

PUBLIC DISCLOSURE

November 30, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**USAmeriBank
113 East Whiting Street
Tampa, Florida 33602**

RSSD ID NUMBER: 3536407

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

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

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INSTITUTION’S CRA RATING

INSTITUTION’S CRA RATING: Satisfactory¹

The following table indicates the performance level of USAmeriBank with respect to the lending, investment and service tests.

PERFORMANCE LEVELS	<u>US AMERIBANK</u>		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

*Note: The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Major factors supporting the institution’s rating include:

- The overall geographic distribution of HMDA² lending reflects adequate penetration in low- and moderate-income geographies.
- The overall geographic distribution of small business lending reflects good penetration in low- and moderate-income geographies.
- The overall distribution of HMDA lending among borrowers of different income levels is poor.
- The overall distribution of small business lending among businesses of different sizes is adequate.
- The bank made an adequate level of community development loans.
- The bank makes a significant level of qualified community development investments in response to assessment area community development needs.
- Retail delivery systems are accessible to the geographies and individuals of different income levels in the bank’s assessment areas.
- The bank provides an excellent level of community development services.

¹ Section 228.28(a) of Regulation BB – Community Reinvestment sets forth the assigned ratings for CRA performance. Section 228.28(a)—3 of the Interagency Questions and Answers Regarding Community Reinvestment provides a point structure that is assigned to each rating identified in section 228.28(a) of the CRA. A large institution’s overall CRA rating is calculated in accordance with the points system set forth in this guidance for the lending, investment and service tests.

² Home mortgage loans are reported by institutions on the Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR). The register includes home purchase, refinance, home improvement and multi-family loans originated and purchased by the institution.

INSTITUTION

DESCRIPTION OF INSTITUTION

USAmeriBank is a multi-state commercial bank headquartered in Clearwater, Florida. The bank operated 27 branch offices and 28 cash-only ATMs in Florida and Alabama as of December 31, 2014. As of June 30, 2015, USAmeriBank had total assets of \$3.4 billion and total deposits of \$2.8 billion. USAmeriBank offers a range of personal and commercial banking products and services, including personal deposit and loan products, commercial deposit and loan products, treasury management, business banking, and online banking.

USAmeriBank received a “Satisfactory” rating at its previous Community Reinvestment Act (CRA) Performance Evaluation (PE) under the Intermediate Small Bank Examination procedures dated April 1, 2013. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment areas.

Business Structure

USAmeriBank is an affiliate of USAmeribancorp, a bank holding company also located in Clearwater. USAmeriBank was started in 2007 and initially operated only in the Tampa MSA. In 2011, the bank acquired Aliant Bank, which expanded the bank’s branch network and operations into Alabama. The bank completed the rebranding of all Aliant Bank locations in Alabama to represent the USAmeriBank name in 2015.

Credit Products and Loan Portfolio

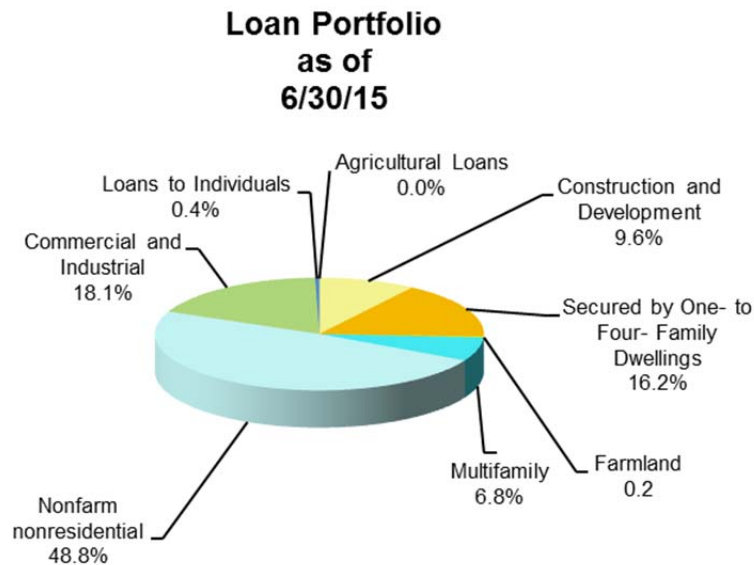
USAmeriBank offers a variety of consumer, commercial, residential, and agricultural loan products to fulfill the credit needs of the residents and businesses in its assessment areas. Consumer loan products include auto loans, personal lines of credit, home equity loans, mortgage loans, boat loans, and education loans. Commercial loan products include term loans and lines of credit, business credit card, and Small Business Administration (SBA) loans.

As shown in the table below, the bank is primarily focused on business and commercial lending. Nonfarm nonresidential lending comprised the greatest percentage of the loan portfolio at 48.8 percent of total loans as of June 30, 2015, followed by commercial and industrial loans at 18.1 percent and loans secured by one-to-four family dwellings at 16.2 percent. Total loans increased by nearly 20.0 percent from December 2013 to June 2015 but the loan portfolio mix did not change significantly.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2015		12/31/2014		12/31/2013	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	262,268	9.6%	220,738	8.8%	205,365	9.0%
Secured by One- to Four- Family Dwellings	443,261	16.2%	418,481	16.6%	379,738	16.6%
Other Real Estate: Farmland	5,671	0.2%	5,380	0.2%	7,654	0.3%
Multifamily	186,657	6.8%	168,923	6.7%	177,184	7.7%
Nonfarm nonresidential	1,336,805	48.8%	1,241,384	49.4%	1,115,597	48.8%
Commercial and Industrial	495,788	18.1%	448,578	17.8%	390,132	17.1%
Loans to Individuals	11,410	0.4%	11,059	0.4%	11,837	0.5%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
Total	\$2,741,860	100.00%	\$2,514,543	100.00%	\$2,287,507	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.

The chart below shows the loan portfolio as of June 30, 2015.



SCOPE OF EXAMINATION

USAmeriBank has a total of five CRA assessment areas in Florida and Alabama. The scope of this evaluation included a full-scope review of at least one assessment area in each state where the bank has branches but all assessment areas were reviewed for lending, investment and service performance. Full scope reviews were conducted in the Tampa assessment area in Florida and the Birmingham assessment area in Alabama; the remaining assessment areas were reviewed using the limited scope procedures. Criteria used to select full-scope assessment areas included the volume of HMDA-reportable and CRA small business lending by number of loans and dollar amount, as a percentage of statewide lending activity; deposit market share; number of branches; percentage of deposits; amount of community development activity; and other non-financial considerations. It should be noted that this is USAmeriBank's first examination under the large bank CRA examination procedures, and the first time that the bank's performance in two states has been considered.

Lending and deposit activity in Florida was slightly greater than in Alabama. As a result, performance in Florida received more weight in determining the overall rating for the institution. A description of each full-scope assessment area is included in the applicable full scope assessment area section of this report.

Examination Review Period and Products Reviewed

This evaluation included an analysis of HMDA-reportable loans and CRA-reportable small business loans originated between January 1, 2013 and December 31, 2014. To determine the final lending test rating, equal weight was given to lending performance in 2013 and 2014. HMDA-reportable home purchase, refinance, and home improvement loans and CRA-reportable small business loans were the major lending products reviewed. CRA-reportable small farm loans and HMDA-reportable multi-family loans were not considered in the overall evaluation due to low activity levels. Retail banking services such as branch distribution and hours of operation were analyzed for the same review period.

The community development activity review period was January 1, 2013 to June 1, 2015. Community development loans originated within this timeframe were included in the lending test analysis and community development investments funded during this period were analyzed as part of the investment test. Investments with community development as a primary purpose that were funded during a prior review period but still outstanding as of June 30, 2015 were also considered. Community development services that took place during the review period were included in the service test review.

A loan, investment, or service has community development as a primary purpose when it is designed for the express purpose of revitalizing or stabilizing low- or moderate-income areas, designated disaster areas, or underserved or distressed nonmetropolitan middle-income areas; providing affordable housing for, or community services targeted to, low- or moderate-income persons; promoting economic development by financing small businesses and farms that meet the requirements set forth in 12 CFR 228.12(g); or supporting, enabling or facilitating projects or activities that meet the “eligible uses” criteria of the Housing and Economic Recovery and are conducted in designated target areas identified in plans approved by the U.S. Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program.

Examination Analysis

This evaluation of USAmeriBank’s record of lending in individual assessment areas includes the use of and comparison to demographic characteristics. The primary sources for demographic data are the 2010 U.S. Census and 2013 Dun & Bradstreet data. Demographic characteristics of a particular assessment area are useful in analyzing a financial institution’s record of lending since they provide a means of estimating loan demand and identifying lending opportunities. To understand small business demand, this analysis relies on self-reported data on revenue size and geographic location from business entities that is collected and published by Dun & Bradstreet. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with information about housing and economic conditions, is used to establish performance context and evaluate the bank accordingly.

Loans are evaluated to determine the lending activity inside and outside the bank’s assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA loans is assessed by comparing the percentage of loans made in each geography type (low, moderate, middle and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses within each geographic income category.

The distribution of HMDA loans by borrower income is assessed by comparing the percentage of loans made to borrowers in each income category (low, moderate, middle and upper-income) to the percentage of families in each income category within the assessment area. The distribution of small business loans by borrower income is assessed by comparing the percentage of loans made to businesses in each revenue category (less than or equal to \$1 million and greater than \$1 million) to the percentage of total businesses in each revenue category within the assessment area.

USAmeriBank’s lending performance was also compared to the performance of aggregate lenders in 2013 and 2014. Aggregate lenders include all lenders required to report HMDA and CRA small business lending data within the respective assessment areas. Lending market share is also discussed to give a better understanding of where USAmeriBank ranks within the respective areas.

Community development activities were reviewed to determine that they have community development as a primary purpose and meet the geographic requirements of the regulation. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, the innovativeness of those activities and their responsiveness to local community development and credit needs.

In order to better understand assessment area community development and credit needs, several sources were used, including contacts with community development practitioners, review of publicly accessible data, information submitted by the institution, and plans that describe the community development environment in local markets. Community contact interviews were conducted with several representatives in affordable housing and economic development organizations operating inside the bank's assessment areas. These individuals have expertise in their respective fields and are familiar with the economic, social and demographic characteristics and community development opportunities in the assessment area. Information obtained from these interviews was used to help establish a context for the communities in which the bank operates and to gather information on USAmeriBank's performance. None of these contacts identified any unmet credit needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

Lending test performance is rated low satisfactory. Lending performance is adequate in Florida, and needs to improve in Alabama. The geographic distribution of loans throughout the assessment areas is adequate. The penetration of loans among borrowers of different income levels and businesses of different sizes is also adequate. Additionally, the bank makes an adequate level of community development loans.

References are made to USAmeriBank's lending distribution by geography and borrower income throughout this report. Detailed information about HMDA-reportable and CRA small business loans by assessment area can be found in Appendices F and G. In some assessment areas and product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance and the reader should refer to the appendices for specific data.

Lending Activity

The following table summarizes the bank's lending activity for 2013 and 2014. As the data shows, USAmeriBank originated more HMDA-reportable loans than small business related loans by both number and dollar amount. However, the distribution of lending activity was different in each state. In Florida, CRA-related lending had a greater impact on the overall lending rating while in Alabama HMDA lending had a greater impact on the lending rating. Lending activity was considered adequate in the two full-scope assessment areas. Detailed information about lending activity can be found in each of the state sections of this report.

Summary of Lending Activity

Loan Type	#	%	\$(000s)	%
Total Consumer related	0	0	\$0	0
Home Improvement	70	--	\$7,010	--
Home Purchase	769	--	\$241,193	--
Multi-Family Housing	47	--	\$99,902	--
Refinancing	414	--	\$120,658	--
Total HMDA related	1,300	57	\$468,763	63
Small Business	957	--	\$276,811	--
Total Small Business related	957	42	\$276,811	37
Small Farm	4	--	\$1,017	--
Total Small Farm related	4	0	\$1,017	0
TOTAL LOANS	2,261	100	\$746,591	100

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

While not evident in the summary table above, the bank had a significant drop in HMDA-reportable lending across its footprint during the review period, with the total number of loans declining by more than 60.0 percent between 2013 and 2014. The decline in HMDA-reportable lending was due to internal restructuring.

The table below shows, by loan type, the number and percentage of loans located inside and outside of the bank's assessment areas. USAmeriBank originated a majority of the total loans to borrowers and businesses located within its assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	62	88.6	\$6,215	88.7	8	11.4	\$795	11.3
Home Purchase - Conventional	542	85.4	\$176,263	80.2	93	14.6	\$43,639	19.8
Home Purchase - FHA	98	88.3	\$14,289	87.3	13	11.7	\$2,073	12.7
Home Purchase - VA	22	95.7	\$4,699	95.3	1	4.3	\$230	4.7
Multi-Family Housing	33	70.2	\$48,638	48.7	14	29.8	\$51,264	51.3
Refinancing	349	84.3	\$99,256	82.3	65	15.7	\$21,402	17.7
Total HMDA related	1,106	85.1	\$349,360	74.5	194	14.9	\$119,403	25.5
Small Business	863	90.2	\$243,495	88	94	9.8	\$33,316	12
Total Small Bus. related	863	90.2	\$243,495	88	94	9.8	\$33,316	12
Small Farm	1	100	\$130	100	0	0	\$0	0
Total Small Farm related	1	100	\$130	100	0	0	\$0	0
TOTAL LOANS	1,970	87.2	\$592,985	79.5	288	12.8	\$152,719	20.5

Note: Affiliate loans not included

The bank originated 85.1 percent of HMDA-reportable loans and 90.2 percent of small business loans, by number, to borrowers and businesses located inside the bank's assessment areas. This indicates USAmeriBank's willingness to originate loans that meet the credit needs of its assessment areas.

Distribution of Lending by Geography, Borrower Income, and Business Revenue Size

The overall geographic distribution of HMDA and small business lending reflects adequate penetration in low- and moderate-income geographies. Of the two full-scope assessment areas, Birmingham is considered poor for overall geographic distribution, while Tampa is good. While the overall geographic distribution of small business loans is good, HMDA lending by geography is poor. The overall distribution of loans among borrowers of different income levels and businesses of different sizes is also adequate. HMDA lending to borrowers of different income levels was poor while small business lending to businesses of different revenue sizes is adequate. Of the two full-scope assessment areas, Birmingham is considered adequate for overall borrower distribution, while Tampa is poor. The analyses for HMDA and small business lending within each assessment area are discussed in detail later in this report.

Community Development Lending

USAmeriBank made a relatively high level of community development loans during the review period. By state, community development lending was good in Florida but poor in Alabama. Since the previous examination, the bank originated or renewed 40 community development loans totaling \$52.0 million. This volume of community development lending is considered good given the size and presence of the institution in its assessment areas and community development lending opportunities. Responsiveness to community development needs at the assessment area level is adequate. Performance in Florida had the greatest impact on the community development lending assessment due to the concentration of deposits and lending activity in the state.

The majority of community development lending activity by state was in Florida with \$45.7 million in community development loans. This performance is considered good given the bank's size and presence in the state and within the Tampa-St. Petersburg assessment area. The bank had seven loans totaling \$6.3 million in Alabama, with the largest concentration of loans in the Montgomery assessment area (\$3.2 million). The bank did not have any community development loans in the Birmingham assessment area and performance statewide in Alabama was considered poor. The majority of the community development loans originated or renewed during the review period were for affordable housing (\$49.7 million).

More information on community development loans can be found in the full-scope assessment area sections of this report.

INVESTMENT TEST

USAmeriBank's investment performance is rated high satisfactory based on the overall level of qualified community development investments and contributions provided in the bank's assessment areas and across the bank's footprint. The bank's performance was good in both Florida and Alabama, and in the Tampa-St. Petersburg and Birmingham full scope assessment areas. Performance in Florida had the greatest impact on the investment test rating due to the concentration of deposits and lending activity in the state.

USAmeriBank had qualified investments totaling approximately \$24.6 million and more than \$24.0 million were acquired during the review period. By state, the bank had approximately \$9.6 million in community development investments in Florida and nearly \$8.0 million in Alabama. Investments in Alabama include \$4.5 million to organizations that benefit the entire state, including the bank's assessment areas. The bank also had \$2.0 million in investments in SBIC funds that served a broader regional area that included the bank's assessment areas in Florida and Alabama. Finally, the bank had \$5.0 million invested in a national SBIC fund that did not have a purpose, mandate or function of serving the bank's footprint. However, the bank was considered responsive to community development needs in its assessment areas, so the additional investment enhanced the bank's overall community development investment rating. The bank's investments addressed

several community development needs, including affordable housing (primarily through mortgage backed securities) and small business financing.

USAmeriBank’s investments include approximately \$256,000 in qualified contributions. In Florida, contributions totaled \$207,400 and in Alabama, \$48,630. The majority of the contributions in both states provided support for organizations that offered community services for low-and moderate-income individuals.

Additional detail regarding investments and contributions can be found in the state and full-scope assessment area sections.

SERVICE TEST

Service test performance is rated high satisfactory

Retail Services

Retail delivery systems are accessible to geographies and individuals of different income levels. During the review period, USAmeriBank opened two branches (both in moderate-income tracts in the Tampa-St. Petersburg assessment area) and closed one branch in an upper-income geography. A specific listing of the branches opened or closed during the period may be obtained by accessing the bank’s CRA public file, which is available on the bank’s web site. USAmeriBank’s record of opening and closing of branches has not adversely affected the accessibility of banking services to low- and moderate-income geographies. In addition, banking services and business hours do not vary in a way that inconveniences any portion of the bank’s assessment areas, including low- and moderate-income geographies and individuals. While USAmeriBank does not offer extended hours at any location in its footprint, weekend hours are offered at half of the branches located in moderate-income geographies compared to weekend hours in just one branch located in an upper-income census tract.

The geographic distribution of USAmeriBank’s branches as of December 31, 2014 is found in the table below. This distribution is based on 2010 census tracts.

Geographic Distribution of Branches & ATMS

Tract Category	Branches							ATMs								Demographics 2014						
	Total Branches		Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs		Cash only ATMs		Census Tracts	House holds	Total Businesses								
	Open	Closed				#	%	Open	Closed	Open	Closed											
	#	%	#	#	#	#	%	#	%	#	%	%	%									
Low	2	7.4%	0	0	2	0	0	Total	2	7.1%	1	11.1%	0	0	1	5.3%	0	0	72	7.9%	5.8%	5.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	6	22.2%	2	0	6	0	3	Total	6	21.4%	2	22.2%	2	0	4	21.1%	0	0	194	21.3%	20.7%	18.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	9	33.3%	0	0	8	0	0	Total	10	35.7%	4	44.4%	1	0	6	31.6%	1	0	355	39.0%	40.9%	37.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	10	37.0%	0	1	9	0	1	Total	10	35.7%	2	22.2%	0	0	8	42.1%	0	0	278	30.5%	32.6%	38.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	12	1.3%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	27	100.0%	2	1	25	0	4	Total	28	100.0%	9	100.0%	3	0	19	100.0%	1	0	911	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

USAmeriBank provides an excellent level of community development services throughout its assessment areas with 1,152 hours of community development services through 133 service activities during the review period. Community development services were considered excellent in Florida and good in Alabama. The bank's officers and staff are involved in numerous organizations and activities that promote or facilitate community services and affordable housing for low- and moderate-income individuals and economic development. The bank is heavily engaged with financial education initiatives in partnership with Junior Achievement and other nonprofit organizations. Bank staff also dedicated a significant number community development service hours serving on the board of directors for a variety of nonprofits, particularly in Florida.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

Birmingham, Alabama

CRA RATING FOR ALABAMA: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects poor penetration throughout the Alabama full-scope assessment area and the distribution of loans by borrower income and revenue size of business reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The bank provided no community development loans within the Alabama full-scope assessment area and a low number in all assessment areas in the state.
- The bank provided a good level of qualified community development investments and grants in the Alabama full-scope assessment area and across the state.
- Retail services are reasonably accessible to the bank's geographies and individuals of different income levels in the Alabama full-scope assessment area.
- The bank provided a relatively high level of community development services in the Alabama full-scope assessment area and throughout the state.

