census tracts, as 62.0 percent of housing units in low-income census tracts and 45.4 percent of housing in moderate-income census tracts are rental units. Moreover, just 7.4 percent of owner-occupied housing units in the assessment area are in low-income census tracts. Considering these factors, opportunities for HMDA lending in low-income census tracts is likely limited.

Specific to rental units in the assessment area, median gross rent is above the state of Texas. Additionally, assessment area demographics indicate that 81.2 percent of low-income and 39.1 percent of moderate-income renters in the assessment area have rental costs exceeding 30.0 percent of their income, making saving for a down payment on a home purchase challenging. As such, homeownership may be out of reach for many LMI residents.

### **Industry and Employment Demographics**

The assessment area supports a large and diverse economy, including large corporations, universities, and a strong small business sector. County business patterns indicate that there are 2,350,036 paid employees in the assessment area; by number of paid employees, the largest job categories are government (12.1), healthcare and social assistance (11.1 percent), accommodation and food services (9.1 percent), and retail trade (8.8 percent). Lastly, assessment area demographics show that 90.2 percent of all businesses in the assessment area have annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Texas.

<b>Unemployment Levels for the Assessment Area</b>		
<b>Time Period (Annual Average)</b>	<b>Assessment Area</b>	<b>Texas</b>
2017	5.1%	4.3%
2018	4.4%	3.9%
2019	3.8%	3.5%

As shown above, unemployment levels in the assessment area remained low throughout the review period, gradually decreasing as time went on, and were slightly above statewide levels. While 2020 data was unavailable at the start of this evaluation, communities nationwide experienced increased unemployment rates directly tied to the COVID-19 pandemic that began severely impacting the United States in the first quarter of the year. Expanded upon in the following section, community contacts noted that the pandemic has adversely affected area residents and small businesses.

### **Community Contact Information**

For the Houston assessment area, three community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized. One contact represented a governmental housing agency specializing in affordable housing, another represented a CDFI specializing in assisting minority- and women-owned businesses, and the final contact represented a governmental agency specializing in economic development.

When describing the assessment area economy, two community contacts indicated, prior to the COVID-19 pandemic, economic conditions within the assessment area were generally favorable during the review period. More specifically, the affordable housing contact indicated the energy and medical industries were contributing to continued growth in the area, with the economic development contact echoing these remarks. The affordable housing contact went on to state that

growth and gentrification has led to an affordable housing shortage in the assessment area, with demand far exceeding supply, and affordable housing wait-lists in the thousands.

The CDFI contact stated the COVID-19 pandemic has had a severe impact on small and minority-owned businesses in the assessment area, mentioning that stable capital, funding, and resources were desperately needed for area small businesses. All three contacts noted opportunities for participation by local financial institutions, including participating in affordable housing initiatives, providing home-buyer education programs, promoting homeownership in the area, and collaborating with area CDFIs.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOUSTON ASSESSMENT AREA**

**LENDING TEST**

The bank’s lending levels reflect adequate responsiveness to assessment area credit needs. The distribution of borrower’s income/revenue profile reflects excellent penetration among customers of different income levels and businesses of different sizes. The geographic distribution of loans reflects excellent penetration throughout the assessment area. The bank is a leader in making community development loans and makes use of innovative and/or flexible lending practices in serving the credit needs of the assessment area.

In 2017, the bank originated only one HMDA loan across the entire assessment area. Moreover, small business lending was extremely limited, originating only one loan in 2017 and three loans in both 2018 and 2019. Given this limited volume, HMDA lending in 2017 and small business lending across the entire review period were not considered in the borrower and geographic distribution review, as it would not result in meaningful analyses.

**Lending Activity**

The following table displays the bank’s combined 2017, 2018, and 2019 lending volume in the Houston assessment area by number and dollar volume.

<b>Summary of Lending Activity January 1, 2017 through December 31, 2019</b>				
<b>Loan Type</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Purchase	37	82.2%	\$17,145	83.3%
Refinance	1	2.2%	\$336	1.6%
Home Improvement	0	0.0%	\$0	0.0%
Multifamily Housing	0	0.0%	\$0	0.0%
<b>Total HMDA</b>	<b>38</b>	<b>84.4%</b>	<b>\$17,481</b>	<b>84.9%</b>
<b>Small Business</b>	<b>7</b>	<b>15.6%</b>	<b>\$3,103</b>	<b>15.1%</b>
<b>TOTAL LOANS</b>	<b>45</b>	<b>100%</b>	<b>\$20,584</b>	<b>100%</b>

The bank’s lending activity represents adequate responsiveness to the credit needs of the assessment area. As shown above, the bank had comparatively limited loan activity in the Houston assessment area. The bank’s loan activity in this assessment area represents 0.3 and 0.1 percent of total HMDA and small business loan activity by number across the bank’s assessment areas, respectively. Of note, HMDA lending represents the most lending, which was the primary credit need in the assessment area identified by community contacts. When compared to the bank’s branching footprint, this level of lending is below the percentage of total branches in the assessment area (0.4 percent). Although when compared to deposits, HMDA lending is above, and small business lending is in line with, the percentage of total bank deposits held in the assessment area (0.2 percent). Most recently in 2019, the bank ranked 213<sup>th</sup> out of 818 reporters in HMDA

lending by number, and 96<sup>th</sup> out of 217 reporters in CRA lending in the same year. This is a highly competitive lending market with numerous mortgage companies and other financial institutions.

### **Loan Distribution by Borrower's Profile**

Overall, the bank's distribution of loans by income or revenue profile in the Houston assessment area is excellent.

#### *HMDA Lending*

The distribution of HMDA loans by borrower's income level during the review period is excellent, particularly to moderate-income borrowers.

In the two years with significant HMDA lending, the bank's level of lending to low-income borrowers (4.8 percent in 2018 and 6.3 percent in 2019) was above the aggregate lending levels (4.5 percent in 2018 and 4.0 percent in 2019), reflecting adequate and good performance, respectively. Despite this level of lending, performance was below demographic figures (27.7 percent in both years).

Pertaining to the percentage of HMDA loans to moderate-income borrowers, the bank's performance in the two years with substantial lending (33.3 percent in 2018 and 43.8 percent in 2019) was excellent, significantly exceeding both aggregate lending levels (16.2 percent in both years) and demographic figures (17.1 percent in both years).

### **Geographic Distribution of Loans**

The bank's overall geographic distribution of loans reflects excellent penetration of geographies of different income levels.

#### *HMDA Lending*

Overall, the bank's distribution of HMDA loans by geography income level during the review period is excellent. The bank had extremely limited volume in 2017 before it had a comprehensive mortgage product offering, originating only one HMDA loan across the assessment area, none of which were to LMI individuals. As such, 2017 performance was poor for both income categories, and this performance had minimal to no impact on the overall conclusion.

In the two years with significant HMDA lending, the bank's level of lending in low-income census tracts (19.0 percent in 2018 and 12.5 percent in 2019) was excellent, well above both the aggregate lending levels (4.3 percent in 2018 and 4.4 percent in 2019) and the demographic figures (7.5 percent in both years).

Pertaining to the percentage of HMDA loans in moderate-income census tracts, the bank's performance in the two years with substantial lending (42.9 percent in 2018 and 62.5 percent in 2019) was also excellent, well above both the aggregate lending levels (17.4 percent in 2018 and 16.4 percent in 2019) and the demographic figures (25.8 percent in both years).

Lastly, no conspicuous lending gaps reflecting evidence of arbitrary exclusion of LMI geographies were identified in the distribution of the bank's loans in the assessment area. While penetration is limited across the entire assessment area, as previously noted, the bank operated only one private client location in the assessment area during the review period, severely hindering its ability to serve the entire, large assessment area. Despite this limited office presence, the bank was able to reach areas beyond those in the immediate vicinity of the sole location, including LMI census tracts. The overall percentage of census tracts with loan activity averaged 1.9 percent, with the lowest year being 2017 (0.3 percent), when the bank did not have a comprehensive suite of mortgage products, including those related to affordable housing. As previously noted, enhancements to the bank's mortgage offerings followed the November 2017 Capital Bank acquisition. Pertaining to penetration of LMI census tracts, performance exceeded the overall penetration in the latter two years (3.5 percent in 2018 and 3.3 percent in 2019), as well as the average penetration rate (2.3 percent). As such, the bank's overall penetration and penetration of LMI geographies did not reflect evidence of arbitrarily excluding LMI geographies.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Houston assessment area. During the review period, the bank originated 26 community development loans totaling \$64.0 million. These loans supported economic development (13), affordable housing (6), revitalization and stabilization of LMI or distressed middle-income geographies (4), and community services (3). Some of the most impactful loans are described below:

- One \$8.1 million loan was made to finance development costs for an intermodal business, projected to bring 1,700 jobs to an area designated as a federally declared disaster area due to damage caused by Hurricane Harvey.
- One \$2.0 million line of credit was provided to a CDFI as a source of capital for a small business loan fund aimed at aiding area small businesses that would not otherwise qualify for financing from a traditional lender. This line of credit is particularly responsive to assessment area needs, as coordination with CDFIs and providing capital to small businesses was a need identified through community contact interviews.
- Ten PPP loans totaling \$23.6 million were made to businesses to provide emergency relief during the COVID-19 pandemic, aiding them in sustaining their operations and preserving over 1,600 jobs in LMI geographies. These loans are responsive to the needs of area businesses and residents considering the global pandemic.

### **Product Innovation**

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

- Under the bank's various affordable housing lending programs, the bank originated 11 loans totaling \$2.1 million: 6 CRA Home Ready loans for \$998,768; 4 Home Start loans for \$884,683; and 1 CRA Home Possible Advantage loans for \$203,700. These loans are provided to home-buyers who are considered LMI, and/or the subject property is in an LMI geography.
- Through the bank's ISP Grant and First Responder Grant Program, the bank provided down payment assistance to 14 borrowers totaling \$42,000. This down payment assistance is seen as responsive given the need identified through community contact interviews.
- As noted in the *Community Development Lending Activity* section above, the bank also originated ten community development PPP loans totaling \$23.6 million to businesses in Houston assessment area LMI geographies to provide emergency relief during the COVID-19 pandemic.

## INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants in the assessment area. Of the 17 qualified community development investments totaling \$31.2 million, 15 accounting for \$26.0 million were made in the current review period and 2 totaling \$5.2 million were made in the prior period but remain outstanding. Most of these investments were MBS providing affordable home loans to LMI borrowers in the assessment area, with the remaining investments including equity investments and limited partnership interests in multifamily affordable housing projects in the assessment area. The non-MBS investments help facilitate large-scale multifamily affordable housing complexes for LMI families, totaling 849 units. Moreover, regardless of the investment type, all of these investments pertain to affordable housing, which community contacts noted as one of the most urgent credit needs in the assessment area. In addition to these investments, the bank also made 71 donations totaling \$454,790. These donations benefitted organizations including, but not limited to, homeless shelters, those focused on serving LMI children, providing health and wellness services to LMI communities, and affordable housing.

## SERVICE TEST

The bank's service delivery systems are reasonably accessible in the assessment area, and the bank's record of opening and closing branches has improved the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.



**Accessibility of Delivery Systems**

Following the IBERIABANK merger, the bank operates six full-service branches and one limited-service branch in the Houston assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	0 0.0%	1 12.5%	1 12.5%	6 75.0%	0 0.0%	<b>8</b> <b>100%</b>
Census Tracts	18.7%	31.8%	21.2%	27.5%	0.8%	<b>100%</b>
Household Population	15.4%	28.8%	24.8%	30.7%	0.4%	<b>100%</b>

The bank operates 12.5 percent of its branches in this assessment area in LMI census tracts, below the percentage of assessment area census tracts that are LMI (50.5 percent) and the household population in LMI census tracts (44.2 percent). Despite this trailing metric, one branch in an upper-income tract borders two LMI census tracts, located only 0.6 and 0.8 miles away. Additionally, two other non-LMI locations border or are near LMI geographies, located 0.4 and 0.9 miles away from these branches. Given this branching presence, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

**Changes in Branch Locations**

<b>Changes in Branch Locations by Census Tract Income Level</b>					
<b>Branch Type</b>	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>TOTAL BRANCHES</b>
Existing Branches	0	0	0	1	<b>1</b>
Acquired Branches	0	1	1	5	<b>7</b>
Opened Branches	0	0	0	0	<b>0</b>
Closed Branches	0	0	0	0	<b>0</b>
<b>OVERALL</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>8</b>

The bank’s record of opening and closing branches has improved the accessibility of its service delivery systems. As previously noted, prior to the IBERIABANK merger, the bank operated a single private client office in the assessment area. Through the merger, the bank acquired seven branches, including one in a moderate-income census tract, substantially increasing the accessibility to the public as a whole, as well as LMI individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's business hours and banking services do not vary in a way that inconveniences certain portions of the Houston assessment area, particularly LMI geographies and individuals. The offices in the assessment area provide relatively consistent lobby hours Monday through Friday during standard business hours. Moreover, six of the offices, including the one branch in a moderate-income census tract, operate drive-through facilities with extended drive-through hours until 5:30 p.m. Monday through Friday.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 341 community development services, totaling 1,777 hours, were provided to 39 different organizations. Bank employees' activities included administering financial literacy training to schools that primarily serve LMI children and to customers at branch locations located in LMI geographies, providing financial expertise to community development-focused nonprofits, and serving on the board and committees of various organizations in the assessment area. Organizations with board and committee representation include, but are not limited to, those that serve LMI children and provide safe and affordable housing to LMI families and seniors. The affordable housing-related services are particularly responsive given the affordable housing needs identified through community contact interviews.

**SCOPE OF EXAMINATION TABLES**

<b>Scope of Examination</b>		
<b>TIME PERIOD REVIEWED</b>	January 1, 2017 – December 31, 2019 for HMDA and small business lending January 1, 2017 – September 30, 2020 for community development loans, investment, and service activities	
<b>FINANCIAL INSTITUTION</b>		<b>PRODUCTS REVIEWED</b>
First Horizon Bank Memphis, Tennessee		HMDA Small Business
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>
Not Applicable		

Appendix A (continued)

Assessment Area – Examination Scope Details						
Assessment Area	Rated Area	# of Legacy Offices	# of Combined Offices	Deposits (\$000s)	Branches Visited	CRA Review Procedures
				(as of June 30, 2020)		
Nashville CSA	Tennessee	45	45	\$5,499	0	Full-Scope
Knoxville CSA	Tennessee	36	36	\$3,882	0	Full-Scope
Johnson City CSA	Tennessee	12	12	\$1,333	0	Full-Scope
Jackson MSA	Tennessee	3	3	\$86	0	Limited-Scope
Clarksville MSA	Tennessee	2	2	\$219	0	Limited-Scope
NonMSA Tennessee	Tennessee	8	8	\$813	0	Limited-Scope
Memphis Multistate MSA	Memphis	36	43	\$10,628	0	Full-Scope
Greensboro CSA	North Carolina	24	32	\$1,484	0	Full-Scope
Raleigh-Durham CSA	North Carolina	14	18	\$1,307	0	Full-Scope
Hickory MSA	North Carolina	8	8	\$694	0	Full-Scope
Asheville MSA	North Carolina	2	2	\$116	0	Limited-Scope
Fayetteville MSA	North Carolina	3	3	\$187	0	Limited-Scope
NonMSA North Carolina	North Carolina	5	5	\$297	0	Limited-Scope
Chattanooga Multistate CSA	Chattanooga	21	21	\$2,663	0	Full-Scope
Miami CSA	Florida	17	39	\$1,239	0	Full-Scope
Cape Coral CSA	Florida	9	23	\$632	0	Full-Scope
Sarasota MSA	Florida	3	6	\$170	0	Limited-Scope
Charlotte Multistate MSA	Charlotte	13	13	\$833	0	Full-Scope
Greenville CSA	South Carolina	4	5	\$211	0	Full-Scope
Charleston MSA	South Carolina	1	1	\$93	0	Limited-Scope
Columbia MSA	South Carolina	4	4	\$114	0	Limited-Scope
Houston MSA	Texas	1	8	\$114	0	Full-Scope
<b>OVERALL</b>		<b>271</b>	<b>337</b>	<b>\$32,613</b>	<b>0</b>	<b>13 Full-Scope</b>

## SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Tennessee	High Satisfactory	Outstanding	High Satisfactory	<b>Satisfactory</b>
Memphis Multistate MSA	Low Satisfactory	Outstanding	High Satisfactory	<b>Satisfactory</b>
North Carolina	High Satisfactory	Outstanding	High Satisfactory	<b>Satisfactory</b>
Chattanooga Multistate CSA	High Satisfactory	Outstanding	High Satisfactory	<b>Satisfactory</b>
Florida	Low Satisfactory	Outstanding	High Satisfactory	<b>Satisfactory</b>
Charlotte Multistate MSA	High Satisfactory	Outstanding	Low Satisfactory	<b>Satisfactory</b>
South Carolina	High Satisfactory	Outstanding	High Satisfactory	<b>Satisfactory</b>
Texas	High Satisfactory	Outstanding	High Satisfactory	<b>Satisfactory</b>

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area for large banks. Summing the points from the Lending, Investment, and Service Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC's *Interagency Large Institution CRA Examination Procedures*.

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Chattanooga Multistate MSA	9	6	6	21	<b>Satisfactory</b>
Memphis Multistate MSA	9	4	4	17	<b>Satisfactory</b>
Florida	6	3	3	12	<b>Satisfactory</b>
North Carolina	6	4	4	14	<b>Satisfactory</b>
South Carolina	3	3	1	7	<b>Needs to Improve</b>
Tennessee	9	4	4	17	<b>Satisfactory</b>
Texas	6	3	1	10	<b>Satisfactory</b>
Virginia	3	3	3	9	<b>Needs to Improve</b>

## LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

## Tennessee

Nashville-Davidson–Murfreesboro, Tennessee Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Nashville CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	15	4.1%	4.0%	1,640	0.9%	2.1%	20.2%
	Moderate	46	12.6%	15.9%	7,232	4.1%	10.6%	17.2%
	Middle	37	10.1%	20.4%	8,404	4.8%	17.4%	20.1%
	Upper	266	72.7%	42.3%	157,652	89.8%	53.9%	42.5%
	Unknown	2	0.5%	17.5%	578	0.3%	16.0%	0.0%
	<b>TOTAL</b>	<b>366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>175,506</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	21	8.3%	6.1%	1,595	2.0%	3.0%	20.2%
	Moderate	47	18.6%	15.8%	5,353	6.6%	10.3%	17.2%
	Middle	34	13.4%	20.1%	5,369	6.6%	16.6%	20.1%
	Upper	147	58.1%	37.8%	68,171	83.7%	50.0%	42.5%
	Unknown	4	1.6%	20.1%	955	1.2%	20.0%	0.0%
	<b>TOTAL</b>	<b>253</b>	<b>100.0%</b>	<b>100.0%</b>	<b>81,443</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	3.1%	7.3%	50	0.5%	4.0%	20.2%
	Moderate	1	3.1%	16.6%	119	1.3%	11.6%	17.2%
	Middle	7	21.9%	25.6%	400	4.3%	21.9%	20.1%
	Upper	23	71.9%	43.5%	8,635	93.8%	56.5%	42.5%
	Unknown	0	0.0%	7.1%	0	0.0%	6.0%	0.0%
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,204</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.2%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.1%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	42.5%
	Unknown	1	100.0%	100.0%	9,511	100.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,511</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	37	5.7%	4.8%	3,285	1.2%	2.2%	20.2%
	Moderate	94	14.4%	15.9%	12,704	4.6%	9.9%	17.2%
	Middle	78	12.0%	20.5%	14,173	5.1%	16.2%	20.1%
	Upper	436	66.9%	40.9%	234,458	85.1%	49.5%	42.5%
	Unknown	7	1.1%	18.0%	11,044	4.0%	22.2%	0.0%
	<b>TOTAL</b>	<b>652</b>	<b>100.0%</b>	<b>100.0%</b>	<b>275,664</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Nashville CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	11	2.8%	4.6%	2,016	1.0%	2.4%	20.2%
	Moderate	38	9.5%	18.0%	7,165	3.4%	12.3%	17.2%
	Middle	37	9.3%	21.0%	8,971	4.3%	17.9%	20.1%
	Upper	304	76.4%	40.5%	191,476	90.7%	51.9%	42.5%
	Unknown	8	2.0%	16.0%	1,407	0.7%	15.5%	0.0%
	<b>TOTAL</b>	<b>398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>211,035</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	29	6.9%	8.9%	2,540	2.6%	4.8%	20.2%
	Moderate	57	13.5%	19.4%	5,277	5.4%	13.4%	17.2%
	Middle	62	14.7%	21.4%	8,416	8.7%	18.1%	20.1%
	Upper	250	59.4%	37.5%	76,059	78.3%	49.4%	42.5%
	Unknown	23	5.5%	12.9%	4,801	4.9%	14.2%	0.0%
	<b>TOTAL</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>97,093</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	27	8.8%	5.0%	1,205	4.0%	3.0%	20.2%
	Moderate	43	14.0%	14.3%	2,764	9.2%	9.7%	17.2%
	Middle	67	21.8%	21.1%	4,340	14.4%	16.8%	20.1%
	Upper	167	54.2%	53.3%	21,538	71.6%	59.9%	42.5%
	Unknown	4	1.3%	6.3%	244	0.8%	10.7%	0.0%
	<b>TOTAL</b>	<b>308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,091</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	1.2%	0	0.0%	0.0%	20.2%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.2%
	Middle	0	0.0%	1.9%	0	0.0%	0.1%	20.1%
	Upper	0	0.0%	16.7%	0	0.0%	0.8%	42.5%
	Unknown	3	100.0%	80.2%	17,254	100.0%	99.1%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17,254</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	67	5.9%	5.9%	5,761	1.6%	2.8%	20.2%
	Moderate	138	12.2%	17.7%	15,206	4.3%	11.2%	17.2%
	Middle	166	14.7%	20.7%	21,727	6.1%	16.1%	20.1%
	Upper	721	63.8%	40.6%	289,073	81.3%	47.0%	42.5%
	Unknown	38	3.4%	15.2%	23,706	6.7%	22.8%	0.0%
	<b>TOTAL</b>	<b>1,130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>355,473</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Nashville CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	14	3.3%	4.0%	2,633	1.2%	2.0%	20.2%
	Moderate	49	11.7%	17.9%	9,657	4.5%	12.1%	17.2%
	Middle	36	8.6%	21.9%	8,094	3.8%	18.5%	20.1%
	Upper	309	73.7%	43.1%	190,934	89.3%	54.5%	42.5%
	Unknown	11	2.6%	13.1%	2,575	1.2%	13.0%	0.0%
	<b>TOTAL</b>	<b>419</b>	<b>100.0%</b>	<b>100.0%</b>	<b>213,893</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	22	5.3%	5.8%	1,731	1.4%	2.8%	20.2%
	Moderate	39	9.4%	14.8%	4,596	3.7%	9.4%	17.2%
	Middle	76	18.2%	19.1%	11,426	9.1%	15.3%	20.1%
	Upper	267	64.0%	40.7%	104,669	83.7%	52.0%	42.5%
	Unknown	13	3.1%	19.6%	2,575	2.1%	20.5%	0.0%
	<b>TOTAL</b>	<b>417</b>	<b>100.0%</b>	<b>100.0%</b>	<b>124,997</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	6	2.9%	4.9%	611	2.7%	2.9%	20.2%
	Moderate	26	12.5%	14.1%	1,850	8.2%	10.1%	17.2%
	Middle	49	23.6%	21.7%	3,090	13.7%	17.4%	20.1%
	Upper	123	59.1%	56.7%	16,703	74.0%	65.2%	42.5%
	Unknown	4	1.9%	2.7%	330	1.5%	4.3%	0.0%
	<b>TOTAL</b>	<b>208</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22,584</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.5%	0	0.0%	0.0%	20.2%
	Moderate	0	0.0%	0.5%	0	0.0%	0.0%	17.2%
	Middle	0	0.0%	1.9%	0	0.0%	0.1%	20.1%
	Upper	1	50.0%	12.4%	738	72.0%	0.8%	42.5%
	Unknown	1	50.0%	84.8%	287	28.0%	99.1%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,025</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	42	4.0%	4.7%	4,975	1.4%	2.2%	20.2%
	Moderate	114	10.9%	16.2%	16,103	4.4%	10.1%	17.2%
	Middle	161	15.4%	20.5%	22,610	6.2%	15.8%	20.1%
	Upper	700	66.9%	43.1%	313,044	86.4%	50.0%	42.5%
	Unknown	29	2.8%	15.5%	5,767	1.6%	21.9%	0.0%
	<b>TOTAL</b>	<b>1,046</b>	<b>100.0%</b>	<b>100.0%</b>	<b>362,499</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Small Business Loans by Revenue and Loan Size								
Assessment Area: Nashville CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	160	36.3%	52.3%	\$13,946	17.2%	39.2%	88.6%
	Over \$1 Million/Unknown	281	63.7%	47.7%	\$66,911	82.8%	60.8%	11.4%
	<b>TOTAL</b>	<b>441</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,857</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	250	56.7%	89.8%	\$11,505	14.2%	25.3%	
	\$100,001–\$250,000	91	20.6%	4.6%	\$16,633	20.6%	16.2%	
	\$250,001–\$1 Million	100	22.7%	5.6%	\$52,719	65.2%	58.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>441</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,857</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	132	82.5%		\$4,721	33.9%	
		\$100,001–\$250,000	17	10.6%		\$2,885	20.7%	
		\$250,001–\$1 Million	11	6.9%		\$6,340	45.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>160</b>	<b>100.0%</b>		<b>\$13,946</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Nashville CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	192	45.4%	45.9%	\$18,040	24.0%	38.5%	90.6%
	Over \$1 Million/ Unknown	231	54.6%	54.1%	\$56,972	76.0%	61.5%	9.4%
	<b>TOTAL</b>	<b>423</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$75,012</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	246	58.2%	90.6%	\$10,834	14.4%	27.7%	
	\$100,001–\$250,000	88	20.8%	4.4%	\$16,555	22.1%	16.0%	
	\$250,001–\$1 Million	89	21.0%	5.0%	\$47,623	63.5%	56.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>423</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$75,012</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	149	35.2%		\$4,968	6.6%	
		\$100,001–\$250,000	28	6.6%		\$4,740	6.3%	
		\$250,001–\$1 Million	15	3.5%		\$8,332	11.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>192</b>	<b>45.4%</b>		<b>\$18,040</b>	<b>24.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Nashville CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	216	45.0%	48.8%	\$25,704	27.9%	37.5%	90.9%
	Over \$1 Million/ Unknown	264	55.0%	51.2%	\$66,352	72.1%	62.5%	9.1%
	<b>TOTAL</b>	<b>480</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,056</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	277	57.7%	91.3%	\$12,969	14.1%	28.9%	
	\$100,001– \$250,000	90	18.8%	4.1%	\$16,409	17.8%	15.7%	
	\$250,001– \$1 Million	113	23.5%	4.6%	\$62,678	68.1%	55.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>480</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,056</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	167	34.8%		\$6,386	6.9%		
	\$100,001– \$250,000	23	4.8%		\$3,850	4.2%		
	\$250,001– \$1 Million	26	5.4%		\$15,468	16.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>216</b>	<b>45.0%</b>		<b>\$25,704</b>	<b>27.9%</b>		

Geographic Distribution of HMDA Loans								
Assessment Area: Nashville CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	24	6.6%	4.9%	8,509	4.8%	4.7%	3.5%
	Moderate	51	13.9%	14.9%	11,305	6.4%	10.9%	16.2%
	Middle	75	20.5%	42.5%	18,311	10.4%	36.1%	42.9%
	Upper	216	59.0%	37.7%	137,381	78.3%	48.3%	37.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>175,506</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	10	4.0%	3.8%	2,491	3.1%	3.1%	3.5%
	Moderate	49	19.4%	15.0%	6,772	8.3%	9.8%	16.2%
	Middle	67	26.5%	43.0%	12,282	15.1%	36.4%	42.9%
	Upper	127	50.2%	38.1%	59,898	73.5%	50.5%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>253</b>	<b>100.0%</b>	<b>100.0%</b>	<b>81,443</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	3.1%	3.6%	63	0.7%	3.0%	3.5%
	Moderate	7	21.9%	17.7%	591	6.4%	11.8%	16.2%
	Middle	7	21.9%	44.9%	1,724	18.7%	37.8%	42.9%
	Upper	17	53.1%	33.6%	6,826	74.2%	47.4%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,204</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	1	100.0%	14.9%	9,511	100.0%	8.4%	13.3%
	Moderate	0	0.0%	34.7%	0	0.0%	19.5%	35.4%
	Middle	0	0.0%	37.2%	0	0.0%	51.2%	29.9%
	Upper	0	0.0%	13.2%	0	0.0%	20.9%	21.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,511</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	36	5.5%	4.5%	20,574	7.5%	4.5%	3.5%
	Moderate	107	16.4%	15.1%	18,668	6.8%	11.2%	16.2%
	Middle	149	22.9%	42.8%	32,317	11.7%	37.2%	42.9%
	Upper	360	55.2%	37.6%	204,105	74.0%	47.1%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>652</b>	<b>100.0%</b>	<b>100.0%</b>	<b>275,664</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Nashville CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	28	7.0%	4.9%	10,288	4.9%	4.8%	3.5%
	Moderate	36	9.0%	15.1%	8,983	4.3%	11.0%	16.2%
	Middle	91	22.9%	42.0%	30,562	14.5%	35.6%	42.9%
	Upper	243	61.1%	38.0%	161,202	76.4%	48.6%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>398</b>	<b>100.0%</b>	<b>100.0%</b>	<b>211,035</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	7	1.7%	4.1%	1,649	1.7%	3.6%	3.5%
	Moderate	42	10.0%	15.2%	4,845	5.0%	10.5%	16.2%
	Middle	143	34.0%	43.4%	24,960	25.7%	37.1%	42.9%
	Upper	229	54.4%	37.1%	65,639	67.6%	48.7%	37.3%
	Unknown	0	0.0%	0.2%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>97,093</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	9	2.9%	3.2%	566	1.9%	3.0%	3.5%
	Moderate	34	11.0%	12.6%	2,131	7.1%	9.5%	16.2%
	Middle	111	36.0%	38.0%	7,506	24.9%	31.6%	42.9%
	Upper	154	50.0%	46.2%	19,888	66.1%	55.9%	37.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>308</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,091</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	2	66.7%	17.9%	14,454	83.8%	8.6%	13.3%
	Moderate	1	33.3%	43.8%	2,800	16.2%	24.6%	35.4%
	Middle	0	0.0%	25.9%	0	0.0%	38.7%	29.9%
	Upper	0	0.0%	12.3%	0	0.0%	28.2%	21.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17,254</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	46	4.1%	4.5%	26,957	7.6%	4.8%	3.5%
	Moderate	113	10.0%	14.9%	18,759	5.3%	12.0%	16.2%
	Middle	345	30.5%	41.9%	63,028	17.7%	35.9%	42.9%
	Upper	626	55.4%	38.7%	246,729	69.4%	47.3%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>1,130</b>	<b>100.0%</b>	<b>100.0%</b>	<b>355,473</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Nashville CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	34	8.1%	5.4%	14,048	6.6%	5.3%	3.5%
	Moderate	49	11.7%	15.6%	12,210	5.7%	11.4%	16.4%
	Middle	107	25.5%	41.2%	34,622	16.2%	35.1%	42.7%
	Upper	229	54.7%	37.7%	153,013	71.5%	48.1%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>419</b>	<b>100.0%</b>	<b>100.0%</b>	<b>213,893</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	7	1.7%	3.8%	1,446	1.2%	3.3%	3.5%
	Moderate	31	7.4%	12.8%	3,794	3.0%	8.8%	16.4%
	Middle	127	30.5%	41.6%	24,865	19.9%	35.1%	42.7%
	Upper	252	60.4%	41.7%	94,892	75.9%	52.7%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>417</b>	<b>100.0%</b>	<b>100.0%</b>	<b>124,997</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	6	2.9%	3.4%	978	4.3%	3.0%	3.5%
	Moderate	22	10.6%	13.2%	1,702	7.5%	10.1%	16.4%
	Middle	75	36.1%	36.0%	7,387	32.7%	30.9%	42.7%
	Upper	105	50.5%	47.3%	12,517	55.4%	55.9%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>208</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22,584</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	18.6%	0	0.0%	15.8%	13.3%
	Moderate	0	0.0%	36.7%	0	0.0%	20.4%	35.4%
	Middle	1	50.0%	31.4%	287	28.0%	48.2%	29.9%
	Upper	1	50.0%	13.3%	738	72.0%	15.6%	21.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,025</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	47	4.5%	4.7%	16,472	4.5%	5.3%	3.5%
	Moderate	102	9.8%	14.3%	17,706	4.9%	11.1%	16.4%
	Middle	310	29.6%	41.0%	67,161	18.5%	35.9%	42.7%
	Upper	587	56.1%	40.0%	261,160	72.0%	47.7%	37.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>1,046</b>	<b>100.0%</b>	<b>100.0%</b>	<b>362,499</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Nashville CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	47	10.7%	8.1%	\$12,583	15.6%	11.3%	7.9%
Moderate	100	22.7%	19.0%	\$14,849	18.4%	20.8%	20.7%
Middle	121	27.4%	28.0%	\$19,432	24.0%	21.5%	30.7%
Upper	172	39.0%	43.1%	\$33,494	41.4%	44.1%	39.9%
Unknown	1	0.2%	1.8%	\$500	0.6%	2.3%	0.9%
<b>TOTAL</b>	<b>441</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,858</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Nashville CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	50	11.8%	8.2%	\$9,329	12.4%	11.0%	7.8%
Moderate	88	20.8%	18.5%	\$15,056	20.1%	20.3%	20.2%
Middle	113	26.7%	28.0%	\$20,825	27.8%	22.1%	30.5%
Upper	170	40.2%	43.3%	\$29,004	38.7%	44.3%	40.7%
Unknown	2	0.5%	2.0%	\$800	1.1%	2.4%	0.9%
<b>TOTAL</b>	<b>423</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$75,014</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Nashville CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	42	8.8%	8.5%	\$10,576	11.5%	11.2%	7.9%
Moderate	117	24.4%	18.1%	\$24,248	26.3%	20.3%	20.2%
Middle	135	28.1%	28.3%	\$21,524	23.4%	23.5%	30.4%
Upper	179	37.3%	43.0%	\$34,292	37.3%	42.9%	40.6%
Unknown	7	1.5%	2.0%	\$1,418	1.5%	2.0%	0.9%
<b>TOTAL</b>	<b>480</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,058</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Knoxville-Morristown-Sevierville, Tennessee Assessment Area**

