

# **PUBLIC DISCLOSURE**

**November 1, 2004**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Horizon Bank  
Bradenton, Florida**

**RSSD ID Number: 2738857**

**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 or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.</p>
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<b>DEFINITIONS</b>
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**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  
HMDA - Home Mortgage Disclosure Act  
HUD - Department of Housing and Urban Development  
LMI - Low- and Moderate-Income  
LTD - Loan-to-Deposit Ratio  
MSA - Metropolitan Statistical Area

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

<b>GENERAL INFORMATION</b>
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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 Horizon Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of November 1, 2004. 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.**

Based on the bank's lending performance and its community development activities, Horizon Bank's compliance with the Community Reinvestment Act (CRA) is outstanding. The bank's average loan-to-deposit (LTD) ratio for the past fourteen quarters ending June 30, 2004 is **REASONABLE** given the institution's size, financial condition, and competition within the assessment area. A **MAJORITY** of the bank's loans were extended to individuals and businesses **IN** its assessment area. Based on samples of small business and HMDA loans, lending to borrowers of different incomes and businesses of different revenue sizes is **EXCELLENT**. Although there are no low-income census tracts in the bank's assessment area, its geographic distribution of loans to moderate-income tracts is **EXCELLENT**. The bank has received no CRA-related complaints since the previous examination. In addition, the bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations.

**DESCRIPTION OF INSTITUTION**

Horizon Bank is the sole subsidiary of Horizon Bancorporation, Inc., which owns 100 percent of the bank's stock. Horizon Bank is headquartered in Bradenton, Florida, and maintains one branch office with an ATM. The main office is located in a moderate-income census tract, and the branch is in a middle-income tract. Horizon Bank is a full-service community bank that offers secured and unsecured commercial loans, residential mortgage loans, revolving lines of credit for consumers and small businesses, and a variety of other consumer and commercial loan products. Although Horizon Bank has historically been a commercial lender, it has widened its scope to include more consumer based loan products such as adjustable rate mortgages (ARMs) and home equity lines of credit (HELOCs). Total assets were \$110.7 million as of June 30, 2004.

As stated, the bank's main office is located in a moderate-income census tract in Bradenton, Florida. The area surrounding the bank is primarily zoned for commercial property, but also has many mobile home parks. Management indicated that the bank's future business plans include the stabilization of its commercial lending, the growth of its residential real estate portfolio, and the creation of a more transactional web site to reach more customers.

The composition of the bank's loan portfolio, according to the June 30, 2004, December 31, 2003, and December 31, 2002 Call Reports, is displayed in the following table:

<b>COMPOSITION OF LOAN PORTFOLIO</b>						
<b>Loan Type</b>	<b>06/30/2004</b>		<b>12/31/2003</b>		<b>12/31/2002</b>	
	<b>\$ (000s)</b>	<b>Percent</b>	<b>\$ (000s)</b>	<b>Percent</b>	<b>\$ (000s)</b>	<b>Percent</b>
Construction and Development	\$4,103	5.0%	\$1,434	2.1%	\$171	0.3%
Secured by One- to Four- Family Dwellings	\$24,405	29.6%	\$19,762	28.4%	\$10,380	20.0%
Other Real Estate: Farmland	\$148	0.2%	\$0	0.0%	\$0	0.0%
Multifamily	\$0	0.0%	\$0	0.0%	\$0	0.0%
Nonfarm Nonresidential	\$34,537	41.9%	\$29,428	42.3%	\$24,281	46.7%
Commercial and Industrial	\$14,196	17.2%	\$12,486	17.9%	\$10,502	20.2%
Loans to Individuals	\$5,066	6.1%	\$6,457	9.3%	\$6,676	12.8%
Agricultural Loans	\$0	0.0%	\$0	0.0%	\$0	0.0%
<b>Total</b>	<b>\$82,455</b>	<b>100.0%</b>	<b>\$69,567</b>	<b>100.0%</b>	<b>\$52,010</b>	<b>100.0%</b>

\* 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.

<b>DESCRIPTION OF INSTITUTION (Continued)</b>
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The bank's loan portfolio as of June 30, 2004 consisted primarily of nonfarm nonresidential loans (41.9 percent), consumer real estate loans secured by one- to four-family dwellings (29.6 percent), and commercial and industrial loans (17.2 percent). Total loans increased by nearly 59 percent between December 31, 2002 and June 30, 2004. Residential loans secured by one- to four-family dwellings showed the most significant growth by dollar amount, increasing by \$14 million (135 percent) since December 31, 2002. No known legal or financial impediments exist that would prevent the bank from meeting the credit needs of its assessment area. The bank received a satisfactory rating at its last CRA evaluation, dated October 23, 2000, conducted by the Federal Reserve Bank of Atlanta.

<b>DESCRIPTION OF ASSESSMENT AREA: Manatee County, Florida</b>
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**Overview**

Horizon Bank's assessment area consists of a portion of Manatee County, which is situated south of Tampa and north of Sarasota on the western coast of Florida. This assessment area meets the requirements of the regulation because this is the area the bank can reasonably serve, based on its branch and main office locations and certain geographic barriers to the east and west. Manatee County, along with Sarasota County, comprises the Sarasota-Bradenton Metropolitan Statistical Area (MSA). According to the 1990 census, the bank's assessment area consisted of 31 of the 45 census tracts in Manatee County, including 6 upper-income, 14 middle-income, 11 moderate-income, and no low-income census tracts. In 2003, 2000 census data became available that changed the size and income distribution of the assessment area. The new assessment area, which consists of 36 of the 45 tracts in Manatee County, includes 3 upper-income tracts, 21 middle-income tracts, 12 moderate-income tracts, and no low-income census tracts. Because loan samples for this analysis include loans that were originated before and after 2000 census data became available, loans originated in 2002 were analyzed using 1990 census data, while 2003 and 2004 loans were analyzed using 2000 census data. The bank's assessment area does not arbitrarily exclude any low- or moderate-income census tracts and is in compliance with the CRA regulation.