Birmingham, Alabama

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment area in the State of Alabama:

- Birmingham

Limited-scope reviews were conducted for the remaining three assessment areas:

- Auburn
- Coosa Tallapoosa
- Montgomery

The time period and products evaluated for this assessment area is consistent with the scope discussed in the institution section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

As of June 30, 2014, USAmeriBank had \$909.3 million in deposits in Alabama accounting for 37.0 percent of USAmeriBank's total deposits. USAmeriBank operated 15 branch offices in Alabama, as of December 31, 2014, representing 55.6 percent of the bank's total branches. Lending activity in Alabama was commensurate with deposit activity during the review period. HMDA lending in Alabama accounted for 60.9 percent of total institutional HMDA-reportable lending by number of loans, and CRA small business lending in Alabama accounted for 37.2 percent of the bank's total CRA small business lending. HMDA-reportable and CRA lending activity combined in Alabama accounted for 50.5 percent of the bank's total lending activity. The Birmingham assessment area had the largest concentration of loans in the state and therefore had a greater influence on the statewide ratings across all three tests.

The following table shows lending activity from January 1, 2013, through December 31, 2014.

Statewide Summary of Lending Activity Assessment Areas Located in Alabama

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	413	41.4%	\$95,108	44.7%
HMDA Refinance	212	21.2%	\$45,135	21.2%
HMDA Home Improvement	48	4.8%	\$2,947	1.4%
HMDA Multi-Family	1	0.1%	\$2,950	1.4%
Total HMDA	674	67.5%	\$146,140	68.7%
Total Small Business	321	32.2%	\$65,739	30.9%
Total Farm	3	0.3%	\$767	0.4%
TOTAL LOANS	998	100.0%	\$212,646	100.0%

Originations and Purchases

Birmingham, Alabama

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

The lending test rating in the State of Alabama is needs to improve. Overall, performance in Alabama with regard to the geographic distribution of loans reflects poor penetration throughout the assessment area. The distribution of loans by borrower income reflects adequate penetration among customers of different income levels and businesses of different sizes. Additionally, USAmeriBank made a poor level of community development loans in Alabama.

During the review period, USAmeriBank reported 674 HMDA loans and 321 small business loans in Alabama. As such, HMDA lending was given greater weight when determining the lending test rating for Alabama. The rating for Alabama is based on performance in the Birmingham full-scope assessment area; 60.5 percent of the bank's HMDA and small business lending in Alabama occurred within this assessment area.

Details of the bank's HMDA and small business lending and information regarding lending by peers can be found in Appendices F and G.

Geographic and Borrower Distribution

The geographic distribution of USAmeriBank's HMDA and small business loans is poor and the distribution of loans by borrower income and revenue size of businesses is adequate. As noted above, the rating for the state of Alabama is derived from the Birmingham assessment area. A detailed discussion of the borrower and geographic distribution of lending for both assessment areas is included in the next section of this report.

Community Development Lending

USAmeriBank made a low level of community development loans in Alabama. The bank originated seven community development loans totaling \$6.3 million in the Alabama assessment areas during the review period. The bank made no loans in the Birmingham assessment area during the review period but did have one \$2.0 million loan to an organization that finances affordable multi-family housing statewide, including in the Birmingham assessment area. The largest concentration of community development lending was in the Montgomery assessment area, with \$3.2 million in loans to support affordable housing.

Investment Test

The investment test rating for Alabama is high satisfactory. The bank made good use of qualified investments and contributions relative to with total investments of approximately \$8.0 million. Total investments include a \$4.0 million investment in a Low-Income Housing Tax Credit (LIHTC) fund that finances projects statewide, including within the bank's assessment areas. The bank exhibited good responsiveness to the credit and community development needs through its investment activities in the Birmingham assessment area.

Additional details regarding specific investments and contributions can be found in the full-scope assessment area sections.

Service Test

The service test rating for Alabama is low satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment areas. Statewide, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-

Birmingham, Alabama

income geographies or low- and moderate-income individuals. The bank closed one branch in an upper-income tract in the assessment areas during the review period but there has been no change to the accessibility of its delivery systems for low- and moderate-income geographies and/or low- and moderate-income individuals. Additional detail on the bank's retail services can be found in the full-scope assessment area section of this report.

Community Development Services

The bank provides a relatively high level of community development services that benefit residents and small businesses in the assessment area.

Additional detail on the bank's retail and community development services can be found in the full-scope assessment area section of this report.

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METROPOLITAN AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BIRMINGHAM, ALABAMA ASSESSMENT AREA

Overview

The Birmingham assessment area includes three of the seven counties in the Birmingham MSA: Jefferson, Shelby, and St. Clair counties. Birmingham, located in Jefferson County, is the principal city in the region. There are 224 census tracts in the assessment area, of which 25 are low-income and 49 are moderate-income census tracts. Most of the low- and moderate-income tracts are in Jefferson County, in the cities of Birmingham and Bessemer.

USAmeriBank operated five branches in the Birmingham assessment area as of December 2014, with one in a moderate-income census tract. The Birmingham assessment area represents 33.1 percent of the branches and 26.1 percent of deposits in the state. The market also represents the largest concentration of combined HMDA and CRA lending, with 60.5 percent (by number) of loans in the state.

The Birmingham assessment area is a highly competitive banking market dominated by national and large regional banks, including Regions Bank, BBVA Compass, and Wells Fargo. According to the June 30, 2014 FDIC Deposit Market Share Report, USAmeriBank is ranked 15th in the market with \$238 million in deposits, or 0.77 percent of total assessment area deposits.

HMDA and CRA lending are similarly competitive. In 2013, USAmeriBank was ranked 24th out of 387 lenders with 1.0 percent of total HMDA loans. Total HMDA lending in the market fell by about 34.0 percent during the review period but the decline for USAmeriBank was much greater. As discussed earlier, the bank went through an internal restructuring between 2013 and 2014, and during that time frame, HMDA lending fell by nearly 80.0 percent in this assessment area. In 2014, USAmeriBank ranked 61st out of 420 lenders with 0.3 percent of total HMDA loans. Wells Fargo, Regions, JP Morgan Chase, and Quicken Loans were the largest HMDA lenders in the assessment area.

For CRA lending, USAmeriBank had less than 1.0 percent of total CRA loans in both 2013 and 2014. The bank was ranked 25th out of 76 lenders in 2013 and 23rd out of 87 lenders in 2014. American Express, Wells Fargo, GE Capital, Capital One, and Regions Bank are the primary CRA lenders in the market.

Population and Income Characteristics

The assessment area population was 937,144 in 2010, representing an increase of 7.7 percent since 2000; in 2013, the population in the market was 941,439. The region has grown faster than elsewhere in the state, but the growth has been uneven. Birmingham lost over 7.0 percent of its residents between 2000 and 2010, though growth in Jefferson County's suburban communities offset most of the city's population loss. The fastest growing county in the assessment area was rural Shelby County, which grew by over 36.0 percent between 2000 and 2010.²⁵

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income. The following chart sets forth the estimated median family income for the Birmingham-Hoover MSA and shows that the median family income increased between 2013 and 2014, from \$57,100 to \$61,000.

²⁵ U.S. Census Bureau. Accessed through PolicyMap. Available at: <http://www.policymap.com>. Accessed on December 15, 2015.

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Borrower Income Levels Birmingham-Hoover, AL MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2013	\$57,100	0	- \$28,549	\$28,550	- \$45,679	\$45,680	- \$68,519	\$68,520	- & above
2014	\$61,000	0	- \$30,499	\$30,500	- \$48,799	\$48,800	- \$73,199	\$73,200	- & above

Housing Characteristics

Census data indicates that there were 413,375 housing units in the assessment area in 2010, of which 62.0 percent were owner-occupied, 25.6 percent were rental units, and 12.5 percent were vacant. Rental and vacant units were more concentrated in low- and moderate-income tracts. The median age of the housing stock was 34 years, though housing was much older in the low- and moderate-income census tracts (53 years and 45 years, respectively) compared to the assessment area overall. These factors suggest that HMDA-reportable lending opportunities in the low- and moderate-income tracts may be limited.

The Birmingham metro housing market has been improving since 2011, though certain counties have experienced a faster recovery from the recession than others. Home sales in the Birmingham metro market (which includes Blount County, in addition to the assessment area counties) started to increase in late 2011. Between 2013 and 2014, home sales increased by 5.6 percent while the median home price increased by 2.0 percent to \$167,169. The median home price in 2014 exceeded the previous peak home price in the market back in 2006.²⁶ The improving sales market has led to more new home construction activity in the assessment area, with the number of building permits issued for single family homes increasing by 14.4 percent between 2013 and 2014. However, new home construction remains just a fraction of the pre-recessionary peak levels.²⁷ The improving housing market is further evidenced in the continued decline in seriously delinquent mortgages. The percent of mortgages considered seriously delinquent (defined as more than 90 days past due or in foreclosure) declined across the assessment area; delinquency rates were highest in Jefferson County at 5.0 percent at the end of 2014.²⁸

While the housing market is improving, housing costs are a challenge for homeowners and renters across the assessment area. The problem is most acute in Birmingham where nearly 50.0 percent of renters and 30.0 percent of homeowners are cost-burdened. A household is considered cost-burdened if homeownership or rental costs account for more than 30.0 percent of household income.²⁹ The *2015 Out of Reach* study by the National Low Income Housing Coalition confirms housing affordability is a concern, finding a minimum wage worker would have to work 2.1 jobs (assuming 40 hours a week for 52 weeks a year) in order to afford the fair market rent for a 2-bedroom apartment in the Birmingham MSA.³⁰ While many low wage earners are

²⁶ Alabama Center for Real Estate, University of Alabama, Culverhouse College of Commerce. "Birmingham Metro Residential Real Estate: Annual Trends Report." Accessed December 15, 2015. Available at: http://dlambw9zjiu0uw.cloudfront.net/market_annual/5.pdf?1441993980

²⁷ Residential Building Permits, Single Family Housing Units. Accessed through PolicyMap. Available at: <http://www.policymap.com>. Accessed December 15, 2015.

²⁸ Federal Reserve Bank of Atlanta calculations of data provided by CoreLogic.

²⁹ US Census Bureau. Accessed through PolicyMap. Available at: <http://www.policymap.com>. Accessed December 14, 2015.

³⁰ National Low Income Housing Coalition. *Out of Reach, 2015*. Available at: <http://nlihc.org/oor/alabama#>. Accessed December 14, 2015.

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struggling to find affordable rental housing, the homeownership market appears to be more in line with household incomes. In Jefferson and St. Clair counties, more than 50.0 percent of the housing (based on median home values) was considered affordable for a household earning the median income in 2013; in St. Clair County, only 30.0 percent of housing was affordable at the median income level. However, affordability is declining as home prices and interest rates start to rise.³¹

The housing market in the city of Birmingham faces additional challenges due to the high concentration of vacant and abandoned housing units as a result of decades of population loss and the more recent foreclosure crisis. Birmingham city officials have identified nearly 16,000 abandoned properties and vacant lots that need to be demolished or cleared in order to spur redevelopment.³² These properties are concentrated in the city's low- and moderate-income neighborhoods and have a destabilizing effect on the surrounding communities. To help address this issue, the city created a new land bank authority in 2014, which will bundle vacant and blighted properties and offer the land to entities for redevelopment.³³

Employment and Economic Conditions

Birmingham was historically a manufacturing center and early economic growth was driven by the steel industry. The economy has diversified in recent years and today the manufacturing sector accounts for just 7.0 percent of total employment. The service sector has become the dominant source of jobs, and specifically, wholesale and retail trade, education and health services, and professional and business services. Government agencies also account for a significant share of employment in the region. The University of Alabama at Birmingham is the major economic driver and the largest employer in the region with 23,000 employees. Other major employers include Regions Bank, AT&T, St. Vincent's Health System, Honda Manufacturing of Alabama, Baptist Health System, Inc. and Children's of Alabama.³⁴

Small businesses are vital to the Birmingham economy. According to 2014 D&B information, there were 42,731 businesses within the Birmingham assessment area, of which 88.4 percent had total annual revenues less than or equal to \$1 million, and were therefore considered to be small businesses.³⁵ Lending to small businesses has been improving over the past several years, increasing by 4.5 percent between 2012 and 2013 in the assessment area. However, less than 50.0 percent of all small business loans are made to firms with revenues under \$1.0 million, indicating that smaller firms may still be struggling to access credit.³⁶

Economic conditions have been improving in the Birmingham-Hoover MSA, with new jobs and declining unemployment over the review period. Job growth has been driven primarily by the professional and business services and manufacturing sectors. The unemployment rate in the Birmingham MSA fell from 6.3 percent in 2013 to 6.0 percent in 2014, and is well below the statewide unemployment rate of 6.8 percent in 2014. Within the assessment area, the unemployment rate is highest in Jefferson County.³⁷

³¹ PolicyMap calculations of data from HUD and the US Census. Accessed through PolicyMap. Available at: <http://www.policymap.com>. Accessed December 15, 2015.

³² AL.com. "Birmingham has a \$4.5 million property demolition problem." July 20, 2015. Available at: http://www.al.com/news/birmingham/index.ssf/2015/07/birmingham_has_a_45_million_pr.html. December 15, 2015.

³³ AL.com. "Want some land for cheap? Promise to redevelop it? Come to Birmingham City Hall." July 14, 2014. Available at: http://www.al.com/news/birmingham/index.ssf/2014/07/want_some_land_for_cheap_promi.html. Accessed December 15, 2015.

³⁴ Birmingham Business Alliance. "2016 Metropolitan Birmingham Major Employers." Available at: <http://birminghambusinessalliance.com/wp-content/uploads/2015/11/2016-Metropolitan-Birmingham-Major-Employers.pdf>. December 15, 2015.

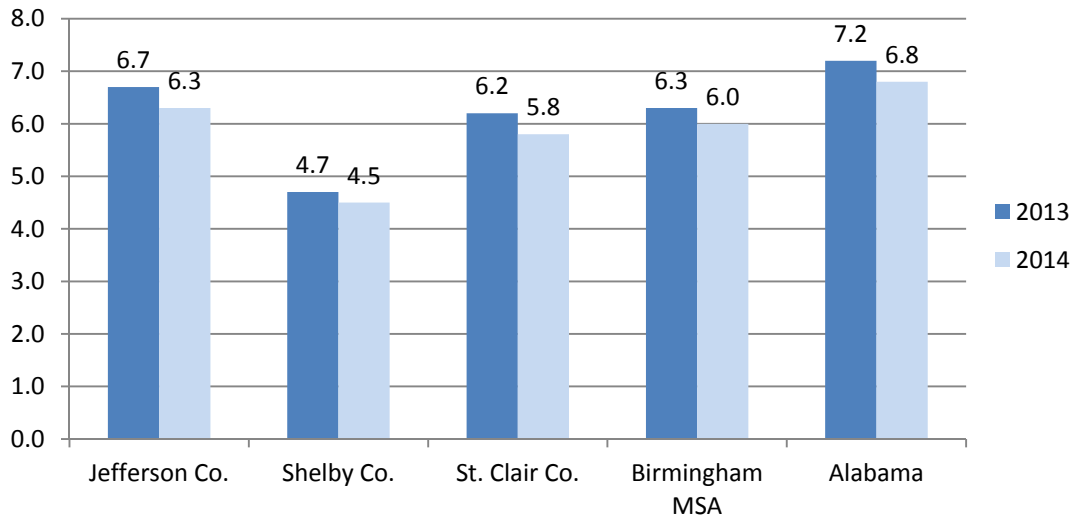
³⁵ FRB Atlanta Calculations of Dun & Bradstreet, 2010 American Community Survey data.

³⁶ Ibid

³⁷ Bureau of Labor Statistics. Available at: <http://www.bls.gov>.

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Unemployment Rates - AL Birmingham



Birmingham is still recovering from the Jefferson County bankruptcy. While the county emerged from bankruptcy in late 2013, the lasting impacts are still evolving. As a result of the bankruptcy, the county has had to make budget cuts in excess of \$30 million and has had to lay off about 800 employees. Additionally, the county’s credit rating has declined and it still has a significant debt to repay. There is speculation that the bankruptcy is discouraging corporate expansion or new investment due to some of the potential unknowns, including the expected increase in sewer rates.³⁸

Despite the recent challenges, the region is experiencing new investment and economic development. In late 2012, Norfolk Southern completed the \$97.5 million Birmingham Regional Intermodal Facility, which will ultimately create more than 200 new jobs, and has given a boost to the region as a center for logistics. There has also been continued investment by automotive suppliers due to the close proximity to the Honda and Mercedes plants. The entrepreneurial community is also growing. Innovation Depot, which was recognized as the nation’s top technology incubator in 2011, now serves over 95 companies and houses approximately 500 employees.³⁹ Innovation Depot continues to generate new businesses and partnerships that are positively impacting the economic renaissance in the city of Birmingham. While new job growth is occurring, one community contact noted that workforce development is needed, particularly for jobs in the technology sectors. The contact expressed concern that certain segments of the workforce did not have the skills needed to transition to new job opportunities.

Downtown redevelopment is taking hold in Birmingham. The city has experienced decades of disinvestment and is home to an estimated 1.6 million square feet of largely vacant buildings constructed before World War II. However, there is now an organization dedicated to Birmingham’s revitalization and there are a number of projects underway to help revitalize downtown Birmingham, including Railroad Park and Regions Field, which opened in 2013. More private companies are investing in rehabbing vacant buildings for office space and there are a number of other civic, residential, office and retail-oriented projects underway. To encourage more

³⁸ New York Times. August 6, 2013. “A Return to Downtown Birmingham.” Available at: <http://www.nytimes.com/2013/08/07/realestate/commercial/a-return-to-downtown-birmingham.html?pagewanted=all& r=0>. Accessed December 14, 2015.

³⁹ University of Alabama Center for Business and Economic Research. “Birmingham-Hoover Metropolitan Area 2013 Outlook.” Available: http://cber.cba.ua.edu/almetro_arch.html. December 15, 2015.

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downtown investment, in 2013 the state approved a bill that provides up to \$5.0 million in state historic tax credits to individual developers.⁴⁰ The state historic tax credits can be used in conjunction with federal tax credits and other subsidized financing programs.

