

# **PUBLIC DISCLOSURE**

**January 10, 2000**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Pinnacle Bank  
RSSD# 2503569**

**2610 Cantrell Road  
Little Rock, Arkansas 72202**

**Federal Reserve Bank of St. Louis  
P.O. Box 442  
St. Louis, Missouri 63166-0442**

**NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the Federal Reserve concerning the safety and soundness of this financial institution.**

<b>Contents</b>
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General Information	1
Institution's CRA Rating	1
Description Of Institution	1
Description Of Assessment Area	3
Conclusions With Respect To The Performance Tests	6
Loan-To-Deposit Ratio Analysis	11
Lending In The Assessment Area	12
Lending To Borrowers Of Different Incomes And Businesses Of Different Sizes	9
Geographic Distribution Of Loans	7
Complaints	12
Compliance With Antidiscrimination Laws	13

<b>Tables</b>
---------------

Distribution Of Total Loans	2
Assessment Area Census Tract Information By Income Level	4
Assessment Area Population Of Families By Income Level	4
1990 Demographic Data- Pinnacle Bank	5
Distribution Of Loans Inside Assessment Area By Income Level Of Census Tract	7
Distribution Of Loans Inside Assessment Area By Income Level Of Borrower	9
Lending Distribution By Business Revenue Level	11
Loan To Deposit Ratio Competitor Analysis	11
Distribution Of Lending Inside Assessment Area	12
Public Disclosure	14

## 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 Community Reinvestment Act (CRA) performance of **Pinnacle Bank** prepared by **The Federal Reserve Bank of St. Louis**, the institution's supervisory agency, as of January 10, 2000. The agency evaluates performance in assessment area(s), as they are delineated by this institution, rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 228.*

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

Pinnacle Bank meets the criteria for a satisfactory rating. An institution in this category has a satisfactory performance record and participates in activities undertaken to help meet the credit needs of its entire assessment area, particularly in low- and moderate-income (LMI) neighborhoods and to LMI borrowers. This performance is in a manner consistent with institutional capacity and constraints, assessment area credit needs and opportunities, relevant demographic and economic factors and safe and sound banking practices.

Specifically, the geographic distribution of the bank's loans reflects reasonable dispersion throughout the assessment area. An analysis of sampled loans indicated satisfactory penetration of loans among borrowers of different incomes and businesses of different revenue sizes. The bank's loan-to-deposit ratio exceeds the standards for satisfactory performance given the institution's size, local competition from other banking entities, and assessment area are loan demand. A majority of the loans sampled are inside the bank's assessment area. No CRA-related complaints were received since the previous examination.

## DESCRIPTION OF INSTITUTION

Pinnacle Bank is a full-service, retail bank, offering a wide range of both consumer and commercial loan and deposit products. The bank's branch network consists of two full-service branches (including the bank's main office). Also, the bank has a drive-up facility and a deposit accepting automatic teller machine (ATM) at its main office. In

addition, Pinnacle Bank had a third facility eight miles west of the main office that housed its mortgage department. However, as of January 1, 2000, the bank reorganized its mortgage department as a subsidiary of the bank, Pinnacle Bank Home Loan Company.

Pinnacle Bank, which opened for business in January of 1997, is a wholly-owned subsidiary of Pinnacle BancShares Inc., a one-bank holding company located in Little Rock, Arkansas.

As of September 30, 1999, the bank reported total assets of \$85.6 million, with total loans and leases representing 76.7 percent of total assets. Assets have grown approximately 79.8 percent since September, 1998. Significant loan products include 1-4 family residential loans, business loans, and motor vehicle loans to individuals.

The following table reflects the bank's loan mix as of September 30, 1999.

