

PUBLIC DISCLOSURE

December 9, 2002

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Cumberland Bank
Carthage, Tennessee**

RSSD ID Number: 191177

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

<p>Note: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion of opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.</p>

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DEFINITIONS

Income Definitions

Throughout this evaluation, the following definitions are used for the various income levels. These levels are defined in the CRA.

Low-Income - An individual income, or median family income for geographies, that is less than 50 percent of the area median income.

Moderate-Income - An individual income, or median family income for geographies, that is at least 50 percent but less than 80 percent of the area median income.

Middle-Income - An individual income, or median family income for geographies, that is at least 80 percent but less than 120 percent of the area median income.

Upper-Income - An individual income, or median family income for geographies, that is 120 percent or more of the area median income.

Other Definitions

ATM -	Automated Teller Machine
BNA-	Block Numbering Area
FDIC -	Federal Deposit Insurance Corporation
HUD -	United States Department of Housing and Urban Development
LTD -	Loan-to-Deposit Ratio
MSA -	Metropolitan Statistical Area
REIS -	Regional Economic Information System

ROUNDING CONVENTION

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

GENERAL INFORMATION

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

This document is an evaluation of the CRA performance of Cumberland Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of December 9, 2002. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

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

The bank's average loan-to-deposit ratio for the fifteen quarters ending June 30, 2002 is **MORE THAN REASONABLE** given the institution's size, financial condition, and competition within its assessment area. A **MAJORITY** of the bank's loans were extended **IN** the bank's assessment area. Lending to borrowers of different incomes businesses of different revenue sizes is **EXCELLENT**. The geographic distribution of HMDA and small business loans was not evaluated due to the absence of low- and moderate-income tracts in the assessment area selected for review using full scope examination procedures. The bank has received no CRA-related complaints since its previous examination by the FDIC dated November 16, 1998. In addition, the bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations.

DESCRIPTION OF INSTITUTION

The bank received a “Satisfactory” rating at its previous evaluation conducted by the FDIC dated November 16, 1998.

Cumberland Bank, headquartered in Carthage, Tennessee, is a wholly owned subsidiary of Cumberland Bancorp, Incorporated. The bank began operations in 1975 and currently operates a main office and eight branches in the following Tennessee counties: Macon, Robertson, Smith, Sumner, and Warren. The bank also operates 17 ATMs throughout these counties. Cumberland Bank became a member of the Federal Reserve System on April 4, 1999. According to the bank’s Consolidated Reports of Condition and Income, between January 1, 1999 through June 30, 2002, the bank’s assets grew from \$153.7 million to \$280.1 million (82.2 percent). During the same time period, gross loans grew from \$116.9 million to \$218.5 million (86.9 percent) and total deposits grew from \$135.4 million to \$246.3 million (81.9 percent). Cumberland Bank is one of six banks under Cumberland Bancorp, Incorporated. Cumberland Bank owns Cumberland Finance, Incorporated, which is a finance company that operates three offices in Gallatin (Sumner County), McMinnville (Warren County), and Murfreesboro (Rutherford County). The bank also owns Cumberland Life Insurance Company (Crossville, TN), Cumberland Financial Services (Gallatin, TN), Insure Tennessee (Carthage, TN), and CBC Title. The only subsidiary of Cumberland Bank that originates loans is Cumberland Finance, Incorporated.

The composition of the loan portfolio according to Consolidated Reports of Condition and Income (Call Report) dating back to the last CRA evaluation is as follows:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2002		12/31/2001		12/31/1998	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	\$11,629	5.3%	\$12,560	6.1%	\$12,461	10.7%
Secured by One- to Four- Family Dwellings	\$69,367	31.9%	\$69,860	34.1%	\$42,172	36.2%
Other Real Estate:						
Farmland	\$4,676	2.1%	\$4,914	2.4%	\$2,401	2.1%
Multifamily	\$402	0.2%	\$416	0.2%	\$769	0.7%
Nonfarm nonresidential	\$6,076	2.8%	\$7,218	3.5%	\$5,285	4.5%
Commercial and Industrial	\$85,596	39.3%	\$73,554	35.9%	\$25,902	22.2%
Loans to Individuals	\$39,322	18.1%	\$35,954	17.5%	\$26,924	23.1%
Agricultural Loans	\$624	0.3%	\$658	0.3%	\$547	0.5%
Total	\$217,692	100.00%	\$205,134	100.00%	\$116,461	100.00%