Community Contacts and Community Development Opportunities

Affordable Housing and Neighborhood Stabilization

Access to quality, affordable housing is an ongoing concern in Birmingham. One community contact noted that there is a particular need for affordable rental housing as many low-income individuals are not able to afford current market rents. Two contacts who specialize in affordable housing said that the banks are not meeting the needs of LMI communities and there are numerous opportunities for them to be more engaged by providing mortgage financing, home improvement loans and quality housing for the elderly and veterans. The city of Birmingham does offer some down payment assistance, but a community contact familiar with the program indicated that it was hard for many homeowners to use the funds since they are unable to qualify for first mortgages.

Community revitalization and stabilization is one of the biggest needs in Birmingham and provides a significant opportunity for bank participation. As noted earlier, the city has a vast number of blighted and vacant properties that have destabilized entire neighborhoods. The city has focused on demolition and as noted earlier, recently created a land bank to try to move blighted properties back into productive use. Birmingham has also targeted federal funds to address the high concentration of blighted and vacant housing in LMI communities and to increase the supply of quality affordable housing units in these areas.⁴¹

In 2011, a tornado struck Birmingham and the surrounding areas, and recovery efforts are still underway. The Pratt community, which is historically a low-income area, was hit particularly hard. Through CDBG – Disaster Recovery funds, the city is investing in a number of projects focused on creating a sound infrastructure and quality of life for the residents of this community. The Pratt Library was reconstructed and now serves as a digital hub for the neighborhood. A new state of the art fire station was also constructed. The city is also making improvements to roadways and bus lines, along with supporting the development of new assisted living and affordable rental units.

Lastly, in 2014, Birmingham was one of 16 cities selected to receive a Smarter Cities Challenge® grant from IBM as part of the company’s citizenship efforts to build a Smarter Planet®. A team of IBM experts developed recommendations to address food insecurity, which the mayor identified as a key challenge facing the city. Much of the city suffers from limited access to supermarkets, grocery stores and affordable healthy food options. The lack of high-quality food choices leads to major health problems for people in every age group and particularly for youth and the elderly in Birmingham’s most impoverished neighborhoods. Addressing these “food deserts” is an ongoing concern in the city.

Small Businesses and Economic Development

Small business credit declined during the recession, and while the region is now recovering, community contacts specializing in small business development felt credit access was still limited. Specifically, small dollar loans are very challenging to obtain, and there is a perception in the community that the large banks have very little appetite for this type of lending.

⁴⁰ New York Times. August 6, 2013. “A Return to Downtown Birmingham.” Available at: <http://www.nytimes.com/2013/08/07/realestate/commercial/a-return-to-downtown-birmingham.html?pagewanted=all& r=0>. Accessed December 14, 2015.

⁴¹ City of Birmingham *Consolidated Plan 2010-2015*. Available at: [http://www.informationbirmingham.com/pdf/community/B'hamConPlan\(Final\)5%2013%2010.pdf](http://www.informationbirmingham.com/pdf/community/B'hamConPlan(Final)5%2013%2010.pdf). Accessed December 16, 2015.

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One community contact indicated that there were opportunities for banks to increase support for small businesses through investments in organizations that provide financing assistance, or have the ability to develop financing programs. Community Development Financial Institutions (CDFIs) are an important partner for small business financing, and while there are two CDFIs that provide small business financing in Birmingham, additional capacity is needed. The city is well served by a network of small business counseling resources that serve start-up businesses, veteran-owned businesses, women-owned and other disadvantaged business owners. However, a community contact indicated that small business owners need more technical assistance to help position themselves for traditional bank financing, and that banks should be investing more time in building direct relationships with traditionally disadvantaged businesses.

Increasing Financial Capability and Stability

Financial stability of low- and moderate-income individuals has declined as evidenced by increasing poverty rates and reliance on public benefits. In Birmingham, 21.4 percent of the population lived in poverty in 2010 while 81.0 percent of Birmingham city school students were eligible for free and reduced price lunch in 2012. Food stamps, another important source of assistance for LMI individuals, have also been increasing, and with the exception of Shelby County, between 15.0 and 18.0 percent of the population in all counties in the assessment area were receiving food stamps in 2010.⁴²

Access to financial services is another issue facing low- and moderate-income individuals in the assessment area. According to the FDIC's 2013 National Survey of Unbanked and Underbanked Households, 5.7 percent of households in the Birmingham MSA are unbanked, meaning they have no type of deposit account with a mainstream financial institution. In addition, 25.7 percent of households are considered underbanked, meaning they have a deposit account but they also rely on alternative financial services providers on a regular basis. The unbanked are disproportionately lower-income and minority households and the percentage of unbanked households is likely significantly higher within the Birmingham city limits.⁴³ Combatting predatory lending is one of the greatest needs in the city. According to one community contact, there are more "payday lenders than McDonalds" in Birmingham, and the number of alternative financial services significantly exceeds bank branches. The contact stated that banks need to focus on creating a small dollar loan product that will help them remain competitive.

The high level of financial distress also indicates a need for more financial education and other types of financial stability efforts. Local financial institutions can partner with organizations in Birmingham like United Way and the Alabama Asset Building Coalition, which are working to increase access to Individual Development Accounts (IDAs), financial education, and free tax assistance programs.

Demographic Characteristics by Census Tract

The following tables based on 2010 U.S. Census and 2014 Dun & Bradstreet data present key demographic and business information used to help develop a performance context for the assessment area.

⁴² U.S. Census Bureau. Accessed through PolicyMap. Available at: <http://www.policymap.com>. Accessed December 16, 2015.

⁴³ 2013 FDIC National Survey of Unbanked and Underbanked Households. Available at: <http://economicinclusion.gov/>. Accessed January 26, 2015.

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Combined Demographics Report

Assessment Area: AL Birmingham

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	25	11.2	17,911	7.4	5,928	33.1	51,019	21.1
Moderate-income	49	21.9	40,725	16.8	7,177	17.6	40,072	16.5
Middle-income	78	34.8	90,895	37.5	8,047	8.9	46,192	19.1
Upper-income	71	31.7	92,690	38.3	2,648	2.9	104,938	43.3
Unknown-income	1	0.4	0	0.0	0	0.0	0	0.0
Total Assessment Area	224	100.0	242,221	100.0	23,800	9.8	242,221	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	39,955	13,121	5.1	32.8	17,881	44.8	8,953	22.4
Moderate-income	81,113	37,263	14.6	45.9	29,334	36.2	14,516	17.9
Middle-income	152,077	100,231	39.1	65.9	34,070	22.4	17,776	11.7
Upper-income	140,230	105,486	41.2	75.2	24,388	17.4	10,356	7.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	413,375	256,101	100.0	62.0	105,673	25.6	51,601	12.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,700	8.7	3,088	8.2	480	13.5	132	9.5
Moderate-income	6,973	16.3	6,040	16.0	711	20.0	222	16.0
Middle-income	13,819	32.3	12,384	32.8	963	27.1	472	34.1
Upper-income	18,233	42.7	16,269	43.1	1,404	39.5	560	40.4
Unknown-income	6	0.0	6	0.0	0	0.0	0	0.0
Total Assessment Area	42,731	100.0	37,787	100.0	3,558	100.0	1,386	100.0
Percentage of Total Businesses:				88.4		8.3		3.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	1.2	4	1.3	0	0.0	0	0.0
Moderate-income	29	8.8	28	8.8	1	10.0	0	0.0
Middle-income	164	49.7	159	49.7	5	50.0	0	0.0
Upper-income	133	40.3	129	40.3	4	40.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	330	100.0	320	100.0	10	100.0	0	.0
Percentage of Total Farms:				97.0		3.0		.0

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

USAmeriBank's lending performance in the Birmingham assessment area is poor. The geographic distribution of loans reflects poor penetration throughout the assessment area. The distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank made a poor level of community development loans in the Birmingham assessment area.

During the review period, the bank reported 459 HMDA loans compared to 143 small business loans in the Birmingham assessment area. Therefore, HMDA lending was weighted more heavily than small business lending in determining the bank's lending test performance in the assessment area. The Birmingham assessment area represents the largest concentration of combined HMDA and CRA small business lending in the state at 60.5 percent. In comparison, 26.1 percent of the bank's statewide deposits are in this assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix F.

Geographic Distribution of Loans

For this analysis the geographic distribution of HMDA and small business lending was compared with available demographic information. Performance context information and aggregate lending data were also taken into consideration. Considering all of these factors, USAmeriBank's geographic distribution of loans reflects poor penetration throughout the assessment area.

Home Purchase Loans

USAmeriBank did not originate home purchase loans in low-income tracts; thus, the bank's performance was less than the percentage of owner-occupied units. However, the bank's performance was commensurate with the aggregate for both years. It should be noted that the level of owner-occupied units in low-income tracts is low; aggregate lending activity in low-income tracts was limited as well. Additionally, the median age of the housing stock in these tracts is 53 years, which can be an indication of substandard housing units and may limit opportunities for home purchase lending in these tracts.

Home purchase lending in moderate-income tracts was poor. The percentage of loans was significantly less than the percentage of owner-occupied units in moderate-income tracts and also less than aggregate. In 2013, 3.5 percent of USAmeriBank's home purchase loans were originated in moderate-income tracts, compared to 14.6 percent of owner-occupied housing units and 5.6 percent of aggregate loans.

The bank's home purchase lending in middle-income tracts was less than the percentage of owner-occupied units in these tracts, while lending in upper-income tracts exceeded the percentage of units throughout the review period.

Home Refinance Loans

Home refinance lending in low-income tracts was poor. The percentage of home refinance loans in low-income tracts for the review period, at 0.8 percent, was less than both the percentage of owner-occupied units, and less than the aggregate loans in 2013 and 2014.

USAmeriBank's home refinance lending in moderate-income tracts was also poor. The percentage of loans in both years was less than the percentage of owner-occupied units and also less than the aggregate. In 2013, 3.5

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percent of the bank's home refinance loans were originated in moderate-income tracts, compared to the aggregate loans at 6.8 percent.

The bank's refinance lending in middle-income tracts was less than the percentage of owner-occupied units in these tracts, while lending in upper-income tracts was greater than the percentage of owner-occupied units throughout the review period.

Home Improvement

USAmeriBank's home improvement lending in both the low- and moderate-income tracts was very poor, with no loans originated in these tracts during the review period. Aggregate lenders were able to originate home improvement loans in the low- and moderate-income tracts at a level commensurate with the percentage of owner-occupied units in those tracts; this would indicate that, although limited, there is some opportunity for home improvement lending in the low- and moderate-income tracts.

The bank's home improvement lending in middle-income tracts was less than the percentage of owner-occupied units in those tracts, while home improvement lending in upper-income tracts was greater than the percentage of owner-occupied units in upper-income tracts.

Small Business Loans

USAmeriBank's small business lending in low-income tracts was good. The bank's small business lending activity in low-income tracts increased during the review period, and was greater than the percentage of small businesses in those tracts; this performance also exceeded aggregate lending in 2014. In 2014, 10.0 percent of the bank's small business loans were originated in low-income tracts where 8.2 percent of small businesses are located. This compares favorably with the aggregate performance at 7.5 percent.

The bank's small business lending in moderate-income tracts was also good. Small business lending in moderate-income tracts was slightly less than the percentage of small businesses in those tracts, and slightly less than aggregate in 2013. However, the bank originated 16.7 percent of total small business loans in moderate-income tracts in 2014, where 16.0 percent of small businesses are located, and exceed the aggregate lending performance at 13.1 percent.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans based on borrower income or gross annual revenues was adequate. For this analysis, the distribution of HMDA lending across borrower income levels and small business lending across business revenue sizes was compared to available demographic information. Performance context issues were also considered, as well as the performance of other banks.

Home Purchase

USAmeriBank's home purchase lending to low-income borrowers was adequate. The percentage of loans the bank originated to low-income borrowers decreased from 5.4 percent in 2013 to 3.0 percent in 2014. For both years, the percentage of loans to low-income borrowers was less than the percentage of low-income families in the assessment area. However, the bank's home purchase lending was greater than the aggregate lending to low-income borrowers in 2013, and slightly less than the aggregate in 2014.

The bank's home purchase lending to moderate-income borrowers was poor. The percentage of home purchase loans to moderate-income borrowers was less than the aggregate in 2013 and 2014. In addition, the bank's lending during the review period to moderate-income borrowers was less than the percentage of moderate-income families living in the assessment area. In 2014, the bank originated 9.0 percent of home purchase loans to moderate-income borrowers while 16.5 percent of families were classified as moderate-income in the assessment area.

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USAmeriBank's home purchase lending to middle- and upper-income borrowers was greater than the percentage of middle- and upper-income families in the assessment area throughout the review period.

Home Refinance Loans

USAmeriBank's home refinance lending to low-income borrowers was poor. The percentage of refinance loans to low-income borrowers was significantly less than the percentage of low-income families in the assessment area for both years. In 2013, the bank originated 0.9 percent of its home refinance loans to low-income borrowers, compared to 21.1 percent of families classified as low-income in the assessment area, and aggregate lending at 4.6 percent.

The bank's home refinance lending to moderate-income borrowers was adequate. The percentage of home refinance loans to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area in 2013, but greater in 2014. Additionally, the bank's performance was greater than aggregate lending in both years.

The bank's overall home refinance lending to middle- and upper-income borrowers was greater than the percentage of middle- and upper-income families in the assessment area throughout the review period.

Home Improvement Loans

USAmeriBank's home improvement lending to low-income borrowers was adequate. The percentage of the bank's home improvement loans during the review period was less than the percentage of families classified as low-income. However, the bank's percentage of home improvement lending exceeded the aggregate in 2014.

The bank's home improvement lending to moderate-income borrowers was poor. The bank originated one home improvement loan to a moderate-income borrower in 2013. This performance was less than the percentage of moderate-income families at 16.5 percent, and also less than aggregate lending in both years.

The bank's home improvement lending to middle- and upper-income families was less than the percentage of middle- and upper-income families in the assessment area.

Small Business Loans

USAmeriBank's distribution of small business loans to businesses of different sizes was adequate. The percentage of small business loans to businesses with revenues of \$1 million or less was significantly less than the percentage of small businesses in the assessment area. The bank's percentage of loans to small businesses at 32.1 percent in 2013 and 37.8 percent in 2014 was less than aggregate in both years at 44.0 percent and 46.6 percent, respectively. However, 60.9 percent of the bank's small business loans in both years of the review period were in amounts of \$250,000 or less, indicating a willingness to lend in the small amounts typically requested by small businesses.

Community Development Lending

USAmeriBank's community development lending performance in the Birmingham assessment area was poor. During the review period, the bank did not originate any community development loans in the assessment area. Assessment area performance was positively impacted by a \$2.0 million loan to a lending pool that provides financing for affordable multi-family housing projects statewide.

Birmingham, Alabama

INVESTMENT TEST

USAmeriBank's performance under the community development investment test in the Birmingham full-scope assessment area is good. The bank had three investments totaling \$2.4 million that directly benefited the assessment area; all of the investments were acquired during the review period. The bank also had a \$4.0 million investment in a statewide LIHTC fund that positively impacted assessment area performance.

The bank made 10 contributions totaling \$10,400 to organizations directly serving the Birmingham assessment area. The majority of contributions supported organizations that provide community services to low- and moderate-income individuals. The bank also provided support to organizations engaged in affordable housing and economic development.

SERVICE TEST

USAmeriBank's performance under the service test in the Birmingham assessment area was adequate. Its retail and community development services reflected adequate responsiveness to the needs of the assessment area.

Retail Services

USAmeriBank's delivery systems in the assessment area are reasonably accessible to the bank's geographies and individuals of different income levels. The distribution of five branch offices and five ATMs as of December 31, 2014, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has no branches in low-income tracts and one in a moderate-income tract representing 20.0 percent of branches. For comparison purposes, 2010 U.S. Census data indicates 8.6 percent of households and 8.7 percent of businesses were located in low-income census tracts, and 18.4 percent of households and 16.3 percent of businesses were located in moderate-income communities. During the review period, no branches were opened or closed in the assessment area; thus, the bank's record of opening and closing branches did not adversely affect the accessibility of its delivery systems, including in low- and moderate-income geographies or to low- and/or moderate-income individuals.

Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility. The bank does not offer weekend or extended hours at any of its branch locations in the Birmingham assessment area. Bank products, services, and standard business hours are consistent at all branches throughout the assessment area.

Birmingham, Alabama

Geographic Distribution of Branches & ATMS Assessment Area: AL Birmingham

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	25	11.2%	8.6%	8.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	20.0%	0	0	1	0	0	Total	1	20.0%	0	0.0%	0	0	1	20.0%	0	0	49	21.9%	18.4%	16.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	1	20.0%	0	0	1	0	0	Total	1	20.0%	0	0.0%	0	0	1	20.0%	0	0	78	34.8%	37.1%	32.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	3	60.0%	0	0	3	0	0	Total	3	60.0%	0	0.0%	0	0	3	60.0%	0	0	71	31.7%	35.9%	42.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	0.4%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	5	100.0%	0	0	5	0	0	Total	5	100.0%	0	0.0%	0	0	5	100.0%	0	0	224	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

USAmeriBank provided a relatively high level of community development services in the assessment area. During the review period, USAmeriBank employees provided 192 service hours by participating in 10 different community development services. Service on the board for a nonprofit organization that provides community services for low- and moderate-income individuals represented the largest share of the hours. Bank employees also engaged in providing financial education and homeownership counseling.

Metropolitan Areas (Limited Review)

The following metropolitan assessment areas were reviewed using limited-scope examination procedures.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ALABAMA METROPOLITAN ASSESSMENT AREAS

- **Auburn Assessment Area (Lee County)**
 - As of December 31, 2014, USAmeriBank operated one branch in the assessment area, representing 6.7 percent of its branches in Alabama.
 - As of June 30, 2014, the bank had \$31.2 million in deposits in this assessment area, representing a market share of 8.6 percent and 3.4 percent of USAmeriBank’s total deposits in Alabama.
- **Montgomery Assessment Area (Elmore and Montgomery Counties)**
 - As of December 31, 2014, USAmeriBank operated six branches in the assessment area, representing 40.0 percent of its branches in Alabama.
 - As of June 30, 2014, the bank had \$353.8 million in deposits in this assessment area, representing a market share of 14.0 percent and 38.9 percent of USAmeriBank’s total deposits in Alabama.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with the bank’s performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix G for information regarding these areas.

Metropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Auburn	<u>Above</u>	<u>Below</u>	<u>Below</u>
Montgomery	<u>Above</u>	<u>Below</u>	<u>Above</u>

For the lending test, USAmeriBank received a needs to improve rating for the state of Alabama. Performance in both limited-scope metropolitan assessment areas was above the bank’s performance in the state. In the Montgomery assessment area, the geographic distribution of loans contributed to stronger performance. In both assessment areas, a higher level of community development lending improved performance. Community development lending in the Montgomery assessment was particularly strong, with approximately \$3.2 million in loans to support affordable housing.

For the investment test, USAmeriBank received a low satisfactory rating for the state. Performance in the Auburn and Montgomery assessment areas was weaker than the bank’s performance in the state due to lower levels of qualified investments relative to the bank’s operations in the assessment areas; however, these assessment areas were still considered satisfactory. Additionally, the limited scope assessment areas benefited from \$4.5 million in qualified statewide investments.