<b>Distribution of Total Loans<sup>1</sup></b>		
<b>Credit Product Type</b>	<b>Amount in 000s</b>	<b>Percentage of Total Loans</b>
Construction and Development	\$ 4,467	6.8%
Commercial Real Estate	\$ 10,200	15.5%
Multifamily Residential	\$ 2,924	4.4%
1-4 Family Residential	\$ 23,871	36.5%
Farmland	\$ 971	1.5%
Commercial and Industrial	\$ 15,311	23.3%
Loans to Individuals	\$ 7,154	10.9%
Other Loans & Leases	\$ 745	1.1%
<b>Total Loans</b>	<b>\$ 65,643</b>	<b>100%</b>

As part of the CRA assessment, the bank's performance was evaluated in relation to the performance of its competitors. Four financial institutions were identified as regional competitors with asset sizes ranging from \$51.8 million to \$102.5 million.

<sup>1</sup> For purposes of this distribution, total loan information is derived from gross loans and leases data as of September 30, 1999 on the Consolidated Report of Condition and Income. 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.

The bank received a rating of “needs to improve” at its previous examination conducted on January 4, 1999, by the Federal Reserve Bank. This conclusion was largely due to the geographic distribution of the bank’s lending that reflected a less than satisfactory dispersion across LMI geographies in the assessment area. In addition, the distribution of loans to borrowers of different income levels reflected poor penetration among LMI individuals.

## DESCRIPTION OF ASSESSMENT AREA

The bank’s assessment area is comprised of 50 census tracts within Pulaski County (see Appendix A), which is in the Little Rock-North Little Rock Metropolitan Statistical Area (MSA 4400). Based on 1990 census tract data, the total population of the assessment area is 203,366. The following table reflects the number and population of the census tracts within the assessment area in each income category.<sup>2</sup>

<b>Assessment Area Census Tract Information by Income Level</b>					
<b>1990 Census Data</b>	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>TOTAL</b>

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<sup>2</sup> Low-income is defined as individual income, or in the case of a geography, a median family income that is less than 50 percent of either the MSA median family income or the statewide nonmetropolitan median family income.

Moderate-income is defined as individual income, or in the case of a geography, a median family income that is at least 50 percent and less than 80 percent of either the MSA median family income or the statewide nonmetropolitan median family income.

Middle-income is defined as individual income, or in the case of a geography, a median family income that is at least 80 percent and less than 120 percent of either the MSA median family income or the statewide nonmetropolitan median family income.

Upper-income is defined as individual income, or in the case of a geography, a median family income that is 120 percent or more of either the MSA median family income or the statewide nonmetropolitan median family income.

Distribution of Census Tracts	2 4.0%	16 32.0%	20 40.0%	12 24.0%	<b>50</b> <b>100%</b>
Population Residing in Each Income Category of Census Tract	4,141 2.0%	51,503 25.3%	74,124 36.5%	73,598 36.2%	<b>203,366</b> <b>100%</b>

The above table demonstrates that Pinnacle Bank’s assessment area contains two low-income census tracts, 16 moderate-income census tracts, 20 middle-income census tracts and 12 upper-income census tracts. Although the assessment area contains two low-income census tracts, one of the tracts (24.02) contains no population or households based on 1990 census information.

As of the 1990 census, the medium family income for the assessment area was \$33,355, compared to the MSA median family income of \$31,598. The following table displays population percentages of the assessment area families by income level, compared to the MSA population as a whole.

<b>Assessment Area Population of Families by Income Level</b>					
<b>1990 Census Data</b>	<b>Low- Income</b>	<b>Moderate- Income</b>	<b>Middle- Income</b>	<b>Upper- Income</b>	<b>TOTAL</b>
Assessment Area	10,680	8,554	10,868	23,351	<b>53,453</b>
	20.0%	16.0%	20.3%	43.7%	<b>100%</b>
MSA 4400	27,572	25,279	31,638	54,888	<b>139,377</b>
	19.8%	18.1%	22.7%	39.4%	<b>100%</b>

The assessment area family population percentages are similar to that of the entire MSA. Although the majority of assessment area census tracts are middle- and upper-income geographies, LMI families comprise over one-third of the assessment area families and are dispersed throughout the assessment area.

The following table reflects key demographic data from the 1990 census that was used in analyzing the bank's CRA performance. Certain components of the data are discussed in this evaluation as they apply to particular portions of the analysis.