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

DESCRIPTION OF INSTITUTION (Continued)

As indicated by the table above, the bank's loan portfolio as of June 30, 2002, consisted primarily of commercial and industrial lending, one- to four family dwelling loans, and loans to individuals. This is consistent with the bank's strategy. No known legal impediments exist that would restrain the bank from meeting the credit needs of its communities.

DESCRIPTION OF ASSESSMENT AREA: Cumberland Bank

Demographic Data by Tract

The Cumberland Bank Assessment Area table shows selected demographic information for the overall institution. The bank has three assessment areas: the Nashville Assessment Area, the Smith-Macon Assessment Area, and the Warren Assessment Area. The Nashville Assessment Area consists of portions of Robertson and Sumner Counties in the Nashville MSA. The Smith-Macon Assessment Area consists of Smith and Macon Counties in Tennessee, and the Warren Assessment Area consists of Warren County, Tennessee. The Smith-Macon and Warren Assessment Areas are not located in an MSA.

CUMBERLAND BANK ASSESSMENT AREA								
DEMOGRAPHICS								
Income Categories	Tract Distribution		Families					
			Families by Tract		Families <Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	0	0.0%	10,564	20.0%
Moderate	4	9.8%	5,489	10.4%	778	14.2%	9,003	17.0%
Middle	31	75.6%	40,735	77.1%	3,901	9.6%	13,016	24.6%
Upper	5	12.2%	6,625	12.5%	216	3.3%	20,266	38.3%
NA	1	2.4%	0	0.0%	0	0.0%	-	-
Total	41	100.0%	52,849	100.0%	4,895	9.3%	52,849	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	0	0	0.0%	0	0.0%	0	0.0%	
Moderate	7,581	5,002	9.9%	66.0%	2,028	26.8%	551	7.3%
Middle	56,127	38,909	77.1%	69.3%	12,554	22.4%	4,664	8.3%
Upper	8,410	6,529	12.9%	77.6%	1,305	15.5%	576	6.8%
NA	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	72,118	50,440	100.0%	69.9%	15,887	22.0%	5,791	8.0%
Businesses by Tract and Revenue Size								
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	896	8.4%	681	8.5%	66	11.9%	149	7.2%
Middle	8,443	79.4%	6,438	80.3%	443	79.7%	1,562	75.8%
Upper	1,293	12.2%	895	11.2%	47	8.5%	351	17.0%
NA	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10,632	100.0%	8,014	100.0%	556	100.0%	2,062	100.0%
Percentage of Total Businesses:			75.4%		5.2%		19.4%	

Sources: 1990 Census Data, 2001 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

Population

According to the 1990 U.S. Census, the assessment area's population was 181,611 persons, representing 3.7 percent of the population of the state of Tennessee.

DESCRIPTION OF ASSESSMENT AREA: Cumberland Bank (Continued)
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Housing Data

Economic market data at the time of the 1990 U.S. Census showed that 69.9 percent of the housing units in the assessment area were owner-occupied, 22 percent were rental units, and 8 percent were vacant units. The median housing value for all types of units in the assessment area was \$65,168. The median housing value is higher than that of the state of Tennessee at \$58,016. Housing in the assessment area was primarily comprised of one-unit dwellings (75.1 percent) and the median age of the housing stock was 18 years.

Income Characteristics

At the time of the U.S. Census, the median family income for the overall assessment area was \$32,828, which was higher than the state's median family income of \$29,546.