Metropolitan Areas (Limited Review)

USAmeriBank received a low satisfactory rating for the service test in the state of Alabama. Performance in the Auburn assessment area was below that of the state, but performance in the Montgomery assessment area was better than USAmeriBank's statewide performance due to stronger retail services. The Auburn assessment area's performance can be attributed to weaker retail and community development services performance.

The performance in the metropolitan limited-scope assessment areas did not change the overall state rating.

Nonmetropolitan Areas (Limited Review)

The following non-metropolitan assessment areas were reviewed using limited-scope examination procedures.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ALABAMA NON-METROPOLITAN ASSESSMENT AREAS

- **Coosa-Tallapoosa Assessment Area (Coosa and Tallapoosa Counties)**
 - As of December 31, 2014, USAmeriBank operated three branches in the assessment area, representing 20.0 percent of its branches in Alabama.
 - As of June 30, 2014, the bank had \$286.7 million in deposits in this assessment area, representing a market share of 18.4 percent and 31.5 percent of USAmeriBank's total deposits in Alabama.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with the bank's performance in the state. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendix G for information regarding these areas.

Nonmetropolitan Assessment Areas			
Assessment Areas	Lending Test	Investment Test	Service Test
Coosa-Tallapoosa	<u>Above</u>	<u>Below</u>	<u>Above</u>

For the lending test, performance in the Coosa-Tallapoosa assessment area was above the bank's performance in the state. A stronger geographic distribution of loans contributed to better performance in the Coosa-Tallapoosa assessment area. Higher levels of community development lending also improved the bank's lending performance in this assessment area relative to the state.

For the investment test, performance in the Coosa-Tallapoosa assessment area was weaker than the bank's performance in the state due to a lower level of qualified investments relative to the bank's operations in the assessment area.

For the service test, performance in Coosa-Tallapoosa was above the statewide performance due to stronger retail and community development services performance.

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

Tampa, Florida

CRA RATING FOR FLORIDA: **Satisfactory**

The Lending Test is rated: **Low Satisfactory**

The Investment Test is rated: **High Satisfactory**

The Service Test is rated: **High Satisfactory**

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects good penetration throughout the Florida full-scope assessment area. The distribution of loans by borrower income and revenue size of business reflects poor penetration among customers of different income levels and businesses of different revenue sizes.
- Lending activity reflects adequate responsiveness to assessment area credit needs.
- The bank made a relatively high level of community development loans within the Florida full-scope assessment area.
- The bank provided a significant level of qualified community development investments and grants in the Florida full-scope assessment area.
- Retail services are accessible to the bank's geographies and individuals of different income levels in the Florida full-scope assessment area.
- The bank provided an excellent level of community development services throughout the Florida full-scope assessment area.

Tampa, Florida

SCOPE OF EXAMINATION

A full-scope review was conducted for the following assessment area in the State of Florida:

- Tampa

No limited-scope reviews were conducted for the State of Florida.

The time period, products, and affiliates evaluated for this assessment area is consistent with the scope discussed in the institution section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

As of June 30, 2014, USAmeriBank had \$1.5 billion in deposits in Florida accounting for 63.0 percent of USAmeriBank's total deposits. USAmeriBank operated 12 branch offices in Florida, as of December 31, 2014, representing 44.4 percent of the bank's total branches. Lending activity in Florida was commensurate with deposit activity during the review period. HMDA lending in Florida accounted for 39.1 percent of total institutional HMDA-reportable lending by number of loans while CRA small business lending accounted for 62.8 percent of the bank's total CRA small business lending. Combined HMDA-reportable and CRA small business lending in Florida accounted for 49.5 percent of the bank's total lending activity.

The following table shows lending activity from January 1, 2013, through December 31, 2014.

Statewide Summary of Lending Activity
Assessment Areas Located in
Florida

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	249	57.60%	\$100,143	49.30%
HMDA Refinance	137	31.70%	\$54,121	26.60%
HMDA Home Improvement	14	3.20%	\$3,268	1.60%
HMDA Multi-Family	32	7.40%	\$45,688	22.50%
Total HMDA	432	44.40%	\$203,220	53.30%
Total Small Business	542	55.60%	\$177,756	46.70%
TOTAL LOANS	974	100.00%	\$380,976	100.00%

Originations and Purchases

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

The lending test rating in Florida is low satisfactory. Overall, performance in the state with regard to the geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of loans by borrower income reflects poor penetration among customers of different income levels and businesses of different sizes. Additionally, USAmeriBank made a relatively high level of community development loans in Florida.

Tampa, Florida

During the review period, USAmeriBank reported 542 small business loans and 432 HMDA loans in Florida. As such, small business lending was given slightly greater weight when determining the lending test rating for Florida. Overall, 49.5 percent of the bank's total HMDA and small business lending occurred in Florida. The rating for the state is based on performance in the Tampa full scope assessment area, which is the only assessment area in the state.

Details of the bank's HMDA and small business lending and information regarding lending by peers can be found in Appendix F.

Geographic and Borrower Distribution

The geographic distribution of USAmeriBank's HMDA and small business loans is good and the distribution of loans by borrower income and revenue size of businesses is poor. As noted above, the rating for the state of Florida is derived from the Tampa assessment area. A detailed discussion of the borrower and geographic distribution of lending for this assessment area is included in the next section of this report.

Community Development Lending

USAmeriBank made a relatively high level of community development loans in Florida. The bank originated 33 community development loans totaling \$45.7 million in Florida; all loans were originated in the Tampa assessment area. More information on community development loans can be found in the next section of this report.

Investment Test

The investment test rating for Florida is high satisfactory. The bank made significant use of qualified investments and contributions with investments of \$9.4 million and contributions \$207,438. All of the bank's investments benefited the Tampa assessment area. Additional details regarding specific investments and contributions can be found in the full-scope assessment area section.

Service Test

The service test rating for Florida is high satisfactory.

Retail Services

Delivery systems, including ATMs and branch office locations, are accessible to the bank's geographies and individuals of different income levels in the full scope assessment area. Overall, banking services and hours of operation do not vary in a way that inconveniences the assessment areas, including low- and moderate-income geographies or low- and moderate-income individuals. The bank opened two branches in moderate-income tracts in the Tampa assessment area and did not close any branches in this area during the review period. Therefore, the bank positively impacted the accessibility of its delivery systems for low- and moderate-income geographies and/or low- and moderate-income individuals. Additional details on the bank's retail services can be found in the full-scope assessment area section.

Community Development Services

The bank provided an excellent level of community development services that benefit residents and small businesses in the assessment area.

Additional details on the bank's retail and community development services can be found in the full-scope assessment area section of this report.

Tampa, Florida

METROPOLITAN AREA *(Full-Scope Review)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TAMPA, FLORIDA ASSESSMENT AREA

Overview

The bank's only Florida assessment area - Tampa, includes Hillsborough and Pinellas counties, which comprise part of the Tampa-St. Petersburg-Clearwater Florida MSA. The concentration of branches and deposits in the Tampa assessment area is greater than any of the bank's other assessment areas; as of December 31, 2014, there were 12 branches with 63.0 percent of the institution's deposits. One branch is located in a low-income census tract and two branches are located in moderate-income census tracts. This market represents the second largest concentration of combined HMDA and CRA small business lending at 49.5 percent.

The Tampa assessment area is a large banking market dominated by several large institutions. According to the June 30, 2014 FDIC Summary of Deposits Report, there are 60 financial institutions operating 622 branch locations in the assessment area with a total of \$58.2 billion in deposits. USAmeriBank is an active participant, and ranks 8th in deposit market share at 2.7 percent of total deposits (\$1.5 billion). Raymond James has the largest deposit market share at 17.7 percent followed by Bank of America at 16.0 percent, and Wells Fargo Bank at 14.6 percent.

For HMDA-reportable lending, USAmeriBank ranked 40th out of 699 reporters in 2013 with 0.4 percent of all HMDA-reportable loans and 64th out of 720 reporters in 2014 with 0.3 percent of loans. The bank's HMDA lending in this assessment area declined by 34.0 percent between 2013 and 2014. Wells Fargo Bank, Bank of America, and JPMorgan Chase Bank were consistently the top HMDA lenders in the assessment area.

In 2013, USAmeriBank ranked 19th out of 115 CRA reporters by originating 0.7 percent of all CRA loans. In 2014, USAmeriBank ranked 20th out of 147 reporters with 0.6 percent of all CRA loans. From 2013 to 2014, the bank's CRA small business loan production increased slightly from 267 loans to 275 loans.

Population and Income Characteristics

Population growth in the assessment area has been somewhat uneven. Growth in Hillsborough County was robust from 2000 to 2010, while Pinellas experienced a slight decline in population. Population increases were seen in both counties between 2010 and 2013. As of 2013, the assessment area's total population was approximately 2.2 million people, representing 11.4 percent of the statewide population. Hillsborough County, where Tampa is located, is the most densely populated county in the assessment area with approximately 1.2 million residents, representing more than 57.8 percent of the assessment area's total population.⁴⁴

For purposes of classifying borrower income, this evaluation uses the FFIEC median family income. The following chart sets forth the estimated median family income for the years 2013 and 2014 for the MSA, which increased slightly from \$56,800 to \$57,400 during the review period. It also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

⁴⁴ US Census Bureau. Accessed through PolicyMap. Accessed December 8, 2015. Available at www.policymap.com.

Tampa, Florida

Borrower Income Levels Tampa-St. Petersburg-Clearwater, FL MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2013	\$56,800	0 - \$28,399	\$28,400 - \$45,439	\$45,440 - \$68,159	\$68,160 - & above
2014	\$57,400	0 - \$28,699	\$28,700 - \$45,919	\$45,920 - \$68,879	\$68,880 - & above

Housing Characteristics

The housing crisis significantly impacted the Tampa assessment area. In the population center of Hillsborough County, single-family median home prices peaked in 2006 at \$237,000 and then rapidly declined, falling to \$145,000 in 2011; a 38.8 percent drop. Home prices have rebounded and the 2014 median home sales price for single-family homes was \$165,000. Median condo prices were hit even harder, dropping 69.4 percent from their peak price of \$179,900 in 2007 to \$55,000 in 2011; 2014 data indicates the condo market is also recovering.⁴⁵ Despite lower sales prices, housing remains unaffordable for many residents. The housing affordability ratio in Hillsborough and Pinellas counties is 31.0 and 30.1, respectively, compared to the state of Florida at 29.3, indicating that housing is slightly more affordable than statewide but affordability overall is low.⁴⁶

Census data indicates that there are 1,029,094 housing units in the assessment area, of which 56.2 percent are owner-occupied, 28.2 percent are rental units and 15.6 percent are vacant. While a majority of units are owner-occupied, more than half of housing units in low-income tracts and about one-third of units in moderate-income tracts are rental units, indicating reduced opportunities for mortgage origination in these geographies. In 2010, the median age of housing stock across the assessment area is 32 years, although units in low-income tracts are considerably older at 40 years.⁴⁷

The development of single-family homes across the assessment has declined significantly, from a high of 15,161 permit issuances in 2005 to a low of 2,730 in 2009. More recently, there has been an uptick in permit activity, with issuances reaching 5,106 in 2014. The majority of activity is occurring in Hillsborough County. Multi-family development with two to over five units, an important source of housing in the assessment area, experienced a similar trend, from a high of 630 permit issuances in 2003 to a low of 71 in 2011. Multi-family activity has since rebounded, reaching 172 permits issued in 2014.⁴⁸

Mortgage delinquencies and reduced loan demand continue to place strains on the local housing market. From January 2013 to December 2014, the percentage of seriously delinquent mortgages in the assessment area, which includes loans more than 90 days past due and loans in the foreclosure process, fell from 14.5 percent to 7.9 percent. While the trend is positive, the percentage is still high.⁴⁹ In October 2015, the Tampa MSA ranked 10th among the nation's 20 largest metro areas for foreclosure activity with 1 in every 543 homes in the MSA in

⁴⁵ Shimberg Center. Florida Housing Data Clearinghouse. Accessed December 8, 2015. Available at <http://flhousingdata.shimberg.ufl.edu/a/profiles?action=geo>.

⁴⁶ Based on 2013 census data, the affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means housing is considered more affordable and a lower ratio means the housing is considered less affordable.

⁴⁷ US Census Bureau. Accessed through Policy Map. Accessed December 8, 2015. Available at www.policymap.com

⁴⁸ Ibid.

⁴⁹ Federal Reserve Bank of Atlanta calculations of data provided by LPS.

Tampa, Florida

some stage of foreclosure, compared to 1 in every 1,147 housing units nationwide.⁵⁰ Furthermore, Home Mortgage Disclosure Act data for the assessment area show that demand for home purchase loans of owner-occupied, one-to-four family dwellings continues to be weak, declining from a high of 50,257 loans in 2005 to 14,128 loans in 2011; a 71.9 percent decrease. Loan activity increased in 2012 and 2013 with 16,208 loans and 19,077 loans, respectively. Single-family loan refinance activity exhibited a similar trend through 2011, but nearly doubled from 15,086 refinances in 2011 to 30,098 in 2012, indicating resurgence in this type of lending as home prices recover and homeowners have increased equity in their homes.⁵¹

Employment and Economic Conditions

The city of Tampa is Florida's third most populous city and Hillsborough County is Florida's fourth most populous county. The Tampa area is a well-known tourist destination with an estimated 21 million people visiting Tampa/Hillsborough County in 2014.⁵² Top employers in the MSA include MacDill Air Force Base, Verizon Communications, the University of South Florida (USF), and Tampa International Airport.⁵³ The area is also home to multiple professional sports teams, and the theme-park Busch Gardens.

MacDill Air Force Base (AFB) is a major economic engine for the Tampa area. Employing approximately 18,853 people, the air force base is the largest employer in Tampa. The military estimates that the economic impact of MacDill AFB on the Greater Tampa Bay Region was \$2.9 billion as of 2014.⁵⁷ As of November 2015, total nonfarm employment in the assessment area was nearly 1.2 million jobs.⁵⁸ Industries with the largest number of employees include trade; transportation and utilities; professional and business services; and education and health services. Government also has a large presence in the Tampa MSA, providing nearly 153,000 jobs. From September 2014 to September 2015, the largest job gains were in the leisure and hospitality services sector followed by the construction sector and the greatest job losses were in the mining and logging sector and information sector.⁵⁹

Unemployment continues to present challenges for the local economy but the situation is improving as shown in the table below. The Tampa assessment area's unemployment rate decreased in Hillsborough and Pinellas counties from 6.7 percent and 6.8 percent, respectively in 2013, to 5.8 percent in 2014, which is on par with the statewide trend. According to October 2015 estimates, Tampa and the state of Florida saw an additional drop in unemployment rates at 4.8 percent and 5.1 percent, respectively. This is the lowest unemployment rate the state has seen in seven years.⁶⁰

⁵⁰ Orlando Business Journal. Accessed December 8, 2015. Available at

http://www.bizjournals.com/orlando/morning_call/2015/11/see-which-c-fla-metro-had-the9th-highest.html

⁵¹ FFIEC. Home Mortgage Disclosure Act. Accessed December 8, 2015. Available at <http://www.ffiec.gov/hmda/>.

⁵² Visit Tampa Bay. Accessed December 8, 2015. Available at <http://www.visittampabay.com/media-room/tampa-tourism-statistics-research/>

⁵³ Federal Reserve Bank of Atlanta analysis of data provided by the Bureau of Labor Statistics.

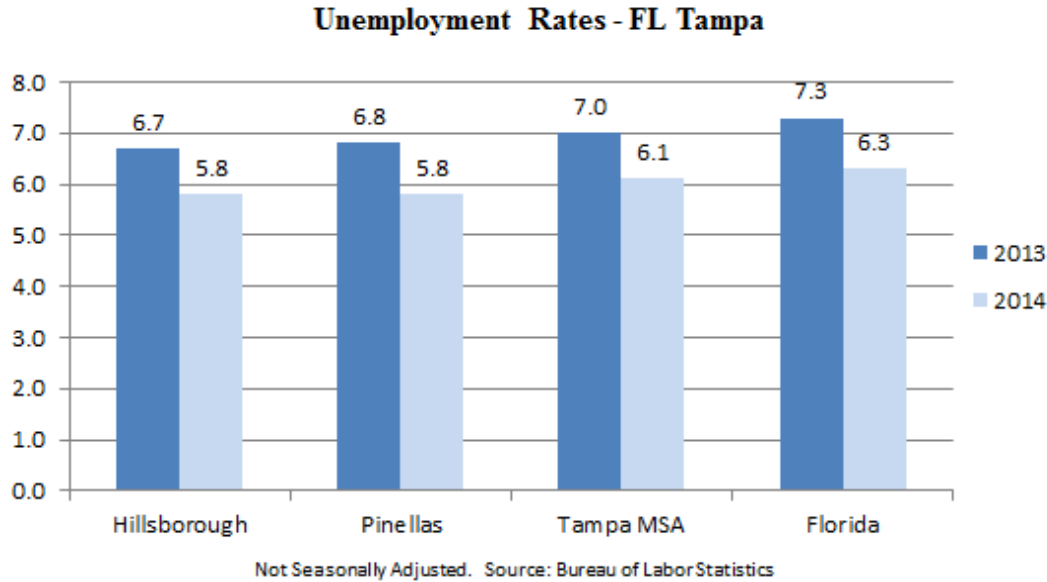
⁵⁷ MacDill Air Force Base. 2014 Economic Impact Statement. Accessed December 8, 2015. Available at <http://www.macdill.af.mil/shared/media/document/AFD-151015-010.pdf>

⁵⁸ Federal Reserve Bank of Atlanta analysis of data provided by the Bureau of Labor Statistics.

⁵⁹ US Bureau of Labor Statistics. Tampa Area Economic Summary. Accessed December 8, 2015. Available at http://www.bls.gov/regions/southeast/summary/BLSSummary_Tampa.pdf.

⁶⁰ Tampa Bay Times. Accessed December 8, 2015. Available at <http://www.tampabay.com/news/business/workinglife/florida-unemployment-hits-7-year-low-with-spurt-in-job-creation/2254769>

Tampa, Florida



Community Contacts and Community Development Opportunities

There are a variety of community development needs impacting the low- and moderate-income residents of the assessment area and numerous organizations serving those needs. To better understand the community development and economic landscapes, community development experts were contacted. These individuals discussed the various opportunities and challenges across the region as well as how financial institutions can be responsive to local community development needs through lending, investment and/or service activities. Bank management also provided input on the performance context issues impacting the assessment area. This information is reflected in the appropriate sections below.