**1990 Census Demographic Data**

The following table provides key demographic information from the 1990 census that was used in analyzing the bank's CRA performance.

**DESCRIPTION OF ASSESSMENT AREA: Manatee County, Florida (Continued)**

**Assessment Area Demographics**  
 Assessment Area : Manatee County (1990 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	8,702	19.6
Moderate-income	11	35.5	16,137	36.4	2,174	13.5	9,669	21.8
Middle-income	14	45.2	20,724	46.8	839	4.0	11,366	25.6
Upper-income	6	19.4	7,459	16.8	192	2.6	14,583	32.9
<b>Total Assessment Area</b>	<b>31</b>	<b>100.0</b>	<b>44,320</b>	<b>100.0</b>	<b>3,205</b>	<b>7.2</b>	<b>44,320</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		<b>#</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	33,417	14,751	32.6	44.1	11,242	33.6	7,424	22.2
Middle-income	37,902	22,719	50.2	59.9	7,616	20.1	7,567	20.0
Upper-income	12,254	7,753	17.1	63.3	2,577	21.0	1,924	15.7
<b>Total Assessment Area</b>	<b>83,573</b>	<b>45,223</b>	<b>100.0</b>	<b>54.1</b>	<b>21,435</b>	<b>25.6</b>	<b>16,915</b>	<b>20.2</b>
	<b>Total Businesses by Tract</b>		<b>Businesses by Tract &amp; Revenue Size</b>					
			<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
			<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,491	33.1	1,278	33.4	175	31.4	38	31.1
Middle-income	2,342	52.0	1,946	50.9	330	59.1	66	54.1
Upper-income	670	14.9	599	15.7	53	9.5	18	14.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>4,503</b>	<b>100.0</b>	<b>3,823</b>	<b>100.0</b>	<b>558</b>	<b>100.0</b>	<b>122</b>	<b>100.0</b>
		<b>Percentage of Total Businesses:</b>		<b>84.9</b>		<b>12.4</b>		<b>2.7</b>

**1990 Census Population Information**

According to population data from the 1990 census, the bank's assessment area had a total population of 153,055 persons, which represented 1.2 percent of the state of Florida's population of 12,937,926 persons.

<b>DESCRIPTION OF ASSESSMENT AREA: Manatee County, Florida (Continued)</b>
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**Income Characteristics**

At the time of the 1990 census, there were 44,320 families in the assessment area. Of those families, 19.6 percent were low-income families and 21.8 percent were moderate-income families. In addition, 7.2 percent of the total families in the assessment area had income below the poverty level. The majority of these families were concentrated in the moderate-income census tracts.

**Housing Data**

According to 1990 census data, the majority (54.1 percent) of the housing units in the bank's assessment area were owner-occupied. Housing data indicate that, of the 83,573 housing units in the bank's assessment area, one-to-four family dwellings comprised 60.2 percent of the total units. Mobile homes represented 18.7 percent of the housing units. The median age of the housing stock in the assessment area was 17 years, which is slightly higher than that of the state at 16 years. The median housing value in the assessment area was \$76,276, which is only slightly lower than that of the state of Florida at \$76,488.

**Business Size Characteristics**

The 1990 demographic table also provides key demographic data by revenue size and by census tract in the bank's assessment area. The table illustrates that, according to the 1990 census, 84.9 percent of the businesses in the bank's assessment area had total annual revenues of \$1 million or less and, therefore, were considered to be small businesses.

**DESCRIPTION OF ASSESSMENT AREA Manatee County, Florida (Continued)**

**2000 Census Demographic Data**

The following table provides key demographic information from the 2000 census that was used in analyzing the bank's CRA performance.

**Assessment Area Demographics**  
 Assessment Area : Manatee County (2000 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	10,475	22.8
Moderate-income	12	33.3	17,100	37.2	2,497	14.6	10,136	22.0
Middle-income	21	58.3	25,108	54.6	1,244	5.0	10,903	23.7
Upper-income	3	8.3	3,763	8.2	160	4.3	14,457	31.4
<b>Total Assessment Area</b>	<b>36</b>	<b>100.0</b>	<b>45,971</b>	<b>100.0</b>	<b>3,901</b>	<b>8.5</b>	<b>45,971</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>		<b>Rental</b>		<b>Vacant</b>		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	36,414	16,777	32.7	46.1	12,739	35.0	6,898	18.9
Middle-income	48,874	30,230	58.9	61.9	9,238	18.9	9,406	19.2
Upper-income	5,467	4,276	8.3	78.2	655	12.0	536	9.8
<b>Total Assessment Area</b>	<b>90,755</b>	<b>51,283</b>	<b>100.0</b>	<b>56.5</b>	<b>22,632</b>	<b>24.9</b>	<b>16,840</b>	<b>18.6</b>
	<b>Total Businesses by Tract</b>	<b>Businesses by Tract &amp; Revenue Size</b>						
		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,438	29.9	1,250	30.6	148	25.4	40	28.6
Middle-income	2,945	61.2	2,449	59.9	403	69.1	93	66.4
Upper-income	429	8.9	390	9.5	32	5.5	7	5.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>4,812</b>	<b>100.0</b>	<b>4,089</b>	<b>100.0</b>	<b>583</b>	<b>100.0</b>	<b>140</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>85.0</b>		<b>12.1</b>		<b>2.9</b>

**DESCRIPTION OF ASSESSMENT AREA: Manatee County, Florida (Continued)**

**2000 Census Population Information**

According to population data from the 2000 census, 169,173 persons live within the bank's assessment area, representing approximately 1.1 percent of the state of Florida's population of 15,982,378 persons. Between the 1990 and 2000 census, the assessment area population increased by 10.5 percent or 16,118 persons, compared to a 23.5 percent increase for the state of Florida overall.