<b>Borrower Distribution of HMDA Loans</b>								
<b>Assessment Area: Knoxville CSA</b>								
<b>Product Type</b>	<b>Borrower Income Levels</b>	<b>2017</b>						
		<b>Count</b>			<b>Dollar</b>			<b>Families</b>
		<b>Bank</b>		<b>HMDA Aggregate</b>	<b>Bank</b>		<b>HMDA Aggregate</b>	
		<b>#</b>	<b>%</b>	<b>%</b>	<b>\$ (000s)</b>	<b>\$ %</b>	<b>\$ %</b>	<b>%</b>
<b>Home Purchase</b>	Low	7	4.8%	5.0%	652	1.2%	2.5%	20.8%
	Moderate	30	20.4%	16.5%	4,092	7.8%	11.1%	16.6%
	Middle	13	8.8%	19.4%	1,702	3.3%	16.7%	20.0%
	Upper	97	66.0%	38.2%	45,871	87.7%	49.7%	42.7%
	Unknown	0	0.0%	20.9%	0	0.0%	20.0%	0.0%
	<b>TOTAL</b>	<b>147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52,317</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>	Low	2	2.3%	6.8%	113	0.5%	3.3%	20.8%
	Moderate	23	26.7%	14.7%	2,111	9.9%	9.7%	16.6%
	Middle	18	20.9%	19.3%	1,780	8.4%	15.9%	20.0%
	Upper	43	50.0%	38.5%	17,281	81.2%	49.8%	42.7%
	Unknown	0	0.0%	20.7%	0	0.0%	21.3%	0.0%
	<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>21,285</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>	Low	2	12.5%	9.3%	60	2.9%	5.9%	20.8%
	Moderate	3	18.8%	15.7%	122	6.0%	10.7%	16.6%
	Middle	4	25.0%	17.3%	265	12.9%	16.3%	20.0%
	Upper	7	43.8%	40.2%	1,601	78.2%	59.8%	42.7%
	Unknown	0	0.0%	17.5%	0	0.0%	7.3%	0.0%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,048</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Multifamily</b>	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.6%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.0%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	42.7%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	11	4.4%	5.7%	825	1.1%	2.7%	20.8%
	Moderate	56	22.5%	15.9%	6,325	8.4%	10.3%	16.6%
	Middle	35	14.1%	19.2%	3,747	5.0%	15.9%	20.0%
	Upper	147	59.0%	38.3%	64,753	85.6%	48.0%	42.7%
	Unknown	0	0.0%	20.9%	0	0.0%	23.1%	0.0%
	<b>TOTAL</b>	<b>249</b>	<b>100.0%</b>	<b>100.0%</b>	<b>75,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Borrower Distribution of HMDA Loans								
Assessment Area: Knoxville CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	7	4.4%	5.6%	548	0.9%	2.8%	20.8%
	Moderate	14	8.8%	16.2%	1,687	2.7%	10.9%	16.6%
	Middle	10	6.3%	19.0%	1,714	2.7%	16.4%	20.0%
	Upper	120	75.5%	39.4%	58,192	91.8%	50.1%	42.7%
	Unknown	8	5.0%	19.8%	1,226	1.9%	19.9%	0.0%
	<b>TOTAL</b>	<b>159</b>	<b>100.0%</b>	<b>100.0%</b>	<b>63,367</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	28	12.7%	8.3%	1,673	3.6%	4.1%	20.8%
	Moderate	20	9.1%	16.8%	1,547	3.3%	11.6%	16.6%
	Middle	31	14.1%	20.4%	2,724	5.8%	17.1%	20.0%
	Upper	139	63.2%	39.8%	39,216	83.9%	50.8%	42.7%
	Unknown	2	0.9%	14.7%	1,596	3.4%	16.4%	0.0%
	<b>TOTAL</b>	<b>220</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46,756</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	12	10.8%	8.1%	547	5.6%	4.3%	20.8%
	Moderate	14	12.6%	13.0%	718	7.4%	9.3%	16.6%
	Middle	16	14.4%	18.0%	806	8.3%	14.9%	20.0%
	Upper	66	59.5%	53.3%	7,416	76.6%	60.8%	42.7%
	Unknown	3	2.7%	7.6%	195	2.0%	10.7%	0.0%
	<b>TOTAL</b>	<b>111</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,682</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.6%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.6%	0	0.0%	0.0%	16.6%
	Middle	0	0.0%	2.6%	0	0.0%	0.3%	20.0%
	Upper	0	0.0%	15.4%	0	0.0%	2.5%	42.7%
	Unknown	0	0.0%	80.8%	0	0.0%	97.1%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	47	9.6%	6.3%	2,768	2.3%	2.9%	20.8%
	Moderate	48	9.8%	15.6%	3,952	3.3%	10.2%	16.6%
	Middle	57	11.6%	18.8%	5,244	4.4%	15.3%	20.0%
	Upper	325	66.3%	39.5%	104,824	87.5%	47.3%	42.7%
	Unknown	13	2.7%	19.8%	3,017	2.5%	24.3%	0.0%
	<b>TOTAL</b>	<b>490</b>	<b>100.0%</b>	<b>100.0%</b>	<b>119,805</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Knoxville CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	9	4.3%	5.2%	935	1.0%	2.6%	20.9%
	Moderate	27	12.8%	16.9%	3,936	4.3%	11.2%	16.7%
	Middle	22	10.4%	21.3%	4,492	4.9%	18.0%	20.1%
	Upper	147	69.7%	44.2%	80,750	87.2%	56.2%	42.3%
	Unknown	6	2.8%	12.4%	2,447	2.6%	12.1%	0.0%
	<b>TOTAL</b>	<b>211</b>	<b>100.0%</b>	<b>100.0%</b>	<b>92,560</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	11	5.7%	6.1%	791	1.7%	2.8%	20.9%
	Moderate	31	16.1%	13.7%	2,388	5.0%	8.6%	16.7%
	Middle	34	17.6%	18.8%	3,785	8.0%	15.0%	20.1%
	Upper	114	59.1%	42.8%	39,927	83.9%	53.3%	42.3%
	Unknown	3	1.6%	18.6%	707	1.5%	20.3%	0.0%
	<b>TOTAL</b>	<b>193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47,598</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	6	3.8%	6.0%	240	1.9%	3.6%	20.9%
	Moderate	32	20.0%	13.6%	1,375	10.8%	10.0%	16.7%
	Middle	36	22.5%	20.3%	2,478	19.4%	15.6%	20.1%
	Upper	82	51.3%	56.2%	8,395	65.9%	66.2%	42.3%
	Unknown	4	2.5%	3.8%	253	2.0%	4.6%	0.0%
	<b>TOTAL</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,741</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.9%
	Moderate	0	0.0%	0.6%	0	0.0%	0.0%	16.7%
	Middle	0	0.0%	3.1%	0	0.0%	0.3%	20.1%
	Upper	0	0.0%	16.0%	0	0.0%	2.1%	42.3%
	Unknown	1	100.0%	80.2%	500	100.0%	97.7%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>500</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	26	4.6%	5.5%	1,966	1.3%	2.5%	20.9%
	Moderate	90	15.9%	15.3%	7,699	5.0%	9.5%	16.7%
	Middle	92	16.3%	20.1%	10,755	7.0%	15.6%	20.1%
	Upper	343	60.7%	44.2%	129,072	84.1%	51.6%	42.3%
	Unknown	14	2.5%	14.8%	3,907	2.5%	20.8%	0.0%
	<b>TOTAL</b>	<b>565</b>	<b>100.0%</b>	<b>100.0%</b>	<b>153,399</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Knoxville CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	125	38.1%	51.1%	\$14,932	23.7%	35.9%	88.8%
	Over \$1 Million/ Unknown	203	61.9%	48.9%	\$48,011	76.3%	64.1%	11.2%
	<b>TOTAL</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$62,943</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	178	54.3%	89.6%	\$8,551	13.6%	25.3%	
	\$100,001–\$250,000	74	22.6%	5.0%	\$12,949	20.6%	16.9%	
	\$250,001–\$1 Million	76	23.2%	5.3%	\$41,443	65.8%	57.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$62,943</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	95	76.0%		\$3,198	21.4%	
		\$100,001–\$250,000	14	11.2%		\$2,450	16.4%	
		\$250,001–\$1 Million	16	12.8%		\$9,284	62.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>125</b>	<b>100.0%</b>		<b>\$14,932</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Knoxville CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	97	34.5%	47.1%	\$7,759	14.0%	35.4%	90.4%
	Over \$1 Million/Unknown	184	65.5%	52.9%	\$47,811	86.0%	64.6%	9.6%
	<b>TOTAL</b>	<b>281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$55,570</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	150	53.4%	89.7%	\$6,489	11.7%	26.5%	
	\$100,001–\$250,000	64	22.8%	4.9%	\$11,427	20.6%	16.4%	
	\$250,001–\$1 Million	67	23.8%	5.4%	\$37,654	67.8%	57.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$55,570</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	78	27.8%		\$2,483	4.5%	
		\$100,001–\$250,000	11	3.9%		\$1,829	3.3%	
		\$250,001–\$1 Million	8	2.8%		\$3,447	6.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>97</b>	<b>34.5%</b>		<b>\$7,759</b>	<b>14.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Knoxville CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	129	34.9%	45.2%	\$17,627	22.5%	33.6%	90.6%
	Over \$1 Million/Unknown	241	65.1%	54.8%	\$60,676	77.5%	66.4%	9.4%
	<b>TOTAL</b>	<b>370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$78,303</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	183	49.5%	89.8%	\$8,479	10.8%	27.8%	
	\$100,001-\$250,000	87	23.5%	5.0%	\$16,168	20.6%	17.0%	
	\$250,001-\$1 Million	100	27.0%	5.1%	\$53,656	68.5%	55.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$78,303</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	89	24.1%		\$2,940	3.8%	
		\$100,001-\$250,000	18	4.9%		\$3,389	4.3%	
		\$250,001-\$1 Million	22	5.9%		\$11,298	14.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>129</b>	<b>34.9%</b>		<b>\$17,627</b>	<b>22.5%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Knoxville CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	4	2.7%	1.4%	1,372	2.6%	0.8%	2.3%
	Moderate	15	10.2%	9.5%	1,873	3.6%	6.3%	11.8%
	Middle	54	36.7%	55.7%	14,102	27.0%	50.9%	57.0%
	Upper	74	50.3%	33.3%	34,970	66.8%	42.0%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52,317</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	1	1.2%	1.6%	70	0.3%	0.9%	2.3%
	Moderate	4	4.7%	9.0%	374	1.8%	6.3%	11.8%
	Middle	49	57.0%	57.6%	10,185	47.9%	54.1%	57.0%
	Upper	32	37.2%	31.7%	10,656	50.1%	38.8%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>21,285</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	6.3%	2.5%	17	0.8%	2.2%	2.3%
	Moderate	2	12.5%	13.3%	230	11.2%	8.6%	11.8%
	Middle	5	31.3%	55.8%	872	42.6%	51.3%	57.0%
	Upper	8	50.0%	28.3%	929	45.4%	38.0%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,048</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	3.0%	0	0.0%	5.4%	9.9%
	Moderate	0	0.0%	37.4%	0	0.0%	34.3%	27.9%
	Middle	0	0.0%	45.5%	0	0.0%	37.7%	44.7%
	Upper	0	0.0%	14.1%	0	0.0%	22.6%	17.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.3%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	6	2.4%	1.6%	1,459	1.9%	1.0%	2.3%
	Moderate	21	8.4%	9.7%	2,477	3.3%	7.4%	11.8%
	Middle	108	43.4%	56.2%	25,159	33.3%	51.2%	57.0%
	Upper	114	45.8%	32.5%	46,555	61.5%	40.4%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>249</b>	<b>100.0%</b>	<b>100.0%</b>	<b>75,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Knoxville CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	0.6%	1.7%	410	0.6%	1.0%	2.3%
	Moderate	10	6.3%	9.5%	1,125	1.8%	6.6%	11.8%
	Middle	68	42.8%	56.1%	20,356	32.1%	52.2%	57.0%
	Upper	80	50.3%	32.7%	41,476	65.5%	40.3%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>159</b>	<b>100.0%</b>	<b>100.0%</b>	<b>63,367</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.5%	0	0.0%	0.9%	2.3%
	Moderate	13	5.9%	8.5%	1,033	2.2%	6.1%	11.8%
	Middle	113	51.4%	57.5%	15,337	32.8%	52.9%	57.0%
	Upper	94	42.7%	32.5%	30,386	65.0%	40.1%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>220</b>	<b>100.0%</b>	<b>100.0%</b>	<b>46,756</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.8%	0	0.0%	1.8%	2.3%
	Moderate	6	5.4%	8.7%	195	2.0%	6.9%	11.8%
	Middle	54	48.6%	48.6%	3,876	40.0%	46.5%	57.0%
	Upper	51	45.9%	40.9%	5,611	58.0%	44.8%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>111</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,682</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	12.2%	0	0.0%	12.3%	9.9%
	Moderate	0	0.0%	34.6%	0	0.0%	38.0%	27.9%
	Middle	0	0.0%	41.7%	0	0.0%	32.9%	44.7%
	Upper	0	0.0%	10.9%	0	0.0%	13.7%	17.3%
	Unknown	0	0.0%	0.6%	0	0.0%	3.2%	0.3%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	0.2%	1.7%	410	0.3%	1.7%	2.3%
	Moderate	29	5.9%	9.4%	2,353	2.0%	8.4%	11.8%
	Middle	235	48.0%	55.9%	39,569	33.0%	51.0%	57.0%
	Upper	225	45.9%	33.0%	77,473	64.7%	38.8%	29.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.2%	0.0%
	<b>TOTAL</b>	<b>490</b>	<b>100.0%</b>	<b>100.0%</b>	<b>119,805</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Knoxville CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	4	1.9%	1.9%	636	0.7%	1.2%	2.2%
	Moderate	15	7.1%	10.5%	2,490	2.7%	7.2%	12.4%
	Middle	77	36.5%	54.2%	25,577	27.6%	50.8%	55.7%
	Upper	115	54.5%	33.3%	63,857	69.0%	40.7%	29.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>211</b>	<b>100.0%</b>	<b>100.0%</b>	<b>92,560</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	3	1.6%	1.3%	343	0.7%	0.8%	2.2%
	Moderate	9	4.7%	8.4%	1,818	3.8%	5.8%	12.4%
	Middle	92	47.7%	54.0%	12,602	26.5%	49.4%	55.7%
	Upper	89	46.1%	36.4%	32,835	69.0%	44.0%	29.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47,598</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	2	1.3%	2.0%	50	0.4%	1.9%	2.2%
	Moderate	14	8.8%	9.6%	1,058	8.3%	8.1%	12.4%
	Middle	75	46.9%	45.9%	5,286	41.5%	42.5%	55.7%
	Upper	69	43.1%	42.5%	6,347	49.8%	47.5%	29.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,741</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	3.1%	0	0.0%	6.7%	9.9%
	Moderate	0	0.0%	29.0%	0	0.0%	23.6%	27.9%
	Middle	1	100.0%	53.1%	500	100.0%	46.3%	44.6%
	Upper	0	0.0%	14.8%	0	0.0%	23.4%	17.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.3%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>500</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	9	1.6%	1.7%	1,029	0.7%	1.5%	2.2%
	Moderate	38	6.7%	9.9%	5,366	3.5%	8.0%	12.4%
	Middle	245	43.4%	53.5%	43,965	28.7%	49.8%	55.7%
	Upper	273	48.3%	34.9%	103,039	67.2%	40.7%	29.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>565</b>	<b>100.0%</b>	<b>100.0%</b>	<b>153,399</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of Small Business Loans Assessment Area: Knoxville CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	18	5.5%	3.6%	\$4,953	7.9%	4.5%	4.5%
Moderate	48	14.6%	12.7%	\$10,749	17.1%	13.4%	14.7%
Middle	149	45.4%	48.5%	\$26,657	42.4%	46.7%	49.1%
Upper	110	33.5%	34.1%	\$19,939	31.7%	34.6%	31.3%
Unknown	3	0.9%	1.1%	\$645	1.0%	0.7%	0.3%
<b>TOTAL</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$62,943</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Knoxville CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	13	4.6%	3.8%	\$2,551	4.6%	4.2%	4.4%
Moderate	53	18.9%	12.6%	\$10,096	18.2%	12.7%	14.4%
Middle	137	48.8%	46.8%	\$29,560	53.2%	45.1%	49.5%
Upper	78	27.8%	35.4%	\$13,363	24.0%	37.5%	31.5%
Unknown	0	0.0%	1.4%	\$0	0.0%	0.6%	0.3%
<b>TOTAL</b>	<b>281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$55,570</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Knoxville CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	30	8.1%	3.2%	\$5,369	6.9%	4.2%	4.3%
Moderate	80	21.6%	12.6%	\$18,849	24.1%	13.3%	14.6%
Middle	151	40.8%	48.5%	\$30,723	39.2%	46.2%	48.6%
Upper	106	28.6%	33.9%	\$22,774	29.1%	35.4%	32.2%
Unknown	3	0.8%	1.8%	\$588	0.8%	0.8%	0.3%
<b>TOTAL</b>	<b>370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$78,303</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Johnson City-Kingsport-Bristol, Tennessee Assessment Area**

Borrower Distribution of HMDA Loans								
Assessment Area: Johnson City-Kingsport CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	4	4.9%	6.1%	290	1.1%	2.8%	20.5%
	Moderate	8	9.9%	16.2%	914	3.4%	10.4%	17.7%
	Middle	8	9.9%	22.2%	1,149	4.3%	19.0%	20.5%
	Upper	61	75.3%	38.1%	24,590	91.3%	51.5%	41.3%
	Unknown	0	0.0%	17.3%	0	0.0%	16.3%	0.0%
	<b>TOTAL</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26,943</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	7	16.3%	7.8%	342	3.8%	4.0%	20.5%
	Moderate	3	7.0%	15.4%	176	2.0%	10.7%	17.7%
	Middle	5	11.6%	21.5%	651	7.2%	17.8%	20.5%
	Upper	28	65.1%	37.6%	7,836	87.0%	48.3%	41.3%
	Unknown	0	0.0%	17.7%	0	0.0%	19.2%	0.0%
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,005</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	11.5%	0	0.0%	4.4%	20.5%
	Moderate	2	33.3%	20.2%	246	43.2%	14.6%	17.7%
	Middle	2	33.3%	21.3%	93	16.3%	18.9%	20.5%
	Upper	2	33.3%	42.3%	230	40.4%	58.0%	41.3%
	Unknown	0	0.0%	4.6%	0	0.0%	4.0%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>569</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.7%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	20.5%
	Upper	0	0.0%	100.0%	612	100.0%	0.0%	41.3%
	Unknown	2	100.0%	100.0%	612	100.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	11	8.3%	6.9%	632	1.7%	3.0%	20.5%
	Moderate	13	9.8%	16.2%	1,336	3.6%	9.8%	17.7%
	Middle	15	11.4%	21.8%	1,893	5.1%	17.3%	20.5%
	Upper	91	68.9%	38.1%	32,656	88.0%	47.1%	41.3%
	Unknown	2	1.5%	17.0%	612	1.6%	22.8%	0.0%
	<b>TOTAL</b>	<b>132</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37,129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Johnson City-Kingsport CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	5	4.8%	5.8%	286	0.9%	2.7%	20.5%
	Moderate	7	6.7%	16.5%	739	2.4%	10.3%	17.7%
	Middle	14	13.5%	20.7%	2,006	6.4%	17.1%	20.5%
	Upper	75	72.1%	41.8%	27,633	88.6%	55.0%	41.3%
	Unknown	3	2.9%	15.2%	530	1.7%	14.9%	0.0%
	<b>TOTAL</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31,194</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	12	9.5%	9.7%	713	4.4%	5.0%	20.5%
	Moderate	16	12.7%	16.2%	1,344	8.3%	10.9%	17.7%
	Middle	29	23.0%	23.5%	2,619	16.2%	20.7%	20.5%
	Upper	66	52.4%	40.0%	11,187	69.3%	50.7%	41.3%
	Unknown	3	2.4%	10.6%	269	1.7%	12.7%	0.0%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16,132</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	6	10.2%	8.2%	222	5.4%	4.8%	20.5%
	Moderate	10	16.9%	15.3%	472	11.5%	11.9%	17.7%
	Middle	13	22.0%	21.7%	624	15.1%	19.5%	20.5%
	Upper	30	50.8%	49.8%	2,803	68.0%	55.9%	41.3%
	Unknown	0	0.0%	5.0%	0	0.0%	8.0%	0.0%
	<b>TOTAL</b>	<b>59</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.7%
	Middle	0	0.0%	2.7%	0	0.0%	0.7%	20.5%
	Upper	0	0.0%	27.0%	0	0.0%	7.5%	41.3%
	Unknown	0	0.0%	70.3%	0	0.0%	91.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	23	8.0%	7.1%	1,221	2.4%	3.1%	20.5%
	Moderate	33	11.4%	16.2%	2,555	5.0%	9.8%	17.7%
	Middle	56	19.4%	20.9%	5,249	10.2%	16.7%	20.5%
	Upper	171	59.2%	41.4%	41,623	80.9%	50.4%	41.3%
	Unknown	6	2.1%	14.5%	799	1.6%	20.0%	0.0%
	<b>TOTAL</b>	<b>289</b>	<b>100.0%</b>	<b>100.0%</b>	<b>51,447</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Johnson City-Kingsport CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	1.9%	5.3%	149	0.5%	2.3%	20.5%
	Moderate	16	15.4%	20.1%	1,551	5.0%	13.1%	17.7%
	Middle	13	12.5%	22.7%	1,556	5.1%	19.4%	20.5%
	Upper	73	70.2%	41.7%	27,459	89.4%	55.4%	41.3%
	Unknown	0	0.0%	10.1%	0	0.0%	9.8%	0.0%
	<b>TOTAL</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	12	13.3%	7.1%	690	5.0%	3.2%	20.5%
	Moderate	10	11.1%	14.4%	806	5.8%	8.9%	17.7%
	Middle	14	15.6%	18.2%	1,376	9.9%	14.2%	20.5%
	Upper	53	58.9%	41.2%	10,943	78.6%	49.6%	41.3%
	Unknown	1	1.1%	19.1%	100	0.7%	24.1%	0.0%
	<b>TOTAL</b>	<b>90</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13,915</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	3	7.3%	5.9%	125	3.9%	3.0%	20.5%
	Moderate	6	14.6%	17.4%	276	8.6%	13.8%	17.7%
	Middle	7	17.1%	24.4%	438	13.6%	21.8%	20.5%
	Upper	25	61.0%	50.3%	2,385	74.0%	59.2%	41.3%
	Unknown	0	0.0%	2.1%	0	0.0%	2.2%	0.0%
	<b>TOTAL</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,224</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	1.1%	0	0.0%	0.4%	20.5%
	Moderate	0	0.0%	2.3%	0	0.0%	0.4%	17.7%
	Middle	0	0.0%	1.1%	0	0.0%	0.4%	20.5%
	Upper	0	0.0%	23.9%	0	0.0%	9.0%	41.3%
	Unknown	1	100.0%	71.6%	580	100.0%	89.8%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>580</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	17	7.2%	6.1%	964	2.0%	2.6%	20.5%
	Moderate	32	13.6%	17.7%	2,633	5.4%	11.2%	17.7%
	Middle	34	14.4%	20.9%	3,370	7.0%	16.9%	20.5%
	Upper	151	64.0%	41.9%	40,787	84.2%	51.4%	41.3%
	Unknown	2	0.8%	13.4%	680	1.4%	17.9%	0.0%
	<b>TOTAL</b>	<b>236</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48,434</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Johnson City-Kingsport CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	43	32.8%	53.3%	\$1,665	9.1%	43.8%	89.8%
	Over \$1 Million/ Unknown	88	67.2%	46.7%	\$16,641	90.9%	56.2%	10.2%
	<b>TOTAL</b>	<b>131</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$18,306</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	84	64.1%	89.4%	\$4,231	23.1%	32.3%	
	\$100,001–\$250,000	27	20.6%	5.8%	\$4,743	25.9%	20.2%	
	\$250,001–\$1 Million	20	15.3%	4.8%	\$9,332	51.0%	47.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>131</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$18,306</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	40	93.0%		\$1,167	70.1%	
		\$100,001–\$250,000	3	7.0%		\$498	29.9%	
		\$250,001–\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>		<b>\$1,665</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Johnson City-Kingsport CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	37	28.7%	50.8%	\$2,921	13.1%	43.1%	91.0%
	Over \$1 Million/Unknown	92	71.3%	49.2%	\$19,319	86.9%	56.9%	9.0%
	<b>TOTAL</b>	<b>129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	55	42.6%	89.4%	\$2,916	13.1%	31.2%	
	\$100,001-\$250,000	48	37.2%	6.1%	\$8,080	36.3%	21.9%	
	\$250,001-\$1 Million	26	20.2%	4.5%	\$11,244	50.6%	46.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,240</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	28	21.7%		\$1,098	4.9%	
		\$100,001-\$250,000	7	5.4%		\$962	4.3%	
		\$250,001-\$1 Million	2	1.6%		\$861	3.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>37</b>	<b>28.7%</b>		<b>\$2,921</b>	<b>13.1%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Johnson City-Kingsport CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	47	30.7%	45.6%	\$5,249	17.8%	42.4%	91.1%
	Over \$1 Million/Unknown	106	69.3%	54.4%	\$24,177	82.2%	57.6%	8.9%
	<b>TOTAL</b>	<b>153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	75	49.0%	91.0%	\$3,821	13.0%	34.9%	
	\$100,001-\$250,000	40	26.1%	4.9%	\$6,244	21.2%	18.2%	
	\$250,001-\$1 Million	38	24.8%	4.1%	\$19,361	65.8%	46.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,426</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	31	20.3%		\$1,316	4.5%	
		\$100,001-\$250,000	11	7.2%		\$1,598	5.4%	
		\$250,001-\$1 Million	5	3.3%		\$2,335	7.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>47</b>	<b>30.7%</b>		<b>\$5,249</b>	<b>17.8%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Johnson City-Kingsport CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	7	8.6%	15.6%	1,075	4.0%	11.4%	17.5%
	Middle	29	35.8%	50.0%	6,898	25.6%	46.5%	55.5%
	Upper	45	55.6%	34.4%	18,970	70.4%	42.1%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>81</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26,943</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	4.7%	15.4%	645	7.2%	11.0%	17.5%
	Middle	16	37.2%	54.3%	2,184	24.3%	52.9%	55.5%
	Upper	25	58.1%	30.3%	6,176	68.6%	36.1%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,005</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	50.0%	21.5%	183	32.2%	15.9%	17.5%
	Middle	3	50.0%	52.1%	386	67.8%	47.4%	55.5%
	Upper	0	0.0%	26.2%	0	0.0%	36.7%	26.9%
	Unknown	0	0.0%	0.2%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>569</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	31.4%	0	0.0%	52.5%	31.0%
	Middle	2	100.0%	52.9%	612	100.0%	13.5%	44.1%
	Upper	0	0.0%	15.7%	0	0.0%	34.0%	24.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>612</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	12	9.1%	16.0%	1,903	5.1%	14.5%	17.5%
	Middle	50	37.9%	51.4%	10,080	27.1%	45.7%	55.5%
	Upper	70	53.0%	32.6%	25,146	67.7%	39.9%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>132</b>	<b>100.0%</b>	<b>100.0%</b>	<b>37,129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of HMDA Loans								
Assessment Area: Johnson City-Kingsport CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	9	8.7%	16.4%	1,363	4.4%	11.5%	17.5%
	Middle	37	35.6%	50.2%	10,677	34.2%	47.3%	55.5%
	Upper	58	55.8%	33.4%	19,154	61.4%	41.2%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31,194</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	15	11.9%	15.7%	1,619	10.0%	11.9%	17.5%
	Middle	54	42.9%	51.4%	5,638	34.9%	49.6%	55.5%
	Upper	57	45.2%	32.9%	8,875	55.0%	38.5%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16,132</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	3.4%	14.2%	198	4.8%	13.2%	17.5%
	Middle	31	52.5%	52.8%	1,764	42.8%	49.6%	55.5%
	Upper	26	44.1%	33.0%	2,159	52.4%	37.2%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>59</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	28.4%	0	0.0%	26.5%	31.0%
	Middle	0	0.0%	50.0%	0	0.0%	21.4%	44.1%
	Upper	0	0.0%	21.6%	0	0.0%	52.1%	24.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	26	9.0%	16.0%	3,180	6.2%	12.7%	17.5%
	Middle	122	42.2%	51.0%	18,079	35.1%	46.3%	55.5%
	Upper	141	48.8%	32.9%	30,188	58.7%	41.0%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>289</b>	<b>100.0%</b>	<b>100.0%</b>	<b>51,447</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Johnson City-Kingsport CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	14	13.5%	17.7%	1,962	6.4%	12.6%	17.5%
	Middle	40	38.5%	49.5%	11,937	38.9%	47.0%	55.5%
	Upper	50	48.1%	32.8%	16,816	54.7%	40.4%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	10	11.1%	14.1%	1,209	8.7%	10.4%	17.5%
	Middle	40	44.4%	52.4%	5,319	38.2%	49.8%	55.5%
	Upper	40	44.4%	33.5%	7,387	53.1%	39.8%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>90</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13,915</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	7.3%	12.5%	101	3.1%	13.6%	17.5%
	Middle	24	58.5%	55.8%	2,065	64.1%	53.5%	55.5%
	Upper	14	34.1%	31.7%	1,058	32.8%	32.9%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,224</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	45.5%	0	0.0%	28.6%	31.0%
	Middle	1	100.0%	39.8%	580	100.0%	33.8%	44.1%
	Upper	0	0.0%	14.8%	0	0.0%	37.7%	24.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>580</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	27	11.4%	16.3%	3,272	6.8%	12.7%	17.5%
	Middle	105	44.5%	50.8%	19,901	41.1%	47.5%	55.5%
	Upper	104	44.1%	32.9%	25,261	52.2%	39.8%	26.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>236</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48,434</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Johnson City-Kingsport CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	21	16.0%	21.9%	\$2,802	15.3%	26.8%	24.4%
Middle	63	48.1%	46.4%	\$7,136	39.0%	42.2%	46.9%
Upper	47	35.9%	30.7%	\$8,369	45.7%	30.5%	28.6%
Unknown	0	0.0%	1.0%	\$0	0.0%	0.5%	0.1%
<b>TOTAL</b>	<b>131</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$18,307</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Johnson City-Kingsport CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	19	14.7%	21.1%	\$2,489	11.2%	20.2%	24.3%
Middle	41	31.8%	43.3%	\$6,460	29.0%	37.4%	46.8%
Upper	69	53.5%	34.0%	\$13,291	59.8%	41.9%	28.6%
Unknown	0	0.0%	1.6%	\$0	0.0%	0.5%	0.2%
<b>TOTAL</b>	<b>129</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$22,240</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Johnson City-Kingsport CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	33	21.6%	20.1%	\$5,935	20.2%	21.3%	24.4%
Middle	50	32.7%	45.3%	\$8,657	29.4%	39.2%	47.0%
Upper	70	45.8%	32.8%	\$14,834	50.4%	38.4%	28.3%
Unknown	0	0.0%	1.8%	\$0	0.0%	1.1%	0.3%
<b>TOTAL</b>	<b>153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,426</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Clarksville, Tennessee Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Clarksville MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.5%	0	0.0%	1.2%	18.5%
	Moderate	0	0.0%	12.0%	0	0.0%	8.2%	17.0%
	Middle	2	50.0%	26.9%	230	32.2%	25.1%	21.4%
	Upper	2	50.0%	33.4%	485	67.8%	40.9%	43.2%
	Unknown	0	0.0%	25.2%	0	0.0%	24.6%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.7%	0	0.0%	1.5%	18.5%
	Moderate	0	0.0%	8.0%	0	0.0%	5.4%	17.0%
	Middle	0	0.0%	13.9%	0	0.0%	11.5%	21.4%
	Upper	0	0.0%	27.7%	0	0.0%	31.9%	43.2%
	Unknown	0	0.0%	47.8%	0	0.0%	49.6%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.2%	0	0.0%	3.0%	18.5%
	Moderate	0	0.0%	10.9%	0	0.0%	7.4%	17.0%
	Middle	0	0.0%	17.9%	0	0.0%	18.9%	21.4%
	Upper	0	0.0%	48.8%	0	0.0%	66.4%	43.2%
	Unknown	0	0.0%	19.2%	0	0.0%	4.4%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	18.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.4%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	43.2%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.6%	0	0.0%	1.3%	18.5%
	Moderate	0	0.0%	11.1%	0	0.0%	7.5%	17.0%
	Middle	2	50.0%	23.5%	230	32.2%	21.9%	21.4%
	Upper	2	50.0%	32.6%	485	67.8%	38.8%	43.2%
	Unknown	0	0.0%	30.2%	0	0.0%	30.5%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Clarksville MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.8%	0	0.0%	1.6%	18.5%
	Moderate	1	16.7%	13.1%	125	15.1%	8.9%	17.0%
	Middle	1	16.7%	26.1%	135	16.3%	23.7%	21.4%
	Upper	4	66.7%	35.9%	566	68.5%	43.4%	43.2%
	Unknown	0	0.0%	22.1%	0	0.0%	22.3%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>826</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	4.7%	0	0.0%	2.6%	18.5%
	Moderate	5	45.5%	10.9%	341	32.0%	6.8%	17.0%
	Middle	0	0.0%	18.3%	0	0.0%	15.5%	21.4%
	Upper	5	45.5%	41.6%	480	45.1%	49.0%	43.2%
	Unknown	1	9.1%	24.5%	243	22.8%	26.1%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,064</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	33.3%	6.7%	50	47.6%	5.1%	18.5%
	Moderate	0	0.0%	9.5%	0	0.0%	11.8%	17.0%
	Middle	1	33.3%	21.4%	30	28.6%	18.0%	21.4%
	Upper	1	33.3%	56.7%	25	23.8%	54.8%	43.2%
	Unknown	0	0.0%	5.7%	0	0.0%	10.3%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	18.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Middle	0	0.0%	2.2%	0	0.0%	0.2%	21.4%
	Upper	0	0.0%	13.3%	0	0.0%	1.7%	43.2%
	Unknown	0	0.0%	84.4%	0	0.0%	98.1%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	5.0%	3.0%	50	2.5%	1.7%	18.5%
	Moderate	6	30.0%	12.2%	466	23.4%	8.0%	17.0%
	Middle	2	10.0%	23.9%	165	8.3%	20.9%	21.4%
	Upper	10	50.0%	37.3%	1,071	53.7%	41.4%	43.2%
	Unknown	1	5.0%	23.6%	243	12.2%	28.1%	0.0%
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,995</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Clarksville MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.8%	0	0.0%	1.7%	18.7%
	Moderate	3	23.1%	13.2%	411	17.1%	9.6%	17.0%
	Middle	4	30.8%	29.6%	457	19.0%	27.8%	21.5%
	Upper	6	46.2%	35.2%	1,542	64.0%	41.7%	42.8%
	Unknown	0	0.0%	19.2%	0	0.0%	19.2%	0.0%
	<b>TOTAL</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,410</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.3%	0	0.0%	1.7%	18.7%
	Moderate	4	44.4%	7.4%	373	39.6%	4.4%	17.0%
	Middle	4	44.4%	13.0%	439	46.6%	10.0%	21.5%
	Upper	1	11.1%	28.4%	131	13.9%	31.2%	42.8%
	Unknown	0	0.0%	48.0%	0	0.0%	52.8%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>943</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	6.1%	0	0.0%	3.1%	18.7%
	Moderate	0	0.0%	11.3%	0	0.0%	10.8%	17.0%
	Middle	2	50.0%	22.6%	119	72.6%	21.4%	21.5%
	Upper	2	50.0%	55.2%	45	27.4%	56.6%	42.8%
	Unknown	0	0.0%	4.8%	0	0.0%	8.2%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	18.7%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Middle	0	0.0%	1.5%	0	0.0%	0.2%	21.5%
	Upper	0	0.0%	33.8%	0	0.0%	7.6%	42.8%
	Unknown	0	0.0%	64.6%	0	0.0%	92.2%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.9%	0	0.0%	1.6%	18.7%
	Moderate	7	26.9%	11.5%	784	22.3%	7.9%	17.0%
	Middle	10	38.5%	24.6%	1,015	28.9%	21.9%	21.5%
	Upper	9	34.6%	34.0%	1,718	48.8%	37.6%	42.8%
	Unknown	0	0.0%	27.0%	0	0.0%	31.0%	0.0%

Small Business Loans by Revenue and Loan Size								
Assessment Area: Clarksville MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	2	100.0%	55.0%	\$80	100.0%	36.0%	92.6%
	Over \$1 Million/ Unknown	0	0.0%	45.0%	\$0	0.0%	64.0%	7.4%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	2	100.0%	96.5%	\$80	100.0%	47.4%	
	\$100,001–\$250,000	0	0.0%	2.0%	\$0	0.0%	15.1%	
	\$250,001–\$1 Million	0	0.0%	1.4%	\$0	0.0%	37.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	2	100.0%		\$80	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%		
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>		<b>\$80</b>	<b>100.0%</b>		

Small Business Loans by Revenue and Loan Size								
Assessment Area: Clarksville MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	4	66.7%	50.4%	\$115	31.1%	38.6%	94.1%
	Over \$1 Million/Unknown	2	33.3%	49.6%	\$255	68.9%	61.4%	5.9%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	5	83.3%	96.9%	\$120	32.4%	49.9%	
	\$100,001-\$250,000	1	16.7%	1.7%	\$250	67.6%	14.2%	
	\$250,001-\$1 Million	0	0.0%	1.4%	\$0	0.0%	35.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$370</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	4	66.7%		\$115	31.1%	
		\$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%	
		<b>TOTAL</b>	<b>4</b>	<b>66.7%</b>		<b>\$115</b>	<b>31.1%</b>	



Small Business Loans by Revenue and Loan Size								
Assessment Area: Clarksville MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	7	70.0%	53.0%	\$940	43.7%	46.4%	94.4%
	Over \$1 Million/Unknown	3	30.0%	47.0%	\$1,209	56.3%	53.6%	5.6%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	7	70.0%	96.6%	\$200	9.3%	48.7%	
	\$100,001-\$250,000	1	10.0%	1.8%	\$149	6.9%	12.7%	
	\$250,001-\$1 Million	2	20.0%	1.6%	\$1,800	83.8%	38.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,149</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	6	60.0%		\$140	6.5%	
		\$100,001-\$250,000	0	0.0%		\$0	0.0%	
		\$250,001-\$1 Million	1	10.0%		\$800	37.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>7</b>	<b>70.0%</b>		<b>\$940</b>	<b>43.7%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Clarksville MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.1%	0	0.0%	0.1%	0.7%
	Moderate	1	25.0%	8.1%	72	10.1%	6.7%	10.1%
	Middle	1	25.0%	59.8%	95	13.3%	55.2%	58.4%
	Upper	2	50.0%	31.7%	548	76.6%	37.6%	30.4%
	Unknown	0	0.0%	0.3%	0	0.0%	0.4%	0.4%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.5%	0	0.0%	0.4%	0.7%
	Moderate	0	0.0%	8.0%	0	0.0%	6.2%	10.1%
	Middle	0	0.0%	61.9%	0	0.0%	57.7%	58.4%
	Upper	0	0.0%	29.2%	0	0.0%	35.2%	30.4%
	Unknown	0	0.0%	0.3%	0	0.0%	0.5%	0.4%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.7%
	Moderate	0	0.0%	8.0%	0	0.0%	8.2%	10.1%
	Middle	0	0.0%	62.4%	0	0.0%	52.5%	58.4%
	Upper	0	0.0%	29.1%	0	0.0%	39.1%	30.4%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.4%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	3.2%	0	0.0%	1.0%	3.6%
	Moderate	0	0.0%	29.0%	0	0.0%	35.9%	29.1%
	Middle	0	0.0%	51.6%	0	0.0%	48.3%	53.9%
	Upper	0	0.0%	9.7%	0	0.0%	10.3%	9.7%
	Unknown	0	0.0%	6.5%	0	0.0%	4.6%	3.7%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.2%	0	0.0%	0.2%	0.7%
	Moderate	1	25.0%	8.1%	72	10.1%	7.1%	10.1%
	Middle	1	25.0%	60.4%	95	13.3%	55.6%	58.4%
	Upper	2	50.0%	30.9%	548	76.6%	36.7%	30.4%
	Unknown	0	0.0%	0.3%	0	0.0%	0.4%	0.4%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>715</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Clarksville MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.2%	0	0.0%	0.2%	0.7%
	Moderate	0	0.0%	8.4%	0	0.0%	7.4%	10.1%
	Middle	4	66.7%	59.1%	434	52.5%	53.5%	58.4%
	Upper	2	33.3%	32.1%	392	47.5%	38.9%	30.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.4%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>826</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.4%	0	0.0%	0.4%	0.7%
	Moderate	0	0.0%	8.2%	0	0.0%	6.0%	10.1%
	Middle	3	27.3%	58.7%	250	23.5%	54.0%	58.4%
	Upper	8	72.7%	32.5%	814	76.5%	39.2%	30.4%
	Unknown	0	0.0%	0.3%	0	0.0%	0.3%	0.4%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,064</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.7%
	Moderate	0	0.0%	5.2%	0	0.0%	4.6%	10.1%
	Middle	3	100.0%	54.3%	105	100.0%	51.6%	58.4%
	Upper	0	0.0%	40.5%	0	0.0%	43.8%	30.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	2.2%	0	0.0%	0.6%	3.6%
	Moderate	0	0.0%	31.1%	0	0.0%	28.8%	29.1%
	Middle	0	0.0%	48.9%	0	0.0%	42.5%	53.9%
	Upper	0	0.0%	15.6%	0	0.0%	16.5%	9.7%
	Unknown	0	0.0%	2.2%	0	0.0%	11.7%	3.7%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.2%	0	0.0%	0.2%	0.7%
	Moderate	0	0.0%	8.5%	0	0.0%	8.4%	10.1%
	Middle	10	50.0%	59.1%	789	39.5%	53.4%	58.4%
	Upper	10	50.0%	32.0%	1,206	60.5%	37.2%	30.4%
	Unknown	0	0.0%	0.2%	0	0.0%	0.8%	0.4%
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,995</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Clarksville MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.2%	0	0.0%	0.2%	0.6%
	Moderate	2	15.4%	7.8%	107	4.4%	6.5%	9.1%
	Middle	6	46.2%	60.5%	906	37.6%	56.2%	62.3%
	Upper	5	38.5%	31.4%	1,397	58.0%	36.9%	27.6%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.4%
	<b>TOTAL</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,410</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.1%	0	0.0%	0.1%	0.6%
	Moderate	1	11.1%	6.3%	80	8.5%	4.6%	9.1%
	Middle	4	44.4%	58.8%	439	46.6%	54.5%	62.3%
	Upper	4	44.4%	34.6%	424	45.0%	40.7%	27.6%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.4%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>943</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.9%	0	0.0%	0.9%	0.6%
	Moderate	0	0.0%	8.7%	0	0.0%	8.1%	9.1%
	Middle	3	75.0%	59.1%	129	78.7%	55.4%	62.3%
	Upper	1	25.0%	31.3%	35	21.3%	35.5%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	3.1%	0	0.0%	1.0%	3.5%
	Moderate	0	0.0%	29.2%	0	0.0%	9.1%	28.8%
	Middle	0	0.0%	47.7%	0	0.0%	58.5%	54.4%
	Upper	0	0.0%	13.8%	0	0.0%	26.6%	9.6%
	Unknown	0	0.0%	6.2%	0	0.0%	4.8%	3.7%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.2%	0	0.0%	0.2%	0.6%
	Moderate	3	11.5%	7.5%	187	5.3%	6.1%	9.1%
	Middle	13	50.0%	60.2%	1,474	41.9%	56.0%	62.3%
	Upper	10	38.5%	32.0%	1,856	52.8%	37.3%	27.6%
	Unknown	0	0.0%	0.2%	0	0.0%	0.4%	0.4%
	<b>TOTAL</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,517</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Clarksville MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	3.8%	\$0	0.0%	7.9%	5.5%
Moderate	0	0.0%	11.8%	\$0	0.0%	10.0%	14.6%
Middle	2	100.0%	44.3%	\$80	100.0%	43.3%	46.4%
Upper	0	0.0%	36.5%	\$0	0.0%	36.0%	28.0%
Unknown	0	0.0%	3.6%	\$0	0.0%	2.8%	5.5%
<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Clarksville MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	16.7%	3.6%	\$5	1.4%	5.4%	5.0%
Moderate	0	0.0%	11.6%	\$0	0.0%	9.0%	14.2%
Middle	3	50.0%	46.6%	\$65	17.6%	50.1%	47.7%
Upper	1	16.7%	33.9%	\$250	67.6%	31.8%	28.4%
Unknown	1	16.7%	4.2%	\$50	13.5%	3.6%	4.8%
<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$370</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Clarksville MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	2.3%	\$0	0.0%	2.8%	4.6%
Moderate	3	30.0%	11.0%	\$875	40.7%	13.5%	13.3%
Middle	5	50.0%	47.2%	\$1,219	56.7%	42.7%	50.8%
Upper	2	20.0%	35.4%	\$55	2.6%	38.1%	27.0%
Unknown	0	0.0%	4.1%	\$0	0.0%	2.9%	4.3%
<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Jackson, Tennessee Assessment Area**