Affordable Housing

Recovery from the effects of the nationwide housing crisis has defined the Tampa housing market in recent years. As a result of plummeting housing values in 2008 and 2009, large institutional investors moved into the market and purchased homes in bulk. It is estimated that these investors bought more than \$800 million in distressed residential properties during and after the recession. Many of these units have been renovated and converted into rentals, thereby reducing the supply of housing units available for sale. While this helped stabilize the area's housing market overall and individual neighborhoods hard hit by rapidly falling housing values, there are now concerns about the impact to the housing market if these investors begin selling properties en masse in order to realize a profit as real estate values rise. Additionally, some local affordable housing advocates argue that these bulk property purchases have artificially raised housing prices, making homeownership unaffordable for many lower-income and first-time homebuyers.⁶¹

Housing costs are a challenge for many homeowners and renters across the assessment area. For example, in densely populated Hillsborough County, 32.7 percent of homeowners and 52.8 percent of renters are considered cost-burdened, meaning that homeownership or rental costs account for more than 30.0 percent of household income. In Pinellas County, 34.3 percent of homeowners and 52.4 percent of renters are considered cost-burdened. Housing affordability is challenging in both Pinellas and Hillsborough counties as only 22.3 percent

⁶¹ Tampa Bay Times. *Blackstone, big investors slow their \$800 million Tampa Bay home-buying binge*. Accessed December 8, 2015. Available at <http://www.tampabay.com/news/business/realestate/blackstone-big-investors-slow-their-800-million-tampa-bay-home-buying-binge/2145419>

Tampa, Florida

and 17.4 percent of homes were affordable to a low- and moderate-income family of four in 2013.⁶² The need for affordable housing is confirmed by the Hillsborough County Consolidated Plan. According to the report, approximately 32.0 percent of households in Hillsborough County have housing problems, whether cost burdened, overcrowded or lacking complete kitchen or plumbing facilities; 43.8 of the households with unmet needs are renters. Other areas of focus include homelessness, poverty reduction, and housing opportunities for people with AIDS.⁶³

A community contact specializing in affordable housing described the local economy as challenged but improving, particularly the housing market in the assessment area. There are currently thousands of people seeking affordable housing but continue to be on waitlists because of the lack of funding and resources for low- and moderate-income people and organizations who support them. Additionally, after the economic downturn, the contact stated it has been difficult for low- and moderate-income people to obtain loan modifications and refinancing on homes because banks are holding homeowners to the pre-recession, inflated appraisal values rather than the current market values of their homes. The Neighborhood Stabilization Program (NSP) funds were particularly helpful in the assessment area; thus, the community contact suggested that the federal government or financial institutions follow-up and consider funding programs with a similar mission.

The contact indicated that there are plenty of opportunities for banks to get involved in meeting the credit needs of the assessment area. These opportunities include partnering with non-profit organizations to support them rather than offering one-time donations which don't support a sustainable, long-term effect on the community. Also, financial institutions can help the community by offering loan products that low- and moderate-income people can qualify for and also offer financial education and ways to repair credit for those affected by the economic downturn whose credit may have been affected by unemployment, bankruptcy, and/or foreclosure.

There are several other opportunities for banks to engage in addressing the affordable housing needs. First, there are several CDFIs located in Tampa which administer loan funds and support affordable housing development. Banks can partner with CDFIs for community development loan and investment opportunities. In addition, banks can work with developers through low-income housing tax credit (LIHTC) program, which provided an estimated \$43.0 million in tax credits to the state of Florida in 2013 for the provision of multi-family affordable rental housing.⁶⁴

Neighborhood Stabilization

The state of Florida received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds were made available to help stabilize communities hard hit by the foreclosure crisis. The City of Tampa received \$13.6 million under the NSP1 allocation process and \$4.7 million under NSP3. NSP1 funds were acquired to purchase and rehabilitate residential properties in targeted neighborhoods with high incidences of foreclosure, resulting in affordable rental and home purchase units for income-qualified individuals. The NSP3 funds are being used for targeted rehabilitation of multi-family rental unit foreclosures.⁶⁵ Other government entities in the assessment area received NSP funding as well. While NSP programs are in their final stages, the associated projects continue to present opportunities for financial institutions to engage in neighborhood stabilization projects in partnership with local governments.

⁶² US Census Bureau. Accessed through Policy Map. Accessed December 8, 2015. Available at www.policymap.com.

⁶³ Hillsborough County, Florida. Five Year Consolidated Plan. Accessed December 8, 2015. Available at <http://www.hillsboroughcounty.org/DocumentCenter/View/661>

⁶⁴ Novogradac and Company LLP. "Affordable Housing Resource Center." Accessed on December 8, 2015. Available at http://www.novoco.com/low_income_housing/lihtc/federal_lihtc_2013.php

⁶⁵ US Department of Housing and Development. "Neighborhood Stabilization Program, NSP Grantees". Accessed on December 8, 2015. Available at <https://www.hudexchange.info/programs/nsp/>.

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Hillsborough County's Consolidated Plan discusses neighborhood stabilization activities. For example, assistance to elderly households has been determined to be a high priority for Hillsborough County. Elderly households are living on a fixed income and are often unable to afford recurring maintenance and necessary renovations to sustain their home. Homes falling into disrepair create blight for the surrounding neighborhood, adversely impacting the neighborhood's stability. Therefore, Hillsborough County places a priority on assisting the elderly with maintaining owner-occupied residences within the community, resulting in a benefit to both the household and the neighborhood where it is located.⁶⁶

Economic Development

Hillsborough County is home to two enterprise zones (EZ) and there is one located in Pinellas County. An EZ is a specific geographic area targeted for economic revitalization. EZs encourage economic growth and investment in distressed areas by offering tax advantages and incentives to businesses locating within the zone boundaries. Some of the targeted industries in Florida EZs include but are not limited to financial services, life sciences, manufacturing, and information technology.⁶⁷

Small businesses play an important role in the Tampa economy but lending to small businesses in the assessment area remains well below peak volumes. In the assessment area, the number of small business loan originations peaked in 2007 at 120,255 and then plummeted to 30,244 originations in 2010, a decline of nearly 75.0 percent. From 2010 to 2013, annual small business loan originations increased by 28.5 percent. The percentage of loans to businesses with revenues of \$1 million or less was also declining through 2010 but has since rebounded. These recent trends in small business lending indicate growing opportunities for banks to deepen relationships with small businesses by providing technical assistance and increasing lending volumes in order to create jobs and further stabilize the economy.⁶⁸

USF operates a small business development center (SBDC) in the assessment area. As an SBA-funded entity, the SBDC specializes in providing technical assistance and training to small businesses. The SBDC also partners with local government economic development entities throughout the area, institutions of higher learning, and GrowFL to provide training, capacity-building resources and networking opportunities to its small business clientele. As such, the SBDC affords an opportunity for financial institutions to work directly with small businesses in the local area by providing technical assistance and access to credit.

A community contact specializing in providing resources to small businesses within the assessment area noted several other opportunities for financial institutions to get involved. The contact has seen a recent uptick in the number of people interested in starting small businesses. Entrepreneurs who couldn't start businesses during the economic downturn, as well as retirees, veterans and the unemployed are coming forward with their ideas for new businesses. The opportunities for financial institutions in the area to support small businesses include providing technical assistance and financial education to entrepreneurs. Additionally, financial institutions can help the community by offering micro loans that bridge the gap in financing and ultimately aid small businesses in securing mainstream financing.

⁶⁶ Hillsborough County, Florida. Five Year Consolidated Plan. Accessed on December 8, 2015. Available at <http://www.hillsboroughcounty.org/DocumentCenter/View/661>.

⁶⁷ Florida Enterprise Zones. Accessed on December 8, 2015. . Available at http://floridaenterprisezones.com/PageView.asp?PageType=R&edit_id=1.

⁶⁸ FFIEC. Community Reinvestment Act. Accessed through PolicyMap. Accessed December 8, 2015. Available at www.policymap.com

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Financial Stability

Households in the Tampa area are struggling as evidenced by participation in the food stamps program. The percentage of the population eligible for food stamps across the assessment area has been increasing in recent years at a rate greater than the state. Over 20.0 percent of residents in Hillsborough County and 16.3 percent of Pinellas County residents received food stamps in 2012. Poverty rates also indicate income challenges for residents. From 2000 to 2012, poverty rates increased in all counties inside the assessment area. Poverty rates in 2013 ranged from a low of 14.1 percent in Pinellas County to a high of 16.8 percent in Hillsborough County. The 2013 statewide poverty rate was 16.3 percent.⁷²

One community contact noted that many lower-income individuals continue to struggle with unemployment and need financial education and assistance with rebuilding credit. The Bank On initiative was also discussed as a means for financial institutions to be responsive to local community development needs. Bank On connects unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. According to the FDIC's 2013 National Survey of Unbanked and Underbanked Households, 4.9 percent of households in the Tampa MSA are unbanked, meaning they have no checking or savings account. Additionally, 19.8 percent of households in the assessment area are considered underbanked, meaning they have a bank account but continue to rely on alternative financial services, like check-cashing services, payday loans, rent-to-own agreements or pawn shops.⁷³ BankOn Tampa Bay helps local residents learn to manage their money and save for the future. Several financial institutions with a presence in the local market participate in the program.⁷⁴

Demographic Characteristics

The following table provides demographic information for the Tampa assessment area used to analyze CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

⁷² US Census Bureau. Accessed through PolicyMap. Accessed December 8, 2015. Available at www.policymap.com.

⁷³ 2013 FDIC National Survey of Unbanked and Underbanked Households. Accessed December 8, 2015. Available at: <https://www.economicinclusion.gov/>.

⁷⁴ BankOn St. Pete. Accessed December 8, 2015. Available at <http://www.bankonstpete.org/>.

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Combined Demographics Report

Assessment Area: FL Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	5.3	19,583	3.7	7,161	36.6	105,850	20.1
Moderate-income	124	21.9	109,511	20.8	18,240	16.7	93,400	17.8
Middle-income	230	40.6	215,857	41.0	17,779	8.2	102,582	19.5
Upper-income	172	30.3	180,927	34.4	7,134	3.9	224,056	42.6
Unknown-income	11	1.9	10	0.0	0	0.0	0	0.0
Total Assessment Area	567	100.0	525,888	100.0	50,314	9.6	525,888	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	40,450	12,122	2.1	30.0	21,456	53.0	6,872	17.0
Moderate-income	231,605	103,153	17.8	44.5	88,971	38.4	39,481	17.0
Middle-income	429,357	249,535	43.2	58.1	117,133	27.3	62,689	14.6
Upper-income	327,629	213,405	36.9	65.1	62,268	19.0	51,956	15.9
Unknown-income	53	0	0.0	0.0	53	100.0	0	0.0
Total Assessment Area	1,029,094	578,215	100.0	56.2	289,881	28.2	160,998	15.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,161	3.1	3,554	2.9	431	5.7	176	4.3
Moderate-income	25,304	18.9	22,507	18.4	1,904	25.3	893	21.8
Middle-income	52,450	39.2	47,790	39.2	3,145	41.7	1,515	36.9
Upper-income	51,582	38.6	48,046	39.4	2,030	26.9	1,506	36.7
Unknown-income	185	0.1	144	0.1	28	0.4	13	0.3
Total Assessment Area	133,682	100.0	122,041	100.0	7,538	100.0	4,103	100.0
Percentage of Total Businesses:			91.3		5.6		3.1	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	23	2.6	21	2.5	2	4.1	0	0.0
Moderate-income	143	16.1	132	15.8	9	18.4	2	50.0
Middle-income	392	44.0	371	44.3	20	40.8	1	25.0
Upper-income	332	37.3	313	37.4	18	36.7	1	25.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	890	100.0	837	100.0	49	100.0	4	100.0
Percentage of Total Farms:			94.0		5.5		.4	

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

USAmeriBank's lending performance in the Tampa assessment area is adequate. The geographic distribution of loans reflects good penetration throughout the assessment area. However, the distribution of borrowers reflects poor penetration among borrowers of different income levels and businesses of different revenue sizes. In addition, the bank made a good level of community development loans.

During the review period, USAmeriBank reported 432 HMDA loans and 542 small business loans in the Tampa assessment area. As such, small business lending received greater weight for the lending test assessment in Tampa. The Tampa assessment area accounted for 49.5 percent of the bank's combined HMDA and small business loan originations. In comparison, 63.0 percent of the bank's total deposits are in this assessment area.

Details of the bank's mortgage and small business lending and information regarding lending by peers can be found in Appendix F.

Geographic Distribution of Loans

For this analysis the geographic distribution of small business and HMDA lending was compared with available demographic information. Performance context information and aggregate lending data were also taken into consideration. For instance, unemployment rates, poverty rates, the level of owner-occupied units, and the volume of small businesses in low- and moderate-income tracts were issues considered when assessing the bank's lending performance. Considering all of these factors, USAmeriBank's geographic distribution of loans reflects good penetration throughout the assessment area.

Small Business Loans

Small business lending in low-income tracts was excellent. The percentage of small business loans in low-income tracts was greater than the distribution of businesses operating in low-income tracts throughout the review period. Additionally, the bank's performance was significantly greater than aggregate lenders during both years of the review period.

Small business lending in moderate-income tracts was also excellent. Throughout the review period, USAmeriBank's lending performance was greater than the distribution of businesses operating in moderate-income tracts. Additionally, USAmeriBank outperformed aggregate lenders in both 2013 and 2014.

Home Purchase Loans

Home purchase lending in low-income tracts was adequate. Throughout the review period, the percentage of home purchase loans originated in low-income tracts was less than the percentage of owner-occupied units located in these tracts. However, USAmeriBank's lending performance was comparable to aggregate lender performance in both years of the review period.

Home purchase lending in moderate-income tracts was poor. Throughout the review period, the percentage of home purchase loans originated in moderate-income tracts was less than the percentage of owner-occupied units located in these tracts. In 2013, USAmeriBank underperformed aggregate lenders with 2.8 percent of its home purchase loans in moderate-income tracts compared to 11.7 percent of aggregate lender loans. However, USAmeriBank's performance relative to aggregate lenders improved in 2014.

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Home purchase lending in middle-income tracts was less than the percentage of owner-occupied units in these tracts, while lending in upper-income tracts exceeded the percentage of owner-occupied units in those tracts throughout the review period.

Home Refinance Loans

Home refinance lending in low-income tracts was poor. Throughout the review period, the percentage of home refinance loans originated in low-income tracts was less than the percentage of owner-occupied units located in these tracts. However, USAmeriBank lending performance was similar to aggregate lender performance in 2013. USAmeriBank did not originate home refinance loans in 2014, while the aggregate lenders originated 1.4 percent of its home refinance loans in these tracts, indicating that there may a limited demand for home refinancing loans in low-income tracts in the assessment area.

Home refinance lending in moderate-income tracts was adequate. USAmeriBank's performance was less than the percentage of owner-occupied units located in these tracts throughout the review period. The bank's performance was also less than the aggregate in 2013, but greater than aggregate performance in 2014.

Home refinance lending in middle-income tracts was less than the percentage of owner-occupied units in these tracts, while lending in upper-income tracts was greater than the percentage of owner-occupied units throughout the review period.

Home Improvement Loans

Home improvement lending in low-income tracts was adequate. USAmeriBank originated only three home improvement loans in these tracts during the review period. However, the bank's home improvement lending was greater than the percentage of owner-occupied units in these tracts and slightly greater than aggregate lenders in both years of the review period.

Home improvement lending in moderate-income tracts was also adequate. Lending performance in this category was less than the percentage of owner-occupied units located in moderate-income tracts. USAmeriBank's performance was slightly less than the aggregate lender performance in 2013, but greater than the aggregate lenders in 2014.

Home improvement lending in middle-income tracts was less than the percentage of owner-occupied units in these tracts, while lending in upper-income tracts was greater than the percentage of owner-occupied units throughout the review period.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans based on borrower income or gross annual revenues was poor. For this analysis, the distribution of small business lending across business revenue sizes and HMDA lending across borrower income levels was compared to available demographic information. Performance context issues were also considered as well as the performance of other banks.

Small Business Loans

The distribution of small business loans to businesses of different sizes was adequate. During the review period, 38.7 percent of small business loan originations were originated to businesses with revenues of \$1 million or less, which was substantially less than the concentration of small businesses in the assessment area (91.3 percent of total businesses). Additionally, USAmeriBank's performance was slightly less than aggregate lending performance in both years of the review period. However, 55.0 percent of the bank's small business

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loans in both years of the review period were in amounts of \$250,000 or less, indicating a willingness to lend in the small amounts typically requested by small businesses.

Home Purchase Loans

Home purchase lending to low-income borrowers was poor. The bank's home purchase lending to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. The bank's performance was also less than aggregate lenders in both 2013 and 2014.

Home purchase lending to moderate-income borrowers was also poor. Throughout the review period, home purchase lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area. Additionally, the bank's lending in this category was less than the aggregate lenders in both 2013 and 2014.

Home purchase lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families in the assessment area throughout the review period.

There are a number of factors impacting home purchase lending performance to low- and moderate-income households. First, as discussed earlier, the bank experienced an institution-wide decline in HMDA lending due to an internal restructuring. In addition, as seen in the above "Combined Demographics Report", 20.1 percent of the families in the area are low-income. Using the assumption that a borrower can afford a home for approximately three times annual income, based on the 2014 FFIEC estimated median family income for the Tampa-St. Petersburg-Clearwater, Florida MSA, an individual at the top of the low-income bracket (\$28,699) can afford a \$86,097 home. In Tampa, the median home sales price in 2014 was \$165,000; clearly opportunities for low-income households to purchase homes are limited.

Additionally, as noted above, affordable housing is a significant concern in the community, and there are many people seeking affordable housing and remain on waiting lists due to the lack of available housing units. With an insufficient supply of affordable housing, the demand for HMDA-reportable loans in low- and moderate-income geographies and by low- and moderate-income borrowers is also impacted.

Home Refinance Loans

Home refinance lending to low-income borrowers was poor. The bank's home refinance lending to low-income borrowers was less than the percentage of low-income families in the assessment area throughout the review period. Also, USAmeriBank's performance was less than aggregate lenders in 2013 and 2014.

Home refinance lending to moderate-income borrowers was also poor. The bank's home refinance lending to moderate-income borrowers was less than the percentage of moderate-income families in the assessment area, and also less than the aggregate lenders throughout the review period. However, USAmeriBank's performance improved from 2.2 percent of its home refinance loans to moderate-income borrowers in 2013, to 6.5 percent in 2014.

Home refinance lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families in the assessment area throughout the review period.

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Home Improvement Loans

Home improvement lending to low-income borrowers was very poor. The bank did not originate home improvement loans to low-income borrowers in the assessment area during the review period. Additionally, the aggregate lenders originated 9.5 percent and 11.0 percent of home improvement loans in this category in 2013 and 2014, respectively, indicating that there is loan demand from low-income borrowers in this assessment area.

Home improvement lending to moderate-income borrowers was very poor. The bank did not originate home improvement loans to moderate-income borrowers in the assessment area during the review period. This performance was also significantly less than aggregate lenders in both years of the review period.

Home improvement lending to middle-income borrowers was less than the percentage of middle-income families in the assessment area, while lending to upper-income borrowers was greater than the percentage of upper-income families in the assessment area throughout the review period.

Community Development Lending

USAmeriBank made a relatively high level of community development loans in the Tampa assessment area. The bank originated 33 community development loans totaling \$45.7 million during the review period. The majority of the community development loans financed multi-family affordable housing projects for low- and moderate-income individuals. Many of the projects financed were also located in low- or moderate-income geographies. The bank's lending was responsive to the critical need for more affordable rental housing in the assessment area. The volume of community development lending, together with the qualitative aspects of the loans, is considered good given the bank's size and presence in the assessment area.