<b>1990 Demographic Data-Pinnacle Bank</b>			
Demographic Data	Assessment Area	Metropolitan Statistical Area (MSA)	State non-metropolitan area
Owner-occupied housing units	53.1%	59.1%	62.0%
Households below poverty level	13.8%	13.6%	19.6%
Families below poverty level	11.0%	10.0%	14.8%
Affordability Ratio <sup>2</sup>	43%	45%	46%
Median home value	\$61,745	\$59,219	\$46,023

The above table demonstrates that the bank's assessment area is similar to the MSA for the above reviewed items. It also reflects that there is an appreciable difference in the assessment area and the non-metropolitan portions of the state.

According to a 1994 US Census Bureau County Business Patterns report, the services industry (40.0 percent), retail trade (22.7 percent) and Finance, Insurance & Real Estate industries (10.3 percent) are the largest industries in Little Rock. These three industries combine to provide 73.0 percent of available employment opportunities. The Bureau of Labor Statistics reported an unemployment rate of 2.9 percent (not seasonally adjusted), which is less than the 1999 average through November of 3.3 percent.

According to a community contact whose organization promotes affordable housing and community development, there is a perception in Little Rock that there is a fair amount of wealth in the community, but that money is not available for community development projects. Overall, certain local neighborhoods are still perceived as being a bad credit risk. Another contact stated, the real problem for LMI borrowers is that the loan process is so slow. Borrowers get discouraged and, in some cases, applicants have waited five or six months to complete financing.

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<sup>2</sup> This feature is calculated by dividing the median household income by the median housing value and represents the amount of single family owner-occupied housing that a dollar of income can purchase for the median household in the geography. Values closer to 100 percent indicate greater affordability.

## **CONCLUSIONS WITH RESPECT TO THE PERFORMANCE TESTS:**

The bank's performance was evaluated under the CRA small bank performance standards. Loan information was taken from residential real estate<sup>3</sup> loans recorded on the bank's Loan Application Register in 1999. Also, statistical samples of small business and motor vehicle loans originated in the last six months were selected for the analysis.

The performance standards evaluate:

- The geographic distribution of loans;
- The bank's lending to borrowers of different income levels and businesses of different sizes;
- The bank's average loan-to-deposit ratio;
- The overall level of lending within the assessment area; and
- Any written complaints since the last examination.

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<sup>3</sup> Residential real estate includes loans that are required to be reported for the Home Mortgage Disclosure Act.

**Geographic Distribution**

As noted earlier, the bank's assessment area includes 50 census tracts composed of two low-income, 16 moderate-income, 20 middle-income, and 12 upper-income census tracts. The following table depicts the distribution of motor vehicle and residential loan activity across these geographies.

<b>Distribution of Loans (Number and Dollar Volume in \$000s) Inside Assessment Area by Income Level of Census Tract</b>					
<b>Loan Type</b>	<b>Census Tract Income Classification</b>				<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	
Motor Vehicle	1	9	16	26	<b>52</b>
	1.9%	17.3%	30.8%	50.0%	<b>100%</b>
	\$18	\$155	\$210	\$385	<b>\$768</b>
Residential	2.4%	20.2%	27.3%	50.1%	<b>100%</b>
	0	22	28	53	<b>103</b>
	0.0%	21.4%	27.2%	51.4%	<b>100%</b>
<b>TOTAL</b>	\$0	\$1466	\$2,357	\$8,529	<b>\$12,352</b>
	0.0%	11.9%	19.1%	69.0%	<b>100%</b>
	<b>1</b>	<b>31</b>	<b>44</b>	<b>79</b>	<b>155</b>
<b>Owner Occupied Housing</b>	<b>0.6%</b>	<b>20.0%</b>	<b>28.4%</b>	<b>51.0%</b>	<b>100%</b>
	<b>\$18</b>	<b>\$1,621</b>	<b>\$2,567</b>	<b>\$8,914</b>	<b>13,120</b>
	<b>0.1%</b>	<b>12.4%</b>	<b>19.6%</b>	<b>67.9%</b>	<b>100%</b>
<b>Population Percentage Residing in Census Tract</b>	<b>1.8%</b>	<b>20.5%</b>	<b>38.0%</b>	<b>39.7%</b>	<b>100%</b>
	<b>2.0%</b>	<b>25.3%</b>	<b>36.5%</b>	<b>36.2%</b>	<b>100%</b>