**Income Characteristics**

The 2000 census data indicate that there are 45,971 families in the assessment area. Of those families, 22.8 percent are low-income, 22 percent are moderate-income, 23.7 percent are middle-income, and 31.5 percent are upper-income. Of total families in the assessment area, 3,901 families (8.5 percent) have incomes below the poverty level. The median family income for the assessment area in 2000 was \$42,455, compared to \$48,623 for the entire Sarasota-Bradenton MSA. According to HUD, the estimated median family income for the MSA was \$53,400 for 2002 and \$52,600 for 2003.

**Housing Data**

According to 2000 census data, 56.5 percent of the housing units in the bank's assessment area are owner-occupied. Housing in the assessment area is primarily comprised of one-to-four family dwellings (61.2 percent), multi-unit dwellings of five families or more (20.8 percent), and mobile homes (17.5 percent). Vacant units represent 18.6 percent of housing units in the assessment area. The median age of the housing stock in the assessment area has risen to 25 years. The median housing value in the assessment area increased to \$88,256 in 2000, while the median housing value in the state of Florida increased to \$93,200. Both, however, are still considerably less than the entire Sarasota-Bradenton MSA, which increased by 24.7 percent to \$104,700 from \$83,994. Local sources contend that the trend of rising costs of new construction to replace aging homes is driving out affordable housing in both Sarasota and Manatee counties.

**Business Size Characteristics**

The demographic table on page 7 provides key demographic business data by census tract income categories within Horizon Bank's assessment area. The table illustrates that, according to the 2000 census, 85 percent of the businesses in the bank's assessment area have total revenues of less than or equal to \$1 million, and, therefore, are considered to be small businesses.

**DESCRIPTION OF ASSESSMENT AREA: Manatee County, Florida (Continued)**

**OTHER INFORMATION**

**Employment Characteristics**

A review of data from the U.S. Bureau of Labor Statistics (BLS) suggests that the service industry, which supports approximately 249,200 jobs, remains the largest employer in Manatee County. The following table shows the annual unemployment rates for Manatee County, the Sarasota-Bradenton MSA, and the state of Florida from 2001 to 2004, according to the BLS. The unemployment rate for Manatee County was consistently higher than the unemployment rate for the MSA, but lower than the rate for the state of Florida.

<b>UNEMPLOYMENT RATES FOR YEARS 2001 – 2004</b>				
<b>Area</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>June 2004</b>
Manatee County	3.4%	3.9%	3.7%	3.8%
Sarasota-Bradenton MSA	3.2%	3.6%	3.5%	3.4%
State of Florida	4.8%	5.5%	5.1%	5.1%

**Community Contacts**

As part of the CRA examination, information was obtained from two community contacts in Manatee County; one involved with economic development and one involved with affordable housing. Both contacts acknowledged that the local economy had been stabilizing with the introduction of more service industries to the area until the recent hurricanes devastated large portions of the western coast of Florida. They indicated that, once the infrastructure is back in place, a more steady recovery can be expected. The contacts had very positive comments regarding the degree of involvement of the financial institutions in the community. Both contacts agreed that the general banking and credit needs are being adequately served in the community for both economic development and affordable housing, and that community banks have always been willing to assist with new projects as they become available.

The economic development contact commented that several community banks, Horizon Bank in particular, have been actively involved in rural development projects as part of what they considered their commitment to economic development in and around the county. Although complimentary of the banks' efforts, the housing contact pointed out that limited land and the high cost of new development are driving up housing costs along the coast. As a result, many low- and moderate-income families are moving inland to find affordable housing.

<b>DESCRIPTION OF ASSESSMENT AREA: Manatee County, Florida (Continued)</b>
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The contact expressed concern that, without a stronger commitment from area legislators, coupled with consistent financial support from local financial institutions, the trend would continue. The economic development contact agreed that, although it benefits economic development in western Florida's interior, families are moving further inland because they can no longer afford to live in the coastal areas of the county.

### **Competition**

Horizon Bank is located in a competitive banking market. Although many financial institutions are moving closer to the coastal areas of the county to meet the increasing demand for development there, the level of competition is still substantial given the bank's size, local area population, and loan demand in the area. According to the FDIC's Deposit Market Share Report, there were 24 institutions in the market as of June 30, 2004. Many of these banks are statewide, multi-regional, or national banks. Horizon Bank ranked 14<sup>th</sup> in deposit market share in the assessment area at 2.3 percent (\$101.2 million). The top financial institution had a deposit market share of 28.8 percent. Local competition does not appear to have adversely affected the bank's ability to grow and serve the credit needs of its assessment area.

<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA</b>
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**Scope of Examination**

The CRA examination review period included small business and HMDA loans originated between January 1, 2002 and June 1, 2004. During this period, commercial loans exceeded residential loans by both number and dollar volume. Therefore, small business lending was given more weight in determining the CRA rating.