Borrower Distribution of HMDA Loans								
Assessment Area: Jackson MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	4.3%	0	0.0%	2.2%	21.3%
	Moderate	2	15.4%	15.6%	166	4.1%	10.9%	17.1%
	Middle	1	7.7%	22.5%	116	2.9%	19.4%	18.1%
	Upper	10	76.9%	37.0%	3,773	93.0%	47.5%	43.5%
	Unknown	0	0.0%	20.6%	0	0.0%	20.1%	0.0%
	<b>TOTAL</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,055</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	7.0%	0	0.0%	3.7%	21.3%
	Moderate	0	0.0%	13.5%	0	0.0%	8.4%	17.1%
	Middle	1	10.0%	16.7%	173	5.9%	13.8%	18.1%
	Upper	9	90.0%	41.8%	2,751	94.1%	54.0%	43.5%
	Unknown	0	0.0%	21.0%	0	0.0%	20.0%	0.0%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,924</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.4%	0	0.0%	0.8%	21.3%
	Moderate	0	0.0%	17.9%	0	0.0%	5.4%	17.1%
	Middle	0	0.0%	14.6%	0	0.0%	5.8%	18.1%
	Upper	1	100.0%	54.5%	122	100.0%	53.4%	43.5%
	Unknown	0	0.0%	10.6%	0	0.0%	34.6%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.1%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	43.5%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	5.0%	0	0.0%	2.5%	21.3%
	Moderate	2	8.3%	15.1%	166	2.3%	9.8%	17.1%
	Middle	2	8.3%	20.3%	289	4.1%	17.1%	18.1%
	Upper	20	83.3%	39.2%	6,646	93.6%	47.9%	43.5%
	Unknown	0	0.0%	20.4%	0	0.0%	22.7%	0.0%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Jackson MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	5.3%	0	0.0%	2.8%	21.3%
	Moderate	1	6.3%	17.9%	109	2.5%	12.2%	17.1%
	Middle	2	12.5%	20.3%	118	2.7%	18.2%	18.1%
	Upper	12	75.0%	35.0%	3,694	85.4%	44.6%	43.5%
	Unknown	1	6.3%	21.4%	407	9.4%	22.2%	0.0%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	6.7%	0	0.0%	3.5%	21.3%
	Moderate	1	11.1%	15.1%	108	4.3%	9.3%	17.1%
	Middle	3	33.3%	18.6%	486	19.4%	13.7%	18.1%
	Upper	5	55.6%	44.9%	1,909	76.3%	55.5%	43.5%
	Unknown	0	0.0%	14.7%	0	0.0%	18.0%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.1%	0	0.0%	3.2%	21.3%
	Moderate	0	0.0%	10.7%	0	0.0%	6.0%	17.1%
	Middle	0	0.0%	17.9%	0	0.0%	14.9%	18.1%
	Upper	0	0.0%	50.0%	0	0.0%	60.7%	43.5%
	Unknown	0	0.0%	14.3%	0	0.0%	15.1%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	4.3%	0	0.0%	2.0%	21.3%
	Moderate	0	0.0%	4.3%	0	0.0%	0.7%	17.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.1%
	Upper	0	0.0%	26.1%	0	0.0%	16.4%	43.5%
	Unknown	0	0.0%	65.2%	0	0.0%	80.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	5.6%	0	0.0%	2.9%	21.3%
	Moderate	2	8.0%	16.5%	217	3.2%	10.9%	17.1%
	Middle	5	20.0%	19.0%	604	8.8%	16.2%	18.1%
	Upper	17	68.0%	38.2%	5,603	82.0%	46.4%	43.5%
	Unknown	1	4.0%	20.7%	407	6.0%	23.5%	0.0%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,831</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Jackson MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.4%	0	0.0%	1.7%	20.3%
	Moderate	0	0.0%	18.2%	0	0.0%	12.6%	16.5%
	Middle	1	5.3%	23.2%	65	0.8%	20.1%	17.9%
	Upper	18	94.7%	38.8%	7,961	99.2%	50.0%	45.3%
	Unknown	0	0.0%	16.3%	0	0.0%	15.6%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,026</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.3%	0	0.0%	1.3%	20.3%
	Moderate	0	0.0%	12.9%	0	0.0%	7.5%	16.5%
	Middle	2	66.7%	18.0%	155	43.7%	13.2%	17.9%
	Upper	1	33.3%	44.6%	200	56.3%	52.7%	45.3%
	Unknown	0	0.0%	21.2%	0	0.0%	25.3%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>355</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	8.8%	0	0.0%	4.3%	20.3%
	Moderate	2	22.2%	15.0%	95	8.3%	7.8%	16.5%
	Middle	1	11.1%	17.5%	16	1.4%	11.8%	17.9%
	Upper	6	66.7%	52.5%	1,029	90.3%	68.8%	45.3%
	Unknown	0	0.0%	6.3%	0	0.0%	7.3%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.5%
	Middle	0	0.0%	2.9%	0	0.0%	0.3%	17.9%
	Upper	0	0.0%	23.5%	0	0.0%	8.2%	45.3%
	Unknown	0	0.0%	73.5%	0	0.0%	91.5%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	3.6%	0	0.0%	1.5%	20.3%
	Moderate	2	6.5%	16.0%	95	1.0%	10.1%	16.5%
	Middle	4	12.9%	20.6%	236	2.5%	16.4%	17.9%
	Upper	25	80.6%	40.7%	9,190	96.5%	48.0%	45.3%
	Unknown	0	0.0%	19.2%	0	0.0%	23.9%	0.0%
	<b>TOTAL</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Small Business Loans by Revenue and Loan Size								
Assessment Area: Jackson MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	7	28.0%	51.8%	\$812	20.0%	46.7%	86.9%
	Over \$1 Million/ Unknown	18	72.0%	48.2%	\$3,241	80.0%	53.3%	13.1%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,053</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	12	48.0%	83.3%	\$492	12.1%	24.6%	
	\$100,001–\$250,000	6	24.0%	9.2%	\$992	24.5%	22.1%	
	\$250,001–\$1 Million	7	28.0%	7.5%	\$2,569	63.4%	53.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,053</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	4	57.1%		\$113	13.9%	
		\$100,001–\$250,000	2	28.6%		\$292	36.0%	
		\$250,001–\$1 Million	1	14.3%		\$407	50.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>7</b>	<b>100.0%</b>		<b>\$812</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Jackson MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	12	63.2%	47.4%	\$1,245	36.2%	52.1%	88.9%
	Over \$1 Million/ Unknown	7	36.8%	52.6%	\$2,191	63.8%	47.9%	11.1%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,436</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	11	57.9%	83.6%	\$363	10.6%	22.8%	
	\$100,001– \$250,000	3	15.8%	8.7%	\$500	14.6%	19.7%	
	\$250,001– \$1 Million	5	26.3%	7.7%	\$2,573	74.9%	57.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,436</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	9	47.4%		\$322	9.4%	
		\$100,001– \$250,000	1	5.3%		\$150	4.4%	
		\$250,001– \$1 Million	2	10.5%		\$773	22.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>12</b>	<b>63.2%</b>		<b>\$1,245</b>	<b>36.2%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Jackson MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	5	22.7%	44.0%	\$725	13.8%	45.9%	89.4%
	Over \$1 Million/Unknown	17	77.3%	56.0%	\$4,512	86.2%	54.1%	10.6%
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,237</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	7	31.8%	86.4%	\$308	5.9%	28.7%	
	\$100,001-\$250,000	8	36.4%	7.3%	\$1,568	29.9%	19.5%	
	\$250,001-\$1 Million	7	31.8%	6.3%	\$3,361	64.2%	51.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,237</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	3	13.6%		\$75	1.4%	
		\$100,001-\$250,000	1	4.5%		\$150	2.9%	
		\$250,001-\$1 Million	1	4.5%		\$500	9.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>5</b>	<b>22.7%</b>		<b>\$725</b>	<b>13.8%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Jackson MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.3%	0	0.0%	0.1%	4.0%
	Moderate	1	7.7%	14.8%	77	1.9%	10.8%	18.2%
	Middle	4	30.8%	34.1%	1,163	28.7%	30.3%	38.0%
	Upper	8	61.5%	50.6%	2,815	69.4%	58.7%	39.5%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.3%
	<b>TOTAL</b>	<b>13</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,055</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.3%	0	0.0%	0.8%	4.0%
	Moderate	2	20.0%	17.2%	376	12.9%	12.2%	18.2%
	Middle	3	30.0%	37.4%	1,927	65.9%	35.5%	38.0%
	Upper	5	50.0%	43.6%	621	21.2%	51.1%	39.5%
	Unknown	0	0.0%	0.5%	0	0.0%	0.3%	0.3%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,924</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.6%	0	0.0%	0.1%	4.0%
	Moderate	0	0.0%	17.9%	0	0.0%	8.0%	18.2%
	Middle	0	0.0%	39.8%	0	0.0%	55.5%	38.0%
	Upper	1	100.0%	40.7%	122	100.0%	36.4%	39.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.3%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	16.7%	0	0.0%	30.1%	18.4%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	37.5%
	Middle	0	0.0%	33.3%	0	0.0%	63.1%	6.9%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	29.4%
	Unknown	0	0.0%	50.0%	0	0.0%	6.8%	7.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.7%	0	0.0%	1.1%	4.0%
	Moderate	3	12.5%	15.6%	453	6.4%	10.8%	18.2%
	Middle	7	29.2%	35.4%	3,090	43.5%	33.2%	38.0%
	Upper	14	58.3%	48.0%	3,558	50.1%	54.6%	39.5%
	Unknown	0	0.0%	0.3%	0	0.0%	0.3%	0.3%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Jackson MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.3%	0	0.0%	0.1%	4.0%
	Moderate	1	6.3%	15.3%	385	8.9%	10.8%	18.2%
	Middle	5	31.3%	31.3%	836	19.3%	28.2%	38.0%
	Upper	10	62.5%	52.8%	3,107	71.8%	60.7%	39.5%
	Unknown	0	0.0%	0.2%	0	0.0%	0.1%	0.3%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.0%	0	0.0%	0.6%	4.0%
	Moderate	1	11.1%	16.5%	250	10.0%	17.0%	18.2%
	Middle	1	11.1%	38.5%	250	10.0%	33.0%	38.0%
	Upper	7	77.8%	42.6%	2,003	80.0%	49.2%	39.5%
	Unknown	0	0.0%	0.5%	0	0.0%	0.2%	0.3%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.8%	0	0.0%	1.2%	4.0%
	Moderate	0	0.0%	21.4%	0	0.0%	17.0%	18.2%
	Middle	0	0.0%	35.7%	0	0.0%	28.8%	38.0%
	Upper	0	0.0%	39.3%	0	0.0%	50.4%	39.5%
	Unknown	0	0.0%	1.8%	0	0.0%	2.6%	0.3%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	4.3%	0	0.0%	9.8%	18.4%
	Moderate	0	0.0%	47.8%	0	0.0%	30.0%	37.5%
	Middle	0	0.0%	21.7%	0	0.0%	10.9%	6.9%
	Upper	0	0.0%	17.4%	0	0.0%	43.5%	29.4%
	Unknown	0	0.0%	8.7%	0	0.0%	5.9%	7.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.9%	0	0.0%	0.6%	4.0%
	Moderate	2	8.0%	15.9%	635	9.3%	12.9%	18.2%
	Middle	6	24.0%	33.2%	1,086	15.9%	28.9%	38.0%
	Upper	17	68.0%	49.6%	5,110	74.8%	57.3%	39.5%
	Unknown	0	0.0%	0.4%	0	0.0%	0.4%	0.3%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,831</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Jackson MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	0.4%	0	0.0%	0.2%	4.0%
	Moderate	1	5.3%	17.0%	560	7.0%	13.0%	16.0%
	Middle	5	26.3%	29.7%	1,285	16.0%	24.9%	32.1%
	Upper	13	68.4%	52.7%	6,181	77.0%	61.9%	47.5%
	Unknown	0	0.0%	0.2%	0	0.0%	0.0%	0.3%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,026</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.9%	0	0.0%	0.5%	4.0%
	Moderate	0	0.0%	12.4%	0	0.0%	8.8%	16.0%
	Middle	0	0.0%	26.7%	0	0.0%	22.1%	32.1%
	Upper	3	100.0%	59.6%	355	100.0%	68.4%	47.5%
	Unknown	0	0.0%	0.4%	0	0.0%	0.1%	0.3%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>355</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.3%	0	0.0%	0.3%	4.0%
	Moderate	2	22.2%	18.8%	201	17.6%	15.5%	16.0%
	Middle	2	22.2%	33.8%	127	11.1%	26.3%	32.1%
	Upper	5	55.6%	46.3%	812	71.2%	57.9%	47.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.3%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	5.9%	0	0.0%	23.9%	18.4%
	Moderate	0	0.0%	35.3%	0	0.0%	12.0%	37.5%
	Middle	0	0.0%	23.5%	0	0.0%	46.9%	6.9%
	Upper	0	0.0%	32.4%	0	0.0%	16.2%	29.4%
	Unknown	0	0.0%	2.9%	0	0.0%	0.9%	7.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	0	0.0%	0.7%	0	0.0%	1.9%	4.0%
	Moderate	3	9.7%	15.6%	761	8.0%	11.8%	16.0%
	Middle	7	22.6%	29.7%	1,412	14.8%	26.3%	32.1%
	Upper	21	67.7%	53.7%	7,348	77.2%	59.8%	47.5%
	Unknown	0	0.0%	0.3%	0	0.0%	0.1%	0.3%
	<b>TOTAL</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Jackson MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	2.2%	\$0	0.0%	1.3%	2.7%
Moderate	10	40.0%	24.3%	\$1,907	47.1%	26.2%	29.7%
Middle	5	20.0%	31.6%	\$705	17.4%	29.0%	31.2%
Upper	8	32.0%	33.1%	\$1,016	25.1%	32.2%	27.6%
Unknown	2	8.0%	8.8%	\$425	10.5%	11.4%	8.9%
<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,053</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Jackson MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	2.6%	\$0	0.0%	2.4%	3.0%
Moderate	4	21.1%	26.0%	\$840	24.4%	25.6%	29.3%
Middle	6	31.6%	28.6%	\$568	16.5%	23.7%	29.9%
Upper	7	36.8%	33.6%	\$1,978	57.6%	33.8%	29.5%
Unknown	2	10.5%	9.2%	\$50	1.5%	14.5%	8.3%
<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,436</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Jackson MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	2.5%	\$0	0.0%	1.8%	2.8%
Moderate	6	27.3%	23.3%	\$912	17.4%	20.6%	26.0%
Middle	10	45.5%	27.1%	\$2,361	45.1%	28.8%	29.8%
Upper	5	22.7%	36.4%	\$1,364	26.0%	34.8%	33.3%
Unknown	1	4.5%	10.7%	\$600	11.5%	14.1%	8.2%
<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,237</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

NonMSA Tennessee Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: NonMSA Tennessee								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.3%	0	0.0%	1.7%	21.3%
	Moderate	4	18.2%	16.0%	407	9.7%	11.2%	18.3%
	Middle	1	4.5%	21.1%	90	2.1%	19.0%	19.7%
	Upper	17	77.3%	37.2%	3,698	88.2%	46.1%	40.8%
	Unknown	0	0.0%	22.4%	0	0.0%	22.1%	0.0%
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,195</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	2	5.4%	5.8%	132	2.7%	3.1%	21.3%
	Moderate	11	29.7%	14.0%	960	19.5%	8.9%	18.3%
	Middle	8	21.6%	17.4%	598	12.1%	14.3%	19.7%
	Upper	16	43.2%	40.5%	3,237	65.7%	49.6%	40.8%
	Unknown	0	0.0%	22.3%	0	0.0%	24.1%	0.0%
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,927</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.4%	0	0.0%	4.0%	21.3%
	Moderate	0	0.0%	17.8%	0	0.0%	11.7%	18.3%
	Middle	1	33.3%	19.7%	36	7.7%	18.7%	19.7%
	Upper	2	66.7%	43.9%	432	92.3%	58.5%	40.8%
	Unknown	0	0.0%	11.2%	0	0.0%	7.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>468</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.3%
	Middle	1	33.3%	0.0%	36	7.7%	0.0%	19.7%
	Upper	2	66.7%	0.0%	432	92.3%	0.0%	40.8%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>468</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	2	3.2%	4.3%	132	1.4%	2.2%	21.3%
	Moderate	15	24.2%	15.4%	1,367	14.3%	10.3%	18.3%
	Middle	10	16.1%	19.8%	724	7.5%	17.3%	19.7%
	Upper	35	56.5%	38.6%	7,367	76.8%	47.2%	40.8%
	Unknown	0	0.0%	21.9%	0	0.0%	23.0%	0.0%
	<b>TOTAL</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,590</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Borrower Distribution of HMDA Loans								
Assessment Area: NonMSA Tennessee								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	4.2%	0	0.0%	2.1%	21.3%
	Moderate	8	28.6%	17.0%	877	14.5%	11.8%	18.3%
	Middle	5	17.9%	21.3%	516	8.5%	18.6%	19.7%
	Upper	15	53.6%	37.4%	4,664	77.0%	46.7%	40.8%
	Unknown	0	0.0%	20.1%	0	0.0%	20.7%	0.0%
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,057</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	8	9.8%	9.1%	312	3.7%	4.3%	21.3%
	Moderate	14	17.1%	17.3%	961	11.4%	11.2%	18.3%
	Middle	17	20.7%	19.6%	1,446	17.2%	17.5%	19.7%
	Upper	41	50.0%	41.5%	5,521	65.5%	50.8%	40.8%
	Unknown	2	2.4%	12.5%	187	2.2%	16.1%	0.0%
	<b>TOTAL</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,427</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	3	11.1%	9.5%	87	6.3%	7.4%	21.3%
	Moderate	3	11.1%	15.3%	105	7.6%	16.8%	18.3%
	Middle	6	22.2%	20.5%	361	26.2%	18.1%	19.7%
	Upper	15	55.6%	47.9%	825	59.9%	47.4%	40.8%
	Unknown	0	0.0%	6.8%	0	0.0%	10.4%	0.0%
	<b>TOTAL</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,378</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.3%
	Middle	0	0.0%	4.8%	0	0.0%	0.6%	19.7%
	Upper	0	0.0%	33.3%	0	0.0%	9.7%	40.8%
	Unknown	0	0.0%	61.9%	0	0.0%	89.6%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	11	8.0%	6.0%	399	2.5%	2.8%	21.3%
	Moderate	25	18.2%	16.6%	1,943	12.2%	11.3%	18.3%
	Middle	28	20.4%	20.4%	2,323	14.6%	17.6%	19.7%
	Upper	71	51.8%	38.5%	11,010	69.4%	46.7%	40.8%
	Unknown	2	1.5%	18.5%	187	1.2%	21.6%	0.0%
	<b>TOTAL</b>	<b>137</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15,862</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: NonMSA Tennessee								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	2.6%	3.1%	51	0.7%	1.6%	21.2%
	Moderate	6	15.8%	15.6%	536	6.8%	10.5%	18.2%
	Middle	3	7.9%	22.4%	377	4.8%	19.4%	19.6%
	Upper	24	63.2%	41.8%	6,400	81.8%	51.5%	41.0%
	Unknown	4	10.5%	17.1%	461	5.9%	17.1%	0.0%
	<b>TOTAL</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,825</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	4	7.5%	5.6%	290	4.4%	2.8%	21.2%
	Moderate	8	15.1%	13.4%	545	8.3%	7.9%	18.2%
	Middle	15	28.3%	19.9%	1,379	21.1%	16.2%	19.6%
	Upper	25	47.2%	41.8%	4,232	64.8%	49.8%	41.0%
	Unknown	1	1.9%	19.3%	89	1.4%	23.3%	0.0%
	<b>TOTAL</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	3.6%	8.0%	60	4.0%	4.8%	21.2%
	Moderate	2	7.1%	15.9%	94	6.3%	10.8%	18.2%
	Middle	8	28.6%	21.6%	290	19.6%	19.4%	19.6%
	Upper	17	60.7%	51.7%	1,039	70.1%	59.4%	41.0%
	Unknown	0	0.0%	2.8%	0	0.0%	5.6%	0.0%
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,483</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.2%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Middle	0	0.0%	3.6%	0	0.0%	0.7%	19.6%
	Upper	0	0.0%	25.0%	0	0.0%	5.1%	41.0%
	Unknown	0	0.0%	71.4%	0	0.0%	94.2%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	6	5.0%	4.0%	401	2.5%	1.9%	21.2%
	Moderate	16	13.4%	14.8%	1,175	7.4%	9.2%	18.2%
	Middle	26	21.8%	21.3%	2,046	12.9%	17.6%	19.6%
	Upper	66	55.5%	41.7%	11,671	73.7%	48.7%	41.0%
	Unknown	5	4.2%	18.2%	550	3.5%	22.6%	0.0%
	<b>TOTAL</b>	<b>119</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15,843</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: NonMSA Tennessee								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	5	15.6%	44.5%	\$75	1.4%	36.5%	89.4%
	Over \$1 Million/Unknown	27	84.4%	55.5%	\$5,313	98.6%	63.5%	10.6%
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,388</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	17	53.1%	93.7%	\$887	16.5%	36.0%	
	\$100,001–\$250,000	9	28.1%	2.8%	\$1,269	23.6%	12.4%	
	\$250,001–\$1 Million	6	18.8%	3.5%	\$3,232	60.0%	51.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,388</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	5	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%	
		<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>		<b>\$75</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: NonMSA Tennessee								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	15	30.6%	42.5%	\$1,204	12.3%	46.1%	90.7%
	Over \$1 Million/Unknown	34	69.4%	57.5%	\$8,624	87.7%	53.9%	9.3%
	<b>TOTAL</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,828</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	23	46.9%	92.6%	\$1,296	13.2%	35.2%	
	\$100,001-\$250,000	15	30.6%	3.8%	\$2,586	26.3%	15.4%	
	\$250,001-\$1 Million	11	22.4%	3.7%	\$5,946	60.5%	49.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,828</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	11	22.4%		\$460	4.7%	
		\$100,001-\$250,000	4	8.2%		\$744	7.6%	
		\$250,001-\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>15</b>	<b>30.6%</b>		<b>\$1,204</b>	<b>12.3%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: NonMSA Tennessee								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	16	40.0%	42.8%	\$2,200	22.8%	45.5%	91.1%
	Over \$1 Million/Unknown	24	60.0%	57.2%	\$7,437	77.2%	54.5%	8.9%
	<b>TOTAL</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,637</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	19	47.5%	94.2%	\$1,010	10.5%	38.8%	
	\$100,001-\$250,000	9	22.5%	3.3%	\$1,465	15.2%	18.2%	
	\$250,001-\$1 Million	12	30.0%	2.5%	\$7,162	74.3%	43.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,637</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	12	30.0%		\$436	4.5%	
		\$100,001-\$250,000	2	5.0%		\$311	3.2%	
		\$250,001-\$1 Million	2	5.0%		\$1,453	15.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>16</b>	<b>40.0%</b>		<b>\$2,200</b>	<b>22.8%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: NonMSA Tennessee								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	6	27.3%	9.3%	701	16.7%	8.4%	10.6%
	Middle	14	63.6%	70.1%	3,092	73.7%	69.8%	71.1%
	Upper	2	9.1%	20.6%	402	9.6%	21.8%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,195</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	8	21.6%	11.2%	701	14.2%	9.9%	10.6%
	Middle	21	56.8%	68.1%	3,056	62.0%	69.4%	71.1%
	Upper	8	21.6%	20.7%	1,170	23.7%	20.6%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,927</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	33.3%	9.3%	132	28.2%	8.7%	10.6%
	Middle	2	66.7%	71.7%	336	71.8%	74.1%	71.1%
	Upper	0	0.0%	19.0%	0	0.0%	17.2%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>468</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	41.7%	0	0.0%	60.2%	51.1%
	Middle	0	0.0%	41.7%	0	0.0%	36.7%	34.4%
	Upper	0	0.0%	16.7%	0	0.0%	3.1%	14.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	15	24.2%	10.0%	1,534	16.0%	9.3%	10.6%
	Middle	37	59.7%	69.5%	6,484	67.6%	69.5%	71.1%
	Upper	10	16.1%	20.5%	1,572	16.4%	21.1%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,590</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: NonMSA Tennessee								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	6	21.4%	10.3%	1,033	17.1%	8.6%	10.6%
	Middle	14	50.0%	71.0%	2,540	41.9%	70.7%	71.1%
	Upper	8	28.6%	18.7%	2,484	41.0%	20.7%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,057</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	3.7%	8.7%	155	1.8%	7.3%	10.6%
	Middle	51	62.2%	69.8%	4,831	57.3%	71.4%	71.1%
	Upper	28	34.1%	21.4%	3,441	40.8%	21.2%	18.3%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>82</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,427</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	7	25.9%	11.1%	265	19.2%	9.8%	10.6%
	Middle	12	44.4%	66.3%	714	51.8%	67.3%	71.1%
	Upper	8	29.6%	22.6%	399	29.0%	22.9%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,378</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	42.9%	0	0.0%	17.2%	51.1%
	Middle	0	0.0%	42.9%	0	0.0%	12.4%	34.4%
	Upper	0	0.0%	14.3%	0	0.0%	70.4%	14.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	16	11.7%	10.0%	1,453	9.2%	8.3%	10.6%
	Middle	77	56.2%	70.3%	8,085	51.0%	69.5%	71.1%
	Upper	44	32.1%	19.6%	6,324	39.9%	22.2%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>137</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15,862</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: NonMSA Tennessee								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	7.9%	10.3%	357	4.6%	8.3%	10.6%
	Middle	24	63.2%	69.8%	4,714	60.2%	69.8%	71.1%
	Upper	11	28.9%	19.9%	2,754	35.2%	21.9%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,825</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	4	7.5%	8.6%	452	6.9%	6.7%	10.6%
	Middle	34	64.2%	71.5%	4,350	66.6%	72.5%	71.1%
	Upper	15	28.3%	19.9%	1,733	26.5%	20.8%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	3.6%	8.0%	55	3.7%	9.2%	10.6%
	Middle	23	82.1%	76.7%	1,241	83.7%	75.2%	71.1%
	Upper	4	14.3%	15.3%	187	12.6%	15.6%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,483</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	39.3%	0	0.0%	53.6%	39.3%
	Middle	0	0.0%	53.6%	0	0.0%	41.7%	53.6%
	Upper	0	0.0%	7.1%	0	0.0%	4.6%	7.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	8	6.7%	9.9%	864	5.5%	9.8%	10.6%
	Middle	81	68.1%	70.5%	10,305	65.0%	69.5%	71.1%
	Upper	30	25.2%	19.6%	4,674	29.5%	20.7%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>119</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15,843</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of Small Business Loans Assessment Area: NonMSA Tennessee							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	8	25.0%	18.4%	\$748	13.9%	19.7%	18.7%
Middle	18	56.3%	55.0%	\$3,631	67.4%	47.8%	57.4%
Upper	6	18.8%	25.1%	\$1,009	18.7%	31.9%	23.9%
Unknown	0	0.0%	1.6%	\$0	0.0%	0.6%	0.0%
<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,388</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: NonMSA Tennessee							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	13	26.5%	17.0%	\$2,824	28.7%	19.6%	18.9%
Middle	23	46.9%	53.7%	\$3,030	30.8%	46.8%	56.8%
Upper	13	26.5%	27.8%	\$3,975	40.4%	32.9%	24.3%
Unknown	0	0.0%	1.4%	\$0	0.0%	0.7%	0.0%
<b>TOTAL</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,829</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: NonMSA Tennessee							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	9	22.5%	17.9%	\$3,104	32.2%	20.0%	19.0%
Middle	17	42.5%	54.7%	\$3,653	37.9%	52.3%	56.1%
Upper	14	35.0%	25.5%	\$2,880	29.9%	26.8%	24.8%
Unknown	0	0.0%	2.0%	\$0	0.0%	1.0%	0.0%
<b>TOTAL</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,637</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## Memphis, Tennessee-Mississippi Multistate Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Memphis MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	7	5.6%	3.1%	625	1.7%	1.4%	24.3%
	Moderate	27	21.4%	12.3%	3,050	8.5%	8.1%	15.5%
	Middle	14	11.1%	18.4%	2,512	7.0%	16.2%	17.1%
	Upper	76	60.3%	43.4%	29,432	82.0%	53.7%	43.0%
	Unknown	2	1.6%	22.8%	277	0.8%	20.6%	0.0%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>35,896</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	4	5.6%	4.4%	241	1.6%	2.0%	24.3%
	Moderate	18	25.4%	10.2%	1,205	8.2%	6.3%	15.5%
	Middle	12	16.9%	15.2%	899	6.1%	11.9%	17.1%
	Upper	36	50.7%	42.7%	11,843	80.9%	53.3%	43.0%
	Unknown	1	1.4%	27.5%	449	3.1%	26.5%	0.0%
	<b>TOTAL</b>	<b>71</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14,637</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	8.0%	0	0.0%	2.9%	24.3%
	Moderate	2	16.7%	15.0%	69	4.0%	6.8%	15.5%
	Middle	4	33.3%	18.6%	367	21.2%	12.8%	17.1%
	Upper	6	50.0%	49.6%	1,299	74.9%	67.8%	43.0%
	Unknown	0	0.0%	8.9%	0	0.0%	9.7%	0.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,735</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	24.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.1%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	43.0%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	11	5.3%	3.6%	866	1.7%	1.5%	24.3%
	Moderate	47	22.5%	11.8%	4,324	8.3%	7.2%	15.5%
	Middle	30	14.4%	17.5%	3,778	7.2%	14.1%	17.1%
	Upper	118	56.5%	43.4%	42,574	81.5%	50.4%	43.0%
	Unknown	3	1.4%	23.6%	726	1.4%	26.9%	0.0%
	<b>TOTAL</b>	<b>209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52,268</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Memphis MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	3	2.1%	3.8%	311	0.6%	1.7%	24.3%
	Moderate	19	13.2%	14.4%	2,886	5.9%	9.4%	15.5%
	Middle	21	14.6%	20.3%	4,000	8.2%	17.8%	17.1%
	Upper	92	63.9%	42.5%	39,448	81.0%	51.6%	43.0%
	Unknown	9	6.3%	19.0%	2,071	4.3%	19.5%	0.0%
	<b>TOTAL</b>	<b>144</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48,716</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	14	5.5%	6.1%	656	1.6%	3.0%	24.3%
	Moderate	31	12.1%	12.2%	2,555	6.2%	8.0%	15.5%
	Middle	50	19.5%	19.8%	5,369	13.0%	16.4%	17.1%
	Upper	144	56.3%	46.1%	29,970	72.5%	57.8%	43.0%
	Unknown	17	6.6%	15.8%	2,770	6.7%	14.9%	0.0%
	<b>TOTAL</b>	<b>256</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41,320</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	8	6.3%	6.2%	197	3.2%	2.8%	24.3%
	Moderate	19	15.1%	12.0%	890	14.5%	8.9%	15.5%
	Middle	24	19.0%	18.7%	1,003	16.3%	15.2%	17.1%
	Upper	70	55.6%	55.7%	3,794	61.6%	62.9%	43.0%
	Unknown	5	4.0%	7.4%	273	4.4%	10.1%	0.0%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	24.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.1%
	Upper	0	0.0%	9.4%	0	0.0%	0.7%	43.0%
	Unknown	1	100.0%	90.6%	25,000	100.0%	99.3%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25,000</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	25	4.7%	4.5%	1,164	1.0%	1.8%	24.3%
	Moderate	69	13.1%	13.1%	6,331	5.2%	7.9%	15.5%
	Middle	95	18.0%	19.1%	10,372	8.6%	15.3%	17.1%
	Upper	306	58.1%	43.0%	73,212	60.4%	47.4%	43.0%
	Unknown	32	6.1%	20.2%	30,114	24.8%	27.6%	0.0%
	<b>TOTAL</b>	<b>527</b>	<b>100.0%</b>	<b>100.0%</b>	<b>121,193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Memphis MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	7	5.0%	3.4%	564	1.1%	1.6%	24.4%
	Moderate	15	10.8%	13.7%	2,039	4.1%	9.0%	15.5%
	Middle	21	15.1%	21.8%	3,497	7.0%	19.2%	17.1%
	Upper	91	65.5%	45.6%	42,130	84.9%	56.0%	42.9%
	Unknown	5	3.6%	15.5%	1,408	2.8%	14.3%	0.0%
	<b>TOTAL</b>	<b>139</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49,638</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	11	6.5%	4.3%	453	1.4%	2.1%	24.4%
	Moderate	24	14.3%	9.2%	1,866	5.7%	5.6%	15.5%
	Middle	25	14.9%	17.5%	2,570	7.9%	13.4%	17.1%
	Upper	99	58.9%	47.0%	25,965	79.6%	55.6%	42.9%
	Unknown	9	5.4%	22.0%	1,772	5.4%	23.4%	0.0%
	<b>TOTAL</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32,626</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	7	6.2%	6.4%	301	3.8%	2.8%	24.4%
	Moderate	15	13.3%	11.4%	715	9.1%	6.3%	15.5%
	Middle	16	14.2%	18.7%	994	12.6%	14.1%	17.1%
	Upper	75	66.4%	58.8%	5,880	74.5%	71.8%	42.9%
	Unknown	0	0.0%	4.7%	0	0.0%	4.9%	0.0%
	<b>TOTAL</b>	<b>113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,890</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	24.4%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.5%
	Middle	0	0.0%	0.7%	0	0.0%	0.0%	17.1%
	Upper	0	0.0%	5.1%	0	0.0%	0.3%	42.9%
	Unknown	1	100.0%	94.2%	11,422	100.0%	99.6%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,422</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	25	5.9%	3.7%	1,318	1.3%	1.6%	24.4%
	Moderate	54	12.8%	11.8%	4,620	4.5%	7.0%	15.5%
	Middle	62	14.7%	19.6%	7,061	7.0%	15.3%	17.1%
	Upper	265	62.9%	45.7%	73,975	72.8%	50.2%	42.9%
	Unknown	15	3.6%	19.1%	14,602	14.4%	26.0%	0.0%
	<b>TOTAL</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>101,576</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Memphis MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	133	31.7%	46.9%	\$11,412	11.0%	31.0%	86.9%
	Over \$1 Million/Unknown	287	68.3%	53.1%	\$92,548	89.0%	69.0%	13.1%
	<b>TOTAL</b>	<b>420</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$103,960</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	185	44.0%	90.7%	\$8,457	8.1%	28.3%	
	\$100,001-\$250,000	102	24.3%	4.4%	\$19,057	18.3%	16.1%	
	\$250,001-\$1 Million	133	31.7%	4.8%	\$76,446	73.5%	55.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>420</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$103,960</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	106	79.7%		\$3,351	29.4%	
		\$100,001-\$250,000	16	12.0%		\$3,061	26.8%	
		\$250,001-\$1 Million	11	8.3%		\$5,000	43.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>133</b>	<b>100.0%</b>		<b>\$11,412</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Memphis MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	113	29.7%	41.4%	\$12,215	12.0%	31.3%	89.4%
	Over \$1 Million/ Unknown	267	70.3%	58.6%	\$89,713	88.0%	68.7%	10.6%
	<b>TOTAL</b>	<b>380</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$101,928</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	158	41.6%	90.8%	\$7,016	6.9%	28.8%	
	\$100,001–\$250,000	94	24.7%	4.6%	\$17,781	17.4%	16.7%	
	\$250,001–\$1 Million	128	33.7%	4.6%	\$77,131	75.7%	54.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>380</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$101,928</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	87	22.9%		\$2,727	2.7%	
		\$100,001–\$250,000	13	3.4%		\$2,399	2.4%	
		\$250,001–\$1 Million	13	3.4%		\$7,089	7.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>113</b>	<b>29.7%</b>		<b>\$12,215</b>	<b>12.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Memphis MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	109	26.5%	40.7%	\$13,304	11.7%	31.5%	89.9%
	Over \$1 Million/Unknown	303	73.5%	59.3%	\$100,807	88.3%	68.5%	10.1%
	<b>TOTAL</b>	<b>412</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$114,111</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	163	39.6%	91.4%	\$8,213	7.2%	30.7%	
	\$100,001-\$250,000	91	22.1%	4.3%	\$16,426	14.4%	16.5%	
	\$250,001-\$1 Million	158	38.3%	4.2%	\$89,472	78.4%	52.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>412</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$114,111</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	86	20.9%		\$3,215	2.8%	
		\$100,001-\$250,000	7	1.7%		\$1,408	1.2%	
		\$250,001-\$1 Million	16	3.9%		\$8,681	7.6%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>109</b>	<b>26.5%</b>		<b>\$13,304</b>	<b>11.7%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Memphis MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	3	2.4%	3.2%	468	1.3%	1.2%	11.0%
	Moderate	7	5.6%	9.7%	680	1.9%	4.7%	16.7%
	Middle	26	20.6%	20.5%	3,174	8.8%	14.6%	22.3%
	Upper	90	71.4%	66.6%	31,574	88.0%	79.5%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>35,896</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	2	2.8%	3.7%	60	0.4%	1.7%	11.0%
	Moderate	12	16.9%	10.3%	799	5.5%	5.2%	16.7%
	Middle	15	21.1%	21.3%	1,072	7.3%	15.1%	22.3%
	Upper	42	59.2%	64.7%	12,706	86.8%	78.0%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>71</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14,637</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	8.3%	8.9%	23	1.3%	2.7%	11.0%
	Moderate	1	8.3%	16.8%	51	2.9%	8.2%	16.7%
	Middle	1	8.3%	23.9%	46	2.7%	15.0%	22.3%
	Upper	9	75.0%	50.3%	1,615	93.1%	74.1%	49.9%
	Unknown	0	0.0%	0.2%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,735</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	26.2%	0	0.0%	18.1%	29.3%
	Moderate	0	0.0%	21.3%	0	0.0%	23.4%	22.2%
	Middle	0	0.0%	19.7%	0	0.0%	21.6%	17.0%
	Upper	0	0.0%	32.8%	0	0.0%	36.9%	31.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.6%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	6	2.9%	3.6%	551	1.1%	2.4%	11.0%
	Moderate	20	9.6%	10.2%	1,530	2.9%	6.1%	16.7%
	Middle	42	20.1%	20.9%	4,292	8.2%	15.2%	22.3%
	Upper	141	67.5%	65.3%	45,895	87.8%	76.3%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>209</b>	<b>100.0%</b>	<b>100.0%</b>	<b>52,268</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of HMDA Loans								
Assessment Area: Memphis MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	1.4%	3.3%	202	0.4%	1.2%	11.0%
	Moderate	9	6.3%	9.7%	1,373	2.8%	4.8%	16.7%
	Middle	20	13.9%	21.4%	3,570	7.3%	15.4%	22.3%
	Upper	113	78.5%	65.5%	43,571	89.4%	78.6%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>144</b>	<b>100.0%</b>	<b>100.0%</b>	<b>48,716</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	4	1.6%	3.4%	165	0.4%	1.4%	11.0%
	Moderate	15	5.9%	10.0%	1,065	2.6%	5.4%	16.7%
	Middle	27	10.5%	22.3%	2,287	5.5%	16.0%	22.3%
	Upper	210	82.0%	64.3%	37,803	91.5%	77.1%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>256</b>	<b>100.0%</b>	<b>100.0%</b>	<b>41,320</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	4	3.2%	4.9%	77	1.3%	2.0%	11.0%
	Moderate	13	10.3%	9.6%	483	7.8%	5.7%	16.7%
	Middle	19	15.1%	17.2%	883	14.3%	13.3%	22.3%
	Upper	90	71.4%	68.2%	4,714	76.6%	78.9%	49.9%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	1	100.0%	33.1%	25,000	100.0%	22.3%	29.3%
	Moderate	0	0.0%	24.5%	0	0.0%	16.7%	22.2%
	Middle	0	0.0%	18.7%	0	0.0%	14.9%	17.0%
	Upper	0	0.0%	23.7%	0	0.0%	46.1%	31.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.6%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>25,000</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	11	2.1%	3.9%	25,444	21.0%	3.5%	11.0%
	Moderate	37	7.0%	10.3%	2,921	2.4%	6.2%	16.7%
	Middle	66	12.5%	21.5%	6,740	5.6%	15.6%	22.3%
	Upper	413	78.4%	64.3%	86,088	71.0%	74.7%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>527</b>	<b>100.0%</b>	<b>100.0%</b>	<b>121,193</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Memphis MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	1.4%	4.1%	172	0.3%	1.5%	11.0%
	Moderate	7	5.0%	11.4%	992	2.0%	5.8%	16.9%
	Middle	13	9.4%	21.5%	1,782	3.6%	16.4%	22.0%
	Upper	117	84.2%	63.0%	46,692	94.1%	76.3%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>139</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49,638</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	5	3.0%	2.4%	147	0.5%	0.9%	11.0%
	Moderate	10	6.0%	7.9%	594	1.8%	4.0%	16.9%
	Middle	29	17.3%	19.4%	2,695	8.3%	13.9%	22.0%
	Upper	124	73.8%	70.3%	29,190	89.5%	81.2%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>168</b>	<b>100.0%</b>	<b>100.0%</b>	<b>32,626</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	5	4.4%	6.4%	151	1.9%	3.3%	11.0%
	Moderate	6	5.3%	10.5%	313	4.0%	6.0%	16.9%
	Middle	22	19.5%	16.7%	1,031	13.1%	12.1%	22.0%
	Upper	80	70.8%	66.3%	6,395	81.1%	78.5%	49.9%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,890</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	1	100.0%	29.2%	11,422	100.0%	14.6%	30.2%
	Moderate	0	0.0%	22.6%	0	0.0%	16.3%	21.9%
	Middle	0	0.0%	18.2%	0	0.0%	12.7%	16.3%
	Upper	0	0.0%	29.9%	0	0.0%	56.5%	31.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.6%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,422</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	13	3.1%	3.9%	11,892	11.7%	2.7%	11.0%
	Moderate	23	5.5%	10.5%	1,899	1.9%	6.3%	16.9%
	Middle	64	15.2%	20.6%	5,508	5.4%	15.3%	22.0%
	Upper	321	76.2%	65.0%	82,277	81.0%	75.6%	49.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>421</b>	<b>100.0%</b>	<b>100.0%</b>	<b>101,576</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Memphis MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	61	14.5%	9.9%	\$16,592	16.0%	11.9%	12.9%
Moderate	82	19.5%	16.1%	\$22,952	22.1%	17.8%	16.0%
Middle	70	16.7%	18.8%	\$15,437	14.8%	17.5%	20.3%
Upper	199	47.4%	53.0%	\$47,549	45.7%	49.2%	49.8%
Unknown	8	1.9%	2.1%	\$1,429	1.4%	3.6%	1.0%
<b>TOTAL</b>	<b>420</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$103,959</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Memphis MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	52	13.7%	10.3%	\$13,235	13.0%	11.0%	12.7%
Moderate	74	19.5%	15.0%	\$23,116	22.7%	18.4%	16.2%
Middle	65	17.1%	18.8%	\$15,750	15.5%	18.4%	20.4%
Upper	183	48.2%	52.8%	\$47,552	46.7%	49.2%	49.7%
Unknown	6	1.6%	3.2%	\$2,275	2.2%	2.9%	0.9%
<b>TOTAL</b>	<b>380</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$101,928</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Memphis MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	61	14.8%	10.0%	\$16,413	14.4%	10.8%	12.9%
Moderate	75	18.2%	15.1%	\$25,225	22.1%	16.7%	16.5%
Middle	77	18.7%	19.1%	\$18,675	16.4%	19.9%	19.9%
Upper	189	45.9%	52.4%	\$50,215	44.0%	49.5%	49.8%
Unknown	10	2.4%	3.4%	\$3,583	3.1%	3.1%	0.9%
<b>TOTAL</b>	<b>412</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$114,111</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## North Carolina