As one measure of performance, the geographic distribution of loans is compared with the distribution of families by census tract income level, as shown in the table. As depicted, for both of the loan products reviewed, the bank had satisfactory lending to LMI areas. Overall, the bank originated 31 (or 20.0 percent) of 155 loans reviewed in moderate-income geographies and one loan in a low-income census tract. In comparison, population figures indicate that 27.3 percent of the assessment area population resides in an LMI census tract.

**Motor Vehicle Loans**

While the percentage of motor vehicle loans originated in low-income census tracts is negligible at 1.9 percent, the percentage of families living in low-income census tracts is also negligible at 2.0 percent. The percentage of motor vehicle loans originated in moderate-income census tracts (17.3 percent) is comparable to the percentage of families living in moderate-income census tracts (25.3 percent) and is a significant

improvement over the bank's motor vehicle penetration level to individuals in such tracts at the previous examination (2.4 percent). The bank's percentage of loans in middle-income census tracts closely parallels the percentage of families residing in middle-income census tracts. The percentage of loans originated in upper-income census tracts is slightly above the percentage of families residing in upper-income census tracts. Given the aforementioned demographic factors, the bank's distribution of consumer lending reflects a good penetration throughout the assessment area and is greatly improved in moderate-income tracts.

### Residential Loans

As with motor vehicle lending, the bank's level of real estate lending to moderate-income tracts has greatly improved. At the last examination, the bank originated only three, or seven percent, of its loans to moderate-income tracts, where 25.3 percent of the population resides. At this exam, the number of loans increased to 22 or 21.4 percent. For the middle- and upper-income tracts, the bank's level of lending also approximated population percentages.

Pinnacle Bank's residential lending also compares well to owner-occupied housing demographics and aggregate lending data. By number, 21.4 percent of the bank's residential loans were originated to borrowers residing in an LMI geography, where approximately 22.3 percent of the owner-occupied housing is located. Aggregate lender data for 1998 indicates that other lenders did not reach LMI areas as effectively; only 12.6 percent of residential lending was made to individuals residing in LMI census tracts.

### Small Business Loans

Conversely, the geographic dispersion of small business loans indicates an area for bank management to focus on improving. For the small business loans sampled, only 1.8 percent were made to businesses located in moderate-income designated census tracts (none were located in a low-income tract). In comparison, the business summary report<sup>4</sup> provided by Dun & Bradstreet for the bank's assessment area indicates that 18.5 percent of industry establishments are located in LMI tracts. Likewise, 1998 aggregate data comprised of lender activity located inside the bank's assessment area indicates that 20.0 percent of all small business loans were to entities located inside an LMI geography.

Despite the weakness in the small business loan distribution analysis, overall lending activity reflects reasonable loan dispersion and has significantly improved since the previous examination. Therefore, the geographic distribution of the bank's loans meets the standards for satisfactory performance.

### **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

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<sup>4</sup> The source data used in this report are as of June 1999.

Residential and motor vehicle loans were reviewed to determine the level of penetration among borrowers of different income levels. Borrower income levels were compared against the 1999 MSA median family income level of \$45,900. Similarly, the number and dollar amount of small business loans originated by the bank were evaluated as well as the distribution of small business loans to businesses of various revenue sizes. The following table shows the distribution of 1999 residential and motor vehicle loans by income level of the borrower, across the assessment area.