Because the loan sample for the CRA analysis includes loans that were originated before and after 2000 census data became available, 2002 loans were analyzed using 1990 census data, and 2003 and 2004 loans were analyzed using 2000 census data. For all loans originated prior to January 1, 2003, 1990 census demographic data were used to describe the bank's assessment area. For all loans originated in 2003 and 2004, 2000 census demographic data were used to describe the bank's assessment area.

**Loan-to-Deposit Ratio**

Horizon Bank's average LTD ratio is considered **REASONABLE** given the bank's size, financial condition, and assessment area credit needs. Based on information from the bank's Call Reports, the bank's LTD ratio as of June 30, 2004 was 88.6 percent. The bank's average LTD ratio for the fourteen-quarter period ending June 30, 2004 was 80.7 percent. This ratio was comparable to the average LTD ratios of five peer banks in the assessment area, which ranged from 75.7 percent to 93.9 percent.

**Assessment Area Concentration**

A **MAJORITY** of the bank's lending occurs **IN** its assessment area. The following table shows the distribution of loans that were originated during the review period inside and outside the bank's assessment area, by number of loans and dollar amount, according to loan type.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)**

<b>LENDING INSIDE AND OUTSIDE ASSESSMENT AREA</b>				
<b>Loan Type</b>	<b>IN</b>			
	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Small Business	113	57.7%	\$28,505	66.5%
HMDA	143	79.0%	\$10,546	74.4%
<i>Total In</i>	256	67.9%	\$39,051	68.5%
	<b>OUT</b>			
	<b>#</b>	<b>%</b>	<b>\$ (000s)</b>	<b>%</b>
Small Business	83	42.3%	\$14,342	33.5%
HMDA	38	21.0%	\$3,631	25.6%
<i>Total Out</i>	121	32.1%	\$17,973	31.5%

As indicated by the table above, 67.9 percent of the bank's HMDA and small business loans were made inside the bank's assessment area. Also, 68.5 percent of the dollar volume was inside the bank's assessment area. It is worth noting that a significant portion of the bank's lending by both number and dollar amount outside its assessment area was in support of development programs that help improve employment and economic conditions in rural communities and towns. The level of lending inside the assessment area indicates the bank's willingness to serve the credit needs of its assessment area.

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

To evaluate Horizon Bank's performance in lending to borrowers of different incomes and businesses of different sizes, small business loans and HMDA reportable loans within the bank's assessment area were analyzed. Borrower income classifications were assigned in accordance with the definitions presented earlier in this report. For the analysis, the distribution of small business lending by revenue size and HMDA loans by borrower income level was compared with available demographic information. In addition, the bank's HMDA lending performance was compared to aggregate data. Aggregate data are defined as data reported by all financial institutions in the bank's assessment area.

**Analysis Based on 1990 Census Data**

*Lending to Borrowers of Different Incomes*

For this analysis, the distribution of loans by borrower income level for 65 HMDA reportable loans originated in the bank's assessment area between January 1 and December 31, 2002 was compared to 1990 census demographic data. Because of the lack of available data on the bank's commercial loan performance for the year 2002, an analysis of small business lending by revenue size was not conducted.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)**

**Loan Distribution Table**

Assessment Area: 2002 Manatee County

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	13	27.1%	863	24.9%
Moderate	27	56.3%	1,882	54.3%	8	16.7%	301	8.7%
Middle	16	33.3%	1,218	35.1%	6	12.5%	252	7.3%
Upper	5	10.4%	367	10.6%	17	35.4%	1,236	35.7%
Unknown	0	0.0%	0	0.0%	4	8.3%	815	23.5%
<b>Total</b>	<b>48</b>	<b>100.0%</b>	<b>3,467</b>	<b>100.0%</b>	<b>48</b>	<b>100.0%</b>	<b>3,467</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	4	30.8%	181	18.8%
Moderate	8	61.5%	472	49.0%	2	1.5%	170	17.7%
Middle	3	23.1%	324	33.6%	4	30.8%	350	36.3%
Upper	2	15.4%	167	17.3%	2	15.4%	205	21.3%
Unknown	0	0.0%	0	0.0%	1	7.7%	57	5.9%
<b>Total</b>	<b>13</b>	<b>100.0%</b>	<b>963</b>	<b>100.0%</b>	<b>13</b>	<b>100.0%</b>	<b>963</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	1	33.3%	25	29.4%
Moderate	1	33.3%	25	29.4%	0	0.0%	0	0.0%
Middle	2	66.7%	60	70.6%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	33.3%	40	47.1%
Unknown	0	0.0%	0	0.0%	1	33.3%	20	23.5%
<b>Total</b>	<b>3</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>	<b>3</b>	<b>100.0%</b>	<b>85</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	192	100.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	192	100.0%
<b>Total</b>	<b>1</b>	<b>100.0%</b>	<b>192</b>	<b>100.0%</b>	<b>1</b>	<b>100.0%</b>	<b>192</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	18	27.7%	1,069	22.7%
Moderate	37	56.9%	2,571	54.6%	10	15.4%	471	10.0%
Middle	21	32.3%	1,602	34.0%	10	15.4%	602	12.8%
Upper	7	10.8%	534	11.3%	20	30.8%	1,481	31.5%
Unknown	0	0.0%	0	0.0%	7	10.8%	1,084	23.0%
<b>Total</b>	<b>65</b>	<b>100.0%</b>	<b>4,707</b>	<b>100.0%</b>	<b>65</b>	<b>100.0%</b>	<b>4,707</b>	<b>100.0%</b>

Originations and Purchases

As illustrated in the table above, 27.7 percent of the HMDA loans were originated to low-income borrowers, which was greater than the percentage of low-income families in the assessment area at 19.6 percent. The majority (72.2 percent) of the HMDA loans originated to low-income borrowers was for home purchases. The table also illustrates that 15.4 percent of the HMDA loans were originated to moderate-income borrowers, which is less than the percentage of moderate-income families in the assessment at 21.8 percent.