Greensboro–Winston-Salem–High Point, North Carolina Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Greensboro-Winston Salem CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	1.9%	4.7%	81	0.4%	2.2%	21.9%
	Moderate	3	5.8%	17.8%	375	2.0%	11.6%	17.6%
	Middle	8	15.4%	22.4%	1,479	7.7%	19.1%	18.2%
	Upper	40	76.9%	39.3%	17,222	89.9%	52.6%	42.3%
	Unknown	0	0.0%	15.8%	0	0.0%	14.5%	0.0%
	<b>TOTAL</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19,157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.5%	0	0.0%	2.8%	21.9%
	Moderate	3	30.0%	12.8%	381	8.8%	8.2%	17.6%
	Middle	0	0.0%	19.4%	0	0.0%	15.5%	18.2%
	Upper	7	70.0%	41.0%	3,938	91.2%	51.8%	42.3%
	Unknown	0	0.0%	21.3%	0	0.0%	21.6%	0.0%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,319</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.8%	0	0.0%	2.5%	21.9%
	Moderate	0	0.0%	15.3%	0	0.0%	8.1%	17.6%
	Middle	0	0.0%	22.7%	0	0.0%	17.4%	18.2%
	Upper	0	0.0%	47.4%	0	0.0%	62.2%	42.3%
	Unknown	0	0.0%	6.7%	0	0.0%	9.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.6%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	42.3%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	1.6%	5.1%	81	0.3%	2.2%	21.9%
	Moderate	6	9.7%	16.2%	756	3.2%	9.7%	17.6%
	Middle	8	12.9%	21.5%	1,479	6.3%	16.5%	18.2%
	Upper	47	75.8%	40.0%	21,160	90.1%	48.1%	42.3%
	Unknown	0	0.0%	17.2%	0	0.0%	23.6%	0.0%
	<b>TOTAL</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23,476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Greensboro-Winston Salem CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	8	9.1%	5.5%	530	2.2%	2.7%	21.9%
	Moderate	14	15.9%	19.4%	1,408	5.9%	12.9%	17.6%
	Middle	22	25.0%	23.4%	3,689	15.5%	20.2%	18.2%
	Upper	42	47.7%	38.9%	17,909	75.1%	51.3%	42.3%
	Unknown	2	2.3%	12.7%	296	1.2%	12.9%	0.0%
	<b>TOTAL</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23,832</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	11	10.5%	7.2%	398	2.9%	4.1%	21.9%
	Moderate	18	17.1%	15.6%	1,174	8.6%	10.6%	17.6%
	Middle	17	16.2%	21.7%	1,483	10.8%	18.6%	18.2%
	Upper	56	53.3%	45.1%	10,353	75.4%	55.3%	42.3%
	Unknown	3	2.9%	10.3%	319	2.3%	11.4%	0.0%
	<b>TOTAL</b>	<b>105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13,727</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	4	10.8%	5.2%	110	4.3%	2.9%	21.9%
	Moderate	7	18.9%	14.1%	393	15.4%	10.8%	17.6%
	Middle	11	29.7%	20.6%	480	18.8%	15.7%	18.2%
	Upper	15	40.5%	55.8%	1,566	61.4%	63.0%	42.3%
	Unknown	0	0.0%	4.3%	0	0.0%	7.6%	0.0%
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,549</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Moderate	0	0.0%	0.6%	0	0.0%	0.0%	17.6%
	Middle	0	0.0%	1.3%	0	0.0%	0.0%	18.2%
	Upper	0	0.0%	1.9%	0	0.0%	0.2%	42.3%
	Unknown	0	0.0%	96.2%	0	0.0%	99.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	23	10.0%	5.8%	1,038	2.6%	2.6%	21.9%
	Moderate	39	17.0%	17.3%	2,975	7.4%	10.6%	17.6%
	Middle	50	21.7%	21.9%	5,652	14.1%	16.8%	18.2%
	Upper	113	49.1%	41.3%	29,828	74.4%	45.8%	42.3%
	Unknown	5	2.2%	13.7%	615	1.5%	24.2%	0.0%
	<b>TOTAL</b>	<b>230</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40,108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Greensboro-Winston Salem CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	5	4.5%	5.3%	460	1.5%	2.6%	21.9%
	Moderate	19	17.1%	19.9%	2,445	8.0%	13.0%	17.6%
	Middle	29	26.1%	23.2%	5,302	17.3%	19.9%	18.2%
	Upper	54	48.6%	41.1%	21,733	71.0%	54.4%	42.3%
	Unknown	4	3.6%	10.5%	667	2.2%	10.1%	0.0%
	<b>TOTAL</b>	<b>111</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,607</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	14	14.6%	5.6%	779	5.3%	2.7%	21.9%
	Moderate	13	13.5%	13.0%	981	6.7%	7.8%	17.6%
	Middle	20	20.8%	18.2%	1,851	12.6%	13.7%	18.2%
	Upper	48	50.0%	44.8%	11,069	75.1%	54.4%	42.3%
	Unknown	1	1.0%	18.4%	60	0.4%	21.4%	0.0%
	<b>TOTAL</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14,740</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	2	8.0%	5.1%	87	3.9%	3.1%	21.9%
	Moderate	8	32.0%	14.7%	478	21.4%	10.9%	17.6%
	Middle	4	16.0%	21.3%	191	8.5%	17.6%	18.2%
	Upper	11	44.0%	55.5%	1,480	66.2%	64.8%	42.3%
	Unknown	0	0.0%	3.4%	0	0.0%	3.5%	0.0%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,236</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.6%	0	0.0%	0.0%	21.9%
	Moderate	0	0.0%	0.6%	0	0.0%	0.0%	17.6%
	Middle	0	0.0%	1.2%	0	0.0%	0.0%	18.2%
	Upper	0	0.0%	3.6%	0	0.0%	0.1%	42.3%
	Unknown	0	0.0%	94.0%	0	0.0%	99.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	21	9.1%	5.2%	1,326	2.8%	2.3%	21.9%
	Moderate	40	17.2%	16.5%	3,904	8.2%	9.7%	17.6%
	Middle	53	22.8%	20.7%	7,344	15.4%	15.4%	18.2%
	Upper	113	48.7%	42.9%	34,282	72.0%	47.9%	42.3%
	Unknown	5	2.2%	14.6%	727	1.5%	24.7%	0.0%
	<b>TOTAL</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47,583</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Greensboro-Winston Salem CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	9	28.1%	52.7%	\$750	11.1%	39.7%	89.5%
	Over \$1 Million/ Unknown	23	71.9%	47.3%	\$5,992	88.9%	60.3%	10.5%
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,742</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	13	40.6%	90.9%	\$788	11.7%	31.9%	
	\$100,001–\$250,000	9	28.1%	4.6%	\$1,536	22.8%	16.5%	
	\$250,001–\$1 Million	10	31.3%	4.5%	\$4,418	65.5%	51.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,742</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	6	66.7%		\$239	31.9%	
		\$100,001–\$250,000	3	33.3%		\$511	68.1%	
		\$250,001–\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>		<b>\$750</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Greensboro-Winston Salem CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	106	48.2%	49.2%	\$9,897	21.5%	36.0%	90.8%
	Over \$1 Million/ Unknown	114	51.8%	50.8%	\$36,055	78.5%	64.0%	9.2%
	<b>TOTAL</b>	<b>220</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$45,952</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	127	57.7%	91.3%	\$5,297	11.5%	31.7%	
	\$100,001– \$250,000	32	14.5%	4.4%	\$5,877	12.8%	16.4%	
	\$250,001– \$1 Million	61	27.7%	4.4%	\$34,778	75.7%	51.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>220</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$45,952</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	82	37.3%		\$3,038	6.6%	
		\$100,001– \$250,000	11	5.0%		\$1,727	3.8%	
		\$250,001– \$1 Million	13	5.9%		\$5,132	11.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>106</b>	<b>48.2%</b>		<b>\$9,897</b>	<b>21.5%</b>	



Small Business Loans by Revenue and Loan Size								
Assessment Area: Greensboro-Winston Salem CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	75	38.3%	46.8%	\$5,202	14.4%	35.5%	91.2%
	Over \$1 Million/ Unknown	121	61.7%	53.2%	\$30,807	85.6%	64.5%	8.8%
	<b>TOTAL</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$36,009</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	123	62.8%	91.7%	\$5,887	16.3%	33.1%	
	\$100,001–\$250,000	27	13.8%	4.2%	\$5,228	14.5%	16.6%	
	\$250,001–\$1 Million	46	23.5%	4.1%	\$24,894	69.1%	50.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$36,009</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	65	33.2%		\$2,595	7.2%	
		\$100,001–\$250,000	5	2.6%		\$882	2.4%	
		\$250,001–\$1 Million	5	2.6%		\$1,725	4.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>75</b>	<b>38.3%</b>		<b>\$5,202</b>	<b>14.4%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Greensboro-Winston Salem CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.2%	0	0.0%	0.6%	2.4%
	Moderate	7	13.5%	14.6%	1,272	6.6%	9.7%	18.5%
	Middle	14	26.9%	40.3%	4,622	24.1%	35.5%	42.5%
	Upper	30	57.7%	43.9%	12,823	66.9%	54.1%	36.5%
	Unknown	1	1.9%	0.0%	440	2.3%	0.0%	0.0%
	<b>TOTAL</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19,157</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.4%	0	0.0%	0.9%	2.4%
	Moderate	1	10.0%	14.4%	660	15.3%	10.2%	18.5%
	Middle	2	20.0%	41.6%	251	5.8%	35.9%	42.5%
	Upper	7	70.0%	42.6%	3,408	78.9%	52.9%	36.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,319</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.6%	0	0.0%	2.0%	2.4%
	Moderate	0	0.0%	16.8%	0	0.0%	10.4%	18.5%
	Middle	0	0.0%	40.8%	0	0.0%	27.8%	42.5%
	Upper	0	0.0%	40.8%	0	0.0%	59.9%	36.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	16.2%	0	0.0%	12.0%	11.0%
	Moderate	0	0.0%	35.2%	0	0.0%	28.9%	29.7%
	Middle	0	0.0%	30.5%	0	0.0%	39.6%	36.0%
	Upper	0	0.0%	16.2%	0	0.0%	18.4%	22.8%
	Unknown	0	0.0%	1.9%	0	0.0%	1.1%	0.5%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	1.3%	0	0.0%	1.7%	2.4%
	Moderate	8	12.9%	14.7%	1,932	8.2%	11.5%	18.5%
	Middle	16	25.8%	40.7%	4,873	20.8%	35.8%	42.5%
	Upper	37	59.7%	43.3%	16,231	69.1%	50.8%	36.5%
	Unknown	1	1.6%	0.0%	440	1.9%	0.1%	0.0%
	<b>TOTAL</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23,476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Greensboro-Winston Salem CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	2.3%	1.4%	211	0.9%	0.7%	2.4%
	Moderate	8	9.1%	14.8%	816	3.4%	10.1%	18.5%
	Middle	33	37.5%	40.7%	4,798	20.1%	35.9%	42.5%
	Upper	44	50.0%	43.0%	17,730	74.4%	53.2%	36.5%
	Unknown	1	1.1%	0.1%	277	1.2%	0.1%	0.0%
	<b>TOTAL</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23,832</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	1	1.0%	1.1%	150	1.1%	0.6%	2.4%
	Moderate	22	21.0%	13.8%	1,544	11.2%	9.4%	18.5%
	Middle	43	41.0%	41.0%	3,450	25.1%	36.7%	42.5%
	Upper	39	37.1%	44.1%	8,583	62.5%	53.2%	36.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>105</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13,727</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.0%	0	0.0%	0.6%	2.4%
	Moderate	8	21.6%	12.1%	485	19.0%	10.4%	18.5%
	Middle	20	54.1%	40.2%	1,229	48.2%	35.0%	42.5%
	Upper	9	24.3%	46.6%	835	32.8%	54.0%	36.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,549</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	8.9%	0	0.0%	0.8%	11.0%
	Moderate	0	0.0%	36.9%	0	0.0%	26.4%	29.7%
	Middle	0	0.0%	28.0%	0	0.0%	35.5%	36.0%
	Upper	0	0.0%	24.8%	0	0.0%	37.1%	22.8%
	Unknown	0	0.0%	1.3%	0	0.0%	0.2%	0.5%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	3	1.3%	1.3%	361	0.9%	0.7%	2.4%
	Moderate	38	16.5%	14.5%	2,845	7.1%	12.1%	18.5%
	Middle	96	41.7%	40.8%	9,477	23.6%	36.1%	42.5%
	Upper	92	40.0%	43.3%	27,148	67.7%	51.1%	36.5%
	Unknown	1	0.4%	0.1%	277	0.7%	0.1%	0.0%
	<b>TOTAL</b>	<b>230</b>	<b>100.0%</b>	<b>100.0%</b>	<b>40,108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Greensboro-Winston Salem CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	0.9%	1.6%	86	0.3%	0.8%	2.4%
	Moderate	9	8.1%	15.2%	861	2.8%	10.4%	18.5%
	Middle	47	42.3%	40.8%	8,696	28.4%	36.2%	42.5%
	Upper	54	48.6%	42.4%	20,964	68.5%	52.6%	36.5%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>111</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,607</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	1	1.0%	0.8%	60	0.4%	0.4%	2.4%
	Moderate	13	13.5%	13.3%	885	6.0%	9.0%	18.5%
	Middle	36	37.5%	38.7%	3,358	22.8%	33.3%	42.5%
	Upper	45	46.9%	47.2%	10,197	69.2%	57.2%	36.5%
	Unknown	1	1.0%	0.0%	240	1.6%	0.0%	0.0%
	<b>TOTAL</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14,740</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.1%	0	0.0%	0.6%	2.4%
	Moderate	6	24.0%	14.3%	290	13.0%	10.9%	18.5%
	Middle	12	48.0%	37.6%	1,038	46.4%	33.4%	42.5%
	Upper	7	28.0%	47.0%	908	40.6%	55.1%	36.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,236</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	15.1%	0	0.0%	8.5%	11.0%
	Moderate	0	0.0%	37.3%	0	0.0%	28.9%	29.7%
	Middle	0	0.0%	27.7%	0	0.0%	26.2%	36.0%
	Upper	0	0.0%	19.3%	0	0.0%	35.3%	22.8%
	Unknown	0	0.0%	0.6%	0	0.0%	1.1%	0.5%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	2	0.9%	1.3%	146	0.3%	1.6%	2.4%
	Moderate	28	12.1%	14.7%	2,036	4.3%	12.2%	18.5%
	Middle	95	40.9%	40.0%	13,092	27.5%	34.2%	42.5%
	Upper	106	45.7%	43.9%	32,069	67.4%	51.8%	36.5%
	Unknown	1	0.4%	0.1%	240	0.5%	0.2%	0.0%
	<b>TOTAL</b>	<b>232</b>	<b>100.0%</b>	<b>100.0%</b>	<b>47,583</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Greensboro-Winston Salem CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	3.6%	\$0	0.0%	3.9%	4.1%
Moderate	8	25.0%	19.4%	\$1,751	26.0%	21.1%	20.9%
Middle	12	37.5%	36.3%	\$1,053	15.6%	36.7%	37.5%
Upper	9	28.1%	38.7%	\$2,659	39.4%	36.8%	37.2%
Unknown	3	9.4%	2.0%	\$1,279	19.0%	1.4%	0.3%
<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,742</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Greensboro-Winston Salem CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	5	2.3%	3.4%	\$1,468	3.2%	3.9%	4.0%
Moderate	75	34.1%	20.5%	\$16,117	35.1%	21.7%	21.1%
Middle	83	37.7%	36.4%	\$16,534	36.0%	37.4%	37.4%
Upper	56	25.5%	37.9%	\$11,332	24.7%	35.6%	37.2%
Unknown	1	0.5%	1.9%	\$500	1.1%	1.4%	0.3%
<b>TOTAL</b>	<b>220</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$45,951</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Greensboro-Winston Salem CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	6	3.1%	3.4%	\$921	2.6%	4.1%	4.1%
Moderate	53	27.0%	20.2%	\$8,775	24.4%	21.0%	21.0%
Middle	94	48.0%	36.9%	\$17,721	49.2%	38.6%	37.5%
Upper	40	20.4%	37.6%	\$7,637	21.2%	34.9%	37.1%
Unknown	3	1.5%	2.0%	\$956	2.7%	1.4%	0.3%
<b>TOTAL</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$36,010</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Raleigh-Durham-Cary, North Carolina Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Raleigh-Durham CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	5.7%	4.9%	260	2.8%	2.5%	20.6%
	Moderate	10	28.6%	15.9%	2,097	22.2%	10.9%	16.2%
	Middle	7	20.0%	21.4%	1,866	19.7%	19.0%	18.4%
	Upper	13	37.1%	46.0%	4,097	43.3%	56.6%	44.9%
	Unknown	3	8.6%	11.8%	1,132	12.0%	11.0%	0.0%
	<b>TOTAL</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	1	4.2%	6.6%	93	1.4%	3.4%	20.6%
	Moderate	9	37.5%	14.8%	1,416	21.1%	10.4%	16.2%
	Middle	0	0.0%	20.0%	0	0.0%	17.4%	18.4%
	Upper	11	45.8%	41.7%	4,076	60.7%	52.7%	44.9%
	Unknown	3	12.5%	16.8%	1,131	16.8%	16.2%	0.0%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,716</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.5%	0	0.0%	3.3%	20.6%
	Moderate	1	33.3%	16.8%	134	12.1%	11.7%	16.2%
	Middle	0	0.0%	20.2%	0	0.0%	16.7%	18.4%
	Upper	2	66.7%	51.4%	970	87.9%	64.3%	44.9%
	Unknown	0	0.0%	4.1%	0	0.0%	4.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.6%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	44.9%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	4.8%	5.5%	353	2.0%	2.5%	20.6%
	Moderate	20	32.3%	15.6%	3,647	21.1%	9.9%	16.2%
	Middle	7	11.3%	20.9%	1,866	10.8%	17.0%	18.4%
	Upper	26	41.9%	44.9%	9,143	52.9%	51.3%	44.9%
	Unknown	6	9.7%	13.0%	2,263	13.1%	19.3%	0.0%
	<b>TOTAL</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17,272</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Raleigh-Durham CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	3	5.3%	5.1%	271	1.2%	2.7%	20.6%
	Moderate	9	15.8%	15.6%	1,437	6.3%	10.9%	16.2%
	Middle	6	10.5%	21.7%	1,381	6.1%	19.4%	18.4%
	Upper	35	61.4%	45.2%	18,047	79.5%	54.8%	44.9%
	Unknown	4	7.0%	12.3%	1,552	6.8%	12.3%	0.0%
	<b>TOTAL</b>	<b>57</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22,688</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	7	15.2%	9.0%	482	6.1%	5.3%	20.6%
	Moderate	7	15.2%	18.2%	816	10.2%	13.6%	16.2%
	Middle	7	15.2%	21.1%	829	10.4%	18.6%	18.4%
	Upper	23	50.0%	42.0%	5,492	69.0%	51.6%	44.9%
	Unknown	2	4.3%	9.7%	343	4.3%	10.9%	0.0%
	<b>TOTAL</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,962</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	2	10.5%	4.8%	110	8.5%	2.8%	20.6%
	Moderate	1	5.3%	12.9%	38	2.9%	8.2%	16.2%
	Middle	7	36.8%	20.8%	254	19.7%	17.2%	18.4%
	Upper	9	47.4%	58.4%	889	68.9%	66.2%	44.9%
	Unknown	0	0.0%	3.1%	0	0.0%	5.7%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,291</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.6%	0	0.0%	0.0%	20.6%
	Moderate	0	0.0%	0.6%	0	0.0%	0.0%	16.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	1.8%	0	0.0%	0.2%	44.9%
	Unknown	0	0.0%	97.0%	0	0.0%	99.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	12	9.8%	5.9%	863	2.7%	2.9%	20.6%
	Moderate	17	13.9%	15.6%	2,291	7.2%	10.1%	16.2%
	Middle	20	16.4%	21.1%	2,464	7.7%	16.9%	18.4%
	Upper	67	54.9%	45.6%	24,428	76.5%	48.7%	44.9%
	Unknown	6	4.9%	11.9%	1,895	5.9%	21.4%	0.0%
	<b>TOTAL</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31,941</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Raleigh-Durham CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	5.8%	0	0.0%	3.2%	20.8%
	Moderate	16	41.0%	18.8%	3,052	25.4%	13.8%	16.2%
	Middle	2	5.1%	22.5%	445	3.7%	20.4%	18.4%
	Upper	19	48.7%	44.0%	7,997	66.5%	54.1%	44.6%
	Unknown	2	5.1%	8.9%	530	4.4%	8.5%	0.0%
	<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,024</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	3	8.1%	6.5%	304	2.0%	3.4%	20.8%
	Moderate	2	5.4%	14.7%	95	0.6%	10.1%	16.2%
	Middle	6	16.2%	21.2%	1,461	9.8%	18.6%	18.4%
	Upper	24	64.9%	43.9%	12,036	80.4%	53.2%	44.6%
	Unknown	2	5.4%	13.6%	1,083	7.2%	14.7%	0.0%
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14,979</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	3	12.5%	5.2%	80	3.4%	3.3%	20.8%
	Moderate	4	16.7%	14.4%	185	7.8%	10.2%	16.2%
	Middle	3	12.5%	21.8%	196	8.3%	17.3%	18.4%
	Upper	11	45.8%	56.0%	1,477	62.4%	65.9%	44.6%
	Unknown	3	12.5%	2.6%	430	18.2%	3.3%	0.0%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,368</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	1.4%	0	0.0%	0.0%	16.2%
	Middle	0	0.0%	0.7%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	1.4%	0	0.0%	0.0%	44.6%
	Unknown	1	100.0%	96.6%	357	100.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	6	5.9%	5.9%	384	1.3%	2.9%	20.8%
	Moderate	22	21.8%	16.6%	3,332	11.2%	11.0%	16.2%
	Middle	11	10.9%	21.7%	2,102	7.1%	17.6%	18.4%
	Upper	54	53.5%	44.8%	21,510	72.4%	48.8%	44.6%
	Unknown	8	7.9%	11.0%	2,400	8.1%	19.7%	0.0%
	<b>TOTAL</b>	<b>101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29,728</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Small Business Loans by Revenue and Loan Size								
Assessment Area: Raleigh-Durham CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	20	28.2%	54.8%	\$4,252	26.3%	40.7%	90.7%
	Over \$1 Million/Unknown	51	71.8%	45.2%	\$11,902	73.7%	59.3%	9.3%
	<b>TOTAL</b>	<b>71</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,154</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	28	39.4%	93.1%	\$1,370	8.5%	37.1%	
	\$100,001–\$250,000	19	26.8%	3.3%	\$3,521	21.8%	14.8%	
	\$250,001–\$1 Million	24	33.8%	3.6%	\$11,263	69.7%	48.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>71</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,154</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	9	45.0%		\$285	6.7%	
		\$100,001–\$250,000	4	20.0%		\$602	14.2%	
		\$250,001–\$1 Million	7	35.0%		\$3,365	79.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>		<b>\$4,252</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Raleigh-Durham CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	62	37.8%	48.9%	\$5,071	15.8%	35.8%	92.2%
	Over \$1 Million/ Unknown	102	62.2%	51.1%	\$26,936	84.2%	64.2%	7.8%
	<b>TOTAL</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,007</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	90	54.9%	93.3%	\$4,218	13.2%	38.4%	
	\$100,001– \$250,000	33	20.1%	3.3%	\$5,886	18.4%	15.1%	
	\$250,001– \$1 Million	41	25.0%	3.4%	\$21,903	68.4%	46.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,007</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	48	29.3%		\$1,654	5.2%	
		\$100,001– \$250,000	9	5.5%		\$1,490	4.7%	
		\$250,001– \$1 Million	5	3.0%		\$1,927	6.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>106</b>	<b>32.0%</b>		<b>\$12,914</b>	<b>16.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Raleigh-Durham CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	74	37.8%	48.4%	\$8,503	18.3%	37.7%	92.6%
	Over \$1 Million/Unknown	122	62.2%	51.6%	\$37,972	81.7%	62.3%	7.4%
	<b>TOTAL</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$46,475</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	103	52.6%	93.7%	\$5,236	11.3%	39.2%	
	\$100,001-\$250,000	31	15.8%	3.1%	\$6,036	13.0%	14.5%	
	\$250,001-\$1 Million	62	31.6%	3.2%	\$35,203	75.7%	46.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$46,475</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	56	28.6%		\$2,337	5.0%	
		\$100,001-\$250,000	12	6.1%		\$2,255	4.9%	
		\$250,001-\$1 Million	6	3.1%		\$3,911	8.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>74</b>	<b>37.8%</b>		<b>\$8,503</b>	<b>18.3%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Raleigh-Durham CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	5.7%	2.5%	408	4.3%	1.9%	2.3%
	Moderate	10	28.6%	15.9%	2,358	24.9%	11.4%	16.5%
	Middle	9	25.7%	35.9%	1,949	20.6%	32.6%	36.7%
	Upper	14	40.0%	45.6%	4,737	50.1%	54.2%	44.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>9,452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	3	12.5%	2.3%	1,296	19.3%	1.5%	2.3%
	Moderate	6	25.0%	16.8%	995	14.8%	11.6%	16.5%
	Middle	4	16.7%	36.4%	605	9.0%	32.7%	36.7%
	Upper	11	45.8%	44.5%	3,820	56.9%	54.2%	44.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,716</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.7%	0	0.0%	1.6%	2.3%
	Moderate	1	33.3%	16.0%	128	11.6%	12.5%	16.5%
	Middle	1	33.3%	35.5%	134	12.1%	29.7%	36.7%
	Upper	1	33.3%	45.7%	842	76.3%	56.3%	44.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	22.2%	0	0.0%	12.3%	13.9%
	Moderate	0	0.0%	25.0%	0	0.0%	15.5%	24.7%
	Middle	0	0.0%	33.3%	0	0.0%	39.1%	28.8%
	Upper	0	0.0%	19.4%	0	0.0%	33.1%	32.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	5	8.1%	2.5%	1,704	9.9%	2.6%	2.3%
	Moderate	17	27.4%	16.2%	3,481	20.2%	11.8%	16.5%
	Middle	14	22.6%	36.0%	2,688	15.6%	33.1%	36.7%
	Upper	26	41.9%	45.3%	9,399	54.4%	52.5%	44.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>62</b>	<b>100.0%</b>	<b>100.0%</b>	<b>17,272</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Raleigh-Durham CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	4	7.0%	2.5%	669	2.9%	2.0%	2.3%
	Moderate	6	10.5%	15.6%	1,519	6.7%	11.9%	16.5%
	Middle	17	29.8%	35.5%	4,954	21.8%	32.1%	36.7%
	Upper	30	52.6%	46.4%	15,546	68.5%	54.1%	44.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>57</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22,688</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.5%	0	0.0%	1.9%	2.3%
	Moderate	12	26.1%	16.4%	1,036	13.0%	12.3%	16.5%
	Middle	15	32.6%	36.7%	1,570	19.7%	32.9%	36.7%
	Upper	19	41.3%	44.3%	5,356	67.3%	52.9%	44.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>46</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,962</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	5.3%	1.9%	30	2.3%	1.8%	2.3%
	Moderate	2	10.5%	12.7%	155	12.0%	10.2%	16.5%
	Middle	9	47.4%	33.2%	603	46.7%	28.3%	36.7%
	Upper	7	36.8%	52.3%	503	39.0%	59.7%	44.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,291</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	12.1%	0	0.0%	11.5%	13.9%
	Moderate	0	0.0%	30.3%	0	0.0%	27.5%	24.7%
	Middle	0	0.0%	35.8%	0	0.0%	30.8%	28.8%
	Upper	0	0.0%	21.8%	0	0.0%	30.2%	32.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	5	4.1%	2.4%	699	2.2%	2.9%	2.3%
	Moderate	20	16.4%	15.6%	2,710	8.5%	13.5%	16.5%
	Middle	41	33.6%	35.5%	7,127	22.3%	31.9%	36.7%
	Upper	56	45.9%	46.5%	21,405	67.0%	51.7%	44.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>122</b>	<b>100.0%</b>	<b>100.0%</b>	<b>31,941</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Raleigh-Durham CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	5.1%	2.9%	365	3.0%	2.2%	2.3%
	Moderate	7	17.9%	15.9%	1,751	14.6%	12.1%	18.2%
	Middle	19	48.7%	35.6%	4,325	36.0%	31.7%	35.8%
	Upper	11	28.2%	45.6%	5,583	46.4%	54.0%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,024</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	1	2.7%	2.0%	30	0.2%	1.5%	2.3%
	Moderate	7	18.9%	14.7%	1,408	9.4%	10.7%	18.2%
	Middle	7	18.9%	33.0%	1,754	11.7%	28.9%	35.8%
	Upper	22	59.5%	50.3%	11,787	78.7%	58.9%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>14,979</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.9%	0	0.0%	1.6%	2.3%
	Moderate	2	8.3%	13.5%	85	3.6%	10.4%	18.2%
	Middle	12	50.0%	33.5%	1,146	48.4%	28.8%	35.8%
	Upper	10	41.7%	51.1%	1,137	48.0%	59.1%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,368</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	20.3%	0	0.0%	10.3%	13.5%
	Moderate	1	100.0%	35.1%	357	100.0%	21.8%	25.6%
	Middle	0	0.0%	26.4%	0	0.0%	23.6%	28.1%
	Upper	0	0.0%	18.2%	0	0.0%	44.3%	32.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>357</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	3.0%	2.5%	395	1.3%	2.7%	2.3%
	Moderate	17	16.8%	15.3%	3,601	12.1%	12.5%	18.2%
	Middle	38	37.6%	34.4%	7,225	24.3%	29.9%	35.8%
	Upper	43	42.6%	47.7%	18,507	62.3%	54.8%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>101</b>	<b>100.0%</b>	<b>100.0%</b>	<b>29,728</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Raleigh-Durham CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	4.4%	\$0	0.0%	4.9%	4.5%
Moderate	16	22.5%	16.0%	\$4,300	26.6%	17.3%	17.5%
Middle	25	35.2%	32.6%	\$5,233	32.4%	32.8%	33.2%
Upper	30	42.3%	45.5%	\$6,621	41.0%	43.8%	44.3%
Unknown	0	0.0%	1.5%	\$0	0.0%	1.2%	0.5%
<b>TOTAL</b>	<b>71</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,154</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Raleigh-Durham CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	5	3.0%	4.5%	\$939	2.9%	5.5%	4.6%
Moderate	29	17.7%	15.8%	\$6,854	21.4%	17.4%	17.9%
Middle	67	40.9%	32.5%	\$12,240	38.2%	34.3%	33.6%
Upper	62	37.8%	45.8%	\$11,875	37.1%	41.5%	43.2%
Unknown	1	0.6%	1.3%	\$100	0.3%	1.3%	0.7%
<b>TOTAL</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$32,008</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Raleigh-Durham CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	6	3.1%	4.3%	\$2,020	4.3%	5.3%	4.6%
Moderate	37	18.9%	16.8%	\$10,307	22.2%	17.1%	19.1%
Middle	67	34.2%	31.4%	\$11,429	24.6%	31.7%	33.2%
Upper	84	42.9%	46.1%	\$22,368	48.1%	44.5%	42.4%
Unknown	2	1.0%	1.4%	\$350	0.8%	1.4%	0.7%
<b>TOTAL</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$46,474</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Hickory-Lenoir-Morganton, North Carolina Assessment Area**

Borrower Distribution of HMDA Loans								
Assessment Area: Hickory MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	4.1%	0	0.0%	1.9%	20.8%
	Moderate	0	0.0%	19.8%	0	0.0%	12.9%	17.8%
	Middle	0	0.0%	22.1%	0	0.0%	18.5%	21.2%
	Upper	0	0.0%	38.4%	0	0.0%	53.3%	40.2%
	Unknown	0	0.0%	15.6%	0	0.0%	13.4%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.5%	0	0.0%	2.9%	20.8%
	Moderate	0	0.0%	15.5%	0	0.0%	9.9%	17.8%
	Middle	0	0.0%	20.0%	0	0.0%	16.0%	21.2%
	Upper	0	0.0%	40.8%	0	0.0%	51.7%	40.2%
	Unknown	0	0.0%	18.2%	0	0.0%	19.5%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	9.3%	0	0.0%	3.6%	20.8%
	Moderate	0	0.0%	17.1%	0	0.0%	9.6%	17.8%
	Middle	0	0.0%	21.8%	0	0.0%	20.0%	21.2%
	Upper	0	0.0%	47.7%	0	0.0%	61.0%	40.2%
	Unknown	0	0.0%	4.0%	0	0.0%	5.7%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	40.2%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	4.7%	0	0.0%	2.2%	20.8%
	Moderate	0	0.0%	18.3%	0	0.0%	11.6%	17.8%
	Middle	0	0.0%	21.4%	0	0.0%	17.4%	21.2%
	Upper	0	0.0%	39.4%	0	0.0%	51.9%	40.2%
	Unknown	0	0.0%	16.1%	0	0.0%	16.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Borrower Distribution of HMDA Loans								
Assessment Area: Hickory MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	8.7%	4.9%	200	4.5%	2.3%	20.8%
	Moderate	3	13.0%	18.9%	235	5.3%	11.7%	17.8%
	Middle	6	26.1%	22.5%	500	11.3%	18.0%	21.2%
	Upper	12	52.2%	38.6%	3,496	78.9%	53.7%	40.2%
	Unknown	0	0.0%	15.0%	0	0.0%	14.3%	0.0%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,431</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	2	5.0%	7.1%	95	2.1%	3.6%	20.8%
	Moderate	12	30.0%	15.8%	573	12.4%	10.5%	17.8%
	Middle	11	27.5%	22.6%	1,100	23.8%	18.7%	21.2%
	Upper	15	37.5%	43.8%	2,846	61.7%	55.2%	40.2%
	Unknown	0	0.0%	10.7%	0	0.0%	12.0%	0.0%
	<b>TOTAL</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,614</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	4	13.3%	6.5%	99	5.4%	4.6%	20.8%
	Moderate	1	3.3%	11.2%	30	1.6%	9.2%	17.8%
	Middle	8	26.7%	20.5%	399	21.9%	15.0%	21.2%
	Upper	17	56.7%	55.7%	1,296	71.1%	62.4%	40.2%
	Unknown	0	0.0%	6.1%	0	0.0%	8.8%	0.0%
	<b>TOTAL</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,824</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	40.2%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	8	8.6%	5.6%	394	3.6%	2.6%	20.8%
	Moderate	16	17.2%	16.8%	838	7.7%	10.8%	17.8%
	Middle	25	26.9%	21.7%	1,999	18.4%	17.2%	21.2%
	Upper	44	47.3%	41.5%	7,638	70.3%	52.2%	40.2%
	Unknown	0	0.0%	14.3%	0	0.0%	17.1%	0.0%
	<b>TOTAL</b>	<b>93</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,869</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Hickory MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	3	11.1%	4.0%	304	5.2%	1.8%	20.8%
	Moderate	10	37.0%	19.8%	1,181	20.3%	12.3%	17.8%
	Middle	4	14.8%	22.1%	527	9.1%	17.7%	21.2%
	Upper	10	37.0%	38.6%	3,796	65.4%	53.5%	40.2%
	Unknown	0	0.0%	15.5%	0	0.0%	14.6%	0.0%
	<b>TOTAL</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,808</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	3	7.0%	5.2%	111	2.3%	2.4%	20.8%
	Moderate	8	18.6%	14.4%	492	10.0%	8.7%	17.8%
	Middle	9	20.9%	18.5%	827	16.8%	14.3%	21.2%
	Upper	23	53.5%	44.4%	3,499	71.0%	54.9%	40.2%
	Unknown	0	0.0%	17.4%	0	0.0%	19.8%	0.0%
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,929</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	6.7%	4.8%	50	5.0%	3.4%	20.8%
	Moderate	4	26.7%	14.1%	220	22.0%	9.7%	17.8%
	Middle	2	13.3%	19.8%	180	18.0%	14.0%	21.2%
	Upper	8	53.3%	56.4%	552	55.1%	66.9%	40.2%
	Unknown	0	0.0%	5.0%	0	0.0%	6.0%	0.0%
	<b>TOTAL</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,002</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.8%
	Middle	0	0.0%	2.6%	0	0.0%	0.1%	21.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	40.2%
	Unknown	1	100.0%	97.4%	1,004	100.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,004</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	7	8.1%	4.5%	465	3.6%	2.0%	20.8%
	Moderate	22	25.6%	16.8%	1,893	14.9%	10.3%	17.8%
	Middle	15	17.4%	20.2%	1,534	12.0%	15.4%	21.2%
	Upper	41	47.7%	41.8%	7,847	61.6%	51.8%	40.2%
	Unknown	1	1.2%	16.6%	1,004	7.9%	20.5%	0.0%
	<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,743</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Hickory MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	4	40.0%	49.4%	\$518	24.4%	36.5%	87.9%
	Over \$1 Million/ Unknown	6	60.0%	50.6%	\$1,603	75.6%	63.5%	12.1%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	3	30.0%	91.1%	\$214	10.1%	34.9%	
	\$100,001–\$250,000	3	30.0%	5.0%	\$424	20.0%	19.4%	
	\$250,001–\$1 Million	4	40.0%	4.0%	\$1,483	69.9%	45.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,121</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	2	50.0%		\$114	22.0%	
		\$100,001–\$250,000	1	25.0%		\$131	25.3%	
		\$250,001–\$1 Million	1	25.0%		\$273	52.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>		<b>\$518</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Hickory MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	33	34.4%	44.4%	\$3,547	22.2%	34.3%	89.4%
	Over \$1 Million/Unknown	63	65.6%	55.6%	\$12,453	77.8%	65.7%	10.6%
	<b>TOTAL</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,000</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	60	62.5%	91.9%	\$2,778	17.4%	34.4%	
	\$100,001-\$250,000	18	18.8%	4.2%	\$3,444	21.5%	17.0%	
	\$250,001-\$1 Million	18	18.8%	4.0%	\$9,778	61.1%	48.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,000</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	23	24.0%		\$726	4.5%	
		\$100,001-\$250,000	5	5.2%		\$778	4.9%	
		\$250,001-\$1 Million	5	5.2%		\$2,043	12.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>33</b>	<b>34.4%</b>		<b>\$3,547</b>	<b>22.2%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Hickory MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	51	45.5%	40.8%	\$6,051	28.4%	33.4%	89.9%
	Over \$1 Million/Unknown	61	54.5%	59.2%	\$15,231	71.6%	66.6%	10.1%
	<b>TOTAL</b>	<b>112</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,282</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	71	63.4%	93.3%	\$3,378	15.9%	38.0%	
	\$100,001-\$250,000	16	14.3%	3.7%	\$3,204	15.1%	17.9%	
	\$250,001-\$1 Million	25	22.3%	3.0%	\$14,700	69.1%	44.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>112</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,282</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	41	36.6%		\$1,572	7.4%	
		\$100,001-\$250,000	5	4.5%		\$942	4.4%	
		\$250,001-\$1 Million	5	4.5%		\$3,537	16.6%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>51</b>	<b>45.5%</b>		<b>\$6,051</b>	<b>28.4%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Hickory MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	9.6%	0	0.0%	7.3%	11.7%
	Middle	0	0.0%	60.1%	0	0.0%	51.6%	66.1%
	Upper	0	0.0%	30.3%	0	0.0%	41.1%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.7%	0	0.0%	8.2%	11.7%
	Middle	0	0.0%	61.2%	0	0.0%	54.2%	66.1%
	Upper	0	0.0%	28.1%	0	0.0%	37.6%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.9%	0	0.0%	8.7%	11.7%
	Middle	0	0.0%	62.9%	0	0.0%	48.8%	66.1%
	Upper	0	0.0%	26.2%	0	0.0%	42.5%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	29.4%	0	0.0%	18.7%	22.3%
	Middle	0	0.0%	58.8%	0	0.0%	34.0%	56.9%
	Upper	0	0.0%	11.8%	0	0.0%	47.3%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.0%	0	0.0%	7.8%	11.7%
	Middle	0	0.0%	60.6%	0	0.0%	52.0%	66.1%
	Upper	0	0.0%	29.4%	0	0.0%	40.2%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Hickory MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	4.3%	10.4%	492	11.1%	8.2%	11.7%
	Middle	13	56.5%	60.8%	1,829	41.3%	52.5%	66.1%
	Upper	9	39.1%	28.7%	2,110	47.6%	39.3%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,431</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	7	17.5%	10.0%	545	11.8%	8.0%	11.7%
	Middle	24	60.0%	61.7%	1,863	40.4%	54.2%	66.1%
	Upper	9	22.5%	28.3%	2,206	47.8%	37.8%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>40</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,614</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	6.7%	10.0%	135	7.4%	9.8%	11.7%
	Middle	14	46.7%	55.0%	723	39.6%	46.3%	66.1%
	Upper	14	46.7%	35.0%	966	53.0%	43.9%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,824</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	24.2%	0	0.0%	13.0%	22.3%
	Middle	0	0.0%	66.7%	0	0.0%	82.4%	56.9%
	Upper	0	0.0%	9.1%	0	0.0%	4.6%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	10	10.8%	10.4%	1,172	10.8%	8.4%	11.7%
	Middle	51	54.8%	60.9%	4,415	40.6%	54.2%	66.1%
	Upper	32	34.4%	28.7%	5,282	48.6%	37.4%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>93</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,869</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Hickory MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	7.4%	11.6%	190	3.3%	8.8%	11.7%
	Middle	19	70.4%	60.2%	4,085	70.3%	53.4%	66.1%
	Upper	6	22.2%	28.2%	1,533	26.4%	37.8%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,808</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	6	14.0%	8.7%	390	7.9%	6.3%	11.7%
	Middle	26	60.5%	60.5%	2,310	46.9%	52.1%	66.1%
	Upper	11	25.6%	30.8%	2,229	45.2%	41.6%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,929</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	6.7%	12.7%	130	13.0%	11.9%	11.7%
	Middle	9	60.0%	56.0%	500	49.9%	49.5%	66.1%
	Upper	5	33.3%	31.3%	372	37.1%	38.7%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,002</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	25.6%	0	0.0%	17.2%	22.3%
	Middle	1	100.0%	59.0%	1,004	100.0%	62.8%	56.9%
	Upper	0	0.0%	15.4%	0	0.0%	19.9%	20.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,004</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	9	10.5%	10.7%	710	5.6%	8.4%	11.7%
	Middle	55	64.0%	60.0%	7,899	62.0%	53.3%	66.1%
	Upper	22	25.6%	29.3%	4,134	32.4%	38.2%	22.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,743</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of Small Business Loans Assessment Area: Hickory MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	4	40.0%	17.4%	\$1,222	57.6%	26.2%	16.0%
Middle	5	50.0%	52.8%	\$824	38.8%	45.7%	58.9%
Upper	1	10.0%	27.7%	\$75	3.5%	27.0%	25.1%
Unknown	0	0.0%	2.1%	\$0	0.0%	1.2%	0.0%
<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,121</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Hickory MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	19	19.8%	17.2%	\$3,489	21.8%	23.7%	16.1%
Middle	56	58.3%	53.4%	\$8,642	54.0%	49.2%	58.5%
Upper	21	21.9%	27.3%	\$3,870	24.2%	25.8%	25.4%
Unknown	0	0.0%	2.2%	\$0	0.0%	1.2%	0.0%
<b>TOTAL</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,001</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Hickory MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	17	15.2%	16.5%	\$2,833	13.3%	19.5%	16.4%
Middle	74	66.1%	54.5%	\$13,035	61.2%	52.7%	58.1%
Upper	21	18.8%	26.3%	\$5,414	25.4%	26.3%	25.5%
Unknown	0	0.0%	2.6%	\$0	0.0%	1.5%	0.0%
<b>TOTAL</b>	<b>112</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,282</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Asheville, North Carolina Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Asheville MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.6%	0	0.0%	1.6%	19.6%
	Moderate	0	0.0%	14.5%	0	0.0%	9.0%	18.7%
	Middle	0	0.0%	20.7%	0	0.0%	16.6%	19.8%
	Upper	4	100.0%	50.7%	2,435	100.0%	63.2%	41.9%
	Unknown	0	0.0%	10.6%	0	0.0%	9.6%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,435</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	6.1%	0	0.0%	3.3%	19.6%
	Moderate	0	0.0%	16.0%	0	0.0%	11.0%	18.7%
	Middle	0	0.0%	22.2%	0	0.0%	18.5%	19.8%
	Upper	0	0.0%	41.0%	0	0.0%	52.6%	41.9%
	Unknown	0	0.0%	14.7%	0	0.0%	14.6%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.6%	0	0.0%	2.7%	19.6%
	Moderate	0	0.0%	18.7%	0	0.0%	11.2%	18.7%
	Middle	0	0.0%	22.2%	0	0.0%	19.0%	19.8%
	Upper	1	100.0%	46.4%	36	100.0%	63.6%	41.9%
	Unknown	0	0.0%	5.1%	0	0.0%	3.6%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.6%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.7%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.8%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.9%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	4.6%	0	0.0%	2.0%	19.6%
	Moderate	0	0.0%	15.2%	0	0.0%	9.1%	18.7%
	Middle	0	0.0%	21.2%	0	0.0%	16.2%	19.8%
	Upper	5	100.0%	47.0%	2,471	100.0%	56.2%	41.9%
	Unknown	0	0.0%	12.0%	0	0.0%	16.5%	0.0%
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,471</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Asheville MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.6%	0	0.0%	1.7%	19.6%
	Moderate	0	0.0%	13.8%	0	0.0%	8.7%	18.7%
	Middle	2	18.2%	21.2%	452	10.6%	16.9%	19.8%
	Upper	9	81.8%	52.0%	3,805	89.4%	63.4%	41.9%
	Unknown	0	0.0%	9.4%	0	0.0%	9.3%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,257</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	7.6%	0	0.0%	3.9%	19.6%
	Moderate	1	16.7%	17.3%	25	1.0%	12.3%	18.7%
	Middle	0	0.0%	23.4%	0	0.0%	20.1%	19.8%
	Upper	5	83.3%	42.4%	2,451	99.0%	53.5%	41.9%
	Unknown	0	0.0%	9.3%	0	0.0%	10.1%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	50.0%	3.0%	15	13.0%	1.8%	19.6%
	Moderate	0	0.0%	12.0%	0	0.0%	7.4%	18.7%
	Middle	0	0.0%	24.2%	0	0.0%	17.2%	19.8%
	Upper	1	50.0%	58.7%	100	87.0%	69.7%	41.9%
	Unknown	0	0.0%	2.2%	0	0.0%	3.8%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.6%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.7%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.8%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.9%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	5.3%	4.8%	15	0.2%	2.1%	19.6%
	Moderate	1	5.3%	14.1%	25	0.4%	8.4%	18.7%
	Middle	2	10.5%	21.8%	452	6.6%	15.6%	19.8%
	Upper	15	78.9%	49.9%	6,356	92.8%	54.0%	41.9%
	Unknown	0	0.0%	9.5%	0	0.0%	19.9%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,848</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Asheville MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.7%	0	0.0%	1.8%	19.6%
	Moderate	1	12.5%	15.7%	162	6.0%	10.3%	18.7%
	Middle	0	0.0%	21.3%	0	0.0%	17.4%	19.8%
	Upper	7	87.5%	51.3%	2,530	94.0%	63.0%	41.9%
	Unknown	0	0.0%	7.9%	0	0.0%	7.6%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,692</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.4%	0	0.0%	2.6%	19.6%
	Moderate	0	0.0%	15.8%	0	0.0%	10.6%	18.7%
	Middle	1	12.5%	21.5%	205	6.2%	17.6%	19.8%
	Upper	6	75.0%	44.4%	2,924	88.3%	54.5%	41.9%
	Unknown	1	12.5%	12.9%	182	5.5%	14.6%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,311</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	5.5%	0	0.0%	3.8%	19.6%
	Moderate	0	0.0%	15.6%	0	0.0%	11.5%	18.7%
	Middle	1	100.0%	20.1%	160	100.0%	13.7%	19.8%
	Upper	0	0.0%	56.6%	0	0.0%	66.6%	41.9%
	Unknown	0	0.0%	2.2%	0	0.0%	4.3%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.6%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.7%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.8%
	Upper	0	0.0%	3.1%	0	0.0%	0.1%	41.9%
	Unknown	1	100.0%	96.9%	372	100.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>372</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	4.5%	0	0.0%	2.0%	19.6%
	Moderate	1	5.6%	15.4%	162	2.5%	9.4%	18.7%
	Middle	2	11.1%	21.0%	365	5.6%	15.7%	19.8%
	Upper	13	72.2%	49.1%	5,454	83.5%	54.7%	41.9%
	Unknown	2	11.1%	10.0%	554	8.5%	18.2%	0.0%
	<b>TOTAL</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Asheville MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	3	50.0%	54.1%	\$494	24.5%	41.4%	92.3%
	Over \$1 Million/ Unknown	3	50.0%	45.9%	\$1,520	75.5%	58.6%	7.7%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,014</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	2	33.3%	93.1%	\$100	5.0%	34.7%	
	\$100,001–\$250,000	1	16.7%	2.9%	\$200	9.9%	12.6%	
	\$250,001–\$1 Million	3	50.0%	4.0%	\$1,714	85.1%	52.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,014</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	2	66.7%		\$100	20.2%		
	\$100,001–\$250,000	0	0.0%		\$0	0.0%		
	\$250,001–\$1 Million	1	33.3%		\$394	79.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>		<b>\$494</b>	<b>100.0%</b>		