Employment Statistics

According to information from the U.S. Bureau of Labor Statistics, the unemployment rates from June 1999 through 2002, respectively, were 2.8 percent, 3.3 percent, 4.8 percent, and 4.6 percent for the Nashville Assessment Area; 4 percent, 4.4 percent, 6.5 percent, and 5.5 percent for the Smith-Macon Assessment Area; and 6.3 percent, 4.2 percent, 7.9 percent, and 6.9 percent for the Warren Assessment Area. Additionally, the unemployment rates for the state of Tennessee were 4.3 percent, 4.3 percent, 4.8 percent, and 5.2 percent for the same periods. A review of data from the REIS as of 1995 shows that the leading industries in the bank's assessment areas include services, manufacturing, and retail trade sectors.

Business Size Characteristics

The demographic table earlier in this report provides key demographic business data by tracts within Cumberland Bank's assessment areas. The Dun and Bradstreet information for 2001 illustrates that 75.4 percent of the businesses in the bank's assessment area had total revenues less than \$1 million, and were therefore considered to be small businesses.

Competition

Cumberland Bank has branch offices that are geographically located in highly competitive banking markets. However, the level of competition is considered typical given the local area population and the current economic growth being experienced in the area. The competition comes mainly from FDIC-Insured institutions

DESCRIPTION OF ASSESSMENT AREA: Cumberland Bank (Continued)
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with branch offices located in the assessment area. Many of these banks are statewide, multi-regional, or national banks.

Community Contacts

As part of the CRA examination, information was obtained from two community contacts regarding local economic conditions and community credit needs. The contacts represented a private business and an economic and community development authority in the bank's assessment areas. The contacts stated that there are opportunities in the assessment area in which bank's could become more involved. Overall, the contacts gave generally positive opinions of the banking sector's role in the economic well being of the areas they serve.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Cumberland Bank Assessment Area

Cumberland Bank's overall CRA rating was determined by evaluating the Smith-Macon Assessment Area using full scope examination procedures regarding lending to borrowers of different income levels and to businesses of different revenue sizes. The Smith-Macon Assessment Area includes a significant level of the bank's lending during the review period and represents the majority of the bank's branches. Cumberland Bank elected not to report geo-coding information on its 1999 HMDA LAR for loans originated outside MSAs. This is an option allowed by Regulation C – Home Mortgage Disclosure Act. As a result, HMDA loans originated in the Smith-Macon and Warren Assessment Areas for this year are not included in the data analysis. As stated earlier in the report, the Smith-Macon Assessment Area does not contain any low- and moderate-income BNAs; therefore, a geographic distribution analysis was not conducted. Please refer to the Smith-Macon Assessment Area section on page 9 for a detailed review of Cumberland Bank's lending patterns. The Nashville and Warren Assessment Areas were evaluated using limited scope examination procedures for the same lending categories and the assessment areas' results were individually compared to the rating for the overall institution. These areas were considered either "**Consistent**" or "**Not Consistent**" with the overall institution's rating regarding geographic distribution and lending to borrowers of different income levels, and to businesses of different revenue sizes. Please refer to the table on page 13 for those ratings.

Loan-to-Deposit Ratio Analysis

Cumberland Bank's average loan-to-deposit ratio is **MORE THAN REASONABLE** given the size, financial condition, and assessment area credit needs. The bank's average LTD ratio for the fifteen-quarter period ending June 30, 2002, was 88.8 percent. The bank's ratio has ranged from 81.9 percent to 95.5 percent in the fifteen quarters since December 31, 1998. The bank's average net LTD ratio was compared with the ratios of four other financial institutions of similar asset size with branch offices in the bank's assessment areas and Cumberland Bank's average net LTD ratio was significantly higher.