A review of the bank's 2002 HMDA lending compared to aggregate lenders indicates that the bank's lending to low-income borrowers in the assessment area was considerably higher at 27.7 percent than the aggregate at 8.5 percent. Lending to moderate-income borrowers at 15.4 percent was lower than the aggregate at 20.3 percent.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)**

**Analysis Based on 2000 Census Data**

*Lending to Borrowers of Different Incomes*

For this analysis, the distribution of HMDA loans by borrower income level and small business loans by revenue size were compared to 2000 census demographic data. To assess the bank's performance of lending to borrowers of different incomes, 78 HMDA loans originated in the bank's assessment area from January 1, 2003 through December 31, 2003 were analyzed. The data for the HMDA loans originated in 2004 were not available for analysis. To assess the bank's performance of lending to businesses of different sizes, a sample of 58 small business loans originated in the bank's assessment area from January 1, 2003 through December 31, 2003, and 55 commercial loans originated between January 1, 2004 and June 30, 2004 were analyzed.

**Loan Distribution Table**

**Assessment Area: 2003 Manatee County**

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
<b>Home Purchase</b>								
Low	0	0.0%	0	0.0%	7	11.9%	222	5.0%
Moderate	43	72.9%	2,904	65.6%	12	20.3%	744	16.8%
Middle	16	27.1%	1,524	34.4%	24	40.7%	1,832	41.4%
Upper	0	0.0%	0	0.0%	14	23.7%	1,411	31.9%
Unknown	0	0.0%	0	0.0%	2	3.4%	219	4.9%
<b>Total</b>	<b>59</b>	<b>100.0%</b>	<b>4,428</b>	<b>100.0%</b>	<b>59</b>	<b>100.0%</b>	<b>4,428</b>	<b>100.0%</b>
<b>Refinance</b>								
Low	0	0.0%	0	0.0%	3	20.0%	68	5.9%
Moderate	6	40.0%	565	49.2%	1	0.7%	117	10.2%
Middle	8	53.3%	466	40.6%	5	33.3%	273	23.8%
Upper	1	6.7%	117	10.2%	4	26.7%	355	30.9%
Unknown	0	0.0%	0	0.0%	2	13.3%	335	29.2%
<b>Total</b>	<b>15</b>	<b>100.0%</b>	<b>1,148</b>	<b>100.0%</b>	<b>15</b>	<b>100.0%</b>	<b>1,148</b>	<b>100.0%</b>
<b>Home Improvement</b>								
Low	0	0.0%	0	0.0%	2	50.0%	21	8.0%
Moderate	2	50.0%	21	8.0%	0	0.0%	0	0.0%
Middle	2	50.0%	242	92.0%	1	25.0%	2	0.8%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	25.0%	240	91.3%
<b>Total</b>	<b>4</b>	<b>100.0%</b>	<b>263</b>	<b>100.0%</b>	<b>4</b>	<b>100.0%</b>	<b>263</b>	<b>100.0%</b>
<b>Multi-Family</b>								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>	<b>0</b>	<b>0.0%</b>
<b>HMDA Totals</b>								
Low	0	0.0%	0	0.0%	12	15.4%	311	5.3%
Moderate	51	65.4%	3,490	59.8%	13	16.7%	861	14.7%
Middle	26	33.3%	2,232	38.2%	30	38.5%	2,107	36.1%
Upper	1	1.3%	117	2.0%	18	23.1%	1,766	30.2%
Unknown	0	0.0%	0	0.0%	5	6.4%	794	13.6%
<b>Total</b>	<b>78</b>	<b>100.0%</b>	<b>5,839</b>	<b>100.0%</b>	<b>78</b>	<b>100.0%</b>	<b>5,839</b>	<b>100.0%</b>

Originations and Purchases

<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)</b>
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As illustrated in the preceding table, 15.4 percent of the HMDA loans were originated to low-income borrowers, which is lower than the percentage of low-income families in the assessment area at 22.8 percent. Compared to 2002, there was a significant reduction in the number of home purchase and refinance loans originated to low-income borrowers. A possible reason for this lending disparity was provided by one of the community contacts. The contact indicated that limited land and the high cost of new development are driving up housing costs. As a result, many low- and moderate-income borrowers are moving inland to find more affordable homes. Also, in lieu of purchasing homes, many of these families are opting for home improvement loans. This trend is expected to continue given the median age of housing (25 years) and the lack of affordable housing for low- and moderate-income borrowers in the assessment area. 16.7 percent of the HMDA loans in the assessment area were originated to moderate-income borrowers. This figure reflects a positive trend from 2002, but is still less than the percentage of moderate-income families in the assessment area at 22 percent.

In 2003, the bank's HMDA lending to low-income borrowers in its assessment area at 15.4 percent was significantly above the aggregate at 7.4 percent. HMDA lending to moderate-income borrowers at 16.7 percent was slightly lower than the aggregate at 19.4 percent. It appears that the bank is meeting the housing credit needs of the low- and moderate-income borrowers in its assessment area compared to its competitors and in the context of the current housing environment.