Small Business Loans by Revenue and Loan Size								
Assessment Area: Asheville MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	11	28.2%	48.0%	\$2,347	18.5%	35.8%	93.1%
	Over \$1 Million/ Unknown	28	71.8%	52.0%	\$10,306	81.5%	64.2%	6.9%
	<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,653</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	13	33.3%	93.5%	\$534	4.2%	35.4%	
	\$100,001– \$250,000	7	17.9%	2.7%	\$1,305	10.3%	12.3%	
	\$250,001– \$1 Million	19	48.7%	3.7%	\$10,814	85.5%	52.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,653</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	6	15.4%		\$256	2.0%	
		\$100,001– \$250,000	2	5.1%		\$400	3.2%	
		\$250,001– \$1 Million	3	7.7%		\$1,691	13.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>11</b>	<b>28.2%</b>		<b>\$2,347</b>	<b>18.5%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Asheville MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	11	25.6%	46.7%	\$4,551	35.9%	37.3%	93.4%
	Over \$1 Million/ Unknown	32	74.4%	53.3%	\$8,140	64.1%	62.7%	6.6%
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,691</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	13	30.2%	93.9%	\$608	4.8%	39.1%	
	\$100,001– \$250,000	12	27.9%	2.7%	\$1,843	14.5%	13.6%	
	\$250,001– \$1 Million	18	41.9%	3.4%	\$10,240	80.7%	47.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,691</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	3	7.0%		\$80	0.6%	
		\$100,001– \$250,000	1	2.3%		\$150	1.2%	
		\$250,001– \$1 Million	7	16.3%		\$4,321	34.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>11</b>	<b>25.6%</b>		<b>\$4,551</b>	<b>35.9%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Asheville MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.6%	0	0.0%	0.6%	0.7%
	Moderate	0	0.0%	9.5%	0	0.0%	7.2%	9.7%
	Middle	2	50.0%	64.6%	920	37.8%	59.4%	66.1%
	Upper	2	50.0%	25.4%	1,515	62.2%	32.8%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,435</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.0%	0	0.0%	0.8%	0.7%
	Moderate	0	0.0%	8.6%	0	0.0%	6.2%	9.7%
	Middle	0	0.0%	65.8%	0	0.0%	60.2%	66.1%
	Upper	0	0.0%	24.6%	0	0.0%	32.8%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.4%	0	0.0%	1.6%	0.7%
	Moderate	0	0.0%	10.6%	0	0.0%	7.4%	9.7%
	Middle	1	100.0%	67.9%	36	100.0%	67.6%	66.1%
	Upper	0	0.0%	20.1%	0	0.0%	23.4%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	8.7%	0	0.0%	11.8%	4.5%
	Moderate	0	0.0%	13.0%	0	0.0%	8.5%	14.5%
	Middle	0	0.0%	60.9%	0	0.0%	46.4%	45.3%
	Upper	0	0.0%	17.4%	0	0.0%	33.3%	35.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.8%	0	0.0%	1.4%	0.7%
	Moderate	0	0.0%	9.3%	0	0.0%	7.0%	9.7%
	Middle	3	60.0%	65.1%	956	38.7%	59.1%	66.1%
	Upper	2	40.0%	24.8%	1,515	61.3%	32.5%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,471</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of HMDA Loans								
Assessment Area: Asheville MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.8%	0	0.0%	0.8%	0.7%
	Moderate	1	9.1%	10.8%	240	5.6%	8.4%	9.7%
	Middle	7	63.6%	65.5%	2,305	54.1%	61.8%	66.1%
	Upper	3	27.3%	22.9%	1,712	40.2%	29.1%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,257</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.0%	0	0.0%	0.8%	0.7%
	Moderate	0	0.0%	9.9%	0	0.0%	7.3%	9.7%
	Middle	4	66.7%	64.3%	491	19.8%	60.5%	66.1%
	Upper	2	33.3%	24.8%	1,985	80.2%	31.4%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,476</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.3%	0	0.0%	0.2%	0.7%
	Moderate	0	0.0%	7.7%	0	0.0%	5.9%	9.7%
	Middle	1	50.0%	62.9%	15	13.0%	57.1%	66.1%
	Upper	1	50.0%	29.2%	100	87.0%	36.9%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>115</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	2.3%	0	0.0%	0.4%	4.5%
	Moderate	0	0.0%	11.4%	0	0.0%	18.0%	14.5%
	Middle	0	0.0%	40.9%	0	0.0%	24.4%	45.3%
	Upper	0	0.0%	45.5%	0	0.0%	57.2%	35.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	0	0.0%	0.8%	0	0.0%	0.7%	0.7%
	Moderate	1	5.3%	9.9%	240	3.5%	8.9%	9.7%
	Middle	12	63.2%	64.6%	2,811	41.0%	56.9%	66.1%
	Upper	6	31.6%	24.7%	3,797	55.4%	33.5%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,848</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Asheville MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.0%	0	0.0%	0.8%	0.7%
	Moderate	0	0.0%	9.5%	0	0.0%	7.3%	9.7%
	Middle	6	75.0%	65.3%	1,933	71.8%	62.0%	66.1%
	Upper	2	25.0%	24.2%	759	28.2%	30.0%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,692</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.8%	0	0.0%	0.6%	0.7%
	Moderate	0	0.0%	9.6%	0	0.0%	7.4%	9.7%
	Middle	3	37.5%	64.2%	537	16.2%	59.3%	66.1%
	Upper	5	62.5%	25.4%	2,774	83.8%	32.7%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,311</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.7%	0	0.0%	0.4%	0.7%
	Moderate	0	0.0%	7.9%	0	0.0%	5.7%	9.7%
	Middle	1	100.0%	67.4%	160	100.0%	63.3%	66.1%
	Upper	0	0.0%	24.0%	0	0.0%	30.7%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>160</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	9.4%	0	0.0%	18.7%	4.5%
	Moderate	0	0.0%	9.4%	0	0.0%	24.6%	14.5%
	Middle	1	100.0%	43.8%	372	100.0%	21.0%	45.3%
	Upper	0	0.0%	37.5%	0	0.0%	35.7%	35.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>372</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.9%	0	0.0%	2.2%	0.7%
	Moderate	0	0.0%	9.3%	0	0.0%	8.6%	9.7%
	Middle	11	61.1%	64.6%	3,002	45.9%	57.2%	66.1%
	Upper	7	38.9%	25.2%	3,533	54.1%	32.0%	23.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Asheville MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	16.7%	3.4%	\$50	2.5%	5.5%	3.3%
Moderate	0	0.0%	13.5%	\$0	0.0%	17.0%	12.2%
Middle	4	66.7%	49.1%	\$1,570	78.0%	39.5%	52.8%
Upper	1	16.7%	32.0%	\$394	19.6%	36.7%	31.8%
Unknown	0	0.0%	2.0%	\$0	0.0%	1.3%	0.0%
<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,014</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Asheville MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	2	5.1%	2.7%	\$100	0.8%	6.2%	3.5%
Moderate	12	30.8%	14.3%	\$5,973	47.2%	17.9%	12.9%
Middle	10	25.6%	49.8%	\$3,006	23.8%	37.9%	50.9%
Upper	15	38.5%	31.2%	\$3,574	28.2%	36.7%	32.7%
Unknown	0	0.0%	2.1%	\$0	0.0%	1.3%	0.0%
<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,653</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Asheville MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	2.3%	3.2%	\$75	0.6%	6.7%	3.4%
Moderate	11	25.6%	14.5%	\$3,988	31.4%	18.4%	13.0%
Middle	13	30.2%	49.0%	\$4,777	37.6%	39.2%	50.6%
Upper	18	41.9%	31.4%	\$3,852	30.3%	34.4%	33.0%
Unknown	0	0.0%	1.8%	\$0	0.0%	1.4%	0.0%
<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,692</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Fayetteville, North Carolina Assessment Area**

Borrower Distribution of HMDA Loans								
Assessment Area: Fayetteville MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.6%	0	0.0%	1.1%	21.3%
	Moderate	0	0.0%	11.9%	0	0.0%	7.0%	17.5%
	Middle	0	0.0%	23.3%	0	0.0%	19.7%	19.9%
	Upper	0	0.0%	39.1%	0	0.0%	50.3%	41.3%
	Unknown	0	0.0%	23.1%	0	0.0%	22.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.0%	0	0.0%	1.7%	21.3%
	Moderate	0	0.0%	6.7%	0	0.0%	4.2%	17.5%
	Middle	0	0.0%	11.2%	0	0.0%	8.9%	19.9%
	Upper	0	0.0%	30.6%	0	0.0%	33.8%	41.3%
	Unknown	0	0.0%	48.5%	0	0.0%	51.5%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.8%	0	0.0%	2.1%	21.3%
	Moderate	0	0.0%	9.4%	0	0.0%	3.9%	17.5%
	Middle	0	0.0%	18.1%	0	0.0%	14.0%	19.9%
	Upper	0	0.0%	64.8%	0	0.0%	74.1%	41.3%
	Unknown	0	0.0%	4.8%	0	0.0%	5.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.9%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.3%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.7%	0	0.0%	1.2%	21.3%
	Moderate	0	0.0%	10.1%	0	0.0%	5.8%	17.5%
	Middle	0	0.0%	19.1%	0	0.0%	15.6%	19.9%
	Upper	0	0.0%	37.4%	0	0.0%	43.8%	41.3%
	Unknown	0	0.0%	30.7%	0	0.0%	33.5%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Fayetteville MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.5%	0	0.0%	1.7%	21.3%
	Moderate	1	4.8%	10.4%	54	1.0%	6.1%	17.5%
	Middle	3	14.3%	24.7%	447	8.1%	21.2%	19.9%
	Upper	17	81.0%	39.5%	5,014	90.9%	48.7%	41.3%
	Unknown	0	0.0%	22.0%	0	0.0%	22.3%	0.0%
	<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,515</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.1%	0	0.0%	3.2%	21.3%
	Moderate	1	50.0%	10.2%	119	20.1%	6.8%	17.5%
	Middle	0	0.0%	15.6%	0	0.0%	11.9%	19.9%
	Upper	1	50.0%	43.8%	473	79.9%	49.9%	41.3%
	Unknown	0	0.0%	25.3%	0	0.0%	28.1%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>592</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.5%	0	0.0%	2.2%	21.3%
	Moderate	0	0.0%	7.3%	0	0.0%	6.0%	17.5%
	Middle	1	50.0%	15.9%	55	16.9%	13.5%	19.9%
	Upper	1	50.0%	59.2%	270	83.1%	59.0%	41.3%
	Unknown	0	0.0%	13.1%	0	0.0%	19.3%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>325</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.3%
	Moderate	0	0.0%	2.6%	0	0.0%	0.0%	17.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.9%
	Upper	0	0.0%	7.7%	0	0.0%	0.9%	41.3%
	Unknown	0	0.0%	89.7%	0	0.0%	99.1%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	3.7%	0	0.0%	1.8%	21.3%
	Moderate	2	8.0%	9.6%	173	2.7%	5.5%	17.5%
	Middle	4	16.0%	20.8%	502	7.8%	16.8%	19.9%
	Upper	19	76.0%	38.8%	5,757	89.5%	43.0%	41.3%
	Unknown	0	0.0%	27.2%	0	0.0%	32.9%	0.0%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,432</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Fayetteville MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	3.1%	3.7%	99	1.2%	1.9%	21.7%
	Moderate	4	12.5%	13.8%	451	5.4%	9.0%	17.8%
	Middle	5	15.6%	24.8%	735	8.8%	22.3%	19.8%
	Upper	22	68.8%	36.4%	7,032	84.5%	45.6%	40.6%
	Unknown	0	0.0%	21.2%	0	0.0%	21.2%	0.0%
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,317</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.1%	0	0.0%	1.6%	21.7%
	Moderate	0	0.0%	5.7%	0	0.0%	3.2%	17.8%
	Middle	0	0.0%	11.2%	0	0.0%	8.0%	19.8%
	Upper	0	0.0%	28.4%	0	0.0%	28.8%	40.6%
	Unknown	1	100.0%	51.6%	72	100.0%	58.4%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>72</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.2%	0	0.0%	2.1%	21.7%
	Moderate	0	0.0%	13.0%	0	0.0%	9.3%	17.8%
	Middle	0	0.0%	15.1%	0	0.0%	12.0%	19.8%
	Upper	0	0.0%	56.9%	0	0.0%	61.6%	40.6%
	Unknown	0	0.0%	10.9%	0	0.0%	15.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.7%
	Moderate	0	0.0%	2.4%	0	0.0%	0.0%	17.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.8%
	Upper	0	0.0%	2.4%	0	0.0%	0.3%	40.6%
	Unknown	0	0.0%	95.2%	0	0.0%	99.6%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	3.0%	3.4%	99	1.2%	1.6%	21.7%
	Moderate	4	12.1%	10.9%	451	5.4%	6.4%	17.8%
	Middle	5	15.2%	19.4%	735	8.8%	15.8%	19.8%
	Upper	22	66.7%	33.5%	7,032	83.8%	36.5%	40.6%
	Unknown	1	3.0%	32.8%	72	0.9%	39.6%	0.0%
	<b>TOTAL</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,389</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Fayetteville MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	0	0.0%	52.6%	\$0	0.0%	38.4%	92.1%
	Over \$1 Million/ Unknown	1	100.0%	47.4%	\$140	100.0%	61.6%	7.9%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	0	0.0%	91.9%	\$0	0.0%	33.5%	
	\$100,001–\$250,000	1	100.0%	4.0%	\$140	100.0%	16.1%	
	\$250,001–\$1 Million	0	0.0%	4.0%	\$0	0.0%	50.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$140</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%	
		\$100,001–\$250,000	0	0.0%		\$0	0.0%	
		\$250,001–\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>		<b>\$0</b>	<b>0.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Fayetteville MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	14	56.0%	49.5%	\$3,959	57.6%	36.6%	93.0%
	Over \$1 Million/ Unknown	11	44.0%	50.5%	\$2,913	42.4%	63.4%	7.0%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,872</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	9	36.0%	92.3%	\$488	7.1%	32.8%	
	\$100,001– \$250,000	3	12.0%	3.6%	\$532	7.7%	14.9%	
	\$250,001– \$1 Million	13	52.0%	4.2%	\$5,852	85.2%	52.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,872</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	6	24.0%		\$252	3.7%	
		\$100,001– \$250,000	1	4.0%		\$122	1.8%	
		\$250,001– \$1 Million	7	28.0%		\$3,585	52.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>14</b>	<b>56.0%</b>		<b>\$3,959</b>	<b>57.6%</b>	



Small Business Loans by Revenue and Loan Size								
Assessment Area: Fayetteville MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	15	40.5%	46.3%	\$2,268	29.4%	36.9%	93.5%
	Over \$1 Million/Unknown	22	59.5%	53.7%	\$5,458	70.6%	63.1%	6.5%
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,726</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	22	59.5%	93.4%	\$1,265	16.4%	35.7%	
	\$100,001-\$250,000	6	16.2%	3.0%	\$990	12.8%	13.8%	
	\$250,001-\$1 Million	9	24.3%	3.5%	\$5,471	70.8%	50.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,726</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	10	27.0%		\$374	4.8%	
		\$100,001-\$250,000	2	5.4%		\$327	4.2%	
		\$250,001-\$1 Million	3	8.1%		\$1,567	20.3%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>15</b>	<b>40.5%</b>		<b>\$2,268</b>	<b>29.4%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Fayetteville MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	7.5%	0	0.0%	4.7%	10.1%
	Middle	0	0.0%	63.0%	0	0.0%	56.1%	64.9%
	Upper	0	0.0%	29.5%	0	0.0%	39.2%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	7.7%	0	0.0%	5.3%	10.1%
	Middle	0	0.0%	66.2%	0	0.0%	59.9%	64.9%
	Upper	0	0.0%	26.1%	0	0.0%	34.9%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.5%	0	0.0%	0.5%	0.4%
	Moderate	0	0.0%	7.7%	0	0.0%	4.3%	10.1%
	Middle	0	0.0%	65.8%	0	0.0%	59.1%	64.9%
	Upper	0	0.0%	26.0%	0	0.0%	36.1%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	1.7%
	Moderate	0	0.0%	31.8%	0	0.0%	23.4%	16.5%
	Middle	0	0.0%	59.1%	0	0.0%	65.7%	79.5%
	Upper	0	0.0%	9.1%	0	0.0%	10.9%	2.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	7.6%	0	0.0%	5.6%	10.1%
	Middle	0	0.0%	64.2%	0	0.0%	57.6%	64.9%
	Upper	0	0.0%	28.2%	0	0.0%	36.8%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Fayetteville MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	7.1%	0	0.0%	4.3%	10.1%
	Middle	11	52.4%	63.3%	2,480	45.0%	55.9%	64.9%
	Upper	10	47.6%	29.6%	3,035	55.0%	39.8%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,515</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	1	50.0%	7.9%	119	20.1%	4.5%	10.1%
	Middle	0	0.0%	64.3%	0	0.0%	58.1%	64.9%
	Upper	1	50.0%	27.8%	473	79.9%	37.4%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>592</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	0	0.0%	11.0%	0	0.0%	7.7%	10.1%
	Middle	1	50.0%	59.6%	55	16.9%	57.3%	64.9%
	Upper	1	50.0%	29.4%	270	83.1%	35.0%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>325</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	1.7%
	Moderate	0	0.0%	17.9%	0	0.0%	9.5%	16.5%
	Middle	0	0.0%	79.5%	0	0.0%	90.1%	79.5%
	Upper	0	0.0%	2.6%	0	0.0%	0.4%	2.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.4%
	Moderate	1	4.0%	7.6%	119	1.9%	4.9%	10.1%
	Middle	12	48.0%	64.1%	2,535	39.4%	59.8%	64.9%
	Upper	12	48.0%	28.3%	3,778	58.7%	35.3%	24.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,432</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Fayetteville MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.8%
	Moderate	2	6.3%	8.3%	413	5.0%	5.6%	11.1%
	Middle	16	50.0%	65.7%	3,029	36.4%	59.1%	65.7%
	Upper	14	43.8%	25.8%	4,875	58.6%	35.2%	22.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>32</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,317</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.1%	0	0.0%	0.0%	0.8%
	Moderate	0	0.0%	7.1%	0	0.0%	4.4%	11.1%
	Middle	1	100.0%	61.4%	72	100.0%	54.4%	65.7%
	Upper	0	0.0%	31.4%	0	0.0%	41.1%	22.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>72</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.8%
	Moderate	0	0.0%	10.0%	0	0.0%	7.6%	11.1%
	Middle	0	0.0%	62.3%	0	0.0%	55.8%	65.7%
	Upper	0	0.0%	27.6%	0	0.0%	36.6%	22.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	3.2%
	Moderate	0	0.0%	19.0%	0	0.0%	3.6%	15.3%
	Middle	0	0.0%	73.8%	0	0.0%	92.2%	80.1%
	Upper	0	0.0%	7.1%	0	0.0%	4.2%	1.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.1%	0	0.0%	0.0%	0.8%
	Moderate	2	6.1%	8.2%	413	4.9%	5.2%	11.1%
	Middle	17	51.5%	64.5%	3,101	37.0%	60.5%	65.7%
	Upper	14	42.4%	27.1%	4,875	58.1%	34.2%	22.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,389</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Fayetteville MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	2.1%	\$0	0.0%	2.5%	1.9%
Moderate	1	100.0%	17.0%	\$140	100.0%	20.9%	19.7%
Middle	0	0.0%	55.3%	\$0	0.0%	56.1%	58.4%
Upper	0	0.0%	24.2%	\$0	0.0%	19.9%	19.9%
Unknown	0	0.0%	1.4%	\$0	0.0%	0.5%	0.1%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Fayetteville MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	4.0%	2.0%	\$500	7.3%	3.6%	1.8%
Moderate	6	24.0%	17.1%	\$1,856	27.0%	19.1%	18.4%
Middle	14	56.0%	55.6%	\$2,893	42.1%	55.2%	59.3%
Upper	4	16.0%	24.2%	\$1,623	23.6%	21.6%	20.4%
Unknown	0	0.0%	1.1%	\$0	0.0%	0.5%	0.1%
<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,872</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Fayetteville MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	2	5.4%	2.6%	\$750	9.7%	3.8%	2.6%
Moderate	9	24.3%	16.8%	\$2,951	38.2%	18.8%	18.6%
Middle	24	64.9%	56.5%	\$3,957	51.2%	55.4%	59.5%
Upper	2	5.4%	22.7%	\$68	0.9%	21.2%	19.2%
Unknown	0	0.0%	1.4%	\$0	0.0%	0.7%	0.1%
<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,726</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

NonMSA North Carolina Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: NonMSA North Carolina								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.9%	0	0.0%	0.7%	19.8%
	Moderate	0	0.0%	8.5%	0	0.0%	4.3%	16.4%
	Middle	0	0.0%	16.8%	0	0.0%	12.3%	18.3%
	Upper	2	100.0%	58.7%	279	100.0%	69.1%	45.4%
	Unknown	0	0.0%	14.1%	0	0.0%	13.7%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	4.0%	0	0.0%	1.6%	19.8%
	Moderate	0	0.0%	8.8%	0	0.0%	5.1%	16.4%
	Middle	0	0.0%	16.1%	0	0.0%	11.3%	18.3%
	Upper	0	0.0%	51.6%	0	0.0%	61.5%	45.4%
	Unknown	0	0.0%	19.6%	0	0.0%	20.4%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	5.3%	0	0.0%	1.8%	19.8%
	Moderate	0	0.0%	12.9%	0	0.0%	8.6%	16.4%
	Middle	0	0.0%	22.6%	0	0.0%	14.6%	18.3%
	Upper	0	0.0%	53.7%	0	0.0%	69.3%	45.4%
	Unknown	0	0.0%	5.6%	0	0.0%	5.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.4%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.3%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	45.4%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.6%	0	0.0%	0.9%	19.8%
	Moderate	0	0.0%	8.7%	0	0.0%	4.2%	16.4%
	Middle	0	0.0%	16.8%	0	0.0%	11.2%	18.3%
	Upper	2	100.0%	56.4%	279	100.0%	61.8%	45.4%
	Unknown	0	0.0%	15.5%	0	0.0%	21.9%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: NonMSA North Carolina								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	2	9.1%	1.9%	123	2.5%	0.8%	19.8%
	Moderate	3	13.6%	9.9%	197	4.1%	5.1%	16.4%
	Middle	1	4.5%	18.1%	128	2.6%	13.4%	18.3%
	Upper	15	68.2%	55.9%	4,225	86.9%	65.8%	45.4%
	Unknown	1	4.5%	14.2%	191	3.9%	15.0%	0.0%
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,864</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	7	22.6%	5.9%	342	12.4%	2.4%	19.8%
	Moderate	6	19.4%	12.8%	387	14.1%	7.4%	16.4%
	Middle	6	19.4%	17.8%	505	18.3%	13.3%	18.3%
	Upper	11	35.5%	53.2%	1,465	53.2%	64.3%	45.4%
	Unknown	1	3.2%	10.3%	54	2.0%	12.6%	0.0%
	<b>TOTAL</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,753</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.3%	0	0.0%	2.8%	19.8%
	Moderate	1	9.1%	5.6%	60	10.2%	4.0%	16.4%
	Middle	1	9.1%	19.2%	15	2.5%	13.5%	18.3%
	Upper	9	81.8%	68.5%	516	87.3%	75.3%	45.4%
	Unknown	0	0.0%	2.5%	0	0.0%	4.3%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>591</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.4%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.3%
	Upper	0	0.0%	9.1%	0	0.0%	0.6%	45.4%
	Unknown	1	100.0%	90.9%	26,745	100.0%	99.4%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26,745</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	9	13.8%	3.1%	465	1.3%	1.2%	19.8%
	Moderate	10	15.4%	10.1%	644	1.8%	5.2%	16.4%
	Middle	8	12.3%	17.8%	648	1.9%	12.6%	18.3%
	Upper	35	53.8%	55.6%	6,206	17.8%	62.5%	45.4%
	Unknown	3	4.6%	13.4%	26,990	77.2%	18.6%	0.0%
	<b>TOTAL</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34,953</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: NonMSA North Carolina								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.0%	0	0.0%	0.7%	19.5%
	Moderate	3	12.5%	9.9%	275	3.7%	4.8%	16.2%
	Middle	4	16.7%	17.1%	790	10.8%	12.5%	18.2%
	Upper	17	70.8%	58.6%	6,282	85.5%	68.9%	46.0%
	Unknown	0	0.0%	12.5%	0	0.0%	13.0%	0.0%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,347</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	2	8.7%	2.8%	75	2.6%	1.3%	19.5%
	Moderate	5	21.7%	7.4%	419	14.8%	3.7%	16.2%
	Middle	1	4.3%	14.2%	166	5.9%	9.4%	18.2%
	Upper	14	60.9%	47.9%	1,856	65.4%	51.9%	46.0%
	Unknown	1	4.3%	27.8%	320	11.3%	33.7%	0.0%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,836</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	20.0%	3.2%	25	9.3%	1.4%	19.5%
	Moderate	1	20.0%	8.4%	25	9.3%	5.2%	16.2%
	Middle	0	0.0%	16.9%	0	0.0%	11.5%	18.2%
	Upper	3	60.0%	69.8%	219	81.4%	78.9%	46.0%
	Unknown	0	0.0%	1.7%	0	0.0%	3.0%	0.0%
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>269</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	19.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Upper	0	0.0%	11.1%	0	0.0%	0.4%	46.0%
	Unknown	0	0.0%	88.9%	0	0.0%	99.6%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	5.8%	2.3%	100	1.0%	0.9%	19.5%
	Moderate	9	17.3%	8.9%	719	6.9%	4.3%	16.2%
	Middle	5	9.6%	15.9%	956	9.1%	10.9%	18.2%
	Upper	34	65.4%	55.2%	8,357	80.0%	60.6%	46.0%
	Unknown	1	1.9%	17.6%	320	3.1%	23.4%	0.0%
	<b>TOTAL</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Small Business Loans by Revenue and Loan Size								
Assessment Area: NonMSA North Carolina								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	3	50.0%	53.7%	\$140	17.6%	46.7%	90.7%
	Over \$1 Million/ Unknown	3	50.0%	46.3%	\$654	82.4%	53.3%	9.3%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$794</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	5	83.3%	91.7%	\$290	36.5%	37.5%	
	\$100,001– \$250,000	0	0.0%	4.3%	\$0	0.0%	17.7%	
	\$250,001– \$1 Million	1	16.7%	4.0%	\$504	63.5%	44.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$794</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	3	100.0%		\$140	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%	
		<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>		<b>\$140</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: NonMSA North Carolina								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	26	54.2%	51.5%	\$2,113	42.4%	45.0%	91.7%
	Over \$1 Million/ Unknown	22	45.8%	48.5%	\$2,865	57.6%	55.0%	8.3%
	<b>TOTAL</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,978</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	34	70.8%	92.3%	\$1,100	22.1%	37.4%	
	\$100,001–\$250,000	10	20.8%	4.2%	\$1,750	35.2%	18.2%	
	\$250,001–\$1 Million	4	8.3%	3.5%	\$2,128	42.7%	44.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,978</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	22	45.8%		\$722	14.5%	
		\$100,001–\$250,000	2	4.2%		\$263	5.3%	
		\$250,001–\$1 Million	2	4.2%		\$1,128	22.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>26</b>	<b>54.2%</b>		<b>\$2,113</b>	<b>42.4%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: NonMSA North Carolina								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	23	46.9%	46.9%	\$851	23.3%	40.7%	92.0%
	Over \$1 Million/Unknown	26	53.1%	53.1%	\$2,799	76.7%	59.3%	8.0%
	<b>TOTAL</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	39	79.6%	92.3%	\$1,222	33.5%	36.2%	
	\$100,001-\$250,000	8	16.3%	4.2%	\$1,428	39.1%	18.3%	
	\$250,001-\$1 Million	2	4.1%	3.5%	\$1,000	27.4%	45.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,650</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	21	42.9%		\$481	13.2%	
		\$100,001-\$250,000	2	4.1%		\$370	10.1%	
		\$250,001-\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>23</b>	<b>46.9%</b>		<b>\$851</b>	<b>23.3%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: NonMSA North Carolina								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	9.6%	0	0.0%	5.5%	18.7%
	Middle	0	0.0%	32.1%	0	0.0%	27.6%	41.5%
	Upper	2	100.0%	58.3%	279	100.0%	66.9%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.5%	0	0.0%	7.1%	18.7%
	Middle	0	0.0%	36.2%	0	0.0%	29.6%	41.5%
	Upper	0	0.0%	53.3%	0	0.0%	63.3%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	12.0%	0	0.0%	6.6%	18.7%
	Middle	0	0.0%	40.5%	0	0.0%	33.8%	41.5%
	Upper	0	0.0%	47.5%	0	0.0%	59.6%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	4.3%	0	0.0%	1.9%	15.3%
	Middle	0	0.0%	30.4%	0	0.0%	16.1%	32.6%
	Upper	0	0.0%	65.2%	0	0.0%	82.0%	52.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	9.9%	0	0.0%	5.7%	18.7%
	Middle	0	0.0%	33.6%	0	0.0%	27.3%	41.5%
	Upper	2	100.0%	56.5%	279	100.0%	67.0%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>279</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: NonMSA North Carolina								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	8	36.4%	10.2%	678	13.9%	6.2%	18.7%
	Middle	5	22.7%	29.4%	1,074	22.1%	25.1%	41.5%
	Upper	9	40.9%	60.5%	3,112	64.0%	68.7%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>22</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,864</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	12	38.7%	10.8%	691	25.1%	6.4%	18.7%
	Middle	8	25.8%	37.5%	728	26.4%	30.7%	41.5%
	Upper	11	35.5%	51.7%	1,334	48.5%	62.9%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>31</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,753</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	27.3%	9.2%	145	24.5%	6.8%	18.7%
	Middle	2	18.2%	32.0%	59	10.0%	23.5%	41.5%
	Upper	6	54.5%	58.8%	387	65.5%	69.7%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>591</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	9.1%	0	0.0%	6.6%	15.3%
	Middle	0	0.0%	18.2%	0	0.0%	5.4%	32.6%
	Upper	1	100.0%	72.7%	26,745	100.0%	88.0%	52.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26,745</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	23	35.4%	10.5%	1,514	4.3%	6.3%	18.7%
	Middle	15	23.1%	31.6%	1,861	5.3%	25.3%	41.5%
	Upper	27	41.5%	57.9%	31,578	90.3%	68.4%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34,953</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: NonMSA North Carolina								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	8.3%	8.5%	196	2.7%	4.7%	15.5%
	Middle	4	16.7%	30.9%	846	11.5%	25.5%	44.7%
	Upper	18	75.0%	60.6%	6,305	85.8%	69.9%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>24</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,347</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	6	26.1%	6.5%	567	20.0%	3.6%	15.5%
	Middle	10	43.5%	34.8%	924	32.6%	28.0%	44.7%
	Upper	7	30.4%	58.7%	1,345	47.4%	68.4%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,836</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	20.0%	7.4%	51	19.0%	4.7%	15.5%
	Middle	3	60.0%	36.7%	68	25.3%	26.0%	44.7%
	Upper	1	20.0%	55.9%	150	55.8%	69.3%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>269</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	11.1%	0	0.0%	6.7%	14.6%
	Middle	0	0.0%	40.7%	0	0.0%	13.1%	33.2%
	Upper	0	0.0%	48.1%	0	0.0%	80.3%	52.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	9	17.3%	8.1%	814	7.8%	4.5%	15.5%
	Middle	17	32.7%	32.7%	1,838	17.6%	25.8%	44.7%
	Upper	26	50.0%	59.1%	7,800	74.6%	69.6%	39.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,452</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: NonMSA North Carolina							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	33.3%	16.0%	\$100	12.6%	15.5%	20.8%
Middle	2	33.3%	34.6%	\$534	67.3%	31.5%	39.7%
Upper	2	33.3%	46.7%	\$160	20.2%	51.5%	39.4%
Unknown	0	0.0%	2.7%	\$0	0.0%	1.5%	0.0%
<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$794</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: NonMSA North Carolina							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	10	20.8%	16.7%	\$1,166	23.4%	18.6%	19.9%
Middle	14	29.2%	33.8%	\$1,245	25.0%	31.3%	38.3%
Upper	24	50.0%	47.1%	\$2,567	51.6%	48.8%	41.8%
Unknown	0	0.0%	2.4%	\$0	0.0%	1.3%	0.0%
<b>TOTAL</b>	<b>48</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,978</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: NonMSA North Carolina							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	16	32.7%	16.3%	\$936	25.6%	17.6%	18.7%
Middle	17	34.7%	35.5%	\$1,187	32.5%	31.9%	39.6%
Upper	16	32.7%	45.3%	\$1,528	41.9%	49.1%	41.7%
Unknown	0	0.0%	2.9%	\$0	0.0%	1.4%	0.0%
<b>TOTAL</b>	<b>49</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,651</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## Chattanooga-Cleveland, Tennessee-Georgia Multistate Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Chattanooga-Cleveland CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	5	4.0%	4.8%	435	1.0%	2.7%	20.3%
	Moderate	25	19.8%	15.8%	2,902	6.5%	10.5%	16.8%
	Middle	16	12.7%	19.9%	2,445	5.5%	17.2%	19.7%
	Upper	80	63.5%	38.8%	38,626	87.0%	50.4%	43.3%
	Unknown	0	0.0%	20.7%	0	0.0%	19.2%	0.0%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>44,408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	6	10.0%	5.9%	452	3.3%	3.1%	20.3%
	Moderate	11	18.3%	12.5%	1,155	8.6%	8.6%	16.8%
	Middle	7	11.7%	20.0%	773	5.7%	16.4%	19.7%
	Upper	35	58.3%	38.7%	11,043	81.8%	48.1%	43.3%
	Unknown	1	1.7%	22.9%	76	0.6%	23.8%	0.0%
	<b>TOTAL</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13,499</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	2	18.2%	11.6%	59	3.5%	10.3%	20.3%
	Moderate	1	9.1%	17.4%	169	10.1%	9.4%	16.8%
	Middle	2	18.2%	20.0%	93	5.6%	14.0%	19.7%
	Upper	6	54.5%	45.1%	1,351	80.8%	59.5%	43.3%
	Unknown	0	0.0%	5.9%	0	0.0%	6.8%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,672</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.7%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	43.3%
	Unknown	1	100.0%	100.0%	84	100.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	13	6.6%	5.5%	946	1.6%	2.7%	20.3%
	Moderate	37	18.7%	14.9%	4,226	7.1%	9.1%	16.8%
	Middle	25	12.6%	19.8%	3,311	5.5%	15.5%	19.7%
	Upper	121	61.1%	39.0%	51,020	85.5%	45.8%	43.3%
	Unknown	2	1.0%	20.8%	160	0.3%	26.9%	0.0%
	<b>TOTAL</b>	<b>198</b>	<b>100.0%</b>	<b>100.0%</b>	<b>59,663</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Borrower Distribution of HMDA Loans								
Assessment Area: Chattanooga-Cleveland CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	1.9%	4.3%	221	0.5%	2.2%	20.3%
	Moderate	7	6.7%	17.2%	679	1.5%	11.6%	16.8%
	Middle	14	13.5%	20.9%	2,427	5.3%	18.0%	19.7%
	Upper	76	73.1%	39.3%	41,104	90.1%	50.6%	43.3%
	Unknown	5	4.8%	18.4%	1,208	2.6%	17.6%	0.0%
	<b>TOTAL</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45,639</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	12	8.2%	7.7%	679	2.8%	4.2%	20.3%
	Moderate	24	16.3%	15.3%	1,940	7.9%	10.7%	16.8%
	Middle	30	20.4%	21.1%	3,179	13.0%	17.3%	19.7%
	Upper	77	52.4%	39.2%	18,196	74.5%	48.7%	43.3%
	Unknown	4	2.7%	16.6%	439	1.8%	19.1%	0.0%
	<b>TOTAL</b>	<b>147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>24,433</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	7	11.7%	5.7%	251	5.5%	2.9%	20.3%
	Moderate	7	11.7%	12.9%	411	9.1%	8.3%	16.8%
	Middle	10	16.7%	20.0%	495	10.9%	15.8%	19.7%
	Upper	33	55.0%	53.9%	3,236	71.5%	60.6%	43.3%
	Unknown	3	5.0%	7.5%	131	2.9%	12.5%	0.0%
	<b>TOTAL</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,524</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.9%	0	0.0%	0.0%	20.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.7%
	Upper	0	0.0%	30.7%	0	0.0%	4.4%	43.3%
	Unknown	3	100.0%	68.4%	11,250	100.0%	95.6%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,250</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	21	6.7%	5.2%	1,151	1.3%	2.5%	20.3%
	Moderate	38	12.1%	15.9%	3,030	3.5%	10.4%	16.8%
	Middle	54	17.2%	20.4%	6,101	7.1%	16.3%	19.7%
	Upper	186	59.2%	40.0%	62,536	72.8%	47.2%	43.3%
	Unknown	15	4.8%	18.6%	13,028	15.2%	23.6%	0.0%
	<b>TOTAL</b>	<b>314</b>	<b>100.0%</b>	<b>100.0%</b>	<b>85,846</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Chattanooga-Cleveland CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	1.5%	6.3%	182	0.4%	3.4%	20.3%
	Moderate	21	15.8%	19.7%	2,825	5.7%	14.0%	16.8%
	Middle	9	6.8%	21.1%	1,655	3.3%	19.2%	19.7%
	Upper	93	69.9%	39.0%	43,250	87.5%	50.4%	43.3%
	Unknown	8	6.0%	13.9%	1,499	3.0%	13.1%	0.0%
	<b>TOTAL</b>	<b>133</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49,411</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	9	7.9%	7.4%	559	2.4%	3.8%	20.3%
	Moderate	15	13.2%	14.0%	1,115	4.8%	9.6%	16.8%
	Middle	16	14.0%	19.3%	1,737	7.4%	17.0%	19.7%
	Upper	69	60.5%	37.1%	19,099	81.6%	45.5%	43.3%
	Unknown	5	4.4%	22.3%	898	3.8%	24.0%	0.0%
	<b>TOTAL</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23,408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	6	8.1%	7.9%	220	3.9%	4.6%	20.3%
	Moderate	14	18.9%	17.4%	654	11.6%	11.9%	16.8%
	Middle	14	18.9%	22.1%	1,123	19.9%	19.6%	19.7%
	Upper	40	54.1%	48.2%	3,644	64.6%	56.9%	43.3%
	Unknown	0	0.0%	4.3%	0	0.0%	7.0%	0.0%
	<b>TOTAL</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,641</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.3%
	Moderate	0	0.0%	3.2%	0	0.0%	0.2%	16.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.7%
	Upper	0	0.0%	15.2%	0	0.0%	2.5%	43.3%
	Unknown	2	100.0%	81.6%	1,032	100.0%	97.3%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,032</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	17	5.3%	6.7%	961	1.2%	3.2%	20.3%
	Moderate	50	15.5%	17.2%	4,594	5.8%	11.2%	16.8%
	Middle	39	12.1%	20.2%	4,515	5.7%	16.6%	19.7%
	Upper	202	62.5%	38.7%	65,993	83.0%	44.7%	43.3%
	Unknown	15	4.6%	17.2%	3,429	4.3%	24.4%	0.0%
	<b>TOTAL</b>	<b>323</b>	<b>100.0%</b>	<b>100.0%</b>	<b>79,492</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Chattanooga-Cleveland CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	90	27.4%	46.9%	\$14,152	17.3%	32.1%	89.5%
	Over \$1 Million/ Unknown	238	72.6%	53.1%	\$67,626	82.7%	67.9%	10.5%
	<b>TOTAL</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$81,778</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	138	42.1%	87.8%	\$7,282	8.9%	22.9%	
	\$100,001–\$250,000	81	24.7%	5.9%	\$15,831	19.4%	18.8%	
	\$250,001–\$1 Million	109	33.2%	6.3%	\$58,665	71.7%	58.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$81,778</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	65	72.2%		\$2,674	18.9%	
		\$100,001–\$250,000	8	8.9%		\$1,299	9.2%	
		\$250,001–\$1 Million	17	18.9%		\$10,179	71.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>90</b>	<b>100.0%</b>		<b>\$14,152</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Chattanooga-Cleveland CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	106	32.0%	44.3%	\$12,914	16.0%	33.9%	91.2%
	Over \$1 Million/Unknown	225	68.0%	55.7%	\$67,903	84.0%	66.1%	8.8%
	<b>TOTAL</b>	<b>331</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,817</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	134	40.5%	88.2%	\$6,190	7.7%	24.7%	
	\$100,001-\$250,000	90	27.2%	5.9%	\$17,105	21.2%	18.8%	
	\$250,001-\$1 Million	107	32.3%	5.9%	\$57,522	71.2%	56.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>331</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,817</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	70	21.1%		\$2,412	3.0%	
		\$100,001-\$250,000	19	5.7%		\$2,957	3.7%	
		\$250,001-\$1 Million	17	5.1%		\$7,545	9.3%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>106</b>	<b>32.0%</b>		<b>\$12,914</b>	<b>16.0%</b>	