INVESTMENT TEST

USAmeriBank's performance under the investment test in the Tampa assessment area was good. The bank invested \$9.4 million in mortgage-backed securities that directly benefited the assessment area. The bank also made 69 contributions totaling \$207,400 to organizations directly serving the Tampa assessment area. The bank invested \$100,000 in Step Up for Students, which is a state-legislated program to provide scholarships and related assistance to aid low-income K-12 students in underperforming schools. Other notable contributions included support for a financial coaching program for Habitat for Humanity clients and funding for a small business mentorship program. The bank also provided significant support for nonprofits engaged in neighborhood revitalization and affordable housing, financial education, and community services for low- and moderate-income individuals.

USAmeriBank's investments and contributions in Tampa exhibited responsiveness to several identified community development and credit needs, including affordable housing, community revitalization, and community services for LMI individuals.

SERVICE TEST

USAmeriBank's performance under the service test in the Tampa assessment area is good. Its retail and community development services reflect good responsiveness to the needs of the assessment area.

Retail Services

USAmeriBank's delivery systems in the assessment area are accessible to the bank's geographies and individuals of different income levels. The distribution of 12 branch offices and 13 ATMs as of December 31, 2014, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank has one branch in a low-income tract representing 8.3 percent of total branches and

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two in moderate-income tracts representing 16.7 percent of branches. For comparison purposes, 2010 U.S. Census data indicates 3.9 percent of households and 3.1 percent of businesses were located in low-income census tracts and 22.1 percent of households and 18.9 percent of businesses were located in moderate-income communities. During the review period, the bank opened two branches in moderate-income census tracts; thus, the bank's record of opening and closing branches increased the accessibility of its delivery systems, particularly to low- and moderate-income geographies or to low- and or moderate-income individuals.

Alternative delivery systems, such as ATMs, toll-free telephone and text banking, and online banking, were also considered in determining accessibility. Banking services and hours of operations do not vary in a way that inconveniences the assessment area, including in low- and moderate-income geographies or to low- and moderate-income individuals. Bank products, services, and standard business hours are consistent throughout the assessment area.

Geographic Distribution of Branches & ATMS

Assessment Area: FL Tampa

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extended Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	1	8.3%	0	0	1	0	0	Total	1	7.7%	1	11.1%	0	0	0	0.0%	0	0	30	5.3%	3.9%	3.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	2	16.7%	2	0	2	0	0	Total	2	15.4%	2	22.2%	2	0	0	0.0%	0	0	124	21.9%	22.1%	18.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	5	41.7%	0	0	5	0	0	Total	6	46.2%	4	44.4%	1	0	2	50.0%	0	0	230	40.6%	42.2%	39.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	4	33.3%	0	0	3	0	0	Total	4	30.8%	2	22.2%	0	0	2	50.0%	0	0	172	30.3%	31.8%	38.6%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	11	1.9%	0.0%	0.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	12	100.0%	2	0	11	0	0	Total	13	100.0%	9	100.0%	3	0	4	100.0%	0	0	567	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

USAmeriBank provided an excellent level of community development services in the assessment area. During the review period, USAmeriBank employees provided 655 service hours in various capacities for community development organizations, by participating in 77 different community development services. Of particular note, service on the board of qualified nonprofit organization represented more than 80.0 percent of the total service hours. Additionally, bank employees engaged in providing financial education (to youth and adults), small business coaching, and homeownership counseling.

Appendix A

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
HMDA and CRA lending: January 1, 2013-December 31, 2014			
Community development loans, investments, and services: January 1, 2013-June 30, 2015			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
USAmeriBank, (Clearwater, Florida)		HMDA Lending & Small Business	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	None	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
ALABAMA			
Auburn, MSA#12220	Limited-Scope Review	NA	
Birmingham, MSA#13820	Full-Scope Review	NA	
Montgomery	Limited-Scope Review	NA	
Coosa-Tallapoosa Non-MSA	Limited-Scope Review	NA	
FLORIDA			
Tampa	Full-Scope Review	Clearwater Branch 1617 Gulf to Bay Boulevard Clearwater, Florida	

Appendix B

APPENDIX B – SUMMARY OF STATE AREA RATINGS

State (or Multistate Metropolitan) Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Alabama	Needs to Improve	High Satisfactory	Low Satisfactory	Needs to Improve
Florida	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

Appendix C

APPENDIX C – ABBREVIATIONS AND DEFINITIONS

Abbreviations

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

Appendix C

Performance Definitions Regarding Lending

- Excellent - This rating is assigned to an institution with lending performance that substantially exceeds the characteristics of demographic data and aggregate performance.
- Good - This rating is assigned to an institution with lending performance that exceeds the characteristics of demographic data and aggregate performance.
- Adequate - This rating is assigned to an institution with lending performance that is comparable to the characteristics of demographic data and aggregate performance.
- Poor - This rating is assigned to an institution with lending performance that is significantly below the characteristics of demographic data and aggregate performance.
- Consistent - This term is used to describe the performance of an institution in an assessment area reviewed not using full-scope procedures when the performance is comparable to the performance in the state overall.
- *Not Consistent - This term is used to describe the performance of an institution in an assessment area reviewed not using full-scope procedures when the performance is not comparable to the performance in the state overall.

*A “not consistent” rating only illustrates the performance of an assessment area in comparison to the performance in the state as a whole. It does not necessarily indicate that the performance is less than satisfactory.

Rounding Convention

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

Appendix D

APPENDIX D - GLOSSARY

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

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

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

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

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

Effective January 19, 2010, the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation revised the definition of community development to include loans, investments, and services by financial institutions that-

- I. Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
- II. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
- III. Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Appendix D

APPENDIX D – GLOSSARY (Continued)

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

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

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

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

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

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

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

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

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

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

Appendix D

APPENDIX D – GLOSSARY (Continued)

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

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

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

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

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

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

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

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

Appendix E

APPENDIX E - GENERAL INFORMATION

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 **USAmeriBank** prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **November 30, 2015**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

Appendix F

APPENDIX F – FULL SCOPE LENDING TABLES

Geographic Distribution of HMDA Loans

Assessment Area: AL Birmingham

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2013, 2014					2013					2014						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	\$ (000s)	\$ %	\$ %	Bank	Agg	%	\$ (000s)	\$ %	\$ %
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	1.0%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.4%
	Moderate	9	2.8%	\$788	1.0%	14.6%	9	3.5%	5.6%	\$788	1.3%	2.9%	0	0.0%	6.2%	\$0	0.0%	3.5%
	Middle	77	23.8%	\$13,289	16.6%	39.1%	60	23.3%	34.6%	\$10,506	17.1%	26.9%	17	25.4%	35.8%	\$2,783	14.9%	26.7%
	Upper	238	73.5%	\$65,963	82.4%	41.2%	188	73.2%	58.8%	\$50,110	81.6%	69.7%	50	74.6%	57.2%	\$15,853	85.1%	69.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>324</i>	<i>100.0%</i>	<i>\$80,040</i>	<i>100.0%</i>	<i>100.0%</i>	<i>257</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$61,404</i>	<i>100.0%</i>	<i>100.0%</i>	<i>67</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,636</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	0.8%	\$116	0.4%	5.1%	1	0.9%	1.4%	\$116	0.5%	3.4%	0	0.0%	1.9%	\$0	0.0%	0.9%
	Moderate	4	3.1%	\$523	1.9%	14.6%	4	3.5%	6.8%	\$523	2.1%	11.5%	0	0.0%	8.1%	\$0	0.0%	4.4%
	Middle	33	26.0%	\$4,394	15.9%	39.1%	30	26.1%	34.2%	\$4,099	16.4%	28.2%	3	25.0%	37.2%	\$295	10.8%	28.6%
	Upper	89	70.1%	\$22,635	81.8%	41.2%	80	69.6%	57.5%	\$20,211	81.0%	56.8%	9	75.0%	52.7%	\$2,424	89.2%	66.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>127</i>	<i>100.0%</i>	<i>\$27,668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>115</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$24,949</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,719</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	3.7%	\$0	0.0%	1.5%	0	0.0%	4.1%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	14.6%	0	0.0%	14.1%	\$0	0.0%	5.2%	0	0.0%	13.0%	\$0	0.0%	5.9%
	Middle	3	37.5%	\$16	1.0%	39.1%	2	28.6%	40.1%	\$12	0.8%	32.1%	1	100.0%	40.9%	\$4	100.0%	31.5%
	Upper	5	62.5%	\$1,544	99.0%	41.2%	5	71.4%	42.0%	\$1,544	99.2%	61.3%	0	0.0%	42.0%	\$0	0.0%	61.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$1,560</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,556</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	13.8%	0	0.0%	20.5%	\$0	0.0%	3.9%	0	0.0%	22.0%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	27.9%	0	0.0%	29.5%	\$0	0.0%	24.5%	0	0.0%	19.8%	\$0	0.0%	4.9%
	Middle	0	0.0%	\$0	0.0%	30.9%	0	0.0%	39.8%	\$0	0.0%	35.4%	0	0.0%	38.5%	\$0	0.0%	15.6%
	Upper	0	0.0%	\$0	0.0%	27.4%	0	0.0%	10.2%	\$0	0.0%	36.2%	0	0.0%	19.8%	\$0	0.0%	74.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	1	0.2%	\$116	0.1%	5.1%	1	0.3%	1.4%	\$116	0.1%	2.3%	0	0.0%	1.4%	\$0	0.0%	0.9%
	Moderate	13	2.8%	\$1,311	1.2%	14.6%	13	3.4%	6.6%	\$1,311	1.5%	8.8%	0	0.0%	7.2%	\$0	0.0%	3.9%
	Middle	113	24.6%	\$17,699	16.2%	39.1%	92	24.3%	34.6%	\$14,617	16.6%	28.0%	21	26.3%	36.6%	\$3,082	14.4%	26.5%
	Upper	332	72.3%	\$90,142	82.5%	41.2%	273	72.0%	57.4%	\$71,865	81.7%	60.8%	59	73.8%	54.7%	\$18,277	85.6%	68.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>459</i>	<i>100.0%</i>	<i>\$109,268</i>	<i>100.0%</i>	<i>100.0%</i>	<i>379</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$87,909</i>	<i>100.0%</i>	<i>100.0%</i>	<i>80</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,359</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Appendix F

APPENDIX F – FULL SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: AL Birmingham

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2013, 2014					2013					2014						
	Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %		
Low	12	8.4%	\$2,852	7.7%	8.2%	3	5.7%	7.6%	\$1,055	7.1%	10.1%	9	10.0%	7.5%	\$1,797	8.2%	11.0%
Moderate	21	14.7%	\$4,711	12.8%	16.0%	6	11.3%	13.2%	\$1,408	9.4%	14.8%	15	16.7%	13.1%	\$3,303	15.0%	15.6%
Middle	42	29.4%	\$10,322	28.0%	32.8%	15	28.3%	28.7%	\$4,240	28.4%	27.5%	27	30.0%	28.6%	\$6,082	27.7%	26.7%
Upper	68	47.6%	\$18,979	51.5%	43.1%	29	54.7%	48.9%	\$8,211	55.1%	47.2%	39	43.3%	49.0%	\$10,768	49.1%	46.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.4%	0	0.0%	1.7%	\$0	0.0%	0.5%
<i>Total</i>	<i>143</i>	<i>100.0%</i>	<i>\$36,864</i>	<i>100.0%</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,914</i>	<i>100.0%</i>	<i>100.0%</i>	<i>90</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,950</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Birmingham

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2013, 2014					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	Count			Dollar			Count			Dollar		
		Count	Dollar	Total Businesses %	Bank		Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg			
		#	%		\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
BUSINESS REVENUE	\$1million or Less	51	35.7%	\$12,757	34.6%	88.4%	17	32.1%	44.0%	\$4,820	32.3%	34.1%	34	37.8%	46.6%	\$7,937	36.2%	37.1%
	Over \$1 Million	68	47.6%	\$18,013	48.9%	8.3%	29	54.7%				39	43.3%					
	<i>Total Rev. available</i>	119	83.3%	\$30,770	83.5%	96.7%	46	86.8%				73	81.1%					
	Rev. Not Known	24	16.8%	\$6,094	16.5%	3.2%	7	13.2%				17	18.9%					
	<i>Total</i>	<i>143</i>	<i>100.0%</i>	<i>\$36,864</i>	<i>100.0%</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>				<i>90</i>	<i>100.0%</i>					
LOAN SIZE	\$100,000 or Less	49	34.3%	\$2,510	6.8%		15	28.3%	87.1%	\$720	4.8%	25.9%	34	37.8%	89.1%	\$1,790	8.2%	26.5%
	\$100,001 - \$250,000	38	26.6%	\$6,879	18.7%		14	26.4%	5.9%	\$2,646	17.7%	16.6%	24	26.7%	5.1%	\$4,233	19.3%	16.7%
	\$250,001 - \$1 Million	56	39.2%	\$27,475	74.5%		24	45.3%	7.0%	\$11,548	77.4%	57.5%	32	35.6%	5.8%	\$15,927	72.6%	56.8%
	<i>Total</i>	<i>143</i>	<i>100.0%</i>	<i>\$36,864</i>	<i>100.0%</i>		<i>53</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,914</i>	<i>100.0%</i>	<i>100.0%</i>	<i>90</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,950</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	21	41.2%	\$1,002	7.9%													
	\$100,001 - \$250,000	12	23.5%	\$2,331	18.3%													
	\$250,001 - \$1 Million	18	35.3%	\$9,424	73.9%													
	<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>\$12,757</i>	<i>100.0%</i>													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2014 FFIEC Census Data, ACS 2010 Data, and 2014 D&B Information

Appendix F

APPENDIX F – FULL SCOPE LENDING TABLES (CONTINUED)

Borrower Distribution of HMDA Loans

Assessment Area: AL Birmingham

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2013, 2014					2013						2014					
		Bank		Families by Family Income %	Count		Dollar		Count		Dollar			Count		Dollar		
		#	%		\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	16	4.9%	\$1,305	1.6%	21.1%	14	5.4%	4.8%	\$1,086	1.8%	2.0%	2	3.0%	5.3%	\$219	1.2%	2.4%
	Moderate	42	13.0%	\$5,398	6.7%	16.5%	36	14.0%	17.8%	\$4,741	7.7%	11.3%	6	9.0%	17.7%	\$657	3.5%	11.4%
	Middle	84	25.9%	\$13,194	16.5%	19.1%	66	25.7%	20.6%	\$10,841	17.7%	17.1%	18	26.9%	21.6%	\$2,353	12.6%	18.4%
	Upper	174	53.7%	\$58,337	72.9%	43.3%	138	53.7%	36.9%	\$44,017	71.7%	48.6%	36	53.7%	36.4%	\$14,320	76.8%	51.2%
	Unknown	8	2.5%	\$1,806	2.3%	0.0%	3	1.2%	20.0%	\$719	1.2%	21.0%	5	7.5%	19.0%	\$1,087	5.8%	16.6%
	<i>Total</i>	<i>324</i>	<i>100.0%</i>	<i>\$80,040</i>	<i>100.0%</i>	<i>100.0%</i>	<i>257</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$61,404</i>	<i>100.0%</i>	<i>100.0%</i>	<i>67</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,636</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	0.8%	\$81	0.3%	21.1%	1	0.9%	4.6%	\$81	0.3%	1.7%	0	0.0%	6.7%	\$0	0.0%	3.4%
	Moderate	18	14.2%	\$2,098	7.6%	16.5%	16	13.9%	10.8%	\$2,026	8.1%	4.9%	2	16.7%	12.4%	\$72	2.6%	8.0%
	Middle	30	23.6%	\$4,573	16.5%	19.1%	27	23.5%	18.3%	\$4,104	16.4%	10.1%	3	25.0%	18.7%	\$469	17.2%	14.7%
	Upper	74	58.3%	\$20,236	73.1%	43.3%	69	60.0%	45.2%	\$18,424	73.8%	39.4%	5	41.7%	40.2%	\$1,812	66.6%	52.7%
	Unknown	4	3.1%	\$680	2.5%	0.0%	2	1.7%	21.1%	\$314	1.3%	43.9%	2	16.7%	22.0%	\$366	13.5%	21.2%
	<i>Total</i>	<i>127</i>	<i>100.0%</i>	<i>\$27,668</i>	<i>100.0%</i>	<i>100.0%</i>	<i>115</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$24,949</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,719</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	12.5%	\$4	0.3%	21.1%	0	0.0%	12.2%	\$0	0.0%	4.0%	1	100.0%	12.7%	\$4	100.0%	4.4%
	Moderate	1	12.5%	\$388	24.9%	16.5%	1	14.3%	17.8%	\$388	24.9%	10.7%	0	0.0%	17.8%	\$0	0.0%	10.2%
	Middle	1	12.5%	\$100	6.4%	19.1%	1	14.3%	25.1%	\$100	6.4%	19.3%	0	0.0%	22.5%	\$0	0.0%	15.8%
	Upper	3	37.5%	\$748	47.9%	43.3%	3	42.9%	39.4%	\$748	48.1%	57.3%	0	0.0%	39.7%	\$0	0.0%	60.0%
	Unknown	2	25.0%	\$320	20.5%	0.0%	2	28.6%	5.5%	\$320	20.6%	8.7%	0	0.0%	7.2%	\$0	0.0%	9.6%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$1,560</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,556</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	18	3.9%	\$1,390	1.3%	21.1%	15	4.0%	4.9%	\$1,167	1.3%	1.8%	3	3.8%	6.1%	\$223	1.0%	2.5%
	Moderate	61	13.3%	\$7,884	7.2%	16.5%	53	14.0%	13.9%	\$7,155	8.1%	7.1%	8	10.0%	15.8%	\$729	3.4%	9.4%
	Middle	115	25.1%	\$17,867	16.4%	19.1%	94	24.8%	19.4%	\$15,045	17.1%	12.4%	21	26.3%	20.6%	\$2,822	13.2%	15.8%
	Upper	251	54.7%	\$79,321	72.6%	43.3%	210	55.4%	41.4%	\$63,189	71.9%	41.4%	41	51.3%	37.8%	\$16,132	75.5%	47.7%
	Unknown	14	3.1%	\$2,806	2.6%	0.0%	7	1.8%	20.3%	\$1,353	1.5%	37.4%	7	8.8%	19.7%	\$1,453	6.8%	24.6%
	<i>Total</i>	<i>459</i>	<i>100.0%</i>	<i>\$109,268</i>	<i>100.0%</i>	<i>100.0%</i>	<i>379</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$87,909</i>	<i>100.0%</i>	<i>100.0%</i>	<i>80</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,359</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix F

APPENDIX F – FULL SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of HMDA Loans