Assessment Area Concentration

A **MAJORITY** of Cumberland Bank's loans were extended **IN** its assessment area. The universe of 1,531 HMDA loans originated between January 1, 1999 through June 30, 2002 and a sample of 213 small business loans originated since the previous performance evaluation (November 1998) were analyzed to determine the extent of the bank's lending inside the assessment area. As illustrated in the following table, a majority (by both number and dollar volume) of the bank's small business and HMDA loans were originated inside the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Cumberland Bank Assessment Area (Continued)

LENDING INSIDE AND OUTSIDE ASSESSMENT AREA				
Loan Type	IN			
	Number	Percent	\$ (000s)	Percent
Small Business	167	78.4%	\$13,358	71.2%
HMDA	1,026	67.0%	\$85,117	67.7%
<i>Total In</i>	<i>1,193</i>	<i>68.4%</i>	<i>\$98,475</i>	<i>68.1%</i>
	OUT			
	Number	Percent	\$ (000s)	Percent
Small Business	46	21.6%	\$5,400	28.8%
HMDA	505	33.0%	\$40,685	32.3%
<i>Total Out</i>	<i>551</i>	<i>31.6%</i>	<i>\$46,085</i>	<i>31.9%</i>

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Smith-Macon Assessment Area

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

To assess Cumberland Bank’s performance relative to this criterion, 460 HMDA loans and 35 small business loans originated within the Smith-Macon Assessment Area were analyzed. Borrower income classifications were assigned in accordance with the definitions outlined earlier in this report. For this analysis, the distribution of HMDA loans by borrower income level was compared with the available demographic information and aggregate lending data for 2000 and 2001. Additionally, small business lending by revenue size was compared with the available demographic information.

Lending to Borrowers of Different Incomes

Of the 460 HMDA loans that were originated in the Smith-Macon Assessment Area during the review period, 448 had income information. The bank’s percentage of HMDA loans to low-income borrowers at 7.4 percent is below the percentage of low-income families at 22.0 percent in the assessment area. A possible reason for the low level of HMDA lending is the poverty level of families in the assessment area. 13.8 percent of total families in the assessment area have incomes below the poverty level. While these families are not ineligible for credit, it is recognized that they have a lower capacity for debt repayment and therefore, may not qualify for HMDA loans. Assuming that the 1,225 poverty level families in the assessment area are categorized as low-income, there are 732 non-poverty, low-income families in the assessment area, representing 8.2 percent of total families. The bank’s lending to low-income borrowers was slightly below this percentage. Additionally, low-income applicants submitted only 7.6 percent of the HMDA applications. 23.9 percent of the HMDA loans were made to moderate-income families, who represent 15.7 percent of total families. Moderate-income applicants submitted 29.2 percent of the HMDA applications.

SMITH-MACON ASSESSMENT AREA		
HMDA LOANS by Borrower Income		
Borrower Income Level	#	%
Low-Income	34	7.4%
Moderate-Income	110	23.9%
Middle-Income	153	33.3%
Upper-Income	151	32.8%
Income Not Available	12	2.6%
<i>Total</i>	<i>460</i>	<i>100.0%</i>

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Smith-Macon Assessment Area
 (Continued)**

Lending to Borrowers of Different Incomes and Businesses of Different Sizes (Continued)

Comparison to the 2000 aggregate HMDA lending illustrated in the table below revealed that the bank's level of HMDA lending was below the aggregate for both low- and moderate-income borrowers.

SMITH - MACON ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	8	6.3%	53	11.2%
Moderate	0	0.0%	0	0.0%	28	22.2%	120	25.4%
Middle	113	89.7%	448	94.7%	34	27.0%	161	34.0%
Upper	13	10.3%	25	5.3%	52	41.3%	135	28.5%
NA	0	0.0%	0	0.0%	4	3.2%	4	0.8%
Total	126	100.0%	473	100.0%	126	100.0%	473	100.0%

Comparison to the 2001 aggregate HMDA lending illustrated in the table below revealed that the bank's level of HMDA lending was similar to the aggregate for low-income borrowers and was above the aggregate for moderate-income borrowers.