Small Business Loans by Revenue and Loan Size Assessment Area: Chattanooga-Cleveland CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	99	29.4%	43.4%	\$14,177	15.3%	32.8%	91.4%
	Over \$1 Million/ Unknown	238	70.6%	56.6%	\$78,781	84.7%	67.2%	8.6%
	<b>TOTAL</b>	<b>337</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,958</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	128	38.0%	87.0%	\$6,663	7.2%	23.5%	
	\$100,001– \$250,000	78	23.1%	6.6%	\$14,978	16.1%	19.2%	
	\$250,001– \$1 Million	131	38.9%	6.4%	\$71,317	76.7%	57.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>337</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,958</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size  Revenue \$1 Million or Less	\$100,000 or Less	66	19.6%		\$2,782	3.0%		
	\$100,001– \$250,000	16	4.7%		\$2,647	2.8%		
	\$250,001– \$1 Million	17	5.0%		\$8,748	9.4%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>99</b>	<b>29.4%</b>		<b>\$14,177</b>	<b>15.3%</b>		

Geographic Distribution of HMDA Loans								
Assessment Area: Chattanooga-Cleveland CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	4	3.2%	2.7%	1,311	3.0%	2.2%	3.4%
	Moderate	7	5.6%	8.9%	1,594	3.6%	5.9%	10.5%
	Middle	44	34.9%	42.6%	9,235	20.8%	37.8%	45.1%
	Upper	71	56.3%	45.8%	32,268	72.7%	54.1%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>44,408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	3	5.0%	2.9%	451	3.3%	2.1%	3.4%
	Moderate	8	13.3%	9.2%	719	5.3%	6.2%	10.5%
	Middle	18	30.0%	43.1%	3,165	23.4%	37.8%	45.1%
	Upper	31	51.7%	44.8%	9,164	67.9%	53.9%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>13,499</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.2%	0	0.0%	1.4%	3.4%
	Moderate	1	9.1%	10.9%	77	4.6%	6.6%	10.5%
	Middle	4	36.4%	43.3%	381	22.8%	36.3%	45.1%
	Upper	6	54.5%	41.6%	1,214	72.6%	55.7%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,672</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	9.5%	0	0.0%	16.9%	16.4%
	Moderate	0	0.0%	19.0%	0	0.0%	6.1%	17.3%
	Middle	0	0.0%	52.4%	0	0.0%	49.2%	38.1%
	Upper	1	100.0%	19.0%	84	100.0%	27.9%	28.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>84</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	7	3.5%	2.9%	1,762	3.0%	3.4%	3.4%
	Moderate	16	8.1%	9.2%	2,390	4.0%	6.0%	10.5%
	Middle	66	33.3%	42.8%	12,781	21.4%	38.8%	45.1%
	Upper	109	55.1%	45.1%	42,730	71.6%	51.9%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>198</b>	<b>100.0%</b>	<b>100.0%</b>	<b>59,663</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Chattanooga-Cleveland CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	1.9%	2.9%	996	2.2%	2.3%	3.4%
	Moderate	7	6.7%	10.1%	1,770	3.9%	6.9%	10.5%
	Middle	31	29.8%	43.3%	8,024	17.6%	38.2%	45.1%
	Upper	64	61.5%	43.7%	34,849	76.4%	52.7%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>104</b>	<b>100.0%</b>	<b>100.0%</b>	<b>45,639</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	3	2.0%	2.7%	299	1.2%	1.6%	3.4%
	Moderate	10	6.8%	8.7%	2,257	9.2%	6.5%	10.5%
	Middle	53	36.1%	43.5%	6,574	26.9%	38.2%	45.1%
	Upper	81	55.1%	45.0%	15,303	62.6%	53.6%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>147</b>	<b>100.0%</b>	<b>100.0%</b>	<b>24,433</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.9%	0	0.0%	1.3%	3.4%
	Moderate	3	5.0%	9.9%	72	1.6%	6.5%	10.5%
	Middle	23	38.3%	36.6%	1,708	37.8%	31.4%	45.1%
	Upper	34	56.7%	51.5%	2,744	60.7%	60.8%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>60</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,524</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	19.3%	0	0.0%	16.8%	19.3%
	Moderate	0	0.0%	18.4%	0	0.0%	5.7%	18.4%
	Middle	1	33.3%	40.4%	750	6.7%	31.9%	40.4%
	Upper	2	66.7%	21.9%	10,500	93.3%	45.6%	21.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,250</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	5	1.6%	2.9%	1,295	1.5%	3.1%	3.4%
	Moderate	20	6.4%	9.6%	4,099	4.8%	6.7%	10.5%
	Middle	108	34.4%	42.7%	17,056	19.9%	37.4%	45.1%
	Upper	181	57.6%	44.8%	63,396	73.8%	52.8%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>314</b>	<b>100.0%</b>	<b>100.0%</b>	<b>85,846</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Chattanooga-Cleveland CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	6	4.5%	3.4%	1,374	2.8%	2.4%	3.4%
	Moderate	4	3.0%	9.6%	473	1.0%	6.6%	10.5%
	Middle	49	36.8%	42.9%	16,107	32.6%	38.6%	45.1%
	Upper	74	55.6%	44.1%	31,457	63.7%	52.4%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>133</b>	<b>100.0%</b>	<b>100.0%</b>	<b>49,411</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	2	1.8%	1.9%	137	0.6%	1.3%	3.4%
	Moderate	5	4.4%	7.7%	372	1.6%	4.9%	10.5%
	Middle	43	37.7%	42.6%	5,068	21.7%	37.5%	45.1%
	Upper	64	56.1%	47.8%	17,831	76.2%	56.3%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>114</b>	<b>100.0%</b>	<b>100.0%</b>	<b>23,408</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	3	4.1%	3.5%	100	1.8%	1.9%	3.4%
	Moderate	5	6.8%	8.8%	360	6.4%	7.3%	10.5%
	Middle	29	39.2%	40.8%	1,871	33.2%	39.3%	45.1%
	Upper	37	50.0%	47.0%	3,310	58.7%	51.5%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>74</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,641</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	12.8%	0	0.0%	4.9%	16.4%
	Moderate	1	50.0%	24.0%	608	58.9%	16.4%	17.3%
	Middle	1	50.0%	39.2%	424	41.1%	29.4%	38.1%
	Upper	0	0.0%	24.0%	0	0.0%	49.3%	28.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,032</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	11	3.4%	2.9%	1,611	2.0%	2.3%	3.4%
	Moderate	15	4.6%	9.0%	1,813	2.3%	7.0%	10.5%
	Middle	122	37.8%	42.5%	23,470	29.5%	37.4%	45.1%
	Upper	175	54.2%	45.5%	52,598	66.2%	53.3%	41.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>323</b>	<b>100.0%</b>	<b>100.0%</b>	<b>79,492</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of Small Business Loans Assessment Area: Chattanooga-Cleveland CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	51	15.5%	7.3%	\$11,743	14.4%	10.5%	7.3%
Moderate	57	17.4%	13.1%	\$12,439	15.2%	15.0%	14.9%
Middle	119	36.3%	39.9%	\$34,380	42.0%	38.8%	41.5%
Upper	101	30.8%	38.3%	\$23,215	28.4%	35.3%	36.1%
Unknown	0	0.0%	1.3%	\$0	0.0%	0.5%	0.2%
<b>TOTAL</b>	<b>328</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$81,777</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Chattanooga-Cleveland CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	45	13.6%	7.8%	\$8,688	10.8%	10.8%	7.0%
Moderate	60	18.1%	13.2%	\$15,899	19.7%	15.6%	14.6%
Middle	143	43.2%	40.0%	\$40,549	50.2%	40.2%	41.5%
Upper	83	25.1%	37.5%	\$15,681	19.4%	32.8%	36.7%
Unknown	0	0.0%	1.5%	\$0	0.0%	0.7%	0.1%
<b>TOTAL</b>	<b>331</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$80,817</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Chattanooga-Cleveland CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	54	16.0%	8.4%	\$16,070	17.3%	12.4%	7.1%
Moderate	69	20.5%	13.2%	\$20,634	22.2%	14.1%	14.8%
Middle	137	40.7%	39.0%	\$38,208	41.1%	40.2%	41.6%
Upper	77	22.8%	37.7%	\$18,046	19.4%	32.8%	36.4%
Unknown	0	0.0%	1.6%	\$0	0.0%	0.5%	0.1%
<b>TOTAL</b>	<b>337</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,958</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## Florida

Miami-Fort Lauderdale, Florida Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Miami-Key West CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.3%	0	0.0%	0.5%	23.1%
	Moderate	0	0.0%	8.7%	0	0.0%	4.6%	16.8%
	Middle	0	0.0%	18.9%	0	0.0%	13.6%	17.6%
	Upper	0	0.0%	53.3%	0	0.0%	64.4%	42.5%
	Unknown	0	0.0%	17.8%	0	0.0%	17.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.4%	0	0.0%	1.6%	23.1%
	Moderate	0	0.0%	9.1%	0	0.0%	4.9%	16.8%
	Middle	0	0.0%	16.9%	0	0.0%	11.6%	17.6%
	Upper	0	0.0%	52.7%	0	0.0%	63.4%	42.5%
	Unknown	0	0.0%	17.8%	0	0.0%	18.5%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.5%	0	0.0%	1.2%	23.1%
	Moderate	0	0.0%	10.0%	0	0.0%	4.5%	16.8%
	Middle	0	0.0%	18.9%	0	0.0%	10.9%	17.6%
	Upper	0	0.0%	61.6%	0	0.0%	75.5%	42.5%
	Unknown	0	0.0%	5.1%	0	0.0%	7.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.6%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	42.5%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.1%	0	0.0%	0.7%	23.1%
	Moderate	0	0.0%	8.8%	0	0.0%	4.3%	16.8%
	Middle	0	0.0%	18.2%	0	0.0%	12.0%	17.6%
	Upper	0	0.0%	53.2%	0	0.0%	59.2%	42.5%
	Unknown	0	0.0%	17.7%	0	0.0%	23.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Miami-Key West CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.5%	0	0.0%	0.7%	23.1%
	Moderate	12	7.7%	7.9%	1,781	2.9%	4.0%	16.8%
	Middle	20	12.9%	18.3%	3,579	5.9%	12.9%	17.6%
	Upper	121	78.1%	53.9%	54,413	90.1%	63.8%	42.5%
	Unknown	2	1.3%	18.5%	613	1.0%	18.6%	0.0%
	<b>TOTAL</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>60,386</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.6%	0	0.0%	1.8%	23.1%
	Moderate	4	6.3%	9.3%	981	3.4%	5.2%	16.8%
	Middle	7	11.1%	17.4%	1,158	4.1%	12.0%	17.6%
	Upper	49	77.8%	53.8%	23,420	82.2%	62.9%	42.5%
	Unknown	3	4.8%	15.9%	2,937	10.3%	18.1%	0.0%
	<b>TOTAL</b>	<b>63</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28,496</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	2.4%	2.1%	60	1.0%	1.1%	23.1%
	Moderate	0	0.0%	6.7%	0	0.0%	3.5%	16.8%
	Middle	8	19.0%	14.4%	904	14.4%	8.9%	17.6%
	Upper	33	78.6%	71.0%	5,307	84.6%	77.8%	42.5%
	Unknown	0	0.0%	5.8%	0	0.0%	8.7%	0.0%
	<b>TOTAL</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,271</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.8%
	Middle	0	0.0%	0.2%	0	0.0%	0.0%	17.6%
	Upper	0	0.0%	0.4%	0	0.0%	0.0%	42.5%
	Unknown	0	0.0%	99.4%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	0.4%	2.1%	60	0.1%	0.9%	23.1%
	Moderate	16	6.2%	8.0%	2,762	2.9%	3.8%	16.8%
	Middle	35	13.5%	17.2%	5,641	5.9%	11.1%	17.6%
	Upper	203	78.1%	53.2%	83,140	87.4%	57.2%	42.5%
	Unknown	5	1.9%	19.5%	3,550	3.7%	26.9%	0.0%
	<b>TOTAL</b>	<b>260</b>	<b>100.0%</b>	<b>100.0%</b>	<b>95,153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Miami-Key West CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.2%	0	0.0%	1.2%	23.1%
	Moderate	9	5.6%	8.5%	971	1.3%	4.5%	16.8%
	Middle	20	12.3%	19.7%	4,318	5.7%	14.4%	17.6%
	Upper	129	79.6%	53.5%	68,054	89.8%	63.7%	42.5%
	Unknown	4	2.5%	16.1%	2,416	3.2%	16.3%	0.0%
	<b>TOTAL</b>	<b>162</b>	<b>100.0%</b>	<b>100.0%</b>	<b>75,759</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	1	1.2%	3.2%	88	0.2%	1.8%	23.1%
	Moderate	4	4.8%	7.8%	448	0.8%	4.0%	16.8%
	Middle	3	3.6%	16.1%	497	0.9%	10.6%	17.6%
	Upper	72	86.7%	53.5%	54,595	95.8%	62.1%	42.5%
	Unknown	3	3.6%	19.4%	1,387	2.4%	21.5%	0.0%
	<b>TOTAL</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>57,015</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.3%	0	0.0%	1.3%	23.1%
	Moderate	1	5.0%	6.9%	100	2.9%	3.9%	16.8%
	Middle	3	15.0%	14.2%	302	8.7%	8.7%	17.6%
	Upper	15	75.0%	73.3%	2,561	74.0%	78.6%	42.5%
	Unknown	1	5.0%	3.3%	500	14.4%	7.5%	0.0%
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,463</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.8%
	Middle	0	0.0%	0.2%	0	0.0%	0.0%	17.6%
	Upper	0	0.0%	1.5%	0	0.0%	0.1%	42.5%
	Unknown	3	100.0%	98.3%	4,958	100.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,958</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	0.4%	2.5%	88	0.1%	1.3%	23.1%
	Moderate	14	5.2%	8.0%	1,519	1.1%	3.9%	16.8%
	Middle	26	9.7%	17.8%	5,117	3.6%	11.5%	17.6%
	Upper	216	80.6%	53.8%	125,210	88.7%	57.2%	42.5%
	Unknown	11	4.1%	17.9%	9,261	6.6%	26.2%	0.0%
	<b>TOTAL</b>	<b>268</b>	<b>100.0%</b>	<b>100.0%</b>	<b>141,195</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Miami-Key West CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	5	50.0%	52.7%	\$469	19.6%	34.3%	91.4%
	Over \$1 Million/Unknown	5	50.0%	47.3%	\$1,920	80.4%	65.7%	8.6%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,389</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	4	40.0%	96.2%	\$210	8.8%	50.1%	
	\$100,001-\$250,000	4	40.0%	2.1%	\$704	29.5%	13.8%	
	\$250,001-\$1 Million	2	20.0%	1.7%	\$1,475	61.7%	36.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,389</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	3	60.0%		\$110	23.5%	
		\$100,001-\$250,000	2	40.0%		\$359	76.5%	
		\$250,001-\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>		<b>\$469</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Miami-Key West CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	41	40.2%	46.3%	\$4,832	22.7%	31.8%	92.6%
	Over \$1 Million/ Unknown	61	59.8%	53.7%	\$16,489	77.3%	68.2%	7.4%
	<b>TOTAL</b>	<b>102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,321</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	64	62.7%	96.4%	\$3,290	15.4%	52.9%	
	\$100,001– \$250,000	15	14.7%	2.0%	\$2,732	12.8%	13.3%	
	\$250,001– \$1 Million	23	22.5%	1.6%	\$15,299	71.8%	33.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,321</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	31	30.4%		\$1,273	6.0%	
		\$100,001– \$250,000	5	4.9%		\$827	3.9%	
		\$250,001– \$1 Million	5	4.9%		\$2,732	12.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>41</b>	<b>40.2%</b>		<b>\$4,832</b>	<b>22.7%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Miami-Key West CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	60	40.3%	48.5%	\$8,499	27.1%	31.6%	92.9%
	Over \$1 Million/ Unknown	89	59.7%	51.5%	\$22,860	72.9%	68.4%	7.1%
	<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$31,359</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	82	55.0%	96.5%	\$3,622	11.6%	55.2%	
	\$100,001–\$250,000	28	18.8%	2.1%	\$4,821	15.4%	13.9%	
	\$250,001–\$1 Million	39	26.2%	1.4%	\$22,916	73.1%	30.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$31,359</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	44	29.5%		\$1,516	4.8%	
		\$100,001–\$250,000	5	3.4%		\$900	2.9%	
		\$250,001–\$1 Million	11	7.4%		\$6,083	19.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>60</b>	<b>40.3%</b>		<b>\$8,499</b>	<b>27.1%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Miami-Key West CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.3%	0	0.0%	1.6%	2.3%
	Moderate	0	0.0%	21.0%	0	0.0%	14.7%	22.7%
	Middle	0	0.0%	32.9%	0	0.0%	26.8%	32.5%
	Upper	0	0.0%	43.2%	0	0.0%	56.2%	42.4%
	Unknown	0	0.0%	0.6%	0	0.0%	0.7%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.4%	0	0.0%	0.9%	2.3%
	Moderate	0	0.0%	17.8%	0	0.0%	11.8%	22.7%
	Middle	0	0.0%	33.1%	0	0.0%	26.1%	32.5%
	Upper	0	0.0%	47.6%	0	0.0%	60.9%	42.4%
	Unknown	0	0.0%	0.2%	0	0.0%	0.4%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.0%	0	0.0%	2.8%	2.3%
	Moderate	0	0.0%	18.9%	0	0.0%	10.9%	22.7%
	Middle	0	0.0%	32.2%	0	0.0%	22.2%	32.5%
	Upper	0	0.0%	46.7%	0	0.0%	64.0%	42.4%
	Unknown	0	0.0%	0.2%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	15.3%	0	0.0%	9.2%	6.6%
	Moderate	0	0.0%	37.2%	0	0.0%	28.1%	29.9%
	Middle	0	0.0%	30.2%	0	0.0%	44.1%	30.2%
	Upper	0	0.0%	16.8%	0	0.0%	18.2%	32.6%
	Unknown	0	0.0%	0.4%	0	0.0%	0.3%	0.7%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.0%	0	0.0%	2.0%	2.3%
	Moderate	0	0.0%	20.0%	0	0.0%	15.0%	22.7%
	Middle	0	0.0%	32.9%	0	0.0%	27.9%	32.5%
	Upper	0	0.0%	44.6%	0	0.0%	54.5%	42.4%
	Unknown	0	0.0%	0.5%	0	0.0%	0.6%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of HMDA Loans								
Assessment Area: Miami-Key West CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	4	2.6%	2.1%	3,007	5.0%	1.4%	2.3%
	Moderate	25	16.1%	21.5%	5,471	9.1%	15.5%	22.7%
	Middle	26	16.8%	33.3%	7,170	11.9%	27.3%	32.5%
	Upper	100	64.5%	42.6%	44,738	74.1%	55.3%	42.4%
	Unknown	0	0.0%	0.5%	0	0.0%	0.5%	0.1%
	<b>TOTAL</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>60,386</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.7%	0	0.0%	1.1%	2.3%
	Moderate	9	14.3%	19.5%	1,775	6.2%	13.8%	22.7%
	Middle	8	12.7%	32.2%	3,604	12.6%	25.1%	32.5%
	Upper	46	73.0%	46.4%	23,117	81.1%	59.8%	42.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.2%	0.1%
	<b>TOTAL</b>	<b>63</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28,496</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.1%	0	0.0%	0.9%	2.3%
	Moderate	3	7.1%	13.3%	413	6.6%	9.2%	22.7%
	Middle	4	9.5%	29.0%	385	6.1%	23.0%	32.5%
	Upper	35	83.3%	56.3%	5,473	87.3%	66.6%	42.4%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.1%
	<b>TOTAL</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,271</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	11.0%	0	0.0%	16.3%	6.6%
	Moderate	0	0.0%	47.1%	0	0.0%	30.4%	29.9%
	Middle	0	0.0%	24.2%	0	0.0%	30.7%	30.2%
	Upper	0	0.0%	17.1%	0	0.0%	22.5%	32.6%
	Unknown	0	0.0%	0.6%	0	0.0%	0.1%	0.7%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	4	1.5%	1.9%	3,007	3.2%	2.6%	2.3%
	Moderate	37	14.2%	20.5%	7,659	8.0%	16.1%	22.7%
	Middle	38	14.6%	32.7%	11,159	11.7%	26.7%	32.5%
	Upper	181	69.6%	44.5%	73,328	77.1%	54.2%	42.4%
	Unknown	0	0.0%	0.4%	0	0.0%	0.4%	0.1%
	<b>TOTAL</b>	<b>260</b>	<b>100.0%</b>	<b>100.0%</b>	<b>95,153</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Miami-Key West CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	0.6%	2.2%	157	0.2%	1.5%	2.3%
	Moderate	28	17.3%	21.8%	6,453	8.5%	16.2%	22.7%
	Middle	20	12.3%	33.5%	7,558	10.0%	27.8%	32.5%
	Upper	113	69.8%	42.0%	61,591	81.3%	54.1%	42.4%
	Unknown	0	0.0%	0.5%	0	0.0%	0.5%	0.1%
	<b>TOTAL</b>	<b>162</b>	<b>100.0%</b>	<b>100.0%</b>	<b>75,759</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.7%	0	0.0%	1.1%	2.3%
	Moderate	9	10.8%	17.7%	1,759	3.1%	12.2%	22.7%
	Middle	12	14.5%	31.3%	6,744	11.8%	24.5%	32.5%
	Upper	62	74.7%	49.1%	48,512	85.1%	61.9%	42.4%
	Unknown	0	0.0%	0.2%	0	0.0%	0.3%	0.1%
	<b>TOTAL</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>57,015</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.2%	0	0.0%	0.8%	2.3%
	Moderate	2	10.0%	14.2%	220	6.4%	10.3%	22.7%
	Middle	3	15.0%	28.1%	680	19.6%	20.5%	32.5%
	Upper	15	75.0%	56.4%	2,563	74.0%	68.3%	42.4%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,463</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	16.6%	0	0.0%	8.0%	6.6%
	Moderate	1	33.3%	43.8%	1,920	38.7%	33.4%	29.9%
	Middle	0	0.0%	22.0%	0	0.0%	31.3%	30.2%
	Upper	2	66.7%	17.2%	3,038	61.3%	27.3%	32.6%
	Unknown	0	0.0%	0.4%	0	0.0%	0.0%	0.7%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,958</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	0.4%	2.0%	157	0.1%	2.0%	2.3%
	Moderate	40	14.9%	20.0%	10,352	7.3%	16.3%	22.7%
	Middle	35	13.1%	32.4%	14,982	10.6%	26.8%	32.5%
	Upper	192	71.6%	45.2%	115,704	81.9%	54.7%	42.4%
	Unknown	0	0.0%	0.4%	0	0.0%	0.4%	0.1%
	<b>TOTAL</b>	<b>268</b>	<b>100.0%</b>	<b>100.0%</b>	<b>141,195</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Miami-Key West CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	4.1%	\$0	0.0%	5.3%	3.9%
Moderate	2	20.0%	21.2%	\$510	21.3%	23.1%	22.3%
Middle	3	30.0%	26.5%	\$484	20.3%	24.0%	27.7%
Upper	5	50.0%	46.2%	\$1,395	58.4%	44.8%	44.8%
Unknown	0	0.0%	1.9%	\$0	0.0%	2.8%	1.3%
<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,389</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Miami-Key West CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	2	2.0%	3.9%	\$193	0.9%	5.1%	4.0%
Moderate	17	16.7%	21.3%	\$2,697	12.6%	23.3%	22.9%
Middle	17	16.7%	26.6%	\$2,624	12.3%	24.2%	27.9%
Upper	65	63.7%	46.3%	\$15,557	73.0%	44.8%	43.9%
Unknown	1	1.0%	1.9%	\$250	1.2%	2.6%	1.3%
<b>TOTAL</b>	<b>102</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,321</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Miami-Key West CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	7	4.7%	4.0%	\$2,276	7.3%	5.1%	4.0%
Moderate	25	16.8%	21.8%	\$5,610	17.9%	23.0%	22.9%
Middle	46	30.9%	26.5%	\$9,663	30.8%	24.5%	27.9%
Upper	70	47.0%	45.8%	\$13,562	43.2%	44.8%	43.8%
Unknown	1	0.7%	1.9%	\$250	0.8%	2.6%	1.4%
<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$31,361</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Cape Coral-Fort Myers-Naples, Florida Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Ft Myers-Naples CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.9%	0	0.0%	0.9%	20.8%
	Moderate	0	0.0%	13.0%	0	0.0%	8.0%	18.2%
	Middle	0	0.0%	18.3%	0	0.0%	13.9%	19.5%
	Upper	1	100.0%	50.5%	164	100.0%	63.2%	41.5%
	Unknown	0	0.0%	16.2%	0	0.0%	14.1%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.0%	0	0.0%	2.3%	20.8%
	Moderate	0	0.0%	14.4%	0	0.0%	8.2%	18.2%
	Middle	0	0.0%	20.0%	0	0.0%	14.4%	19.5%
	Upper	0	0.0%	45.0%	0	0.0%	60.1%	41.5%
	Unknown	0	0.0%	15.5%	0	0.0%	15.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	5.2%	0	0.0%	1.9%	20.8%
	Moderate	0	0.0%	15.3%	0	0.0%	10.4%	18.2%
	Middle	0	0.0%	24.2%	0	0.0%	18.0%	19.5%
	Upper	0	0.0%	51.6%	0	0.0%	65.7%	41.5%
	Unknown	0	0.0%	3.7%	0	0.0%	4.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.5%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.8%	0	0.0%	1.2%	20.8%
	Moderate	0	0.0%	13.5%	0	0.0%	7.8%	18.2%
	Middle	0	0.0%	18.9%	0	0.0%	13.5%	19.5%
	Upper	1	100.0%	49.1%	164	100.0%	60.1%	41.5%
	Unknown	0	0.0%	15.7%	0	0.0%	17.5%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans Assessment Area: Ft Myers-Naples CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.8%	0	0.0%	1.4%	20.8%
	Moderate	4	9.8%	14.4%	604	3.2%	9.3%	18.2%
	Middle	4	9.8%	20.2%	692	3.7%	15.6%	19.5%
	Upper	33	80.5%	46.0%	17,583	93.1%	58.4%	41.5%
	Unknown	0	0.0%	16.6%	0	0.0%	15.4%	0.0%
	<b>TOTAL</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18,879</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	1	3.6%	7.3%	35	0.5%	3.6%	20.8%
	Moderate	4	14.3%	16.7%	378	5.6%	10.5%	18.2%
	Middle	7	25.0%	22.6%	1,116	16.4%	17.1%	19.5%
	Upper	15	53.6%	40.0%	5,106	75.1%	53.4%	41.5%
	Unknown	1	3.6%	13.5%	166	2.4%	15.4%	0.0%
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,801</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	4	10.5%	5.1%	179	4.6%	3.9%	20.8%
	Moderate	8	21.1%	14.9%	1,089	28.0%	9.8%	18.2%
	Middle	8	21.1%	22.9%	474	12.2%	16.4%	19.5%
	Upper	17	44.7%	52.3%	1,844	47.5%	62.6%	41.5%
	Unknown	1	2.6%	4.8%	300	7.7%	7.3%	0.0%
	<b>TOTAL</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,886</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.5%
	Upper	0	0.0%	6.6%	0	0.0%	0.3%	41.5%
	Unknown	1	100.0%	93.4%	525	100.0%	99.7%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>525</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	5	4.6%	3.9%	214	0.7%	1.8%	20.8%
	Moderate	16	14.8%	14.7%	2,071	6.9%	8.7%	18.2%
	Middle	19	17.6%	20.5%	2,282	7.6%	14.5%	19.5%
	Upper	65	60.2%	44.7%	24,533	81.5%	53.6%	41.5%
	Unknown	3	2.8%	16.2%	991	3.3%	21.4%	0.0%
	<b>TOTAL</b>	<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,091</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Ft Myers-Naples CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	2.6%	3.5%	125	0.5%	1.8%	20.8%
	Moderate	4	10.3%	16.9%	493	1.9%	11.2%	18.2%
	Middle	7	17.9%	21.2%	1,485	5.6%	16.7%	19.5%
	Upper	26	66.7%	46.6%	24,247	91.7%	58.4%	41.5%
	Unknown	1	2.6%	11.9%	100	0.4%	11.9%	0.0%
	<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26,450</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	6	15.8%	5.3%	918	6.0%	2.5%	20.8%
	Moderate	3	7.9%	13.4%	372	2.4%	7.9%	18.2%
	Middle	5	13.2%	18.4%	731	4.7%	13.3%	19.5%
	Upper	24	63.2%	41.5%	13,386	86.9%	54.9%	41.5%
	Unknown	0	0.0%	21.4%	0	0.0%	21.5%	0.0%
	<b>TOTAL</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15,407</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	5.6%	0	0.0%	2.7%	20.8%
	Moderate	2	14.3%	15.4%	180	13.5%	9.0%	18.2%
	Middle	7	50.0%	23.8%	774	58.0%	17.1%	19.5%
	Upper	5	35.7%	52.4%	380	28.5%	64.1%	41.5%
	Unknown	0	0.0%	2.8%	0	0.0%	7.2%	0.0%
	<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,334</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.5%
	Upper	0	0.0%	1.4%	0	0.0%	0.7%	41.5%
	Unknown	0	0.0%	98.6%	0	0.0%	99.3%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	7	7.7%	4.2%	1,043	2.4%	1.9%	20.8%
	Moderate	9	9.9%	15.7%	1,045	2.4%	9.3%	18.2%
	Middle	19	20.9%	20.1%	2,990	6.9%	14.2%	19.5%
	Upper	55	60.4%	45.3%	38,013	88.0%	53.5%	41.5%
	Unknown	1	1.1%	14.6%	100	0.2%	21.1%	0.0%
	<b>TOTAL</b>	<b>91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>43,191</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Ft Myers-Naples CSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	1	25.0%	49.5%	\$65	12.5%	37.0%	93.0%
	Over \$1 Million/Unknown	3	75.0%	50.5%	\$456	87.5%	63.0%	7.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	2	50.0%	95.6%	\$165	31.7%	45.4%	
	\$100,001-\$250,000	2	50.0%	2.2%	\$356	68.3%	12.9%	
	\$250,001-\$1 Million	0	0.0%	2.3%	\$0	0.0%	41.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$521</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	1	100.0%		\$65	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%	
		<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>		<b>\$65</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Ft Myers-Naples CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	49	53.8%	45.5%	\$5,325	39.6%	32.7%	94.0%
	Over \$1 Million/ Unknown	42	46.2%	54.5%	\$8,116	60.4%	67.3%	6.0%
	<b>TOTAL</b>	<b>91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,441</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	57	62.6%	95.4%	\$2,705	20.1%	45.7%	
	\$100,001–\$250,000	19	20.9%	2.4%	\$3,261	24.3%	13.8%	
	\$250,001–\$1 Million	15	16.5%	2.2%	\$7,475	55.6%	40.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,441</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	34	37.4%		\$1,124	8.4%	
		\$100,001–\$250,000	8	8.8%		\$1,600	11.9%	
		\$250,001–\$1 Million	7	7.7%		\$2,601	19.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>49</b>	<b>53.8%</b>		<b>\$5,325</b>	<b>39.6%</b>	



Small Business Loans by Revenue and Loan Size								
Assessment Area: Ft Myers-Naples CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	42	29.6%	46.1%	\$5,864	21.6%	33.0%	94.2%
	Over \$1 Million/ Unknown	100	70.4%	53.9%	\$21,246	78.4%	67.0%	5.8%
	<b>TOTAL</b>	<b>142</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,110</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	82	57.7%	95.5%	\$3,719	13.7%	46.5%	
	\$100,001– \$250,000	27	19.0%	2.4%	\$4,542	16.8%	14.4%	
	\$250,001– \$1 Million	33	23.2%	2.1%	\$18,849	69.5%	39.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>142</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,110</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	30	21.1%		\$763	2.8%	
		\$100,001– \$250,000	5	3.5%		\$809	3.0%	
		\$250,001– \$1 Million	7	4.9%		\$4,292	15.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>42</b>	<b>29.6%</b>		<b>\$5,864</b>	<b>21.6%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Ft Myers-Naples CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.6%	0	0.0%	0.9%	2.1%
	Moderate	0	0.0%	20.2%	0	0.0%	14.8%	17.8%
	Middle	0	0.0%	43.6%	0	0.0%	39.4%	43.2%
	Upper	1	100.0%	34.5%	164	100.0%	44.7%	36.9%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.1%	0	0.0%	0.6%	2.1%
	Moderate	0	0.0%	16.7%	0	0.0%	11.1%	17.8%
	Middle	0	0.0%	48.4%	0	0.0%	40.0%	43.2%
	Upper	0	0.0%	33.8%	0	0.0%	48.3%	36.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	1.3%	0	0.0%	0.5%	2.1%
	Moderate	0	0.0%	17.3%	0	0.0%	11.0%	17.8%
	Middle	0	0.0%	50.8%	0	0.0%	44.3%	43.2%
	Upper	0	0.0%	30.6%	0	0.0%	44.1%	36.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	8.5%	0	0.0%	2.6%	2.5%
	Moderate	0	0.0%	29.6%	0	0.0%	26.5%	17.5%
	Middle	0	0.0%	42.3%	0	0.0%	46.3%	31.8%
	Upper	0	0.0%	19.7%	0	0.0%	24.6%	48.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	1.5%	0	0.0%	0.9%	2.1%
	Moderate	0	0.0%	19.3%	0	0.0%	14.4%	17.8%
	Middle	0	0.0%	45.0%	0	0.0%	39.9%	43.2%
	Upper	1	100.0%	34.2%	164	100.0%	44.7%	36.9%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Ft Myers-Naples CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	1.7%	0	0.0%	1.0%	2.1%
	Moderate	7	17.1%	19.7%	806	4.3%	14.8%	17.8%
	Middle	12	29.3%	43.0%	2,826	15.0%	38.9%	43.2%
	Upper	22	53.7%	35.6%	15,247	80.8%	45.3%	36.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>18,879</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.2%	0	0.0%	0.6%	2.1%
	Moderate	4	14.3%	17.3%	655	9.6%	11.8%	17.8%
	Middle	15	53.6%	47.6%	3,016	44.3%	40.7%	43.2%
	Upper	9	32.1%	33.9%	3,130	46.0%	46.8%	36.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>28</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,801</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.6%	0	0.0%	0.5%	2.1%
	Moderate	8	21.1%	14.7%	389	10.0%	12.1%	17.8%
	Middle	17	44.7%	48.3%	1,515	39.0%	41.5%	43.2%
	Upper	13	34.2%	36.4%	1,982	51.0%	45.3%	36.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.7%	0.0%
	<b>TOTAL</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,886</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	13.2%	0	0.0%	6.5%	2.5%
	Moderate	1	100.0%	46.1%	525	100.0%	44.5%	17.5%
	Middle	0	0.0%	25.0%	0	0.0%	39.9%	31.8%
	Upper	0	0.0%	15.8%	0	0.0%	9.1%	48.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>525</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	1.5%	0	0.0%	1.3%	2.1%
	Moderate	20	18.5%	18.8%	2,375	7.9%	16.0%	17.8%
	Middle	44	40.7%	44.2%	7,357	24.4%	39.1%	43.2%
	Upper	44	40.7%	35.5%	20,359	67.7%	43.6%	36.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>30,091</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Ft Myers-Naples CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.0%	0	0.0%	1.4%	2.1%
	Moderate	5	12.8%	19.2%	568	2.1%	14.9%	17.8%
	Middle	10	25.6%	43.4%	2,515	9.5%	38.9%	43.2%
	Upper	24	61.5%	35.4%	23,367	88.3%	44.7%	36.9%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>26,450</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.0%	0	0.0%	0.6%	2.1%
	Moderate	4	10.5%	16.1%	529	3.4%	11.5%	17.8%
	Middle	16	42.1%	46.9%	4,799	31.1%	39.7%	43.2%
	Upper	17	44.7%	36.0%	8,729	56.7%	48.1%	36.9%
	Unknown	1	2.6%	0.0%	1,350	8.8%	0.0%	0.0%
	<b>TOTAL</b>	<b>38</b>	<b>100.0%</b>	<b>100.0%</b>	<b>15,407</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.7%	0	0.0%	0.4%	2.1%
	Moderate	2	14.3%	15.2%	101	7.6%	11.2%	17.8%
	Middle	7	50.0%	47.0%	731	54.8%	39.9%	43.2%
	Upper	5	35.7%	37.2%	502	37.6%	48.5%	36.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,334</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	8.5%	0	0.0%	1.3%	2.5%
	Moderate	0	0.0%	38.0%	0	0.0%	22.6%	17.5%
	Middle	0	0.0%	28.2%	0	0.0%	38.7%	31.8%
	Upper	0	0.0%	25.4%	0	0.0%	37.4%	48.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	1.6%	0	0.0%	1.1%	2.1%
	Moderate	11	12.1%	18.0%	1,198	2.8%	14.3%	17.8%
	Middle	33	36.3%	44.4%	8,045	18.6%	38.8%	43.2%
	Upper	46	50.5%	35.9%	32,598	75.5%	45.7%	36.9%
	Unknown	1	1.1%	0.1%	1,350	3.1%	0.1%	0.0%
	<b>TOTAL</b>	<b>91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>43,191</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Ft Myers-Naples CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	2.4%	\$0	0.0%	2.9%	2.8%
Moderate	0	0.0%	17.7%	\$0	0.0%	17.5%	17.7%
Middle	2	50.0%	39.0%	\$171	32.8%	34.4%	41.0%
Upper	2	50.0%	40.2%	\$350	67.2%	44.5%	38.4%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.5%	0.1%
<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Ft Myers-Naples CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	1	1.1%	2.4%	\$34	0.3%	2.8%	2.8%
Moderate	13	14.3%	17.7%	\$1,492	11.1%	18.2%	18.8%
Middle	48	52.7%	39.0%	\$7,075	52.6%	33.7%	40.7%
Upper	29	31.9%	40.2%	\$4,840	36.0%	44.8%	37.6%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.5%	0.0%
<b>TOTAL</b>	<b>91</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,441</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Ft Myers-Naples CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	4	2.8%	2.4%	\$1,682	6.2%	2.5%	2.8%
Moderate	20	14.1%	17.9%	\$4,654	17.2%	17.6%	19.1%
Middle	66	46.5%	39.2%	\$11,108	41.0%	35.2%	40.6%
Upper	52	36.6%	39.3%	\$9,666	35.7%	44.2%	37.4%
Unknown	0	0.0%	1.2%	\$0	0.0%	0.5%	0.0%
<b>TOTAL</b>	<b>142</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,110</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