Assessment Area: FL Tampa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2013, 2014					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2013					2014						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$(000s)	%	#	%	Agg %	\$(000s)	%	Agg %	#	%	Agg %	\$(000s)	%	Agg %	
HOME PURCHASE	Low	2	0.8%	\$228	0.2%	2.1%	1	0.7%	1.0%	\$128	0.2%	0.6%	1	0.9%	1.1%	\$100	0.2%	0.7%
	Moderate	14	5.6%	\$1,863	1.9%	17.8%	4	2.8%	11.7%	\$620	1.1%	7.3%	10	9.3%	12.2%	\$1,243	2.9%	7.8%
	Middle	51	20.5%	\$11,798	11.8%	43.2%	27	19.1%	39.3%	\$6,842	11.9%	30.5%	24	22.2%	40.8%	\$4,956	11.6%	32.6%
	Upper	181	72.7%	\$86,060	85.9%	36.9%	109	77.3%	48.0%	\$50,009	86.8%	61.6%	72	66.7%	45.8%	\$36,051	84.7%	59.0%
	Unknown	1	0.4%	\$194	0.2%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	0.9%	0.0%	\$194	0.5%	0.0%
	Total	249	100.0%	\$100,143	100.0%	100.0%	141	100.0%	100.0%	\$57,599	100.0%	100.0%	108	100.0%	100.0%	\$42,544	100.0%	100.0%
REFINANCE	Low	1	0.7%	\$173	0.3%	2.1%	1	1.1%	1.2%	\$173	0.5%	1.0%	0	0.0%	1.4%	\$0	0.0%	0.9%
	Moderate	12	8.8%	\$9,267	17.1%	17.8%	6	6.6%	11.4%	\$4,884	14.6%	8.9%	6	13.0%	11.7%	\$4,383	21.2%	8.0%
	Middle	24	17.5%	\$6,255	11.6%	43.2%	17	18.7%	38.9%	\$3,616	10.8%	30.9%	7	15.2%	40.6%	\$2,639	12.8%	32.6%
	Upper	100	73.0%	\$38,426	71.0%	36.9%	67	73.6%	48.6%	\$24,757	74.1%	59.2%	33	71.7%	46.4%	\$13,669	66.1%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	137	100.0%	\$54,121	100.0%	100.0%	91	100.0%	100.0%	\$33,430	100.0%	100.0%	46	100.0%	100.0%	\$20,691	100.0%	100.0%
HOME IMPROVEMENT	Low	3	21.4%	\$550	16.8%	2.1%	1	11.1%	1.5%	\$170	7.8%	0.4%	2	40.0%	1.5%	\$380	35.2%	0.7%
	Moderate	2	14.3%	\$80	2.4%	17.8%	1	11.1%	13.2%	\$7	0.3%	5.5%	1	20.0%	14.9%	\$73	6.8%	8.8%
	Middle	1	7.1%	\$13	0.4%	43.2%	1	11.1%	41.0%	\$13	0.6%	25.7%	0	0.0%	40.5%	\$0	0.0%	32.7%
	Upper	8	57.1%	\$2,625	80.3%	36.9%	6	66.7%	44.4%	\$1,997	91.3%	68.4%	2	40.0%	43.1%	\$628	58.1%	57.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	14	100.0%	\$3,268	100.0%	100.0%	9	100.0%	100.0%	\$2,187	100.0%	100.0%	5	100.0%	100.0%	\$1,081	100.0%	100.0%
MULTI FAMILY	Multi-Family Units					Low	2	11.8%	5.5%	\$660	2.8%	2.8%	3	20.0%	10.6%	\$3,938	17.9%	5.3%
	Moderate	7	21.9%	\$9,276	20.3%	27.4%	3	17.6%	22.7%	\$2,419	10.2%	18.3%	4	26.7%	25.5%	\$6,857	31.2%	30.5%
	Middle	15	46.9%	\$28,094	61.5%	37.1%	9	52.9%	41.1%	\$17,700	74.7%	62.8%	6	40.0%	30.5%	\$10,394	47.2%	39.4%
	Upper	5	15.6%	\$3,720	8.1%	31.3%	3	17.6%	30.7%	\$2,900	12.2%	16.1%	2	13.3%	33.3%	\$820	3.7%	24.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	32	100.0%	\$45,688	100.0%	100.0%	17	100.0%	100.0%	\$23,679	100.0%	100.0%	15	100.0%	100.0%	\$22,009	100.0%	100.0%
HMDA TOTALS	Low	11	2.5%	\$5,549	2.7%	2.1%	5	1.9%	1.1%	\$1,131	1.0%	0.9%	6	3.4%	1.2%	\$4,418	5.1%	1.0%
	Moderate	35	8.1%	\$20,486	10.1%	17.8%	14	5.4%	11.6%	\$7,930	6.8%	8.7%	21	12.1%	12.2%	\$12,556	14.5%	9.3%
	Middle	91	21.1%	\$46,160	22.7%	43.2%	54	20.9%	39.1%	\$28,171	24.1%	32.3%	37	21.3%	40.7%	\$17,989	20.8%	33.0%
	Upper	294	68.1%	\$130,831	64.4%	36.9%	185	71.7%	48.2%	\$79,663	68.1%	58.1%	109	62.6%	45.9%	\$51,168	59.3%	56.7%
	Unknown	1	0.2%	\$194	0.1%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	0.6%	0.0%	\$194	0.2%	0.0%
	Total	432	100.0%	\$203,220	100.0%	100.0%	258	100.0%	100.0%	\$116,895	100.0%	100.0%	174	100.0%	100.0%	\$86,325	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Appendix F

APPENDIX F – FULL SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: FL Tampa

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2013, 2014					2013					2014						
	Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %		
Low	49	9.0%	\$13,535	7.6%	2.9%	22	8.2%	3.3%	\$5,236	6.0%	4.5%	27	9.8%	3.4%	\$8,299	9.1%	5.4%
Moderate	129	23.8%	\$44,664	25.1%	18.4%	67	25.1%	17.5%	\$23,015	26.5%	21.6%	62	22.5%	18.3%	\$21,649	23.8%	21.0%
Middle	210	38.7%	\$74,137	41.7%	39.2%	106	39.7%	38.4%	\$35,313	40.7%	41.8%	104	37.8%	37.7%	\$38,824	42.7%	40.4%
Upper	154	28.4%	\$45,420	25.6%	39.4%	72	27.0%	39.6%	\$23,270	26.8%	31.4%	82	29.8%	39.3%	\$22,150	24.4%	32.6%
Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.2%	0	0.0%	0.1%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.1%	\$0	0.0%	0.6%	0	0.0%	1.1%	\$0	0.0%	0.6%
Total	542	100.0%	\$177,756	100.0%	100.0%	267	100.0%	100.0%	\$86,834	100.0%	100.0%	275	100.0%	100.0%	\$90,922	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Borrower Distribution of HMDA Loans

Assessment Area: FL Tampa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2013, 2014					2013					2014						
		Count		Bank Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	4	1.6%	\$269	0.3%	20.1%	3	2.1%	4.3%	\$220	0.4%	1.7%	1	0.9%	3.8%	\$49	0.1%	1.5%
	Moderate	12	4.8%	\$1,877	1.9%	17.8%	8	5.7%	15.0%	\$1,291	2.2%	8.5%	4	3.7%	13.9%	\$586	1.4%	7.8%
	Middle	20	8.0%	\$2,815	2.8%	19.5%	12	8.5%	19.4%	\$1,697	2.9%	14.8%	8	7.4%	19.1%	\$1,118	2.6%	14.6%
	Upper	184	73.9%	\$81,237	81.1%	42.6%	105	74.5%	50.2%	\$47,486	82.4%	64.7%	79	73.1%	48.2%	\$33,751	79.3%	62.6%
	Unknown	29	11.6%	\$13,945	13.9%	0.0%	13	9.2%	11.1%	\$6,905	12.0%	10.3%	16	14.8%	14.9%	\$7,040	16.5%	13.5%
	Total	249	100.0%	\$100,143	100.0%	100.0%	141	100.0%	100.0%	\$57,599	100.0%	100.0%	108	100.0%	100.0%	\$42,544	100.0%	100.0%
REFINANCE	Low	1	0.7%	\$85	0.2%	20.1%	1	1.1%	5.8%	\$85	0.3%	2.7%	0	0.0%	5.8%	\$0	0.0%	2.9%
	Moderate	5	3.6%	\$961	1.8%	17.8%	2	2.2%	11.3%	\$274	0.8%	5.9%	3	6.5%	11.3%	\$687	3.3%	6.8%
	Middle	14	10.2%	\$2,196	4.1%	19.5%	10	11.0%	17.0%	\$1,626	4.9%	10.4%	4	8.7%	18.0%	\$570	2.8%	13.5%
	Upper	98	71.5%	\$37,231	68.8%	42.6%	66	72.5%	50.5%	\$23,975	71.7%	50.9%	32	69.6%	46.1%	\$13,256	64.1%	57.0%
	Unknown	19	13.9%	\$13,648	25.2%	0.0%	12	13.2%	15.5%	\$7,470	22.3%	30.2%	7	15.2%	18.9%	\$6,178	29.9%	19.8%
	Total	137	100.0%	\$54,121	100.0%	100.0%	91	100.0%	100.0%	\$33,430	100.0%	100.0%	46	100.0%	100.0%	\$20,691	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	9.5%	\$0	0.0%	2.8%	0	0.0%	11.0%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	17.6%	\$0	0.0%	7.6%	0	0.0%	14.8%	\$0	0.0%	8.8%
	Middle	2	14.3%	\$20	0.6%	19.5%	2	22.2%	21.8%	\$20	0.9%	14.9%	0	0.0%	18.7%	\$0	0.0%	15.8%
	Upper	9	64.3%	\$2,698	82.6%	42.6%	6	66.7%	49.2%	\$1,997	91.3%	72.1%	3	60.0%	50.3%	\$701	64.8%	65.2%
	Unknown	3	21.4%	\$550	16.8%	0.0%	1	11.1%	1.9%	\$170	7.8%	2.6%	2	40.0%	5.2%	\$380	35.2%	7.1%
	Total	14	100.0%	\$3,268	100.0%	100.0%	9	100.0%	100.0%	\$2,187	100.0%	100.0%	5	100.0%	100.0%	\$1,081	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	32	100.0%	\$45,688	100.0%	0.0%	17	100.0%	100.0%	\$23,679	100.0%	100.0%	15	100.0%	100.0%	\$22,009	100.0%	100.0%
	Total	32	100.0%	\$45,688	100.0%	100.0%	17	100.0%	100.0%	\$23,679	100.0%	100.0%	15	100.0%	100.0%	\$22,009	100.0%	100.0%
HMDA TOTALS	Low	5	1.2%	\$354	0.2%	20.1%	4	1.6%	5.2%	\$305	0.3%	2.2%	1	0.6%	4.7%	\$49	0.1%	1.8%
	Moderate	17	3.9%	\$2,838	1.4%	17.8%	10	3.9%	13.1%	\$1,565	1.3%	6.7%	7	4.0%	13.1%	\$1,273	1.5%	7.1%
	Middle	36	8.3%	\$5,031	2.5%	19.5%	24	9.3%	18.1%	\$3,343	2.9%	11.7%	12	6.9%	18.7%	\$1,688	2.0%	13.4%
	Upper	291	67.4%	\$121,166	59.6%	42.6%	177	68.6%	50.2%	\$73,458	62.8%	54.3%	114	65.5%	47.5%	\$47,708	55.3%	57.3%
	Unknown	83	19.2%	\$73,831	36.3%	0.0%	43	16.7%	13.4%	\$38,224	32.7%	25.1%	40	23.0%	16.0%	\$35,607	41.2%	20.4%
	Total	432	100.0%	\$203,220	100.0%	100.0%	258	100.0%	100.0%	\$116,895	100.0%	100.0%	174	100.0%	100.0%	\$86,325	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Appendix F

APPENDIX F – FULL SCOPE LENDING TABLES (CONTINUED) Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Tampa

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2013, 2014					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses	2013			2014								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$(000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
		#	%	\$(000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
BUSINESS REVENUE	\$1million or Less	210	38.7%	\$63,340	35.6%	91.3%	98	36.7%	47.5%	\$31,567	36.4%	32.2%	112	40.7%	48.3%	\$31,773	34.9%	33.7%
	Over \$1 Million	226	41.7%	\$78,724	44.3%	5.6%	113	42.3%					113	41.1%				
	Total Rev. available	436	80.4%	\$142,064	79.9%	96.9%	211	79.0%					225	81.8%				
	Rev. Not Known	106	19.6%	\$35,692	20.1%	3.1%	56	21.0%					50	18.2%				
	Total	542	100.0%	\$177,756	100.0%	100.0%	267	100.0%					275	100.0%				
LOAN SIZE	\$100,000 or Less	167	30.8%	\$9,217	5.2%		84	31.5%	94.1%	\$4,601	5.3%	37.6%	83	30.2%	94.0%	\$4,616	5.1%	35.7%
	\$100,001 - \$250,000	131	24.2%	\$24,850	14.0%		71	26.6%	2.8%	\$13,635	15.7%	14.2%	60	21.8%	2.8%	\$11,215	12.3%	14.8%
	\$250,001 - \$1 Million	244	45.0%	\$143,689	80.8%		112	41.9%	3.1%	\$68,598	79.0%	48.2%	132	48.0%	3.2%	\$75,091	82.6%	49.5%
	Total	542	100.0%	\$177,756	100.0%		267	100.0%	100.0%	\$86,834	100.0%	100.0%	275	100.0%	100.0%	\$90,922	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	76	36.2%	\$4,091	6.5%													
	\$100,001 - \$250,000	45	21.4%	\$8,483	13.4%													
	\$250,001 - \$1 Million	89	42.4%	\$50,766	80.1%													
	Total	210	100.0%	\$63,340	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2014 FHFC Census Data, ACS 2010 Data, and 2014 D&B Information

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES

Geographic Distribution of HMDA Loans

Assessment Area: AL Auburn

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2013, 2014					2013					2014						
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	%	\$ (000s)	\$ %	%	Bank	Agg	%	\$ (000s)	\$ %	%
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	%		
HOME PURCHASE	Low	1	14.3%	\$104	7.4%	4.4%	0	0.0%	1.9%	\$0	0.0%	1.1%	1	25.0%	2.4%	\$104	18.6%	1.6%
	Moderate	2	28.6%	\$243	17.3%	15.7%	1	33.3%	18.6%	\$169	20.1%	16.6%	1	25.0%	17.0%	\$74	13.2%	15.4%
	Middle	3	42.9%	\$707	50.4%	57.2%	1	33.3%	56.6%	\$325	38.6%	55.7%	2	50.0%	58.7%	\$382	68.2%	58.2%
	Upper	1	14.3%	\$348	24.8%	22.7%	1	33.3%	22.9%	\$348	41.3%	26.7%	0	0.0%	21.9%	\$0	0.0%	24.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$1,402</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$842</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$560</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	1.5%	\$0	0.0%	0.7%	0	0.0%	1.9%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	11.5%	\$0	0.0%	6.8%	0	0.0%	10.0%	\$0	0.0%	9.0%
	Middle	5	83.3%	\$758	79.8%	57.2%	4	80.0%	57.1%	\$587	75.4%	55.9%	1	100.0%	59.7%	\$171	100.0%	57.6%
	Upper	1	16.7%	\$192	20.2%	22.7%	1	20.0%	29.9%	\$192	24.6%	36.6%	0	0.0%	28.4%	\$0	0.0%	32.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$950</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$779</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$171</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.4%	0	0.0%	5.3%	\$0	0.0%	1.2%	0	0.0%	2.3%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	10.1%	\$0	0.0%	17.4%	0	0.0%	12.8%	\$0	0.0%	14.7%
	Middle	0	0.0%	\$0	0.0%	57.2%	0	0.0%	60.8%	\$0	0.0%	53.4%	0	0.0%	61.0%	\$0	0.0%	50.3%
	Upper	0	0.0%	\$0	0.0%	22.7%	0	0.0%	23.8%	\$0	0.0%	28.0%	0	0.0%	23.8%	\$0	0.0%	32.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	5.6%	\$0	0.0%	0.6%	0	0.0%	27.8%	\$0	0.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	16.7%	\$0	0.0%	14.4%	0	0.0%	16.7%	\$0	0.0%	19.3%
	Middle	0	0.0%	\$0	0.0%	47.0%	0	0.0%	44.4%	\$0	0.0%	9.3%	0	0.0%	22.2%	\$0	0.0%	15.9%
	Upper	0	0.0%	\$0	0.0%	13.2%	0	0.0%	33.3%	\$0	0.0%	75.7%	0	0.0%	33.3%	\$0	0.0%	59.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	7.7%	\$104	4.4%	4.4%	0	0.0%	1.8%	\$0	0.0%	0.8%	1	20.0%	2.3%	\$104	14.2%	2.1%
	Moderate	2	15.4%	\$243	10.3%	15.7%	1	12.5%	14.7%	\$169	10.4%	10.8%	1	20.0%	14.6%	\$74	10.1%	14.0%
	Middle	8	61.5%	\$1,465	62.3%	57.2%	5	62.5%	57.0%	\$912	56.3%	51.4%	3	60.0%	59.0%	\$553	75.6%	52.2%
	Upper	2	15.4%	\$540	23.0%	22.7%	2	25.0%	26.5%	\$540	33.3%	37.0%	0	0.0%	24.1%	\$0	0.0%	31.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$2,352</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,621</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$731</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: AL Auburn

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2013, 2014					2013					2014						
	Count		Bank Dollar		Small Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ 000s	\$ %	\$ %	Bank #	Agg %	Bank \$ 000s	\$ %	Agg \$ %		
Low	1	4.8%	\$750	21.2%	4.0%	1	7.7%	2.7%	\$750	26.2%	3.6%	0	0.0%	2.0%	\$0	0.0%	1.8%
Moderate	4	19.0%	\$130	3.7%	16.0%	3	23.1%	15.2%	\$90	3.1%	18.7%	1	12.5%	18.0%	\$40	5.9%	21.8%
Middle	15	71.4%	\$2,574	72.7%	59.2%	9	69.2%	56.4%	\$2,028	70.7%	51.2%	6	75.0%	56.1%	\$546	81.0%	51.2%
Upper	1	4.8%	\$88	2.5%	20.8%	0	0.0%	23.6%	\$0	0.0%	24.3%	1	12.5%	22.7%	\$88	13.1%	24.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.1%	\$0	0.0%	2.2%	0	0.0%	1.2%	\$0	0.0%	0.5%
Total	21	100.0%	\$3,542	100.0%	100.0%	13	100.0%	100.0%	\$2,868	100.0%	100.0%	8	100.0%	100.0%	\$674	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Borrower Distribution of HMDA Loans