SMITH - MACON ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	17	7.5%	93	7.5%
Moderate	0	0.0%	0	0.0%	54	23.9%	237	19.2%
Middle	217	96.0%	1,195	96.9%	80	35.4%	287	23.3%
Upper	9	4.0%	38	3.1%	69	30.5%	344	27.9%
NA	0	0.0%	0	0.0%	6	2.7%	272	22.1%
Total	226	100.0%	1,233	100.0%	226	100.0%	1,233	100.0%

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Smith-Macon Assessment Area
 (Continued)**

Overall, the bank's level of lending to low-income borrowers for the combined years of 2000 and 2001 at 7.3 percent was below aggregate performance at 8.6 percent. The bank's level of lending to moderate-income borrowers for 2000 and 2001 at 24.1 percent was above the aggregate performance at 20.9 percent.

Lending to Businesses of Different Sizes

Of the 35 loans originated in the Smith-Macon Assessment Area during the review period, 31 loans (88.6 percent) were extended to businesses with gross annual revenues of less than \$1 million. As noted earlier, 75.8 percent of the businesses in the assessment area are considered to be small businesses. In addition, 82.9 percent of the dollar volume of small business loans originated were in amounts of \$100,000 or less. Please refer to the following table for lending percentages.

SMITH-MACON ASSESSMENT AREA SMALL BUSINESS LOANS		
Business Revenue:	#	%
\$1 Million or Less	31	88.6%
Over \$1 Million	4	11.4%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	29	82.9%
\$100,001 - \$250,000	3	8.6%
\$250,001 - \$1 Million	3	8.6%
<i>Total</i>	<i>35</i>	<i>100.0%</i>

Cumberland Bank's record of lending reflects **EXCELLENT** penetration among individuals of different incomes, including low- and moderate-income levels, and businesses of different sizes.

Geographic Distribution of Loans

The Smith-Macon Assessment Area does not contain any low- and moderate-income census tracts; therefore, an analysis of the geographic distribution of loans is not valid for this assessment area. The following tables illustrate the geographic distribution of loans and are provided for informational purposes only.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Smith-Macon Assessment Area
 (Continued)**

SMITH-MACON ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	0	0.0%
Moderate-Income	0	0.0%
Middle-Income	433	94.1%
Upper-Income	27	5.9%
<i>Total Assessment Area</i>	<i>460</i>	<i>100.0%</i>

SMITH-MACON ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	0	0.0%
Middle-Income	35	100.0%
Upper-Income	0	0.0%
<i>Total Assessment Area</i>	<i>35</i>	<i>100.0%</i>

Complaints

No CRA-related complaints have been received since the previous performance evaluation.

Compliance With Antidiscrimination Laws

The bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations. No evidence of discrimination or the use of illegal credit practices was noted during the review of bank policies and procedures. No practices have the intent or the effect of discouraging applicants for credit.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: LIMITED SCOPE AREAS

The following metropolitan and nonmetropolitan areas were not reviewed using full-scope examination procedures; however, through the use of available facts and data, including performance and demographic information, conclusions regarding performance compared with the overall institution, which did not impact the overall rating are provided. Please refer to the tables in Appendices A, B, C, and D for information regarding these areas.

Assessment Areas	Lending to Borrowers of Different Income Levels and to Businesses of Different Revenue Sizes	Geographic Distribution
<i>Nashville</i>	Consistent	Not Consistent(+) *
<i>Warren</i>	Not Consistent (-)	Not Valid**

*The assessment area contains moderate-income census tracts, therefore, a geographic distribution analysis was conducted.