North Port-Sarasota-Bradenton, Florida Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Sarasota MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.5%	0	0.0%	1.6%	17.5%
	Moderate	0	0.0%	16.2%	0	0.0%	10.5%	19.2%
	Middle	0	0.0%	20.9%	0	0.0%	16.6%	21.9%
	Upper	1	100.0%	48.8%	915	100.0%	62.0%	41.4%
	Unknown	0	0.0%	10.6%	0	0.0%	9.3%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>915</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	9.3%	0	0.0%	4.8%	17.5%
	Moderate	0	0.0%	18.9%	0	0.0%	12.3%	19.2%
	Middle	0	0.0%	21.4%	0	0.0%	17.2%	21.9%
	Upper	0	0.0%	38.3%	0	0.0%	52.5%	41.4%
	Unknown	0	0.0%	12.2%	0	0.0%	13.3%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	9.3%	0	0.0%	4.7%	17.5%
	Moderate	0	0.0%	20.1%	0	0.0%	12.8%	19.2%
	Middle	0	0.0%	24.1%	0	0.0%	20.5%	21.9%
	Upper	0	0.0%	42.3%	0	0.0%	57.9%	41.4%
	Unknown	0	0.0%	4.2%	0	0.0%	4.2%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	19.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.4%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	5.3%	0	0.0%	2.4%	17.5%
	Moderate	0	0.0%	17.1%	0	0.0%	10.8%	19.2%
	Middle	0	0.0%	21.1%	0	0.0%	16.5%	21.9%
	Upper	1	100.0%	45.6%	915	100.0%	58.1%	41.4%
	Unknown	0	0.0%	10.8%	0	0.0%	12.3%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>915</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Sarasota MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	8.3%	4.6%	139	5.7%	2.5%	17.5%
	Moderate	5	41.7%	16.9%	770	31.4%	11.4%	19.2%
	Middle	2	16.7%	21.2%	479	19.5%	16.9%	21.9%
	Upper	4	33.3%	44.2%	1,068	43.5%	57.1%	41.4%
	Unknown	0	0.0%	13.0%	0	0.0%	12.2%	0.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,456</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	11.0%	0	0.0%	6.0%	17.5%
	Moderate	3	30.0%	22.1%	421	18.7%	15.2%	19.2%
	Middle	2	20.0%	22.0%	360	16.0%	18.4%	21.9%
	Upper	5	50.0%	33.5%	1,475	65.4%	47.8%	41.4%
	Unknown	0	0.0%	11.5%	0	0.0%	12.6%	0.0%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,256</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	6.8%	0	0.0%	4.0%	17.5%
	Moderate	1	5.3%	19.3%	85	4.8%	13.1%	19.2%
	Middle	11	57.9%	25.3%	940	53.4%	20.1%	21.9%
	Upper	7	36.8%	45.4%	735	41.8%	56.4%	41.4%
	Unknown	0	0.0%	3.3%	0	0.0%	6.4%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,760</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	19.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.4%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	2.4%	6.3%	139	2.1%	3.0%	17.5%
	Moderate	9	22.0%	18.0%	1,276	19.7%	11.0%	19.2%
	Middle	15	36.6%	21.5%	1,779	27.5%	15.6%	21.9%
	Upper	16	39.0%	41.5%	3,278	50.6%	50.5%	41.4%
	Unknown	0	0.0%	12.7%	0	0.0%	20.0%	0.0%
	<b>TOTAL</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,472</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Sarasota MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	4.2%	0	0.0%	2.2%	17.5%
	Moderate	2	16.7%	17.9%	400	14.7%	11.8%	19.2%
	Middle	3	25.0%	22.0%	538	19.8%	17.9%	21.9%
	Upper	7	58.3%	46.2%	1,783	65.5%	58.4%	41.4%
	Unknown	0	0.0%	9.7%	0	0.0%	9.7%	0.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,721</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	7.1%	0	0.0%	3.6%	17.5%
	Moderate	4	44.4%	17.1%	536	22.7%	10.5%	19.2%
	Middle	1	11.1%	19.1%	100	4.2%	14.7%	21.9%
	Upper	4	44.4%	39.0%	1,730	73.1%	52.7%	41.4%
	Unknown	0	0.0%	17.7%	0	0.0%	18.6%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	8.3%	0	0.0%	5.5%	17.5%
	Moderate	1	20.0%	16.5%	45	8.2%	11.1%	19.2%
	Middle	2	40.0%	26.4%	200	36.4%	18.9%	21.9%
	Upper	2	40.0%	46.0%	305	55.5%	59.6%	41.4%
	Unknown	0	0.0%	2.9%	0	0.0%	4.9%	0.0%
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Moderate	0	0.0%	3.2%	0	0.0%	0.3%	19.2%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	21.9%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.4%
	Unknown	1	100.0%	96.8%	350	100.0%	99.7%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>350</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	5.3%	0	0.0%	2.4%	17.5%
	Moderate	7	25.9%	17.4%	981	16.4%	10.2%	19.2%
	Middle	6	22.2%	21.2%	838	14.0%	15.2%	21.9%
	Upper	13	48.1%	43.9%	3,818	63.8%	51.7%	41.4%
	Unknown	1	3.7%	12.1%	350	5.8%	20.4%	0.0%
	<b>TOTAL</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,987</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Small Business Loans by Revenue and Loan Size								
Assessment Area: Sarasota MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	0	0.0%	53.0%	\$0	0.0%	38.8%	93.4%
	Over \$1 Million/ Unknown	2	100.0%	47.0%	\$549	100.0%	61.2%	6.6%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$549</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	0	0.0%	95.1%	\$0	0.0%	41.9%	
	\$100,001–\$250,000	1	50.0%	2.4%	\$250	45.5%	14.5%	
	\$250,001–\$1 Million	1	50.0%	2.4%	\$299	54.5%	43.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$549</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%	
		\$100,001–\$250,000	0	0.0%		\$0	0.0%	
		\$250,001–\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>		<b>\$0</b>	<b>0.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Sarasota MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	8	66.7%	48.7%	\$254	53.6%	36.2%	94.0%
	Over \$1 Million/ Unknown	4	33.3%	51.3%	\$220	46.4%	63.8%	6.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$474</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	12	100.0%	95.4%	\$474	100.0%	44.0%	
	\$100,001– \$250,000	0	0.0%	2.2%	\$0	0.0%	12.8%	
	\$250,001– \$1 Million	0	0.0%	2.4%	\$0	0.0%	43.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$474</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	8	66.7%		\$254	53.6%	
		\$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%	
		<b>TOTAL</b>	<b>8</b>	<b>66.7%</b>		<b>\$254</b>	<b>53.6%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Sarasota MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	16	69.6%	49.5%	\$1,406	50.9%	37.8%	94.2%
	Over \$1 Million/ Unknown	7	30.4%	50.5%	\$1,355	49.1%	62.2%	5.8%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,761</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	18	78.3%	96.0%	\$730	26.4%	47.8%	
	\$100,001– \$250,000	3	13.0%	2.0%	\$582	21.1%	12.8%	
	\$250,001– \$1 Million	2	8.7%	2.0%	\$1,449	52.5%	39.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,761</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	13	56.5%		\$455	16.5%	
		\$100,001– \$250,000	2	8.7%		\$332	12.0%	
		\$250,001– \$1 Million	1	4.3%		\$619	22.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>16</b>	<b>69.6%</b>		<b>\$1,406</b>	<b>50.9%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Sarasota MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.5%
	Moderate	0	0.0%	13.7%	0	0.0%	9.5%	16.1%
	Middle	1	100.0%	55.1%	915	100.0%	46.5%	55.9%
	Upper	0	0.0%	30.9%	0	0.0%	43.9%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>915</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.1%	0	0.0%	0.0%	0.5%
	Moderate	0	0.0%	13.5%	0	0.0%	9.2%	16.1%
	Middle	0	0.0%	61.0%	0	0.0%	49.1%	55.9%
	Upper	0	0.0%	25.4%	0	0.0%	41.7%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.1%	0	0.0%	0.0%	0.5%
	Moderate	0	0.0%	16.2%	0	0.0%	9.6%	16.1%
	Middle	0	0.0%	63.0%	0	0.0%	54.4%	55.9%
	Upper	0	0.0%	20.7%	0	0.0%	36.0%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.6%
	Moderate	0	0.0%	31.6%	0	0.0%	12.9%	13.6%
	Middle	0	0.0%	36.8%	0	0.0%	50.6%	38.3%
	Upper	0	0.0%	31.6%	0	0.0%	36.4%	47.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.5%
	Moderate	0	0.0%	13.8%	0	0.0%	9.5%	16.1%
	Middle	1	100.0%	57.1%	915	100.0%	47.5%	55.9%
	Upper	0	0.0%	29.0%	0	0.0%	43.0%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>915</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Sarasota MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.3%	0	0.0%	0.1%	0.5%
	Moderate	6	50.0%	13.4%	1,267	51.6%	10.1%	16.1%
	Middle	2	16.7%	54.1%	313	12.7%	45.3%	55.9%
	Upper	4	33.3%	32.2%	876	35.7%	44.5%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,456</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.5%
	Moderate	4	40.0%	15.6%	938	41.6%	11.5%	16.1%
	Middle	4	40.0%	59.3%	600	26.6%	48.0%	55.9%
	Upper	2	20.0%	24.8%	718	31.8%	40.4%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,256</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.2%	0	0.0%	0.2%	0.5%
	Moderate	2	10.5%	12.8%	143	8.1%	10.5%	16.1%
	Middle	10	52.6%	60.8%	743	42.2%	49.9%	55.9%
	Upper	7	36.8%	26.2%	874	49.7%	39.4%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,760</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.6%
	Moderate	0	0.0%	12.5%	0	0.0%	0.8%	13.6%
	Middle	0	0.0%	62.5%	0	0.0%	86.2%	38.3%
	Upper	0	0.0%	25.0%	0	0.0%	13.0%	47.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.5%
	Moderate	12	29.3%	13.8%	2,348	36.3%	9.5%	16.1%
	Middle	16	39.0%	55.7%	1,656	25.6%	49.0%	55.9%
	Upper	13	31.7%	30.2%	2,468	38.1%	41.4%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>41</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,472</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Sarasota MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.5%
	Moderate	0	0.0%	13.8%	0	0.0%	10.2%	16.1%
	Middle	7	58.3%	52.8%	1,329	48.8%	44.4%	55.9%
	Upper	5	41.7%	33.3%	1,392	51.2%	45.3%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,721</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	0.1%	0	0.0%	0.1%	0.5%
	Moderate	0	0.0%	13.0%	0	0.0%	9.1%	16.1%
	Middle	5	55.6%	57.4%	786	33.2%	46.3%	55.9%
	Upper	4	44.4%	29.5%	1,580	66.8%	44.5%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	0.1%	0	0.0%	0.0%	0.5%
	Moderate	1	20.0%	13.1%	45	8.2%	10.8%	16.1%
	Middle	3	60.0%	57.9%	305	55.5%	46.1%	55.9%
	Upper	1	20.0%	29.0%	200	36.4%	43.1%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.6%
	Moderate	1	100.0%	35.5%	350	100.0%	9.2%	13.6%
	Middle	0	0.0%	45.2%	0	0.0%	45.7%	38.3%
	Upper	0	0.0%	19.4%	0	0.0%	45.1%	47.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>350</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	0.2%	0	0.0%	0.1%	0.5%
	Moderate	2	7.4%	13.4%	395	6.6%	9.7%	16.1%
	Middle	15	55.6%	54.4%	2,420	40.4%	44.6%	55.9%
	Upper	10	37.0%	32.0%	3,172	53.0%	45.6%	27.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>27</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,987</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Sarasota MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.4%	\$0	0.0%	1.1%	0.4%
Moderate	1	50.0%	18.0%	\$299	54.5%	17.7%	18.6%
Middle	1	50.0%	43.8%	\$250	45.5%	36.8%	48.4%
Upper	0	0.0%	37.1%	\$0	0.0%	43.8%	32.6%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.5%	0.0%
<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$549</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Sarasota MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.4%	\$0	0.0%	0.6%	0.5%
Moderate	2	16.7%	18.5%	\$75	15.8%	19.1%	19.3%
Middle	2	16.7%	43.8%	\$119	25.1%	36.2%	48.0%
Upper	8	66.7%	36.7%	\$280	59.1%	43.4%	32.1%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.7%	0.0%
<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$474</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Sarasota MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	0.5%	\$0	0.0%	1.0%	0.5%
Moderate	1	4.3%	18.2%	\$5	0.2%	19.4%	19.3%
Middle	12	52.2%	44.5%	\$560	20.3%	36.6%	47.9%
Upper	10	43.5%	36.3%	\$2,196	79.5%	42.5%	32.2%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.5%	0.0%
<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,761</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## Charlotte-Gastonia, North Carolina-South Carolina Multistate Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Charlotte MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	5.6%	0	0.0%	2.5%	23.4%
	Moderate	0	0.0%	18.5%	0	0.0%	11.5%	16.9%
	Middle	0	0.0%	20.0%	0	0.0%	16.5%	18.4%
	Upper	8	100.0%	41.4%	5,560	100.0%	55.8%	41.4%
	Unknown	0	0.0%	14.4%	0	0.0%	13.7%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,560</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	6.7%	0	0.0%	3.1%	23.4%
	Moderate	1	50.0%	15.6%	242	66.9%	9.9%	16.9%
	Middle	1	50.0%	18.8%	120	33.1%	14.9%	18.4%
	Upper	0	0.0%	39.7%	0	0.0%	54.1%	41.4%
	Unknown	0	0.0%	19.2%	0	0.0%	18.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>362</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.9%	0	0.0%	2.6%	23.4%
	Moderate	0	0.0%	15.3%	0	0.0%	7.5%	16.9%
	Middle	0	0.0%	19.3%	0	0.0%	12.5%	18.4%
	Upper	0	0.0%	51.6%	0	0.0%	72.0%	41.4%
	Unknown	0	0.0%	5.9%	0	0.0%	5.4%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.4%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.9%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	41.4%
	Unknown	1	100.0%	100.0%	28,714	100.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28,714</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	6.0%	0	0.0%	2.5%	23.4%
	Moderate	1	9.1%	17.6%	242	0.7%	10.1%	16.9%
	Middle	1	9.1%	19.6%	120	0.3%	14.7%	18.4%
	Upper	8	72.7%	41.2%	5,560	16.1%	51.2%	41.4%
	Unknown	1	9.1%	15.7%	28,714	82.9%	21.5%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34,636</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Borrower Distribution of HMDA Loans								
Assessment Area: Charlotte MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	16	19.3%	5.8%	1,648	7.3%	2.8%	23.4%
	Moderate	21	25.3%	18.3%	2,457	10.9%	11.9%	16.9%
	Middle	3	3.6%	20.3%	740	3.3%	17.0%	18.4%
	Upper	39	47.0%	40.7%	16,698	74.2%	53.5%	41.4%
	Unknown	4	4.8%	14.8%	958	4.3%	14.8%	0.0%
	<b>TOTAL</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22,501</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	9	13.4%	9.4%	757	6.8%	4.9%	23.4%
	Moderate	11	16.4%	17.7%	987	8.9%	12.2%	16.9%
	Middle	11	16.4%	20.7%	1,633	14.7%	17.1%	18.4%
	Upper	35	52.2%	39.7%	7,591	68.4%	52.5%	41.4%
	Unknown	1	1.5%	12.6%	135	1.2%	13.2%	0.0%
	<b>TOTAL</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,103</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	2.9%	4.9%	20	0.7%	2.7%	23.4%
	Moderate	7	20.0%	11.8%	364	12.6%	7.5%	16.9%
	Middle	2	5.7%	18.5%	90	3.1%	13.1%	18.4%
	Upper	24	68.6%	56.5%	2,386	82.7%	66.4%	41.4%
	Unknown	1	2.9%	8.3%	25	0.9%	10.3%	0.0%
	<b>TOTAL</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,885</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.5%	0	0.0%	0.0%	23.4%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.9%
	Middle	0	0.0%	0.5%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	2.6%	0	0.0%	0.1%	41.4%
	Unknown	0	0.0%	96.3%	0	0.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	26	14.1%	6.5%	2,425	6.6%	2.9%	23.4%
	Moderate	39	21.1%	17.1%	3,808	10.4%	10.2%	16.9%
	Middle	16	8.6%	19.8%	2,463	6.7%	14.6%	18.4%
	Upper	98	53.0%	41.3%	26,675	73.1%	46.8%	41.4%
	Unknown	6	3.2%	15.2%	1,118	3.1%	25.7%	0.0%
	<b>TOTAL</b>	<b>185</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36,489</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Charlotte MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	10	8.8%	4.8%	1,026	3.1%	2.3%	23.0%
	Moderate	38	33.6%	17.6%	5,321	16.1%	11.1%	16.8%
	Middle	15	13.3%	21.0%	2,395	7.2%	17.1%	18.3%
	Upper	45	39.8%	43.9%	22,912	69.2%	56.6%	41.9%
	Unknown	5	4.4%	12.6%	1,463	4.4%	12.9%	0.0%
	<b>TOTAL</b>	<b>113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>33,117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	5	7.7%	5.4%	332	1.7%	2.5%	23.0%
	Moderate	11	16.9%	12.0%	950	4.9%	7.0%	16.8%
	Middle	8	12.3%	17.4%	901	4.7%	12.5%	18.3%
	Upper	38	58.5%	45.1%	16,344	85.1%	57.3%	41.9%
	Unknown	3	4.6%	20.0%	675	3.5%	20.8%	0.0%
	<b>TOTAL</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19,202</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	4	15.4%	4.9%	240	6.6%	2.8%	23.0%
	Moderate	2	7.7%	11.5%	88	2.4%	7.8%	16.8%
	Middle	3	11.5%	19.2%	200	5.5%	13.9%	18.3%
	Upper	15	57.7%	56.9%	2,944	80.6%	66.2%	41.9%
	Unknown	2	7.7%	7.5%	180	4.9%	9.3%	0.0%
	<b>TOTAL</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,652</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.8%
	Middle	0	0.0%	0.5%	0	0.0%	0.0%	18.3%
	Upper	0	0.0%	2.2%	0	0.0%	0.1%	41.9%
	Unknown	1	100.0%	97.3%	11,550	100.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	19	9.3%	5.0%	1,598	2.4%	2.1%	23.0%
	Moderate	51	24.9%	14.8%	6,359	9.4%	8.5%	16.8%
	Middle	26	12.7%	19.1%	3,496	5.2%	13.6%	18.3%
	Upper	98	47.8%	44.8%	42,200	62.5%	51.5%	41.9%
	Unknown	11	5.4%	16.2%	13,868	20.5%	24.4%	0.0%
	<b>TOTAL</b>	<b>205</b>	<b>100.0%</b>	<b>100.0%</b>	<b>67,521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Charlotte MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	7	38.9%	50.8%	\$679	23.7%	35.2%	88.7%
	Over \$1 Million/ Unknown	11	61.1%	49.2%	\$2,180	76.3%	64.8%	11.3%
	<b>TOTAL</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,859</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	13	72.2%	92.6%	\$625	21.9%	36.1%	
	\$100,001–\$250,000	1	5.6%	3.5%	\$150	5.2%	14.7%	
	\$250,001–\$1 Million	4	22.2%	3.9%	\$2,084	72.9%	49.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,859</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	6	85.7%		\$195	28.7%	
		\$100,001–\$250,000	0	0.0%		\$0	0.0%	
		\$250,001–\$1 Million	1	14.3%		\$484	71.3%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>7</b>	<b>100.0%</b>		<b>\$679</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Charlotte MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	69	46.3%	46.1%	\$7,075	23.8%	32.8%	90.6%
	Over \$1 Million/ Unknown	80	53.7%	53.9%	\$22,637	76.2%	67.2%	9.4%
	<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,712</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	85	57.0%	93.0%	\$3,544	11.9%	37.2%	
	\$100,001– \$250,000	23	15.4%	3.3%	\$4,134	13.9%	14.1%	
	\$250,001– \$1 Million	41	27.5%	3.7%	\$22,034	74.2%	48.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,712</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	50	33.6%		\$1,440	4.8%	
		\$100,001– \$250,000	9	6.0%		\$1,551	5.2%	
		\$250,001– \$1 Million	10	6.7%		\$4,084	13.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>69</b>	<b>46.3%</b>		<b>\$7,075</b>	<b>23.8%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Charlotte MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	62	36.0%	46.9%	\$6,478	18.2%	33.8%	91.3%
	Over \$1 Million/ Unknown	110	64.0%	53.1%	\$29,054	81.8%	66.2%	8.7%
	<b>TOTAL</b>	<b>172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35,532</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	91	52.9%	93.3%	\$3,846	10.8%	38.2%	
	\$100,001– \$250,000	30	17.4%	3.2%	\$4,965	14.0%	14.2%	
	\$250,001– \$1 Million	51	29.7%	3.5%	\$26,721	75.2%	47.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35,532</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	46	26.7%		\$1,406	4.0%	
		\$100,001– \$250,000	5	2.9%		\$748	2.1%	
		\$250,001– \$1 Million	11	6.4%		\$4,324	12.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>62</b>	<b>36.0%</b>		<b>\$6,478</b>	<b>18.2%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Charlotte MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.2%	0	0.0%	2.3%	4.0%
	Moderate	1	12.5%	20.4%	625	11.2%	14.2%	23.3%
	Middle	0	0.0%	30.7%	0	0.0%	24.2%	34.1%
	Upper	7	87.5%	45.6%	4,935	88.8%	59.2%	38.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,560</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.6%	0	0.0%	1.6%	4.0%
	Moderate	0	0.0%	18.9%	0	0.0%	12.3%	23.3%
	Middle	2	100.0%	32.8%	362	100.0%	25.3%	34.1%
	Upper	0	0.0%	45.6%	0	0.0%	60.8%	38.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>362</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.3%	0	0.0%	2.0%	4.0%
	Moderate	0	0.0%	21.3%	0	0.0%	11.6%	23.3%
	Middle	0	0.0%	28.9%	0	0.0%	17.8%	34.1%
	Upper	0	0.0%	46.5%	0	0.0%	68.6%	38.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	22.0%	0	0.0%	11.3%	15.5%
	Moderate	0	0.0%	29.3%	0	0.0%	18.5%	30.1%
	Middle	1	100.0%	25.2%	28,714	100.0%	36.1%	21.0%
	Upper	0	0.0%	23.6%	0	0.0%	34.1%	33.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>28,714</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	3.1%	0	0.0%	2.8%	4.0%
	Moderate	1	9.1%	20.1%	625	1.8%	14.0%	23.3%
	Middle	3	27.3%	31.2%	29,076	83.9%	25.3%	34.1%
	Upper	7	63.6%	45.6%	4,935	14.2%	57.8%	38.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>34,636</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Charlotte MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	2.4%	3.9%	171	0.8%	2.6%	4.0%
	Moderate	22	26.5%	20.4%	2,287	10.2%	14.6%	23.3%
	Middle	27	32.5%	30.5%	4,629	20.6%	25.2%	34.1%
	Upper	32	38.6%	45.1%	15,414	68.5%	57.5%	38.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>83</b>	<b>100.0%</b>	<b>100.0%</b>	<b>22,501</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	3	4.5%	3.2%	232	2.1%	2.1%	4.0%
	Moderate	17	25.4%	19.5%	2,422	21.8%	13.4%	23.3%
	Middle	21	31.3%	31.8%	2,173	19.6%	25.1%	34.1%
	Upper	26	38.8%	45.4%	6,276	56.5%	59.3%	38.6%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>67</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,103</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.6%	0	0.0%	2.1%	4.0%
	Moderate	9	25.7%	16.2%	451	15.6%	12.2%	23.3%
	Middle	11	31.4%	24.9%	638	22.1%	17.7%	34.1%
	Upper	15	42.9%	56.3%	1,796	62.3%	68.0%	38.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,885</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	25.4%	0	0.0%	19.3%	15.5%
	Moderate	0	0.0%	31.2%	0	0.0%	23.8%	30.1%
	Middle	0	0.0%	24.9%	0	0.0%	24.7%	21.0%
	Upper	0	0.0%	18.5%	0	0.0%	32.2%	33.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	5	2.7%	3.6%	403	1.1%	4.6%	4.0%
	Moderate	48	25.9%	19.8%	5,160	14.1%	15.4%	23.3%
	Middle	59	31.9%	30.6%	7,440	20.4%	24.9%	34.1%
	Upper	73	39.5%	46.0%	23,486	64.4%	55.1%	38.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>185</b>	<b>100.0%</b>	<b>100.0%</b>	<b>36,489</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Charlotte MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	1.8%	3.5%	179	0.5%	2.7%	3.5%
	Moderate	35	31.0%	19.0%	4,870	14.7%	13.7%	21.4%
	Middle	41	36.3%	31.6%	8,290	25.0%	26.0%	35.6%
	Upper	35	31.0%	45.8%	19,778	59.7%	57.6%	39.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>113</b>	<b>100.0%</b>	<b>100.0%</b>	<b>33,117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.6%	0	0.0%	1.7%	3.5%
	Moderate	14	21.5%	15.5%	1,987	10.3%	10.5%	21.4%
	Middle	20	30.8%	30.1%	3,102	16.2%	22.8%	35.6%
	Upper	31	47.7%	51.8%	14,113	73.5%	65.0%	39.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>65</b>	<b>100.0%</b>	<b>100.0%</b>	<b>19,202</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.9%	0	0.0%	2.0%	3.5%
	Moderate	4	15.4%	15.4%	213	5.8%	11.2%	21.4%
	Middle	10	38.5%	27.0%	697	19.1%	21.4%	35.6%
	Upper	12	46.2%	54.7%	2,742	75.1%	65.5%	39.5%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,652</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	19.7%	0	0.0%	40.4%	14.9%
	Moderate	1	100.0%	35.0%	11,550	100.0%	15.5%	27.9%
	Middle	0	0.0%	23.5%	0	0.0%	13.9%	23.2%
	Upper	0	0.0%	21.9%	0	0.0%	30.1%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.2%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	2	1.0%	3.1%	179	0.3%	5.9%	3.5%
	Moderate	54	26.3%	17.6%	18,620	27.6%	12.7%	21.4%
	Middle	71	34.6%	30.7%	12,089	17.9%	23.6%	35.6%
	Upper	78	38.0%	48.5%	36,633	54.3%	57.8%	39.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>205</b>	<b>100.0%</b>	<b>100.0%</b>	<b>67,521</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of Small Business Loans Assessment Area: Charlotte MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	3	16.7%	7.7%	\$1,147	40.1%	9.6%	8.1%
Moderate	6	33.3%	20.7%	\$419	14.7%	22.7%	23.2%
Middle	1	5.6%	25.0%	\$50	1.7%	21.7%	26.0%
Upper	8	44.4%	44.6%	\$1,243	43.5%	43.4%	42.0%
Unknown	0	0.0%	2.0%	\$0	0.0%	2.6%	0.7%
<b>TOTAL</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,859</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Charlotte MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	13	8.7%	7.8%	\$2,949	9.9%	11.7%	8.0%
Moderate	39	26.2%	19.9%	\$6,016	20.2%	22.2%	22.8%
Middle	38	25.5%	25.1%	\$8,453	28.4%	21.2%	26.4%
Upper	57	38.3%	45.2%	\$11,995	40.4%	42.2%	42.1%
Unknown	2	1.3%	1.9%	\$300	1.0%	2.7%	0.7%
<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$29,713</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Charlotte MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	18	10.5%	7.2%	\$5,036	14.2%	10.2%	7.5%
Moderate	39	22.7%	18.3%	\$6,513	18.3%	19.7%	20.9%
Middle	52	30.2%	26.1%	\$8,873	25.0%	24.1%	28.0%
Upper	59	34.3%	46.3%	\$14,670	41.3%	43.5%	42.8%
Unknown	4	2.3%	2.0%	\$441	1.2%	2.4%	0.8%
<b>TOTAL</b>	<b>172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35,533</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## South Carolina

Greenville-Spartanburg-Anderson, South Carolina Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Greenville-Spartanburg CSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Home Purchase	Low	0	0.0%	3.5%	0	0.0%	1.7%	21.1%
	Moderate	0	0.0%	16.9%	0	0.0%	11.4%	16.1%
	Middle	0	0.0%	21.5%	0	0.0%	18.5%	18.4%
	Upper	2	100.0%	42.5%	1,475	100.0%	54.2%	44.4%
	Unknown	0	0.0%	15.7%	0	0.0%	14.3%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,475</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.4%	0	0.0%	2.6%	21.1%
	Moderate	0	0.0%	13.7%	0	0.0%	9.0%	16.1%
	Middle	0	0.0%	19.7%	0	0.0%	15.4%	18.4%
	Upper	0	0.0%	42.2%	0	0.0%	53.2%	44.4%
	Unknown	0	0.0%	19.0%	0	0.0%	19.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	6.3%	0	0.0%	2.0%	21.1%
	Moderate	0	0.0%	15.8%	0	0.0%	7.7%	16.1%
	Middle	0	0.0%	18.1%	0	0.0%	13.4%	18.4%
	Upper	0	0.0%	53.9%	0	0.0%	68.6%	44.4%
	Unknown	0	0.0%	5.9%	0	0.0%	8.3%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	44.4%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	4.1%	0	0.0%	1.8%	21.1%
	Moderate	0	0.0%	16.0%	0	0.0%	10.2%	16.1%
	Middle	0	0.0%	20.8%	0	0.0%	16.7%	18.4%
	Upper	2	100.0%	42.8%	1,475	100.0%	51.6%	44.4%
	Unknown	0	0.0%	16.2%	0	0.0%	19.6%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,475</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Greenville-Spartanburg CSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	14.3%	4.9%	233	5.4%	2.6%	21.1%
	Moderate	3	21.4%	19.7%	424	9.9%	14.0%	16.1%
	Middle	2	14.3%	23.5%	411	9.6%	21.1%	18.4%
	Upper	5	35.7%	37.4%	2,777	64.6%	48.4%	44.4%
	Unknown	2	14.3%	14.6%	455	10.6%	13.9%	0.0%
	<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,300</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	9.0%	0	0.0%	4.7%	21.1%
	Moderate	0	0.0%	17.4%	0	0.0%	12.3%	16.1%
	Middle	3	50.0%	22.9%	410	35.0%	19.9%	18.4%
	Upper	3	50.0%	39.5%	762	65.0%	51.0%	44.4%
	Unknown	0	0.0%	11.2%	0	0.0%	12.1%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	6.3%	0	0.0%	4.3%	21.1%
	Moderate	4	40.0%	13.1%	105	21.2%	9.2%	16.1%
	Middle	3	30.0%	22.9%	296	59.7%	19.3%	18.4%
	Upper	3	30.0%	51.3%	95	19.2%	57.0%	44.4%
	Unknown	0	0.0%	6.3%	0	0.0%	10.1%	0.0%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>496</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.1%
	Middle	0	0.0%	1.1%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	1.1%	0	0.0%	0.0%	44.4%
	Unknown	0	0.0%	97.7%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	2	6.7%	5.9%	233	3.9%	2.7%	21.1%
	Moderate	7	23.3%	18.3%	529	8.9%	11.5%	16.1%
	Middle	8	26.7%	22.7%	1,117	18.7%	17.7%	18.4%
	Upper	11	36.7%	38.6%	3,634	60.9%	42.3%	44.4%
	Unknown	2	6.7%	14.6%	455	7.6%	25.8%	0.0%
	<b>TOTAL</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,968</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Greenville-Spartanburg CSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	9.1%	5.3%	133	4.0%	2.8%	21.3%
	Moderate	4	36.4%	21.3%	539	16.0%	15.5%	16.3%
	Middle	1	9.1%	24.5%	147	4.4%	22.2%	18.4%
	Upper	5	45.5%	37.0%	2,547	75.7%	48.0%	44.0%
	Unknown	0	0.0%	11.9%	0	0.0%	11.4%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	6.5%	0	0.0%	3.3%	21.3%
	Moderate	3	37.5%	14.9%	306	8.1%	9.9%	16.3%
	Middle	0	0.0%	19.7%	0	0.0%	15.9%	18.4%
	Upper	5	62.5%	39.4%	3,476	91.9%	49.9%	44.0%
	Unknown	0	0.0%	19.5%	0	0.0%	21.0%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,782</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	1	25.0%	6.1%	25	12.8%	3.9%	21.3%
	Moderate	1	25.0%	13.6%	100	51.0%	9.8%	16.3%
	Middle	2	50.0%	21.2%	71	36.2%	15.8%	18.4%
	Upper	0	0.0%	55.7%	0	0.0%	66.1%	44.0%
	Unknown	0	0.0%	3.4%	0	0.0%	4.3%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.3%
	Middle	0	0.0%	1.0%	0	0.0%	0.1%	18.4%
	Upper	0	0.0%	2.9%	0	0.0%	0.2%	44.0%
	Unknown	0	0.0%	96.2%	0	0.0%	99.7%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	2	8.7%	5.6%	158	2.2%	2.7%	21.3%
	Moderate	8	34.8%	18.4%	945	12.9%	12.2%	16.3%
	Middle	3	13.0%	22.4%	218	3.0%	18.1%	18.4%
	Upper	10	43.5%	38.6%	6,023	82.0%	44.7%	44.0%
	Unknown	0	0.0%	14.9%	0	0.0%	22.3%	0.0%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Greenville-Spartanburg CSA								
2017								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	4	66.7%	49.9%	\$905	47.3%	37.3%	87.5%
	Over \$1 Million/Unknown	2	33.3%	50.1%	\$1,007	52.7%	62.7%	12.5%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,912</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	1	16.7%	92.5%	\$40	2.1%	33.6%	
	\$100,001-\$250,000	3	50.0%	3.6%	\$570	29.8%	15.4%	
	\$250,001-\$1 Million	2	33.3%	3.9%	\$1,302	68.1%	51.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,912</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	1	25.0%		\$40	4.4%	
		\$100,001-\$250,000	2	50.0%		\$463	51.2%	
		\$250,001-\$1 Million	1	25.0%		\$402	44.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>		<b>\$905</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Greenville-Spartanburg CSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	19	45.2%	46.4%	\$2,966	24.5%	36.7%	89.5%
	Over \$1 Million/Unknown	23	54.8%	53.6%	\$9,128	75.5%	63.3%	10.5%
	<b>TOTAL</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,094</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	17	40.5%	91.6%	\$741	6.1%	32.3%	
	\$100,001-\$250,000	8	19.0%	4.0%	\$1,324	10.9%	15.4%	
	\$250,001-\$1 Million	17	40.5%	4.4%	\$10,029	82.9%	52.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,094</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	11	26.2%		\$422	3.5%	
		\$100,001-\$250,000	5	11.9%		\$849	7.0%	
		\$250,001-\$1 Million	3	7.1%		\$1,695	14.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>19</b>	<b>45.2%</b>		<b>\$2,966</b>	<b>24.5%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Greenville-Spartanburg CSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	21	48.8%	47.6%	\$1,874	22.9%	34.4%	90.2%
	Over \$1 Million/ Unknown	22	51.2%	52.4%	\$6,301	77.1%	65.6%	9.8%
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,175</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	26	60.5%	92.1%	\$1,474	18.0%	33.6%	
	\$100,001–\$250,000	7	16.3%	3.9%	\$1,088	13.3%	16.0%	
	\$250,001–\$1 Million	10	23.3%	4.0%	\$5,613	68.7%	50.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,175</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	16	37.2%		\$697	8.5%	
		\$100,001–\$250,000	3	7.0%		\$398	4.9%	
		\$250,001–\$1 Million	2	4.7%		\$779	9.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>21</b>	<b>48.8%</b>		<b>\$1,874</b>	<b>22.9%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Greenville-Spartanburg CSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.3%	0	0.0%	2.1%	3.2%
	Moderate	0	0.0%	10.1%	0	0.0%	6.9%	14.5%
	Middle	0	0.0%	39.4%	0	0.0%	35.1%	40.6%
	Upper	2	100.0%	48.3%	1,475	100.0%	55.9%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,475</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.0%	0	0.0%	1.7%	3.2%
	Moderate	0	0.0%	10.0%	0	0.0%	7.3%	14.5%
	Middle	0	0.0%	38.3%	0	0.0%	33.0%	40.6%
	Upper	0	0.0%	49.7%	0	0.0%	57.9%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.4%	0	0.0%	1.8%	3.2%
	Moderate	0	0.0%	12.8%	0	0.0%	6.3%	14.5%
	Middle	0	0.0%	38.9%	0	0.0%	30.0%	40.6%
	Upper	0	0.0%	44.9%	0	0.0%	61.8%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	7.5%
	Moderate	0	0.0%	25.7%	0	0.0%	17.6%	23.3%
	Middle	0	0.0%	40.0%	0	0.0%	32.6%	35.6%
	Upper	0	0.0%	34.3%	0	0.0%	49.9%	33.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.3%	0	0.0%	1.9%	3.2%
	Moderate	0	0.0%	10.2%	0	0.0%	7.5%	14.5%
	Middle	0	0.0%	39.1%	0	0.0%	34.4%	40.6%
	Upper	2	100.0%	48.5%	1,475	100.0%	56.2%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,475</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of HMDA Loans								
Assessment Area: Greenville-Spartanburg CSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	3	21.4%	2.2%	506	11.8%	2.0%	3.2%
	Moderate	2	14.3%	11.2%	602	14.0%	8.0%	14.5%
	Middle	2	14.3%	40.2%	254	5.9%	35.5%	40.6%
	Upper	7	50.0%	46.4%	2,938	68.3%	54.5%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,300</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.3%	0	0.0%	1.7%	3.2%
	Moderate	0	0.0%	10.7%	0	0.0%	7.3%	14.5%
	Middle	1	16.7%	39.0%	127	10.8%	34.4%	40.6%
	Upper	5	83.3%	48.0%	1,045	89.2%	56.7%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.3%	0	0.0%	2.2%	3.2%
	Moderate	2	20.0%	9.9%	45	9.1%	6.9%	14.5%
	Middle	3	30.0%	32.8%	84	16.9%	26.9%	40.6%
	Upper	5	50.0%	55.0%	367	74.0%	63.9%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>10</b>	<b>100.0%</b>	<b>100.0%</b>	<b>496</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	9.1%	0	0.0%	0.4%	7.5%
	Moderate	0	0.0%	31.8%	0	0.0%	10.7%	23.3%
	Middle	0	0.0%	25.0%	0	0.0%	17.4%	35.6%
	Upper	0	0.0%	34.1%	0	0.0%	71.5%	33.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	3	10.0%	2.3%	506	8.5%	1.8%	3.2%
	Moderate	4	13.3%	11.0%	647	10.8%	8.2%	14.5%
	Middle	6	20.0%	39.5%	465	7.8%	32.6%	40.6%
	Upper	17	56.7%	47.3%	4,350	72.9%	57.4%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>30</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,968</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Greenville-Spartanburg CSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.2%	0	0.0%	1.9%	3.2%
	Moderate	1	9.1%	10.7%	150	4.5%	7.7%	14.5%
	Middle	3	27.3%	40.4%	816	24.2%	36.1%	40.6%
	Upper	7	63.6%	46.7%	2,400	71.3%	54.3%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,366</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.4%	0	0.0%	2.0%	3.2%
	Moderate	1	12.5%	9.0%	50	1.3%	6.1%	14.5%
	Middle	2	25.0%	36.0%	559	14.8%	30.4%	40.6%
	Upper	5	62.5%	52.6%	3,173	83.9%	61.5%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>8</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,782</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.8%	0	0.0%	3.3%	3.2%
	Moderate	1	25.0%	9.5%	26	13.3%	7.9%	14.5%
	Middle	3	75.0%	35.8%	170	86.7%	27.7%	40.6%
	Upper	0	0.0%	51.9%	0	0.0%	61.1%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	16.2%	0	0.0%	11.6%	7.5%
	Moderate	0	0.0%	21.9%	0	0.0%	9.8%	23.3%
	Middle	0	0.0%	32.4%	0	0.0%	42.6%	35.6%
	Upper	0	0.0%	29.5%	0	0.0%	36.1%	33.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.4%	0	0.0%	2.8%	3.2%
	Moderate	3	13.0%	10.2%	226	3.1%	7.4%	14.5%
	Middle	8	34.8%	38.7%	1,545	21.0%	34.8%	40.6%
	Upper	12	52.2%	48.8%	5,573	75.9%	55.0%	41.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>7,344</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Greenville-Spartanburg CSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	2	33.3%	4.9%	\$1,113	58.2%	7.5%	4.8%
Moderate	1	16.7%	15.5%	\$40	2.1%	17.1%	17.5%
Middle	0	0.0%	33.5%	\$0	0.0%	28.6%	34.8%
Upper	3	50.0%	44.6%	\$759	39.7%	46.0%	42.9%
Unknown	0	0.0%	1.6%	\$0	0.0%	0.9%	0.0%
<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,912</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Greenville-Spartanburg CSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	3	7.1%	4.9%	\$1,432	11.8%	6.3%	5.1%
Moderate	6	14.3%	14.5%	\$2,209	18.3%	16.9%	16.9%
Middle	17	40.5%	34.0%	\$4,125	34.1%	30.8%	34.6%
Upper	16	38.1%	45.0%	\$4,328	35.8%	45.2%	43.3%
Unknown	0	0.0%	1.5%	\$0	0.0%	0.8%	0.0%
<b>TOTAL</b>	<b>42</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,094</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Greenville-Spartanburg CSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	2	4.7%	5.1%	\$1,015	12.4%	6.8%	5.2%
Moderate	6	14.0%	14.3%	\$814	10.0%	16.2%	16.9%
Middle	18	41.9%	33.4%	\$2,771	33.9%	29.9%	34.8%
Upper	17	39.5%	45.6%	\$3,575	43.7%	46.2%	43.0%
Unknown	0	0.0%	1.7%	\$0	0.0%	0.9%	0.0%
<b>TOTAL</b>	<b>43</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,175</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Charleston-North Charleston, South Carolina Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Charleston MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.7%	0	0.0%	1.0%	22.8%
	Moderate	0	0.0%	14.2%	0	0.0%	8.2%	15.1%
	Middle	0	0.0%	18.5%	0	0.0%	13.8%	17.6%
	Upper	1	100.0%	52.3%	165	100.0%	64.6%	44.4%
	Unknown	0	0.0%	12.3%	0	0.0%	12.4%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	4.4%	0	0.0%	1.9%	22.8%
	Moderate	0	0.0%	13.2%	0	0.0%	7.3%	15.1%
	Middle	0	0.0%	19.3%	0	0.0%	13.3%	17.6%
	Upper	0	0.0%	47.7%	0	0.0%	62.7%	44.4%
	Unknown	0	0.0%	15.3%	0	0.0%	14.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	6.1%	0	0.0%	1.7%	22.8%
	Moderate	0	0.0%	12.9%	0	0.0%	5.3%	15.1%
	Middle	0	0.0%	19.7%	0	0.0%	12.8%	17.6%
	Upper	0	0.0%	54.2%	0	0.0%	67.8%	44.4%
	Unknown	0	0.0%	7.0%	0	0.0%	12.4%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.6%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	44.4%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	3.4%	0	0.0%	1.2%	22.8%
	Moderate	0	0.0%	13.8%	0	0.0%	7.4%	15.1%
	Middle	0	0.0%	18.7%	0	0.0%	13.0%	17.6%
	Upper	1	100.0%	50.9%	165	100.0%	60.9%	44.4%
	Unknown	0	0.0%	13.1%	0	0.0%	17.5%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Charleston MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	9.1%	3.7%	82	0.7%	1.5%	22.8%
	Moderate	0	0.0%	13.4%	0	0.0%	7.6%	15.1%
	Middle	0	0.0%	18.2%	0	0.0%	13.5%	17.6%
	Upper	9	81.8%	48.8%	7,810	70.9%	61.9%	44.4%
	Unknown	1	9.1%	15.9%	3,120	28.3%	15.4%	0.0%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,012</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	7.2%	0	0.0%	3.3%	22.8%
	Moderate	0	0.0%	15.3%	0	0.0%	8.8%	15.1%
	Middle	2	33.3%	18.4%	228	5.9%	13.7%	17.6%
	Upper	4	66.7%	45.4%	3,643	94.1%	60.1%	44.4%
	Unknown	0	0.0%	13.7%	0	0.0%	14.0%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,871</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.6%	0	0.0%	1.7%	22.8%
	Moderate	0	0.0%	9.4%	0	0.0%	5.4%	15.1%
	Middle	2	66.7%	18.7%	240	21.1%	12.5%	17.6%
	Upper	1	33.3%	61.8%	900	78.9%	69.7%	44.4%
	Unknown	0	0.0%	6.6%	0	0.0%	10.8%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.8%
	Moderate	0	0.0%	1.5%	0	0.0%	0.1%	15.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.6%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	44.4%
	Unknown	0	0.0%	98.5%	0	0.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	5.0%	4.5%	82	0.5%	1.8%	22.8%
	Moderate	0	0.0%	13.1%	0	0.0%	7.0%	15.1%
	Middle	4	20.0%	17.8%	468	2.9%	12.1%	17.6%
	Upper	14	70.0%	48.9%	12,353	77.1%	56.8%	44.4%
	Unknown	1	5.0%	15.7%	3,120	19.5%	22.3%	0.0%
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16,023</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Charleston MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	7.1%	4.2%	95	1.1%	1.8%	22.8%
	Moderate	3	21.4%	15.9%	837	9.5%	9.5%	15.1%
	Middle	1	7.1%	18.2%	281	3.2%	14.2%	17.6%
	Upper	9	64.3%	45.9%	7,603	86.2%	59.7%	44.4%
	Unknown	0	0.0%	15.8%	0	0.0%	14.9%	0.0%
	<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,816</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	4.2%	0	0.0%	1.9%	22.8%
	Moderate	0	0.0%	11.4%	0	0.0%	6.2%	15.1%
	Middle	0	0.0%	16.5%	0	0.0%	11.8%	17.6%
	Upper	7	77.8%	47.7%	2,219	69.3%	60.8%	44.4%
	Unknown	2	22.2%	20.2%	985	30.7%	19.3%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,204</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.0%	0	0.0%	1.5%	22.8%
	Moderate	0	0.0%	10.0%	0	0.0%	6.3%	15.1%
	Middle	0	0.0%	19.3%	0	0.0%	12.4%	17.6%
	Upper	0	0.0%	63.8%	0	0.0%	68.9%	44.4%
	Unknown	0	0.0%	3.8%	0	0.0%	11.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.8%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.1%
	Middle	0	0.0%	3.8%	0	0.0%	0.2%	17.6%
	Upper	0	0.0%	3.8%	0	0.0%	0.7%	44.4%
	Unknown	0	0.0%	92.5%	0	0.0%	99.1%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	4.3%	4.1%	95	0.8%	1.8%	22.8%
	Moderate	3	13.0%	13.7%	837	7.0%	7.6%	15.1%
	Middle	1	4.3%	17.4%	281	2.3%	12.4%	17.6%
	Upper	16	69.6%	47.8%	9,822	81.7%	57.2%	44.4%
	Unknown	2	8.7%	17.0%	985	8.2%	21.0%	0.0%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,020</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Charleston MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	0	0.0%	49.3%	\$0	0.0%	40.4%	88.7%
	Over \$1 Million/ Unknown	5	100.0%	50.7%	\$2,096	100.0%	59.6%	11.3%
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,096</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	2	40.0%	91.4%	\$200	9.5%	32.3%	
	\$100,001– \$250,000	1	20.0%	4.0%	\$146	7.0%	14.9%	
	\$250,001– \$1 Million	2	40.0%	4.6%	\$1,750	83.5%	52.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,096</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%		
	\$100,001– \$250,000	0	0.0%		\$0	0.0%		
	\$250,001– \$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>		<b>\$0</b>	<b>0.0%</b>		