*Lending to Businesses of Different Sizes - 2003*

Of the sample of 58 small business loans originated in the bank's assessment area in 2003, 100 percent were extended to businesses with gross annual revenues of \$1 million or less, which is higher than the 85 percent of total businesses in the assessment area that are considered to be small businesses. In addition, 39.7 percent of the small business loans originated were in amounts of \$100,000 or less. As such, it appears that a significant portion of the bank's overall commercial lending was extended to small businesses.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)**

**Loan Distribution Table**

Assessment Area: 2003 Manatee County

Income Categories	COMMERCIAL			
	#	%	\$(000s)	%
	<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%
Moderate	21	36.2%	5,033	28.6%
Middle	35	60.3%	11,989	68.0%
Upper	2	3.4%	605	3.4%
Unknown	0	0.0%	0	0.0%
<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>17,627</b>	<b>100.0%</b>
	<b>By Loan Size</b>			
\$100,000 or less	23	39.7%	1,102	6.3%
\$100,001 - \$250,000	14	24.1%	2,578	14.6%
\$250,001 - \$1 Million*	19	32.8%	7,851	44.5%
Over \$1 Million*	2	3.4%	6,096	34.6%
<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>17,627</b>	<b>100.0%</b>
	<b>By Revenue</b>			
\$1 Million or Less	58	100.0%	17,627	100.0%
Over \$1 Million	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%
<b>Total</b>	<b>58</b>	<b>100.0%</b>	<b>17,627</b>	<b>100.0%</b>

Originations and Purchases

\*Small Business loans are loan sizes that are \$1 Million or less

*Lending to Businesses of Different Sizes - 2004*

Of the sample of 55 small business loans originated in 2004, 100 percent were to businesses with gross annual revenues of \$1 million or less, which is above the 85 percent of total businesses in the assessment area that are considered small businesses. In addition, 63.6 percent of the small business loans were in amounts of \$100,000 or less. Again, it appears that the bank extends a significant portion of its commercial loans to small businesses.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)**

**Loan Distribution Table**

Assessment Area: 2004 Manatee County

Income Categories	COMMERCIAL			
	#	%	\$(000s)	%
	<b>By Tract Income</b>			
Low	0	0.0%	0	0.0%
Moderate	25	45.5%	3,287	30.2%
Middle	28	50.9%	7,555	69.5%
Upper	2	3.6%	36	0.3%
Unknown	0	0.0%	0	0.0%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>10,878</i>	<i>100.0%</i>
	<b>By Loan Size</b>			
\$100,000 or less	35	63.6%	1,459	13.4%
\$100,001 - \$250,000	12	21.8%	2,162	19.9%
\$250,001 - \$1 Million*	6	10.9%	3,381	31.1%
Over \$1 Million*	2	3.6%	3,876	35.6%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>10,878</i>	<i>100.0%</i>
	<b>By Revenue</b>			
\$1 Million or Less	55	100.0%	10,878	100.0%
Over \$1 Million	0	0.0%	0	0.0%
Not Known	0	0.0%	0	0.0%
<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>10,878</i>	<i>100.0%</i>

Originations and Purchases

\*Small Business loans are loan sizes that are \$1 Million or less

Based on the data Horizon's lending performance reflects **EXCELLENT** penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.

**Geographic Distribution of Loans**

To evaluate Horizon Bank's performance concerning the geographic distribution of loans, HMDA loans and small business loans originated within the bank's assessment area were compared with the demographic information available. For all loans originated in 2002, 1990 census data were used for the analysis of the geographic distribution of loans. For all loans originated in 2003 and 2004, 2000 census data were used. As previously stated, data for the bank's 2002 small business loans and 2004 HMDA loans were not available for analysis.

**Analysis Based on 1990 Census Data**

*HMDA Lending*

As shown in the table on page 13, of the 65 HMDA loans originated in the bank's assessment area in 2002, 37 (56.9 percent) were originated in the moderate-income census tracts. Based on 1990 census data, there were 11 moderate-income and no low-income census tracts in the bank's assessment area. The moderate-income tracts contained 36.4 percent of total families in the bank's assessment area. The bank's level of HMDA lending at

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)**

56.9 percent in the moderate-income census tracts was well above the percentage of families in those tracts. This level of performance is excellent considering the percentage of families below the poverty level in moderate-income tracts at 13.5 percent.

A review of the bank's 2002 HMDA lending compared to aggregate lenders reveals that the bank's lending levels in the moderate-income census tracts (at 56.9 percent) far exceeded the aggregate (at 21.2 percent).

**Analysis Based on 2000 Census Data**

*HMDA Lending*

As shown in the table on page 14, of the 78 HMDA loans originated in the bank's assessment area in 2003, 51 (65.4 percent) were originated in the moderate-income census tracts, which far exceeds the percentage of total families in the bank's assessment area (at 37.2 percent). The bank's level of HMDA lending in the moderate-income census tracts rose by 8.5 percent from 2002 to 65.4 percent, which is well above the percentage of families in those tracts. This level of performance is excellent considering the percentage of families below the poverty level in moderate-income tracts is 14.6 percent.

A review of the bank's 2003 HMDA lending compared to aggregate lenders indicates that the bank's lending levels in the moderate-income census tracts (at 65.4 percent), again substantially exceeded the aggregate at 24 percent.