**The assessment area does not contain any low- or moderate-income BNAs.

APPENDIX A: Demographic Tables

NASHVILLE ASSESSMENT AREA

NASHVILLE ASSESSMENT AREA								
DEMOGRAPHICS								
2002 HUD Median Family Income (MSA): \$61,600 Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	0	0.0%	6,590	19.2%
Moderate	4	18.2%	5,489	16.0%	778	14.2%	5,969	17.4%
Middle	14	63.6%	22,593	66.0%	1,383	6.1%	8,896	26.0%
Upper	4	18.2%	6,164	18.0%	168	2.7%	12,791	37.4%
NA	0	0.0%	0	0.0%	0	0.0%	-	-
Total	22	100.0%	34,246	100.0%	2,329	6.8%	34,246	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	0	0	0.0%	0	0.0%	0	0.0%	0
Moderate	7,581	5,002	15.6%	2,028	26.8%	551	7.3%	
Middle	30,103	21,110	65.8%	6,743	22.4%	2,250	7.5%	
Upper	7,704	5,975	18.6%	1,271	16.5%	458	5.9%	
NA	0	0	0.0%	0	0.0%	0	0.0%	
Total	45,388	32,087	100.0%	10,042	22.1%	3,259	7.2%	
Total Businesses by Tract								
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	896	13.0%	681	13.4%	66	18.0%	149	10.2%
Middle	4,766	68.9%	3,540	69.5%	253	69.1%	973	66.6%
Upper	1,255	18.1%	869	17.1%	47	12.8%	339	23.2%
NA	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	6,917	100.0%	5,090	100.0%	366	100.0%	1,461	100.0%
Percentage of Total Businesses:			73.6%		5.3%		21.1%	

Sources: 1990 Census Data, 2001 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

APPENDIX A: Demographic Tables (Continued)

WARREN ASSESSMENT AREA

WARREN ASSESSMENT AREA								
DEMOGRAPHICS								
2002 HUD MFI (State non-metro): \$42,600 Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families<Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	0	0.0%	2,017	20.8%
Moderate	0	0.0%	0	0.0%	0	0.0%	1,639	16.9%
Middle	9	100.0%	9,707	100.0%	1,341	13.8%	2,196	22.6%
Upper	0	0.0%	0	0.0%	0	0.0%	3,855	39.7%
NA	0	0.0%	0	0.0%	0	0.0%	-	-
Total	9	100.0%	9,707	100.0%	1,341	13.8%	9,707	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	0	0	0.0%	0	0.0%	0	0.0%	0
Moderate	0	0	0.0%	0	0.0%	0	0.0%	0
Middle	13,802	9,277	100.0%	67.2%	3,404	24.7%	1,121	8.1%
Upper	0	0	0.0%	0.0%	0	0.0%	0	0.0%
NA	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	13,802	9,277	100.0%	67.2%	3,404	24.7%	1,121	8.1%
Total Businesses by Tract								
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2,084	100.0%	1,687	100.0%	112	100.0%	285	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
NA	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2,084	100.0%	1,687	100.0%	112	100.0%	285	100.0%
Percentage of Total Businesses:				81.0%	5.4%		13.7%	

Sources: 1990 Census Data, 2001 Dun & Bradstreet business demographic data.

APPENDIX B: Cumberland Bank Assessment Area Lending Tables

CUMBERLAND BANK ASSESSMENT AREA

CUMBERLAND BANK ASSESSMENT AREA		
HMDA LOANS by Borrower Income		
Borrower Income Level	#	%
Low-Income	118	11.5%
Moderate-Income	249	24.3%
Middle-Income	311	30.3%
Upper-Income	326	31.8%
Income Not Available	22	2.1%
<i>Total</i>	<i>1,026</i>	<i>100.0%</i>

CUMBERLAND BANK ASSESSMENT AREA		
SMALL BUSINESS LOANS		
Business Revenue:	#	%
\$1 Million or Less	136	81.4%
Over \$1 Million	31	18.6%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	135	80.8%
\$100,001 - \$250,000	18	10.8%
\$250,001 - \$1 Million	14	8.4%
<i>Total</i>	<i>167</i>	<i>100.0%</i>

APPENDIX B: Cumberland Bank Assessment Area Lending Tables (Continued)