<b>Distribution of Loans (Number and Dollar Volume in \$000s) Inside Assessment Area by Income Level of Borrower</b>					
<b>Loan Type</b>	<b>Borrower Income Classification</b>				<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	
<b>Motor Vehicle</b>	7 13.5%	13 25.0%	11 21.1%	21 40.4%	<b>52</b> <b>100%</b>
	\$68 8.9%	\$177 23.0%	\$168 21.9%	\$355 46.2%	<b>\$768</b> <b>100%</b>
	6 7.6%	5 6.3%	8 10.1%	60 76.0%	<b>79</b> <b>100%</b>
<b>Residential</b>	\$110 1.4%	\$461 5.9%	\$346 4.5%	\$6,828 88.2%	<b>\$7,745</b> <b>100%</b>
	<b>13</b> <b>10.0%</b>	<b>18</b> <b>13.7%</b>	<b>19</b> <b>14.5%</b>	<b>81</b> <b>61.8%</b>	<b>131</b> <b>100%</b>
	\$178 2.1%	\$638 7.5%	\$514 6.0%	\$7,183 84.4%	<b>\$8,513</b> <b>100%</b>
<b>Assessment Area Family Population</b>	<b>20.0%</b>	<b>16.0%</b>	<b>20.3%</b>	<b>43.7%</b>	<b>100%</b>

As the table indicates, the bank originated 23.7 percent of its motor vehicle and residential loans (or 9.6 percent by dollar volume) to LMI borrowers which comprise 36.0 percent of the population. This is an increase from the previous examination where the bank made only 14.4 percent of such loans to LMI borrowers.

### Motor Vehicle Loans

The bank's record of motor vehicle lending to borrowers of different income levels, when compared to the demographics of the assessment area, exceeds the standards for satisfactory performance. Pinnacle Bank made 38.5 percent of its loans to purchase a motor vehicle to LMI borrowers, compared to LMI population percentage of 36.0 percent. This is an increase from 10.0 percent at the previous exam.

### Real Estate Loans

Although motor vehicle lending activity represented strong penetration to borrowers of all income classifications, residential lending activity still represents an area for improvement. The bank's level of real estate lending to low-income borrowers has increased from three (7.0%) to six loans (7.6%), but the percentage of lending to moderate-income borrowers has decreased from 11.6 percent to 6.3 percent, although the number of loans remained at five. The level of real estate loans to LMI borrowers compares less favorably to the 1998 HMDA aggregate data of all lenders in the bank's assessment area. The bank made 13.9 percent of its real estate loans to LMI borrowers, while the 1998 HMDA aggregate data indicates that 18.9 percent of all loans were made to LMI borrowers. The percentage of residential loans originated to middle-income borrowers is lower than the percentage composition of total families in the assessment area. The bank made a higher proportion of loans to upper-income borrowers when compared to the percentage composition of total families. Even though Pinnacle Bank's residential lending activity reflects an area for improvement, the overall distribution of lending performance by borrower income reflects satisfactory performance.

#### Loans to Businesses of Different Revenue Sizes

The bank's record of lending to businesses of different revenue sizes meets the standards for satisfactory performance. Loans to businesses represent a significant portion of the bank's lending activity and the bank considers itself a strong lender to small businesses. Comparisons of both loan amount and gross revenues of the business are conducted to serve as indicators of lending to small businesses. These percentages are compared to the same characteristics for aggregate small business lending activity reported in the assessment area in 1998. This data includes lending activity in the assessment area for all institutions required to report small business lending data as required by the CRA.

The following table illustrates the level of lending to businesses of different sizes.

<b>Lending Distribution by Business Revenue Level</b>				
<b>Gross Revenue</b>	<b>Loan Origination Amount (in \$000s)</b>			<b>TOTAL</b>
	<b>≤\$100</b>	<b>&lt;\$100≥\$250</b>	<b>&gt;\$250≤\$1,000</b>	
Less Than \$1 Million	41 82.0%	9 18.0%	0 0.0%	<b>50</b> <b>87.7%</b>
\$1 Million or Greater	2 28.6%	3 42.8%	2 28.6%	<b>7</b> <b>12.3%</b>
<b>TOTAL</b>	<b>43</b> <b>75.4%</b>	<b>12</b> <b>21.1%</b>	<b>2</b> <b>3.5%</b>	<b>57</b> <b>100%</b>

The bank makes a significant number of loans to small businesses (87.7 percent). Of these loans, the vast majority (82.0 percent) were made in amounts less than \$100,000, which indicates a willingness to meet the needs of small businesses. In comparison, Little Rock MSA aggregate data indicates that 61.3 percent of the business loans were made to entities with gross annual revenues of less than one million dollars.<sup>5</sup> Consequently, Pinnacle Bank meets the standards of satisfactory performance under this criterion, based upon lending activity to consumers and small businesses.