Small Business Loans by Revenue and Loan Size								
Assessment Area: Charleston MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	6	54.5%	43.1%	\$685	51.1%	35.8%	90.7%
	Over \$1 Million/Unknown	5	45.5%	56.9%	\$656	48.9%	64.2%	9.3%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,341</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	5	45.5%	91.5%	\$255	19.0%	34.0%	
	\$100,001-\$250,000	5	45.5%	4.2%	\$786	58.6%	16.6%	
	\$250,001-\$1 Million	1	9.1%	4.2%	\$300	22.4%	49.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,341</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	3	27.3%		\$105	7.8%	
		\$100,001-\$250,000	2	18.2%		\$280	20.9%	
		\$250,001-\$1 Million	1	9.1%		\$300	22.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>6</b>	<b>54.5%</b>		<b>\$685</b>	<b>51.1%</b>	



Small Business Loans by Revenue and Loan Size								
Assessment Area: Charleston MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	3	27.3%	43.8%	\$582	14.5%	35.2%	91.4%
	Over \$1 Million/Unknown	8	72.7%	56.2%	\$3,436	85.5%	64.8%	8.6%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,018</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	3	27.3%	92.0%	\$176	4.4%	34.0%	
	\$100,001-\$250,000	3	27.3%	3.7%	\$500	12.4%	14.9%	
	\$250,001-\$1 Million	5	45.5%	4.2%	\$3,342	83.2%	51.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,018</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	1	9.1%		\$100	2.5%	
		\$100,001-\$250,000	1	9.1%		\$200	5.0%	
		\$250,001-\$1 Million	1	9.1%		\$282	7.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>3</b>	<b>27.3%</b>		<b>\$582</b>	<b>14.5%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Charleston MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.8%	0	0.0%	2.6%	6.4%
	Moderate	0	0.0%	12.7%	0	0.0%	7.5%	14.8%
	Middle	0	0.0%	34.1%	0	0.0%	27.8%	31.4%
	Upper	1	100.0%	48.7%	165	100.0%	60.9%	46.9%
	Unknown	0	0.0%	0.8%	0	0.0%	1.2%	0.5%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.8%	0	0.0%	2.7%	6.4%
	Moderate	0	0.0%	11.8%	0	0.0%	6.9%	14.8%
	Middle	0	0.0%	30.3%	0	0.0%	23.2%	31.4%
	Upper	0	0.0%	53.1%	0	0.0%	65.8%	46.9%
	Unknown	0	0.0%	1.0%	0	0.0%	1.4%	0.5%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	5.3%	0	0.0%	5.4%	6.4%
	Moderate	0	0.0%	12.3%	0	0.0%	6.0%	14.8%
	Middle	0	0.0%	31.1%	0	0.0%	19.5%	31.4%
	Upper	0	0.0%	50.4%	0	0.0%	67.8%	46.9%
	Unknown	0	0.0%	0.9%	0	0.0%	1.4%	0.5%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	32.5%	0	0.0%	27.9%	15.2%
	Moderate	0	0.0%	15.0%	0	0.0%	17.2%	19.8%
	Middle	0	0.0%	32.5%	0	0.0%	33.0%	31.0%
	Upper	0	0.0%	15.0%	0	0.0%	21.6%	31.2%
	Unknown	0	0.0%	5.0%	0	0.0%	0.4%	2.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	3.9%	0	0.0%	4.0%	6.4%
	Moderate	0	0.0%	12.4%	0	0.0%	7.8%	14.8%
	Middle	0	0.0%	32.9%	0	0.0%	26.7%	31.4%
	Upper	1	100.0%	49.9%	165	100.0%	60.3%	46.9%
	Unknown	0	0.0%	0.8%	0	0.0%	1.2%	0.5%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>165</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Charleston MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	4.8%	0	0.0%	3.2%	6.4%
	Moderate	1	9.1%	11.0%	517	4.7%	6.5%	14.8%
	Middle	3	27.3%	36.3%	518	4.7%	29.5%	31.4%
	Upper	7	63.6%	47.3%	9,977	90.6%	60.1%	46.9%
	Unknown	0	0.0%	0.6%	0	0.0%	0.8%	0.5%
	<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>11,012</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	4.5%	0	0.0%	3.3%	6.4%
	Moderate	0	0.0%	12.4%	0	0.0%	7.3%	14.8%
	Middle	0	0.0%	29.1%	0	0.0%	22.7%	31.4%
	Upper	6	100.0%	53.3%	3,871	100.0%	65.7%	46.9%
	Unknown	0	0.0%	0.8%	0	0.0%	1.1%	0.5%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,871</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.3%	0	0.0%	4.5%	6.4%
	Moderate	1	33.3%	7.6%	140	12.3%	6.0%	14.8%
	Middle	0	0.0%	28.7%	0	0.0%	22.9%	31.4%
	Upper	2	66.7%	59.7%	1,000	87.7%	66.0%	46.9%
	Unknown	0	0.0%	0.6%	0	0.0%	0.6%	0.5%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,140</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	41.2%	0	0.0%	26.1%	15.2%
	Moderate	0	0.0%	13.2%	0	0.0%	21.0%	19.8%
	Middle	0	0.0%	20.6%	0	0.0%	34.5%	31.0%
	Upper	0	0.0%	22.1%	0	0.0%	17.6%	31.2%
	Unknown	0	0.0%	2.9%	0	0.0%	0.8%	2.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	4.7%	0	0.0%	4.9%	6.4%
	Moderate	2	10.0%	11.0%	657	4.1%	8.0%	14.8%
	Middle	3	15.0%	33.6%	518	3.2%	27.7%	31.4%
	Upper	15	75.0%	50.1%	14,848	92.7%	58.6%	46.9%
	Unknown	0	0.0%	0.7%	0	0.0%	0.9%	0.5%
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>16,023</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Charleston MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	7.1%	4.7%	281	3.2%	3.2%	6.4%
	Moderate	3	21.4%	13.2%	799	9.1%	8.1%	14.8%
	Middle	2	14.3%	34.7%	331	3.8%	28.3%	31.4%
	Upper	8	57.1%	46.7%	7,405	84.0%	59.5%	46.9%
	Unknown	0	0.0%	0.7%	0	0.0%	0.8%	0.5%
	<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>8,816</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.1%	0	0.0%	2.2%	6.4%
	Moderate	2	22.2%	10.1%	652	20.3%	6.1%	14.8%
	Middle	1	11.1%	31.6%	378	11.8%	23.8%	31.4%
	Upper	6	66.7%	54.6%	2,174	67.9%	67.2%	46.9%
	Unknown	0	0.0%	0.6%	0	0.0%	0.7%	0.5%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,204</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.9%	0	0.0%	3.6%	6.4%
	Moderate	0	0.0%	6.2%	0	0.0%	4.1%	14.8%
	Middle	0	0.0%	28.6%	0	0.0%	22.4%	31.4%
	Upper	0	0.0%	61.6%	0	0.0%	68.4%	46.9%
	Unknown	0	0.0%	0.7%	0	0.0%	1.4%	0.5%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	39.6%	0	0.0%	21.2%	15.2%
	Moderate	0	0.0%	13.2%	0	0.0%	9.9%	19.8%
	Middle	0	0.0%	26.4%	0	0.0%	30.1%	31.0%
	Upper	0	0.0%	17.0%	0	0.0%	32.8%	31.2%
	Unknown	0	0.0%	3.8%	0	0.0%	6.2%	2.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	4.3%	4.1%	281	2.3%	3.8%	6.4%
	Moderate	5	21.7%	11.7%	1,451	12.1%	7.4%	14.8%
	Middle	3	13.0%	33.0%	709	5.9%	26.4%	31.4%
	Upper	14	60.9%	50.6%	9,579	79.7%	61.3%	46.9%
	Unknown	0	0.0%	0.7%	0	0.0%	1.1%	0.5%
	<b>TOTAL</b>	<b>23</b>	<b>100.0%</b>	<b>100.0%</b>	<b>12,020</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Charleston MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	9.6%	\$0	0.0%	14.3%	10.5%
Moderate	1	20.0%	14.3%	\$146	7.0%	18.5%	16.8%
Middle	1	20.0%	25.2%	\$750	35.8%	21.2%	25.1%
Upper	1	20.0%	46.9%	\$100	4.8%	42.3%	45.2%
Unknown	2	40.0%	3.8%	\$1,100	52.5%	3.8%	2.3%
<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,096</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Charleston MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	2	18.2%	10.0%	\$156	11.6%	15.8%	10.5%
Moderate	3	27.3%	14.2%	\$440	32.8%	19.4%	16.3%
Middle	0	0.0%	24.4%	\$0	0.0%	20.7%	25.5%
Upper	6	54.5%	47.7%	\$745	55.6%	41.0%	45.4%
Unknown	0	0.0%	3.8%	\$0	0.0%	3.1%	2.2%
<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,341</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Charleston MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	\$0	0.0%	11.3%	10.8%	15.4%
Moderate	2	18.2%	\$1,200	29.9%	16.0%	13.7%	18.9%
Middle	1	9.1%	\$940	23.4%	25.4%	24.9%	20.8%
Upper	6	54.5%	\$1,207	30.0%	45.1%	46.5%	41.3%
Unknown	2	18.2%	\$670	16.7%	2.2%	4.1%	3.6%
<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>\$4,017</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Columbia, South Carolina Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Columbia MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	7.8%	0	0.0%	3.5%	23.3%
	Moderate	0	0.0%	18.4%	0	0.0%	11.7%	15.9%
	Middle	0	0.0%	21.3%	0	0.0%	18.2%	18.2%
	Upper	0	0.0%	32.2%	0	0.0%	48.9%	42.6%
	Unknown	0	0.0%	20.2%	0	0.0%	17.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.6%	0	0.0%	11.9%	23.3%
	Moderate	0	0.0%	11.4%	0	0.0%	1.7%	15.9%
	Middle	0	0.0%	17.2%	0	0.0%	7.2%	18.2%
	Upper	0	0.0%	35.3%	0	0.0%	51.1%	42.6%
	Unknown	0	0.0%	30.6%	0	0.0%	28.1%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.0%	0	0.0%	0.4%	23.3%
	Moderate	0	0.0%	12.4%	0	0.0%	1.1%	15.9%
	Middle	0	0.0%	20.8%	0	0.0%	1.9%	18.2%
	Upper	0	0.0%	53.4%	0	0.0%	9.3%	42.6%
	Unknown	0	0.0%	6.5%	0	0.0%	87.4%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.9%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	42.6%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	7.1%	0	0.0%	7.5%	23.3%
	Moderate	0	0.0%	16.3%	0	0.0%	5.4%	15.9%
	Middle	0	0.0%	20.2%	0	0.0%	10.7%	18.2%
	Upper	0	0.0%	33.6%	0	0.0%	45.5%	42.6%
	Unknown	0	0.0%	22.8%	0	0.0%	30.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Columbia MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	8.1%	0	0.0%	4.3%	23.3%
	Moderate	0	0.0%	21.5%	0	0.0%	15.2%	15.9%
	Middle	0	0.0%	21.7%	0	0.0%	20.5%	18.2%
	Upper	4	100.0%	32.2%	1,871	100.0%	43.7%	42.6%
	Unknown	0	0.0%	16.5%	0	0.0%	16.4%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,871</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	8.6%	0	0.0%	5.1%	23.3%
	Moderate	0	0.0%	16.1%	0	0.0%	10.6%	15.9%
	Middle	2	22.2%	20.4%	436	21.6%	16.4%	18.2%
	Upper	7	77.8%	39.2%	1,580	78.4%	50.1%	42.6%
	Unknown	0	0.0%	15.8%	0	0.0%	17.8%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,016</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	5.7%	0	0.0%	3.7%	23.3%
	Moderate	1	25.0%	17.3%	30	13.0%	11.6%	15.9%
	Middle	0	0.0%	18.6%	0	0.0%	14.2%	18.2%
	Upper	3	75.0%	53.5%	200	87.0%	63.4%	42.6%
	Unknown	0	0.0%	5.0%	0	0.0%	7.1%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>230</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.9%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Upper	0	0.0%	6.1%	0	0.0%	0.3%	42.6%
	Unknown	0	0.0%	93.9%	0	0.0%	99.7%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	7.8%	0	0.0%	3.8%	23.3%
	Moderate	1	5.9%	18.9%	30	0.7%	12.1%	15.9%
	Middle	2	11.8%	20.2%	436	10.6%	16.6%	18.2%
	Upper	14	82.4%	34.0%	3,651	88.7%	39.5%	42.6%
	Unknown	0	0.0%	19.0%	0	0.0%	27.9%	0.0%
	<b>TOTAL</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Columbia MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	7.1%	0	0.0%	3.5%	23.3%
	Moderate	0	0.0%	22.5%	0	0.0%	15.4%	15.9%
	Middle	0	0.0%	22.7%	0	0.0%	21.5%	18.2%
	Upper	2	66.7%	34.0%	734	81.0%	45.7%	42.6%
	Unknown	1	33.3%	13.7%	172	19.0%	13.9%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>906</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.7%	0	0.0%	3.5%	23.3%
	Moderate	0	0.0%	11.5%	0	0.0%	6.9%	15.9%
	Middle	1	16.7%	16.3%	75	3.3%	12.4%	18.2%
	Upper	5	83.3%	37.6%	2,217	96.7%	45.9%	42.6%
	Unknown	0	0.0%	29.0%	0	0.0%	31.3%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,292</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.9%	0	0.0%	2.6%	23.3%
	Moderate	0	0.0%	15.4%	0	0.0%	9.6%	15.9%
	Middle	1	33.3%	20.2%	225	50.6%	17.4%	18.2%
	Upper	2	66.7%	55.6%	220	49.4%	65.2%	42.6%
	Unknown	0	0.0%	3.9%	0	0.0%	5.1%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>445</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	2.9%	0	0.0%	0.2%	23.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.9%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.2%
	Upper	0	0.0%	2.9%	0	0.0%	0.9%	42.6%
	Unknown	0	0.0%	94.1%	0	0.0%	99.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	6.3%	0	0.0%	3.2%	23.3%
	Moderate	0	0.0%	17.8%	0	0.0%	11.4%	15.9%
	Middle	2	16.7%	19.7%	300	8.2%	16.8%	18.2%
	Upper	9	75.0%	35.7%	3,171	87.0%	43.2%	42.6%
	Unknown	1	8.3%	20.5%	172	4.7%	25.5%	0.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,643</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Small Business Loans by Revenue and Loan Size								
Assessment Area: Columbia MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	1	25.0%	52.1%	\$100	4.2%	36.7%	88.8%
	Over \$1 Million/Unknown	3	75.0%	47.9%	\$2,273	95.8%	63.3%	11.2%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,373</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	1	25.0%	91.0%	\$100	4.2%	29.6%	
	\$100,001-\$250,000	0	0.0%	4.3%	\$0	0.0%	16.1%	
	\$250,001-\$1 Million	3	75.0%	4.7%	\$2,273	95.8%	54.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,373</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	1	100.0%		\$100	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%	
		<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>		<b>\$100</b>	<b>100.0%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Columbia MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	9	34.6%	44.1%	\$2,420	42.3%	33.0%	90.8%
	Over \$1 Million/ Unknown	17	65.4%	55.9%	\$3,307	57.7%	67.0%	9.2%
	<b>TOTAL</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,727</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	17	65.4%	90.7%	\$818	14.3%	31.0%	
	\$100,001– \$250,000	3	11.5%	4.5%	\$525	9.2%	15.5%	
	\$250,001– \$1 Million	6	23.1%	4.8%	\$4,384	76.5%	53.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,727</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	6	23.1%		\$136	2.4%	
		\$100,001– \$250,000	0	0.0%		\$0	0.0%	
		\$250,001– \$1 Million	3	11.5%		\$2,284	39.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>9</b>	<b>34.6%</b>		<b>\$2,420</b>	<b>42.3%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Columbia MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	13	65.0%	43.1%	\$1,744	44.8%	33.0%	91.5%
	Over \$1 Million/ Unknown	7	35.0%	56.9%	\$2,150	55.2%	67.0%	8.5%
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,894</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	15	75.0%	91.6%	\$824	21.2%	32.7%	
	\$100,001– \$250,000	1	5.0%	4.1%	\$250	6.4%	15.4%	
	\$250,001– \$1 Million	4	20.0%	4.2%	\$2,820	72.4%	52.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,894</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	10	50.0%		\$474	12.2%	
		\$100,001– \$250,000	1	5.0%		\$250	6.4%	
		\$250,001– \$1 Million	2	10.0%		\$1,020	26.2%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>13</b>	<b>65.0%</b>		<b>\$1,744</b>	<b>44.8%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Columbia MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.7%	0	0.0%	10.2%	5.0%
	Moderate	0	0.0%	11.3%	0	0.0%	6.1%	17.9%
	Middle	0	0.0%	21.8%	0	0.0%	15.1%	27.6%
	Upper	0	0.0%	64.1%	0	0.0%	68.5%	49.5%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.2%	0	0.0%	1.8%	5.0%
	Moderate	0	0.0%	12.2%	0	0.0%	26.4%	17.9%
	Middle	0	0.0%	26.6%	0	0.0%	20.0%	27.6%
	Upper	0	0.0%	59.0%	0	0.0%	51.8%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.0%	0	0.0%	0.2%	5.0%
	Moderate	0	0.0%	14.6%	0	0.0%	0.9%	17.9%
	Middle	0	0.0%	27.5%	0	0.0%	2.2%	27.6%
	Upper	0	0.0%	55.0%	0	0.0%	96.7%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	10.3%	0	0.0%	5.4%	22.2%
	Moderate	0	0.0%	53.8%	0	0.0%	59.6%	41.7%
	Middle	0	0.0%	10.3%	0	0.0%	4.5%	16.0%
	Upper	0	0.0%	25.6%	0	0.0%	30.6%	19.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.6%	0	0.0%	5.0%	5.0%
	Moderate	0	0.0%	11.8%	0	0.0%	18.6%	17.9%
	Middle	0	0.0%	23.2%	0	0.0%	16.4%	27.6%
	Upper	0	0.0%	62.3%	0	0.0%	60.0%	49.5%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Columbia MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.4%	0	0.0%	1.3%	5.0%
	Moderate	0	0.0%	12.0%	0	0.0%	7.3%	17.9%
	Middle	0	0.0%	20.6%	0	0.0%	16.0%	27.6%
	Upper	4	100.0%	65.1%	1,871	100.0%	75.5%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1,871</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	2.4%	0	0.0%	1.3%	5.0%
	Moderate	1	11.1%	10.3%	170	8.4%	6.2%	17.9%
	Middle	2	22.2%	24.6%	605	30.0%	20.2%	27.6%
	Upper	6	66.7%	62.6%	1,241	61.6%	72.3%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,016</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	2.2%	0	0.0%	1.1%	5.0%
	Moderate	0	0.0%	12.6%	0	0.0%	7.9%	17.9%
	Middle	1	25.0%	21.1%	30	13.0%	18.3%	27.6%
	Upper	3	75.0%	64.2%	200	87.0%	72.7%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>230</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	30.3%	0	0.0%	14.0%	22.2%
	Moderate	0	0.0%	21.2%	0	0.0%	46.5%	41.7%
	Middle	0	0.0%	24.2%	0	0.0%	6.6%	16.0%
	Upper	0	0.0%	24.2%	0	0.0%	32.9%	19.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>HMDA TOTALS</b>	Low	0	0.0%	2.5%	0	0.0%	2.8%	5.0%
	Moderate	1	5.9%	11.7%	170	4.1%	11.6%	17.9%
	Middle	3	17.6%	21.9%	635	15.4%	15.9%	27.6%
	Upper	13	76.5%	63.9%	3,312	80.4%	69.6%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>17</b>	<b>100.0%</b>	<b>100.0%</b>	<b>4,117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Columbia MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	2.8%	0	0.0%	1.6%	5.0%
	Moderate	0	0.0%	12.4%	0	0.0%	7.3%	17.9%
	Middle	1	33.3%	20.7%	85	9.4%	16.1%	27.6%
	Upper	2	66.7%	64.0%	821	90.6%	75.0%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>906</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	1.8%	0	0.0%	0.9%	5.0%
	Moderate	1	16.7%	8.8%	78	3.4%	5.0%	17.9%
	Middle	0	0.0%	21.4%	0	0.0%	16.3%	27.6%
	Upper	5	83.3%	68.0%	2,214	96.6%	77.8%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>2,292</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	3.2%	0	0.0%	1.8%	5.0%
	Moderate	1	33.3%	9.0%	120	27.0%	5.1%	17.9%
	Middle	0	0.0%	22.0%	0	0.0%	18.9%	27.6%
	Upper	2	66.7%	65.9%	325	73.0%	74.1%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>445</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	29.4%	0	0.0%	24.4%	22.2%
	Moderate	0	0.0%	20.6%	0	0.0%	36.7%	41.7%
	Middle	0	0.0%	26.5%	0	0.0%	10.5%	16.0%
	Upper	0	0.0%	23.5%	0	0.0%	28.3%	19.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.8%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	2.5%	0	0.0%	2.7%	5.0%
	Moderate	2	16.7%	11.1%	198	5.4%	8.3%	17.9%
	Middle	1	8.3%	21.2%	85	2.3%	16.1%	27.6%
	Upper	9	75.0%	65.1%	3,360	92.2%	72.9%	49.5%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>3,643</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Columbia MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	12.6%	\$0	0.0%	16.9%	16.8%
Moderate	1	25.0%	21.0%	\$523	22.0%	27.7%	21.2%
Middle	0	0.0%	22.3%	\$0	0.0%	20.9%	23.5%
Upper	3	75.0%	42.3%	\$1,850	78.0%	33.2%	37.9%
Unknown	0	0.0%	1.8%	\$0	0.0%	1.3%	0.6%
<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,373</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Columbia MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	4	15.4%	11.9%	\$1,405	24.5%	18.1%	16.0%
Moderate	10	38.5%	22.3%	\$2,011	35.1%	30.5%	20.6%
Middle	4	15.4%	21.3%	\$131	2.3%	18.4%	23.0%
Upper	8	30.8%	42.8%	\$2,180	38.1%	31.8%	39.7%
Unknown	0	0.0%	1.7%	\$0	0.0%	1.2%	0.7%
<b>TOTAL</b>	<b>26</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,727</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Columbia MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	6	30.0%	12.3%	\$340	8.7%	16.9%	15.5%
Moderate	4	20.0%	20.7%	\$472	12.1%	28.7%	20.8%
Middle	4	20.0%	21.7%	\$217	5.6%	20.1%	23.1%
Upper	6	30.0%	43.5%	\$2,865	73.6%	33.3%	39.9%
Unknown	0	0.0%	1.8%	\$0	0.0%	1.1%	0.6%
<b>TOTAL</b>	<b>20</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,894</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Texas

Houston, Texas Assessment Area

Borrower Distribution of HMDA Loans								
Assessment Area: Houston MSA								
Product Type	Borrower Income Levels	2017						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.4%	0	0.0%	1.7%	27.7%
	Moderate	0	0.0%	14.7%	0	0.0%	9.3%	17.1%
	Middle	0	0.0%	19.9%	0	0.0%	15.7%	17.0%
	Upper	1	100.0%	43.0%	364	100.0%	57.9%	38.1%
	Unknown	0	0.0%	19.0%	0	0.0%	15.3%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>364</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.9%	0	0.0%	2.9%	27.7%
	Moderate	0	0.0%	12.0%	0	0.0%	7.1%	17.1%
	Middle	0	0.0%	18.6%	0	0.0%	13.3%	17.0%
	Upper	0	0.0%	41.0%	0	0.0%	56.1%	38.1%
	Unknown	0	0.0%	22.5%	0	0.0%	20.6%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	7.1%	0	0.0%	3.1%	27.7%
	Moderate	0	0.0%	12.4%	0	0.0%	7.0%	17.1%
	Middle	0	0.0%	17.6%	0	0.0%	12.5%	17.0%
	Upper	0	0.0%	54.9%	0	0.0%	71.7%	38.1%
	Unknown	0	0.0%	8.0%	0	0.0%	5.8%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	27.7%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	38.1%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	4.2%	0	0.0%	1.7%	27.7%
	Moderate	0	0.0%	13.9%	0	0.0%	7.7%	17.1%
	Middle	0	0.0%	19.4%	0	0.0%	13.3%	17.0%
	Upper	1	100.0%	42.8%	364	100.0%	50.5%	38.1%
	Unknown	0	0.0%	19.7%	0	0.0%	26.8%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>364</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Borrower Distribution of HMDA Loans								
Assessment Area: Houston MSA								
Product Type	Borrower Income Levels	2018						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	5.3%	3.6%	126	2.1%	1.7%	27.7%
	Moderate	7	36.8%	17.5%	1,046	17.7%	11.1%	17.1%
	Middle	3	15.8%	21.0%	581	9.8%	16.6%	17.0%
	Upper	8	42.1%	41.1%	4,148	70.3%	55.1%	38.1%
	Unknown	0	0.0%	16.7%	0	0.0%	15.4%	0.0%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,901</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	8.0%	0	0.0%	4.2%	27.7%
	Moderate	0	0.0%	15.9%	0	0.0%	10.1%	17.1%
	Middle	0	0.0%	20.6%	0	0.0%	15.3%	17.0%
	Upper	0	0.0%	42.3%	0	0.0%	57.1%	38.1%
	Unknown	1	100.0%	13.1%	336	100.0%	13.4%	0.0%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>336</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	6.2%	0	0.0%	4.1%	27.7%
	Moderate	0	0.0%	13.4%	0	0.0%	9.7%	17.1%
	Middle	0	0.0%	17.7%	0	0.0%	13.0%	17.0%
	Upper	0	0.0%	57.0%	0	0.0%	63.2%	38.1%
	Unknown	0	0.0%	5.7%	0	0.0%	10.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	27.7%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Upper	0	0.0%	1.8%	0	0.0%	0.1%	38.1%
	Unknown	0	0.0%	98.2%	0	0.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	4.8%	4.5%	126	2.0%	1.8%	27.7%
	Moderate	7	33.3%	16.2%	1,046	16.3%	9.0%	17.1%
	Middle	4	19.0%	19.7%	762	11.9%	13.4%	17.0%
	Upper	8	38.1%	39.9%	4,148	64.6%	46.2%	38.1%
	Unknown	1	4.8%	19.8%	336	5.2%	29.4%	0.0%
	<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,418</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Borrower Distribution of HMDA Loans								
Assessment Area: Houston MSA								
Product Type	Borrower Income Levels	2019						
		Count			Dollar			Families
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	1	6.3%	3.6%	140	1.3%	1.8%	27.7%
	Moderate	7	43.8%	18.8%	865	8.1%	11.8%	17.1%
	Middle	3	18.8%	23.5%	445	4.2%	18.4%	17.0%
	Upper	5	31.3%	41.3%	9,249	86.4%	56.0%	38.1%
	Unknown	0	0.0%	12.8%	0	0.0%	12.1%	0.0%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,699</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	5.1%	0	0.0%	2.4%	27.7%
	Moderate	0	0.0%	11.5%	0	0.0%	6.2%	17.1%
	Middle	0	0.0%	17.2%	0	0.0%	11.2%	17.0%
	Upper	0	0.0%	47.2%	0	0.0%	61.3%	38.1%
	Unknown	0	0.0%	19.0%	0	0.0%	18.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	6.3%	0	0.0%	3.5%	27.7%
	Moderate	0	0.0%	13.4%	0	0.0%	8.5%	17.1%
	Middle	0	0.0%	18.6%	0	0.0%	12.6%	17.0%
	Upper	0	0.0%	57.8%	0	0.0%	69.5%	38.1%
	Unknown	0	0.0%	3.9%	0	0.0%	6.0%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	27.7%
	Moderate	0	0.0%	0.3%	0	0.0%	0.0%	17.1%
	Middle	0	0.0%	0.3%	0	0.0%	0.0%	17.0%
	Upper	0	0.0%	1.4%	0	0.0%	0.1%	38.1%
	Unknown	0	0.0%	98.0%	0	0.0%	99.9%	0.0%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	1	6.3%	4.0%	140	1.3%	1.7%	27.7%
	Moderate	7	43.8%	16.2%	865	8.1%	8.9%	17.1%
	Middle	3	18.8%	21.0%	445	4.2%	14.1%	17.0%
	Upper	5	31.3%	42.0%	9,249	86.4%	49.5%	38.1%
	Unknown	0	0.0%	16.7%	0	0.0%	25.7%	0.0%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,699</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Small Business Loans by Revenue and Loan Size								
Assessment Area: Houston MSA								
Business Revenue and Loan Size		2017						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	1	100.0%	44.3%	\$1,000	100.0%	32.2%	87.9%
	Over \$1 Million/ Unknown	0	0.0%	55.7%	\$0	0.0%	67.8%	12.1%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,000</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	0	0.0%	93.1%	\$0	0.0%	36.0%	
	\$100,001–\$250,000	0	0.0%	3.4%	\$0	0.0%	14.8%	
	\$250,001–\$1 Million	1	100.0%	3.6%	\$1,000	100.0%	49.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,000</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%		
	\$100,001–\$250,000	0	0.0%		\$0	0.0%		
	\$250,001–\$1 Million	1	100.0%		\$1,000	100.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>		<b>\$1,000</b>	<b>100.0%</b>		

Small Business Loans by Revenue and Loan Size								
Assessment Area: Houston MSA								
Business Revenue and Loan Size		2018						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	1	33.3%	39.0%	\$1,000	64.4%	30.3%	89.8%
	Over \$1 Million/Unknown	2	66.7%	61.0%	\$553	35.6%	69.7%	10.2%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,553</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	1	33.3%	93.1%	\$53	3.4%	37.0%	
	\$100,001–\$250,000	0	0.0%	3.5%	\$0	0.0%	15.2%	
	\$250,001–\$1 Million	2	66.7%	3.4%	\$1,500	96.6%	47.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,553</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%	
		\$100,001–\$250,000	0	0.0%		\$0	0.0%	
		\$250,001–\$1 Million	1	33.3%		\$1,000	64.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>1</b>	<b>33.3%</b>		<b>\$1,000</b>	<b>64.4%</b>	

Small Business Loans by Revenue and Loan Size								
Assessment Area: Houston MSA								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	0	0.0%	43.2%	\$0	0.0%	31.8%	90.2%
	Over \$1 Million/Unknown	3	100.0%	56.8%	\$550	100.0%	68.2%	9.8%
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	1	33.3%	93.7%	\$100	18.2%	38.8%	
	\$100,001–\$250,000	1	33.3%	3.2%	\$150	27.3%	14.8%	
	\$250,001–\$1 Million	1	33.3%	3.1%	\$300	54.5%	46.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$550</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%	
		\$100,001–\$250,000	0	0.0%		\$0	0.0%	
		\$250,001–\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>		<b>\$0</b>	<b>0.0%</b>	

Geographic Distribution of HMDA Loans								
Assessment Area: Houston MSA								
Product Type	Tract Income Levels	2017						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	0	0.0%	3.7%	0	0.0%	2.9%	7.5%
	Moderate	0	0.0%	16.1%	0	0.0%	11.0%	25.8%
	Middle	0	0.0%	31.8%	0	0.0%	24.3%	27.9%
	Upper	1	100.0%	48.3%	364	100.0%	61.7%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>364</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	3.6%	0	0.0%	2.5%	7.5%
	Moderate	0	0.0%	18.3%	0	0.0%	11.6%	25.8%
	Middle	0	0.0%	32.5%	0	0.0%	23.7%	27.9%
	Upper	0	0.0%	45.6%	0	0.0%	62.2%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	5.7%	0	0.0%	4.3%	7.5%
	Moderate	0	0.0%	21.5%	0	0.0%	12.3%	25.8%
	Middle	0	0.0%	27.3%	0	0.0%	19.2%	27.9%
	Upper	0	0.0%	45.4%	0	0.0%	64.0%	38.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	31.4%	0	0.0%	24.4%	28.6%
	Moderate	0	0.0%	31.7%	0	0.0%	18.8%	29.1%
	Middle	0	0.0%	15.2%	0	0.0%	17.4%	18.6%
	Upper	0	0.0%	21.5%	0	0.0%	39.3%	22.9%
	Unknown	0	0.0%	0.3%	0	0.0%	0.1%	0.9%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	0	0.0%	3.8%	0	0.0%	5.5%	7.5%
	Moderate	0	0.0%	16.9%	0	0.0%	12.1%	25.8%
	Middle	0	0.0%	31.7%	0	0.0%	23.2%	27.9%
	Upper	1	100.0%	47.5%	364	100.0%	59.0%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>364</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Houston MSA								
Product Type	Tract Income Levels	2018						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	4	21.1%	4.2%	625	10.6%	3.4%	7.5%
	Moderate	7	36.8%	16.1%	1,637	27.7%	11.3%	25.8%
	Middle	5	26.3%	31.9%	1,196	20.3%	25.0%	27.9%
	Upper	3	15.8%	47.7%	2,443	41.4%	60.2%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>5,901</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	4.1%	0	0.0%	2.7%	7.5%
	Moderate	1	100.0%	19.9%	336	100.0%	13.0%	25.8%
	Middle	0	0.0%	31.3%	0	0.0%	22.8%	27.9%
	Upper	0	0.0%	44.7%	0	0.0%	61.3%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>336</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.8%	0	0.0%	3.6%	7.5%
	Moderate	0	0.0%	16.4%	0	0.0%	13.1%	25.8%
	Middle	0	0.0%	24.8%	0	0.0%	20.0%	27.9%
	Upper	0	0.0%	54.0%	0	0.0%	63.3%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	24.8%	0	0.0%	15.8%	28.6%
	Moderate	0	0.0%	34.0%	0	0.0%	30.8%	29.1%
	Middle	0	0.0%	16.1%	0	0.0%	20.7%	18.6%
	Upper	0	0.0%	24.5%	0	0.0%	31.9%	22.9%
	Unknown	0	0.0%	0.5%	0	0.0%	0.7%	0.9%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	4	19.0%	4.3%	625	9.7%	5.1%	7.5%
	Moderate	9	42.9%	17.4%	2,154	33.6%	14.7%	25.8%
	Middle	5	23.8%	31.9%	1,196	18.6%	24.2%	27.9%
	Upper	3	14.3%	46.3%	2,443	38.1%	55.8%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.2%	0.1%
	<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>6,418</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of HMDA Loans								
Assessment Area: Houston MSA								
Product Type	Tract Income Levels	2019						
		Count			Dollar			Owner-Occupied Units
		Bank		HMDA Aggregate	Bank		HMDA Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Home Purchase	Low	2	12.5%	4.4%	461	4.3%	3.5%	7.5%
	Moderate	10	62.5%	16.1%	1,365	12.8%	11.3%	25.8%
	Middle	1	6.3%	32.2%	144	1.3%	25.0%	27.9%
	Upper	3	18.8%	47.2%	8,729	81.6%	60.2%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,699</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Refinance	Low	0	0.0%	4.1%	0	0.0%	2.8%	7.5%
	Moderate	0	0.0%	15.8%	0	0.0%	9.8%	25.8%
	Middle	0	0.0%	27.6%	0	0.0%	19.4%	27.9%
	Upper	0	0.0%	52.4%	0	0.0%	68.0%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Home Improvement	Low	0	0.0%	4.6%	0	0.0%	3.4%	7.5%
	Moderate	0	0.0%	17.2%	0	0.0%	12.3%	25.8%
	Middle	0	0.0%	25.8%	0	0.0%	18.2%	27.9%
	Upper	0	0.0%	52.4%	0	0.0%	66.0%	38.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily	Low	0	0.0%	25.9%	0	0.0%	16.2%	28.6%
	Moderate	0	0.0%	30.1%	0	0.0%	23.3%	29.1%
	Middle	0	0.0%	15.3%	0	0.0%	23.1%	18.6%
	Upper	0	0.0%	28.7%	0	0.0%	37.4%	22.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.9%
	<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
HMDA TOTALS	Low	2	12.5%	4.4%	461	4.3%	4.9%	7.5%
	Moderate	10	62.5%	16.4%	1,365	12.8%	12.6%	25.8%
	Middle	1	6.3%	31.1%	144	1.3%	23.6%	27.9%
	Upper	3	18.8%	48.1%	8,729	81.6%	58.8%	38.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	<b>TOTAL</b>	<b>16</b>	<b>100.0%</b>	<b>100.0%</b>	<b>10,699</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Geographic Distribution of Small Business Loans Assessment Area: Houston MSA							
Tract Income Levels	2017						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	13.4%	\$0	0.0%	15.1%	13.5%
Moderate	0	0.0%	22.2%	\$0	0.0%	23.1%	22.6%
Middle	1	100.0%	21.7%	\$1,000	100.0%	20.3%	21.2%
Upper	0	0.0%	41.2%	\$0	0.0%	40.6%	42.4%
Unknown	0	0.0%	1.5%	\$0	0.0%	0.9%	0.2%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,000</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Houston MSA							
Tract Income Levels	2018						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	13.7%	\$0	0.0%	15.7%	13.3%
Moderate	1	33.3%	21.6%	\$500	32.2%	22.8%	22.7%
Middle	0	0.0%	21.5%	\$0	0.0%	20.4%	21.5%
Upper	2	66.7%	41.8%	\$1,053	67.8%	40.2%	42.3%
Unknown	0	0.0%	1.4%	\$0	0.0%	0.9%	0.2%
<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,553</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Geographic Distribution of Small Business Loans Assessment Area: Houston MSA							
Tract Income Levels	2019						
	Count			Dollar			Businesses
	Bank		Aggregate	Bank		Aggregate	
	#	%	%	\$ 000s	\$ %	\$ %	%
Low	0	0.0%	13.6%	\$0	0.0%	15.6%	13.4%
Moderate	2	66.7%	21.4%	\$450	81.8%	22.6%	22.6%
Middle	0	0.0%	21.7%	\$0	0.0%	20.2%	21.6%
Upper	1	33.3%	41.8%	\$100	18.2%	40.8%	42.2%
Unknown	0	0.0%	1.4%	\$0	0.0%	0.9%	0.3%
<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## GLOSSARY

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

**Assessment area:** One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

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

**Community contact:** Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

**Community development:** An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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

**Demographics:** The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

**Distressed nonmetropolitan middle-income geography:** A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

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

**Household:** One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

**Housing affordability ratio:** Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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

## Appendix D (continued)

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

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

**Median family income:** The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

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

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan statistical area (nonMSA):** Not part of a metropolitan area. (See metropolitan area.)

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

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

**Performance context:** The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

**Performance criteria:** These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

**Performance evaluation (PE):** A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

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

**Small businesses/small farms:** A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

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

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

**Underserved middle-income geography:** A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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