CUMBERLAND BANK ASSESSMENT AREA

CUMBERLAND BANK ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	0	0.0%
Moderate-Income	116	11.3%
Middle-Income	858	83.6%
Upper-Income	52	5.1%
<i>Total Assessment Area</i>	<i>1,026</i>	<i>100.0%</i>

CUMBERLAND BANK ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	22	13.2%
Middle-Income	135	80.8%
Upper-Income	10	6.0%
<i>Total Assessment Area</i>	<i>167</i>	<i>100.0%</i>

APPENDIX B: Cumberland Bank Assessment Area Lending Tables (Continued)

CUMBERLAND BANK ASSESSMENT AREA

CUMBERLAND BANK ASSESSMENT AREA								
1999 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	10	14.1%	1,113	9.7%
Moderate	17	23.9%	1,468	12.8%	16	22.5%	2,361	20.6%
Middle	51	71.8%	8,061	70.2%	20	28.2%	2,846	24.8%
Upper	3	4.2%	1,948	17.0%	22	31.0%	2,636	23.0%
NA	0	0.0%	0	0.0%	3	4.2%	2,521	22.0%
Total	71	100.0%	11,477	100.0%	71	100.0%	11,477	100.0%

CUMBERLAND BANK ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	25	11.1%	892	11.4%
Moderate	8	3.5%	1,386	17.8%	40	17.7%	1,775	22.8%
Middle	198	87.6%	4,922	63.1%	67	29.6%	1,899	24.3%
Upper	20	8.8%	1,494	19.1%	90	39.8%	1,544	19.8%
NA	0	0.0%	0	0.0%	4	1.8%	1,692	21.7%
Total	226	100.0%	7,802	100.0%	226	100.0%	7,802	100.0%

CUMBERLAND BANK ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	61	12.5%	1,355	9.9%
Moderate	59	12.1%	1,590	11.6%	120	24.6%	2,832	20.7%
Middle	409	84.0%	9,561	70.0%	155	31.8%	3,237	23.7%
Upper	19	3.9%	2,500	18.3%	141	29.0%	3,160	23.1%
NA	0	0.0%	0	0.0%	10	2.1%	3,067	22.5%
Total	487	100.0%	13,651	100.0%	487	100.0%	13,651	100.0%

APPENDIX C: Nashville Assessment Area Lending Tables

NASHVILLE ASSESSMENT AREA

NASHVILLE ASSESSMENT AREA		
HMDA LOANS by Borrower Income		
Borrower Income Level	#	%
Low-Income	69	16.6%
Moderate-Income	118	28.4%
Middle-Income	117	28.2%
Upper-Income	103	24.8%
Income Not Available	8	1.9%
<i>Total</i>	<i>415</i>	<i>100.0%</i>

NASHVILLE ASSESSMENT AREA		
SMALL BUSINESS LOANS		
Business Revenue:	#	%
\$1 Million or Less	67	74.4%
Over \$1 Million	23	25.6%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	70	77.8%
\$100,001 - \$250,000	11	12.2%
\$250,001 - \$1 Million	9	10.0%
<i>Total</i>	<i>90</i>	<i>100.0%</i>

APPENDIX C: Nashville Assessment Area Lending Tables (Continued)

NASHVILLE ASSESSMENT AREA

NASHVILLE ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	0	0.0%
Moderate-Income	116	28.0%
Middle-Income	274	66.0%
Upper-Income	25	6.0%
<i>Total Assessment Area</i>	<i>415</i>	<i>100.0%</i>

NASHVILLE ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	22	24.4%
Middle-Income	58	64.4%
Upper-Income	10	11.1%
<i>Total Assessment Area</i>	<i>90</i>	<i>100.0%</i>

APPENDIX C: Nashville Assessment Area Lending Tables (Continued)