*Small Business Lending*

In 2003, of the 58 small business loans sampled that were originated in the bank's assessment area, 21 (36.2 percent) were to businesses in the moderate-income census tracts. This level of performance is excellent considering that only 30.6 percent of small businesses in the assessment area are located in these tracts.

In 2004, of the 55 small business loans originated in the bank's assessment area, 25 (45.5 percent) were to businesses in moderate-income census tracts. The bank's performance level continues to be excellent, exceeding the 30.6 percent of small businesses in the assessment area that are located in these tracts.

<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA (Continued)</b>
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Based on the above analysis, the overall geographic distribution of loans reflects **EXCELLENT** dispersion throughout the bank's assessment area.

### **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.

### **Qualified Community Development Activities**

Horizon Bank is a participant in the United States Department of Agriculture's (USDA) rural development business and industrial guaranteed loan fund, which supports rural development programs that help improve employment and economic conditions in rural communities and towns. The organization targets rural areas contiguous to cities or towns with populations of 50,000 or less. USDA eligibility standards require that local lenders, such as Horizon Bank, be the lead lender for rural guarantee loans, be located in or near the community where the project is or will be located, and routinely provide credit to that community. Although located out of its assessment area, Horizon Bank has either originated or participated in \$8.2 million in USDA guaranteed loans that it both initiated and services.

Additionally, the bank originated \$3.2 million in loans to fund affordable housing initiatives during the review period. These loans were extended to developers who build mobile home parks for fixed-income individuals and families in predominantly moderate-income census tracts of the assessment area. This level of community development activity has enhanced credit availability to low- and moderate-income borrowers and small businesses both inside and outside of the bank's assessment area.

**APPENDIX A: AGGREGATE LENDING TABLES**

**Peer Group Loan Distribution Report**

**Assessment Area: Manatee County 2002**

	By Tract Income			HMDA		By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	482	9.7%	32,583	5.4%
Moderate	1,192	23.9%	92,032	15.2%	1,081	21.7%	92,537	15.3%
Middle	2,908	58.3%	393,015	64.8%	1,126	22.6%	121,287	20.0%
Upper	887	17.8%	121,678	20.1%	1,625	32.6%	271,979	44.8%
Unknown	0	0.0%	0	0.0%	673	13.5%	88,339	14.6%
<b>Total</b>	<b>4,987</b>	<b>100.0%</b>	<b>606,725</b>	<b>100.0%</b>	<b>4,987</b>	<b>100.0%</b>	<b>606,725</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	437	7.3%	28,303	3.8%
Moderate	1,099	18.5%	86,310	11.5%	1,124	18.9%	93,634	12.4%
Middle	3,406	57.2%	407,799	54.2%	1,348	22.6%	134,273	17.8%
Upper	1,450	24.3%	258,579	34.4%	1,977	33.2%	362,691	48.2%
Unknown	0	0.0%	0	0.0%	1,069	18.0%	133,787	17.8%
<b>Total</b>	<b>5,955</b>	<b>100.0%</b>	<b>752,688</b>	<b>100.0%</b>	<b>5,955</b>	<b>100.0%</b>	<b>752,688</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	46	11.1%	737	5.5%
Moderate	108	26.1%	2,512	18.9%	99	23.9%	2,465	18.5%
Middle	222	53.6%	8,048	60.4%	109	26.3%	2,903	21.8%
Upper	84	20.3%	2,758	20.7%	131	31.6%	6,188	46.5%
Unknown	0	0.0%	0	0.0%	29	7.0%	1,025	7.7%
<b>Total</b>	<b>414</b>	<b>100.0%</b>	<b>13,318</b>	<b>100.0%</b>	<b>414</b>	<b>100.0%</b>	<b>13,318</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	6	54.5%	1,869	7.1%	0	0.0%	0	0.0%
Middle	5	45.5%	24,423	92.9%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	11	100.0%	26,292	100.0%
<b>Total</b>	<b>11</b>	<b>100.0%</b>	<b>26,292</b>	<b>100.0%</b>	<b>11</b>	<b>100.0%</b>	<b>26,292</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	965	8.5%	61,623	4.4%
Moderate	2,405	21.2%	182,723	13.1%	2,304	20.3%	188,636	13.5%
Middle	6,541	57.5%	833,285	59.6%	2,583	22.7%	258,463	18.5%
Upper	2,421	21.3%	383,015	27.4%	3,733	32.8%	640,858	45.8%
Unknown	0	0.0%	0	0.0%	1,782	15.7%	249,443	17.8%
<b>Total</b>	<b>11,367</b>	<b>100.0%</b>	<b>1,399,023</b>	<b>100.0%</b>	<b>11,367</b>	<b>100.0%</b>	<b>1,399,023</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>			<b>SMALL BUSINESS/FARM</b>		<b>SMALL FARM</b>		
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1,433	30.6%	45,343	30.3%	2	20.0%	140	17.9%
Middle	2,423	51.8%	77,113	51.6%	2	20.0%	138	17.6%
Upper	820	17.5%	27,012	18.1%	6	60.0%	506	64.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>4,676</b>	<b>100.0%</b>	<b>149,468</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>784</b>	<b>100.0%</b>
	<b>By Loan Size</b>							
\$100,000 or Less	4,349	93.0%	48,568	32.5%	7	70.0%	237	30.2%
\$100,001 - \$250,000	185	4.0%	32,393	21.7%	3	30.0%	547	69.8%
\$250,001 - \$1 Million*	142	3.0%	68,507	45.8%	0	0.0%	0	0.0%
Over \$1 Million*	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>4,676</b>	<b>100.0%</b>	<b>149,468</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>784</b>	<b>100.0%</b>
	<b>By Revenue</b>							
Total \$1 Million or Less	1,425	30.5%	70,838	47.4%	6	60.0%	398	50.8%