**Loan-to-Deposit Ratio Analysis**

Pinnacle Bank's loan-to-deposit ratio exceeds the standards for satisfactory performance.

<b>Loan to Deposit Ratio Competitor Analysis</b>			
<b>Name</b>	<b>Asset Size<sup>6</sup> (in \$000s)</b>	<b>Headquarters</b>	<b>Average Loan to Deposit<sup>7</sup></b>
Pinnacle Bank	\$85,607	Little Rock, Arkansas	84.6%
Regional Bank Competitors	\$102,567	Little Rock Arkansas	74.9%
	\$83,682	Little Rock, Arkansas	71.0%
	\$56,183	Little Rock, Arkansas	77.9%
	\$51,806	Little Rock, Arkansas	64.8%

The loan-to-deposit ratio for Pinnacle Bank's regional competitors ranged from 64.8 percent to 74.9 percent. In comparison to local competitors, Pinnacle Bank's lending level is considered strong and as such, exceeds the standard for satisfactory performance.

<sup>5</sup> This information was derived from 1998 Aggregate CRA lending data collected by the FFIEC.

<sup>6</sup> The bank's total assets as of the September 30, 1999, Consolidated Reports of Condition and Income.

<sup>7</sup> This figure represents a four-quarter average from December of 1998 to September of 1999.

**Lending in the Assessment Area**

Pinnacle Bank’s lending within the assessment area meets the standard for satisfactory performance. A review of statistical samples of motor vehicle loans, residential lending and business loans revealed that a majority of the bank’s loans were originated within the assessment area.

The following table identifies, by loan type, the number, dollar volume and percentage of loans originated inside the assessment area.

<b>Distribution of Lending Inside Assessment Area</b>					
<b>Loan Type</b>	<b>Number in Assessment Area</b>		<b>Dollar Amount in Assessment Area</b>		<b>TOTAL Number/Dollars</b>
Motor Vehicle	52	52.5%	\$768,000	53.2%	<b>99 \$1,444,000</b>
Residential	103	75.2%	\$12,352,000	82.0%	<b>137 \$15,066,000</b>
Small Business	57	86.4%	\$3,710,000	77.5%	<b>66 \$4,787,000</b>
<b>TOTAL</b>	<b>212</b>	<b>70.2%</b>	<b>\$16,830,000</b>	<b>79.0%</b>	<b>302 \$21,297,000</b>

As illustrated in the table above, 212 (or 70.2 percent) of the 302 loans sampled were originated within the bank’s assessment area. By dollar volume, 79.0 percent of the loans sampled were originated inside the assessment area.

**Review of Complaints**

No CRA-related complaints have been received since the bank has been in operation.

**Additional Information**

A fair lending analysis was performed to assess compliance with the Equal Credit Opportunity Act and the Fair Housing Act. The analysis concluded that the bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations.

**APPENDIX A**

**PUBLIC DISCLOSURE**

Pinnacle Bank  
Census Tracts within Assessment Area

Census Tract	Income Classification
1.00	Middle
2.00 – 5.00	Moderate
6.00	Middle
7.00 – 8.00	Moderate
9.00	Middle
10.00 – 14.00	Moderate
15.00	Middle
16.00 – 17.00	Upper
18.00 – 19.00	Moderate
20.01	Middle
20.02	Moderate
21.01	Upper
21.02	Middle
22.01 – 23.00	Upper
24.02	Low
24.03	Middle
24.04	Upper
24.05 – 24.06	Middle
40.01	Low
40.03 – 40.04	Middle
40.05	Moderate
41.03 – 41.06	Middle
41.07	Moderate
41.08	Middle
42.01 – 42.03	Middle
42.05 – 42.06	Upper
42.07	Middle
42.08	Upper