NASHVILLE ASSESSMENT AREA

NASHVILLE ASSESSMENT AREA								
1999 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	10	14.1%	936	9.4%
Moderate	17	23.9%	1,468	14.7%	16	22.5%	2,081	20.8%
Middle	51	71.8%	6,600	66.1%	20	28.2%	2,431	24.3%
Upper	3	4.2%	1,918	19.2%	22	31.0%	2,213	22.2%
NA	0	0.0%	0	0.0%	3	4.2%	2,325	23.3%
Total	71	100.0%	9,986	100.0%	71	100.0%	9,986	100.0%

NASHVILLE ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	10	23.3%	853	14.8%
Moderate	8	18.6%	1,001	17.4%	6	14.0%	1,593	27.7%
Middle	28	65.1%	3,619	63.0%	16	37.2%	1,708	29.7%
Upper	7	16.3%	1,129	19.6%	11	25.6%	1,466	25.5%
NA	0	0.0%	0	0.0%	0	0.0%	129	2.2%
Total	43	100.0%	5,749	100.0%	43	100.0%	5,749	100.0%

NASHVILLE ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	38	19.5%	1,202	10.4%
Moderate	59	30.3%	1,590	13.8%	55	28.2%	2,396	20.7%
Middle	126	64.6%	7,509	65.0%	57	29.2%	2,730	23.6%
Upper	10	5.1%	2,462	21.3%	42	21.5%	2,551	22.1%
NA	0	0.0%	0	0.0%	3	1.5%	2,682	23.2%
Total	195	100.0%	11,561	100.0%	195	100.0%	11,561	100.0%

APPENDIX D: Warren Assessment Area Lending Tables

WARREN ASSESSMENT AREA

WARREN ASSESSMENT AREA		
HMDA LOANS by Borrower Income		
Borrower Income Level	#	%
Low-Income	14	9.3%
Moderate-Income	21	14.0%
Middle-Income	41	27.3%
Upper-Income	72	48.0%
Income Not Available	2	1.3%
<i>Total</i>	<i>150</i>	<i>100.0%</i>

WARREN ASSESSMENT AREA		
SMALL BUSINESS LOANS		
Business Revenue:	#	%
\$1 Million or Less	38	90.5%
Over \$1 Million	4	9.5%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	36	85.7%
\$100,001 - \$250,000	4	9.5%
\$250,001 - \$1 Million	2	4.8%
<i>Total</i>	<i>42</i>	<i>100.0%</i>

APPENDIX D: Warren Assessment Area Lending Tables (Continued)

WARREN ASSESSMENT AREA

WARREN ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	0	0.0%
Moderate-Income	0	0.0%
Middle-Income	151	100.0%
Upper-Income	0	0.0%
<i>Total Assessment Area</i>	<i>151</i>	<i>100.0%</i>

WARREN ASSESSMENT AREA GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	0	0.0%
Middle-Income	42	100.0%
Upper-Income	0	0.0%
<i>Total Assessment Area</i>	<i>42</i>	<i>100.0%</i>

Cumberland Bank
Carthage, Tennessee
December 9, 2002

RSSD ID Number: 191177

APPENDIX D: Warren Assessment Area Lending Tables

WARREN ASSESSMENT AREA

WARREN ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	7	12.3%	113	15.8%
Moderate	0	0.0%	0	0.0%	6	10.5%	189	26.4%
Middle	57	100.0%	716	100.0%	17	29.8%	210	29.3%
Upper	0	0.0%	0	0.0%	27	47.4%	198	27.7%
NA	0	0.0%	0	0.0%	0	0.0%	6	0.8%
Total	57	100.0%	716	100.0%	57	100.0%	716	100.0%

WARREN ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
INCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	0	0.0%	6	9.1%	60	7.0%
Moderate	0	0.0%	0	0.0%	11	16.7%	199	23.2%
Middle	66	100.0%	857	100.0%	18	27.3%	220	25.7%
Upper	0	0.0%	0	0.0%	30	45.5%	265	30.9%
NA	0	0.0%	0	0.0%	1	1.5%	113	13.2%
Total	66	100.0%	857	100.0%	66	100.0%	857	100.0%