Originations and Purchases

\*Small Business loans are loan sizes that are \$1 Million or less

\*Small Farm loans are loan sizes that are \$500,000 or less

**APPENDIX A: AGGREGATE LENDING TABLES**

**Peer Group Loan Distribution Report**

**Assessment Area: Manatee County 2003**

	By Tract Income			HMDA		By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>Home Purchase</b>							
Low	0	0.0%	0	0.0%	408	7.6%	29,726	4.1%
Moderate	1,523	28.3%	133,504	18.5%	1,104	20.5%	105,310	14.6%
Middle	3,452	64.2%	515,032	71.2%	1,148	21.4%	131,853	18.2%
Upper	400	7.4%	74,473	10.3%	1,848	34.4%	336,306	46.5%
Unknown	0	0.0%	0	0.0%	867	16.1%	119,814	16.6%
<b>Total</b>	<b>5,375</b>	<b>100.0%</b>	<b>723,009</b>	<b>100.0%</b>	<b>5,375</b>	<b>100.0%</b>	<b>723,009</b>	<b>100.0%</b>
	<b>Refinance</b>							
Low	0	0.0%	0	0.0%	717	7.2%	49,915	4.1%
Moderate	2,128	21.5%	180,653	14.8%	1,860	18.8%	163,107	13.4%
Middle	6,643	67.2%	852,793	70.0%	2,102	21.3%	224,470	18.4%
Upper	1,120	11.3%	184,217	15.1%	3,317	33.5%	543,291	44.6%
Unknown	0	0.0%	0	0.0%	1,895	19.2%	236,880	19.5%
<b>Total</b>	<b>9,891</b>	<b>100.0%</b>	<b>1,217,663</b>	<b>100.0%</b>	<b>9,891</b>	<b>100.0%</b>	<b>1,217,663</b>	<b>100.0%</b>
	<b>Home Improvement</b>							
Low	0	0.0%	0	0.0%	23	7.9%	959	9.4%
Moderate	80	27.5%	2,219	21.8%	63	21.6%	1,505	14.8%
Middle	178	61.2%	6,442	63.3%	89	30.6%	2,638	25.9%
Upper	33	11.3%	1,519	14.9%	105	36.1%	4,142	40.7%
Unknown	0	0.0%	0	0.0%	11	3.8%	936	9.2%
<b>Total</b>	<b>291</b>	<b>100.0%</b>	<b>10,180</b>	<b>100.0%</b>	<b>291</b>	<b>100.0%</b>	<b>10,180</b>	<b>100.0%</b>
	<b>Multi-Family</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	5	50.0%	4,850	27.8%	0	0.0%	0	0.0%
Middle	4	40.0%	3,211	18.4%	0	0.0%	0	0.0%
Upper	1	10.0%	9,381	53.8%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	10	100.0%	17,442	100.0%
<b>Total</b>	<b>10</b>	<b>100.0%</b>	<b>17,442</b>	<b>100.0%</b>	<b>10</b>	<b>100.0%</b>	<b>17,442</b>	<b>100.0%</b>
	<b>HMDA Totals</b>							
Low	0	0.0%	0	0.0%	1,148	7.4%	80,600	4.1%
Moderate	3,736	24.0%	321,226	16.3%	3,027	19.4%	269,922	13.7%
Middle	10,277	66.0%	1,377,478	70.0%	3,339	21.4%	358,961	18.2%
Upper	1,554	10.0%	269,590	13.7%	5,270	33.9%	883,739	44.9%
Unknown	0	0.0%	0	0.0%	2,783	17.9%	375,072	19.1%
<b>Total</b>	<b>15,567</b>	<b>100.0%</b>	<b>1,968,294</b>	<b>100.0%</b>	<b>15,567</b>	<b>100.0%</b>	<b>1,968,294</b>	<b>100.0%</b>
	<b>SMALL BUSINESS</b>			<b>SMALL BUSINESS/FARM</b>		<b>SMALL FARM</b>		
	#	%	\$(000s)	%	#	%	\$(000s)	%
	<b>By Tract Income</b>							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1,397	27.4%	35,089	22.8%	6	22.2%	605	40.0%
Middle	3,281	64.4%	108,260	70.3%	14	51.9%	343	22.7%
Upper	418	8.2%	10,716	7.0%	7	25.9%	563	37.3%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>5,096</b>	<b>100.0%</b>	<b>154,065</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>1,511</b>	<b>100.0%</b>
	<b>By Loan Size</b>							
\$100,000 or Less	4,774	93.7%	48,776	31.7%	23	85.2%	434	28.7%
\$100,001 - \$250,000	170	3.3%	29,582	19.2%	3	11.1%	577	38.2%
\$250,001 - \$1 Million*	152	3.0%	75,707	49.1%	1	3.7%	500	33.1%
Over \$1 Million*	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Total</b>	<b>5,096</b>	<b>100.0%</b>	<b>154,065</b>	<b>100.0%</b>	<b>27</b>	<b>100.0%</b>	<b>1,511</b>	<b>100.0%</b>
	<b>By Revenue</b>							
Total \$1 Million or Less	1,773	34.8%	75,311	48.9%	20	74.1%	658	43.5%

Originations and Purchases

\*Small Business loans are loan sizes that are \$1 Million or less

\*Small Farm loans are loan sizes that are \$500,000 or less