Assessment Area: AL Auburn

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data				Bank & Aggregate Lending Comparison												
		2013, 2014				Families by Family Income %	2013			2014								
		Count		Bank Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	\$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.1%	0	0.0%	7.3%	\$0	0.0%	4.0%	0	0.0%	5.1%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	19.9%	\$0	0.0%	14.7%	0	0.0%	16.6%	\$0	0.0%	11.6%
	Middle	3	42.9%	\$551	39.3%	20.8%	1	33.3%	23.6%	\$169	20.1%	23.0%	2	50.0%	23.8%	\$382	68.2%	21.7%
	Upper	4	57.1%	\$851	60.7%	39.7%	2	66.7%	34.1%	\$673	79.9%	43.8%	2	50.0%	39.2%	\$178	31.8%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.0%	\$0	0.0%	14.5%	0	0.0%	15.2%	\$0	0.0%	14.8%
Total	7	100.0%	\$1,402	100.0%	100.0%	3	100.0%	100.0%	\$842	100.0%	100.0%	4	100.0%	100.0%	\$560	100.0%	100.0%	
REFINANCE	Low	0	0.0%	\$0	0.0%	23.1%	0	0.0%	5.4%	\$0	0.0%	1.8%	0	0.0%	4.6%	\$0	0.0%	2.3%
	Moderate	2	33.3%	\$228	24.0%	16.3%	2	40.0%	12.0%	\$228	29.3%	5.3%	0	0.0%	11.2%	\$0	0.0%	6.8%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	18.0%	\$0	0.0%	9.6%	0	0.0%	15.6%	\$0	0.0%	11.6%
	Upper	3	50.0%	\$628	66.1%	39.7%	2	40.0%	40.4%	\$457	58.7%	29.0%	1	100.0%	40.9%	\$171	100.0%	48.6%
	Unknown	1	16.7%	\$94	9.9%	0.0%	1	20.0%	24.3%	\$94	12.1%	54.2%	0	0.0%	27.8%	\$0	0.0%	30.6%
Total	6	100.0%	\$950	100.0%	100.0%	5	100.0%	100.0%	\$779	100.0%	100.0%	1	100.0%	100.0%	\$171	100.0%	100.0%	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.1%	0	0.0%	12.7%	\$0	0.0%	3.1%	0	0.0%	17.4%	\$0	0.0%	18.2%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	19.6%	\$0	0.0%	8.9%	0	0.0%	16.9%	\$0	0.0%	10.3%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	26.5%	\$0	0.0%	31.7%	0	0.0%	20.3%	\$0	0.0%	19.8%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	33.9%	\$0	0.0%	40.0%	0	0.0%	37.2%	\$0	0.0%	43.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.4%	\$0	0.0%	16.3%	0	0.0%	8.1%	\$0	0.0%	8.6%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.1%	0	0.0%	6.5%	\$0	0.0%	2.3%	0	0.0%	5.5%	\$0	0.0%	2.3%
	Moderate	2	15.4%	\$228	9.7%	16.3%	2	25.0%	15.8%	\$228	14.1%	7.9%	0	0.0%	14.8%	\$0	0.0%	8.6%
	Middle	3	23.1%	\$551	23.4%	20.8%	1	12.5%	20.8%	\$169	10.4%	13.3%	2	40.0%	20.9%	\$382	52.3%	15.8%
	Upper	7	53.8%	\$1,479	62.9%	39.7%	4	50.0%	37.2%	\$1,130	69.7%	31.2%	3	60.0%	39.5%	\$349	47.7%	42.4%
	Unknown	1	7.7%	\$94	4.0%	0.0%	1	12.5%	19.7%	\$94	5.8%	45.3%	0	0.0%	19.3%	\$0	0.0%	30.9%
Total	13	100.0%	\$2,352	100.0%	100.0%	8	100.0%	100.0%	\$1,621	100.0%	100.0%	5	100.0%	100.0%	\$731	100.0%	100.0%	

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED) Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Auburn

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2013, 2014					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses	2013			2014								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1million or Less	14	66.7%	\$3,044	85.9%	90.2%	9	69.2%	48.4%	\$2,658	92.7%	49.9%	5	62.5%	45.5%	\$386	57.3%	45.4%
	Over \$1 Million	4	19.0%	\$363	10.2%	6.0%	1	7.7%					3	37.5%				
	<i>Total Rev. available</i>	18	85.7%	\$3,407	96.1%	96.2%	10	76.9%					8	100.0%				
	Rev. Not Known	3	14.3%	\$135	3.8%	3.8%	3	23.1%					0	0.0%				
	<i>Total</i>	21	100.0%	\$3,542	100.0%	100.0%	13	100.0%					8	100.0%				
LOAN SIZE	\$100,000 or Less	14	66.7%	\$639	18.0%		9	69.2%	90.1%	\$400	13.9%	29.6%	5	62.5%	92.6%	\$239	35.5%	34.1%
	\$100,001 - \$250,000	3	14.3%	\$435	12.3%		0	0.0%	4.9%	\$0	0.0%	18.8%	3	37.5%	4.1%	\$435	64.5%	18.7%
	\$250,001 - \$1 Million	4	19.0%	\$2,468	69.7%		4	30.8%	5.0%	\$2,468	86.1%	51.6%	0	0.0%	3.3%	\$0	0.0%	47.2%
	<i>Total</i>	21	100.0%	\$3,542	100.0%		13	100.0%	100.0%	\$2,868	100.0%	100.0%	8	100.0%	100.0%	\$674	100.0%	100.0%
LOAN SIZE Rev. \$1 Mill or Less	\$100,000 or Less	8	57.1%	\$301	9.9%													
	\$100,001 - \$250,000	2	14.3%	\$275	9.0%													
	\$250,001 - \$1 Million	4	28.6%	\$2,468	81.1%													
	<i>Total</i>	14	100.0%	\$3,044	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2014 FHFC Census Data, ACS 2010 Data, and 2014 D&B Information

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of HMDA Loans

Assessment Area: AL Coosa Tallapoosa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2013					Bank & Aggregate Lending Comparison 2013					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			#	%	%	Bank		Agg
		#	%	\$ (000s)	\$ %	%				\$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	18.8%	\$498	15.7%	23.9%	3	18.8%	11.8%	\$498	15.7%	6.7%
	Middle	9	56.3%	\$1,268	40.0%	59.1%	9	56.3%	43.3%	\$1,268	40.0%	34.1%
	Upper	4	25.0%	\$1,403	44.3%	17.0%	4	25.0%	44.7%	\$1,403	44.3%	59.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$3,169</i>	<i>100.0%</i>	<i>100.0%</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,169</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	4	16.7%	\$587	11.4%	23.9%	4	16.7%	13.2%	\$587	11.4%	7.5%
	Middle	10	41.7%	\$2,137	41.5%	59.1%	10	41.7%	52.2%	\$2,137	41.5%	45.5%
	Upper	10	41.7%	\$2,428	47.1%	17.0%	10	41.7%	34.2%	\$2,428	47.1%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.4%	\$0	0.0%	0.4%
	<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$5,152</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,152</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	6.7%	\$10	2.6%	23.9%	1	6.7%	13.8%	\$10	2.6%	7.2%
	Middle	10	66.7%	\$60	15.6%	59.1%	10	66.7%	53.8%	\$60	15.6%	27.8%
	Upper	4	26.7%	\$315	81.8%	17.0%	4	26.7%	32.5%	\$315	81.8%	64.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>\$385</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$385</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	29.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	36.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	34.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	8	14.5%	\$1,095	12.6%	23.9%	8	14.5%	12.8%	\$1,095	12.6%	7.2%
	Middle	29	52.7%	\$3,465	39.8%	59.1%	29	52.7%	49.2%	\$3,465	39.8%	41.5%
	Upper	18	32.7%	\$4,146	47.6%	17.0%	18	32.7%	37.7%	\$4,146	47.6%	51.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.3%
	<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>\$8,706</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,706</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2013 FFIEC Census Data and 2010 ACS Data

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: AL Coosa Tallapoosa

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
	2013					2013					
	Count		Bank Dollar		Small Businesses	Count		Dollar			
	#	%	\$ (000s)	\$ %	%	#	%	Agg %	Bank \$ 000s	\$ %	Agg \$ %
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	11	33.3%	\$1,892	38.0%	24.2%	11	33.3%	26.1%	\$1,892	38.0%	39.3%
Middle	19	57.6%	\$2,491	50.1%	57.4%	19	57.6%	55.3%	\$2,491	50.1%	46.0%
Upper	3	9.1%	\$591	11.9%	18.3%	3	9.1%	14.5%	\$591	11.9%	13.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	4.1%	\$0	0.0%	1.6%
<i>Total</i>	<i>33</i>	<i>100.0%</i>	<i>\$4,974</i>	<i>100.0%</i>	<i>100.0%</i>	<i>33</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,974</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2013 FFIEC Census Data, ACS 2010 Data, and 2013 D&B Information

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Borrower Distribution of HMDA Loans

Assessment Area: AL Coosa Tallapoosa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2013					Bank & Aggregate Lending Comparison 2013					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				#	%		%
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	3.5%	\$0	0.0%	2.1%
	Moderate	2	12.5%	\$122	3.8%	17.8%	2	12.5%	12.6%	\$122	3.8%	5.8%
	Middle	5	31.3%	\$781	24.6%	18.1%	5	31.3%	16.9%	\$781	24.6%	10.5%
	Upper	9	56.3%	\$2,266	71.5%	43.5%	9	56.3%	53.9%	\$2,266	71.5%	70.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.0%	\$0	0.0%	11.1%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$3,169</i>	<i>100.0%</i>	<i>100.0%</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,169</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	2	8.3%	\$75	1.5%	20.5%	2	8.3%	3.6%	\$75	1.5%	1.4%
	Moderate	1	4.2%	\$165	3.2%	17.8%	1	4.2%	8.1%	\$165	3.2%	4.2%
	Middle	2	8.3%	\$206	4.0%	18.1%	2	8.3%	16.9%	\$206	4.0%	9.0%
	Upper	19	79.2%	\$4,706	91.3%	43.5%	19	79.2%	59.6%	\$4,706	91.3%	68.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.9%	\$0	0.0%	16.7%
	<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$5,152</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,152</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	10.0%	\$0	0.0%	1.8%
	Moderate	3	20.0%	\$15	3.9%	17.8%	3	20.0%	18.8%	\$15	3.9%	7.9%
	Middle	6	40.0%	\$51	13.2%	18.1%	6	40.0%	31.3%	\$51	13.2%	16.4%
	Upper	6	40.0%	\$319	82.9%	43.5%	6	40.0%	36.3%	\$319	82.9%	70.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.8%	\$0	0.0%	3.6%
	<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>\$385</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$385</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>0.0%</i>
HMDA TOTALS	Low	2	3.6%	\$75	0.9%	20.5%	2	3.6%	3.9%	\$75	0.9%	1.6%
	Moderate	6	10.9%	\$302	3.5%	17.8%	6	10.9%	10.2%	\$302	3.5%	4.8%
	Middle	13	23.6%	\$1,038	11.9%	18.1%	13	23.6%	17.7%	\$1,038	11.9%	9.6%
	Upper	34	61.8%	\$7,291	83.7%	43.5%	34	61.8%	56.4%	\$7,291	83.7%	69.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.8%	\$0	0.0%	14.7%
	<i>Total</i>	<i>55</i>	<i>100.0%</i>	<i>\$8,706</i>	<i>100.0%</i>	<i>100.0%</i>	<i>55</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,706</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2013 FFIEC Census Data and 2010 ACS Data

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Coosa Tallapoosa

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2013					2013					
		Bank			Total		Count			Dollar		
		Count		\$ (000s)		Businesses	Bank		Agg	Bank		Agg
#	%	\$	%	#	%		%	\$ (000s)		\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	18	54.5%	\$3,153	63.4%	91.9%	18	54.5%	45.4%	\$3,153	63.4%	41.6%
	Over \$1 Million	9	27.3%	\$1,122	22.6%	3.9%	9	27.3%				
	<i>Total Rev. available</i>	27	81.8%	\$4,275	86.0%	95.8%	27	81.8%				
	Rev. Not Known	6	18.2%	\$699	14.1%	4.2%	6	18.2%				
	<i>Total</i>	33	100.0%	\$4,974	100.0%	100.0%	33	100.0%				
LOAN SIZE	\$100,000 or Less	20	60.6%	\$1,090	21.9%		20	60.6%	88.7%	\$1,090	21.9%	25.8%
	\$100,001 - \$250,000	7	21.2%	\$1,394	28.0%		7	21.2%	5.7%	\$1,394	28.0%	19.5%
	\$250,001 - \$1 Million	6	18.2%	\$2,490	50.1%		6	18.2%	5.7%	\$2,490	50.1%	54.7%
	<i>Total</i>	33	100.0%	\$4,974	100.0%		33	100.0%	100.0%	\$4,974	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	10	55.6%	\$452	14.3%							
	\$100,001 - \$250,000	4	22.2%	\$766	24.3%							
	\$250,001 - \$1 Million	4	22.2%	\$1,935	61.4%							
	<i>Total</i>	18	100.0%	\$3,153	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.

2013 FFIEC Census Data, 2010 ACS Data, and 2013 D&B Information

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of HMDA Loans

Assessment Area: AL Montgomery

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2013, 2014					2013						2014					
		Bank				Owner Occupied Units %	Count		Dollar				Count		Dollar			
		Count #	%	Dollar \$ (000s)	%		Bank #	Agg %	Bank \$ (000s)	%	Agg %	Bank #	Agg %	Bank \$ (000s)	%	Agg %		
HOME PURCHASE	Low	1	2.0%	\$12	0.2%	7.0%	0	0.0%	1.6%	\$0	0.0%	0.6%	1	4.3%	1.9%	\$12	0.5%	0.9%
	Moderate	7	14.0%	\$390	5.9%	17.4%	1	3.7%	8.7%	\$17	0.4%	5.1%	6	26.1%	9.7%	\$373	15.1%	5.6%
	Middle	17	34.0%	\$2,098	31.7%	36.3%	10	37.0%	32.0%	\$1,294	31.2%	28.4%	7	30.4%	32.5%	\$804	32.5%	29.5%
	Upper	25	50.0%	\$4,122	62.2%	39.3%	16	59.3%	57.7%	\$2,835	68.4%	65.9%	9	39.1%	55.9%	\$1,287	52.0%	64.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	50	100.0%	\$6,622	100.0%	100.0%	27	100.0%	100.0%	\$4,146	100.0%	100.0%	23	100.0%	100.0%	\$2,476	100.0%	100.0%
REFINANCE	Low	3	6.3%	\$585	5.5%	7.0%	2	5.0%	1.9%	\$575	6.5%	1.7%	1	12.5%	2.3%	\$10	0.5%	1.1%
	Moderate	6	12.5%	\$481	4.5%	17.4%	6	15.0%	8.6%	\$481	5.4%	8.2%	0	0.0%	10.5%	\$0	0.0%	6.0%
	Middle	13	27.1%	\$3,306	30.9%	36.3%	11	27.5%	35.3%	\$2,348	26.5%	40.2%	2	25.0%	34.7%	\$958	52.1%	33.7%
	Upper	26	54.2%	\$6,312	59.1%	39.3%	21	52.5%	54.2%	\$5,440	61.5%	49.8%	5	62.5%	52.5%	\$872	47.4%	59.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	48	100.0%	\$10,684	100.0%	100.0%	40	100.0%	100.0%	\$8,844	100.0%	100.0%	8	100.0%	100.0%	\$1,840	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	7.0%	0	0.0%	6.0%	\$0	0.0%	2.3%	0	0.0%	6.0%	\$0	0.0%	3.8%
	Moderate	3	18.8%	\$18	2.0%	17.4%	1	12.5%	15.1%	\$5	0.6%	7.9%	2	25.0%	16.6%	\$13	13.0%	13.3%
	Middle	3	18.8%	\$33	3.6%	36.3%	1	12.5%	43.7%	\$7	0.9%	38.3%	2	25.0%	38.4%	\$26	26.0%	41.0%
	Upper	10	62.5%	\$855	94.4%	39.3%	6	75.0%	35.2%	\$794	98.5%	51.5%	4	50.0%	39.0%	\$61	61.0%	42.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	16	100.0%	\$906	100.0%	100.0%	8	100.0%	100.0%	\$806	100.0%	100.0%	8	100.0%	100.0%	\$100	100.0%	100.0%
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	7.1%	\$0	0.0%	1.4%	0	0.0%	27.8%	\$0	0.0%	20.8%
	Moderate	0	0.0%	\$0	0.0%	24.5%	0	0.0%	28.6%	\$0	0.0%	15.7%	0	0.0%	33.3%	\$0	0.0%	31.3%
	Middle	0	0.0%	\$0	0.0%	28.9%	0	0.0%	14.3%	\$0	0.0%	2.7%	0	0.0%	11.1%	\$0	0.0%	0.8%
	Upper	1	100.0%	\$2,950	100.0%	31.3%	1	100.0%	50.0%	\$2,950	100.0%	80.1%	0	0.0%	27.8%	\$0	0.0%	47.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$2,950	100.0%	100.0%	1	100.0%	100.0%	\$2,950	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	4	3.5%	\$597	2.8%	7.0%	2	2.6%	1.9%	\$575	3.4%	1.4%	2	5.1%	2.3%	\$22	0.5%	2.6%
	Moderate	16	13.9%	\$889	4.2%	17.4%	8	10.5%	8.9%	\$503	3.0%	7.5%	8	20.5%	10.5%	\$386	8.7%	7.9%
	Middle	33	28.7%	\$5,437	25.7%	36.3%	22	28.9%	34.3%	\$3,649	21.8%	35.5%	11	28.2%	33.6%	\$1,788	40.5%	28.8%
	Upper	62	53.9%	\$14,239	67.3%	39.3%	44	57.9%	54.9%	\$12,019	71.8%	55.5%	18	46.2%	53.7%	\$2,220	50.3%	60.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	115	100.0%	\$21,162	100.0%	100.0%	76	100.0%	100.0%	\$16,746	100.0%	100.0%	39	100.0%	100.0%	\$4,416	100.0%	100.0%

Originations & Purchases
2014 FFIEC Census Data and 2010 ACS Data

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: AL Montgomery

Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
	2013, 2014					2013					2014						
	Bank		Small Businesses		Count	Count		Dollar			Count		Dollar				
	Count	Dollar	Dollar	Bank		Agg	Bank	Agg	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Low	21	24.1%	\$3,052	20.6%	15.4%	8	22.2%	18.1%	\$1,230	28.4%	23.2%	13	25.5%	16.4%	\$1,822	17.4%	23.3%
Moderate	22	25.3%	\$4,506	30.5%	14.7%	11	30.6%	12.7%	\$1,674	38.7%	12.6%	11	21.6%	13.4%	\$2,832	27.1%	13.9%
Middle	24	27.6%	\$3,109	21.0%	30.3%	9	25.0%	24.1%	\$964	22.3%	19.0%	15	29.4%	24.4%	\$2,145	20.5%	18.7%
Upper	20	23.0%	\$4,122	27.9%	39.6%	8	22.2%	43.6%	\$460	10.6%	44.9%	12	23.5%	44.2%	\$3,662	35.0%	43.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.4%	\$0	0.0%	0.2%	0	0.0%	1.6%	\$0	0.0%	0.4%
Total	87	100.0%	\$14,789	100.0%	100.0%	36	100.0%	100.0%	\$4,328	100.0%	100.0%	51	100.0%	100.0%	\$10,461	100.0%	100.0%

Originations & Purchases

2014 FFIEC Census Data, 2010 ACS Data, and 2014 D&B Information

Borrower Distribution of HMDA Loans

Assessment Area: AL Montgomery

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2013, 2014					2013					2014						
		Bank		Families by Family Income	Count	Dollar		Count		Dollar			Count		Dollar			
		Count	Dollar			Bank	Agg	Bank	Agg	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	10	20.0%	\$546	8.2%	24.3%	3	11.1%	9.4%	\$233	5.6%	4.8%	7	30.4%	7.7%	\$313	12.6%	3.6%
	Moderate	16	32.0%	\$1,684	25.4%	16.3%	11	40.7%	24.1%	\$1,041	25.1%	18.4%	5	21.7%	21.6%	\$643	26.0%	15.0%
	Middle	9	18.0%	\$1,067	16.1%	18.0%	5	18.5%	20.7%	\$709	17.1%	20.5%	4	17.4%	20.7%	\$358	14.5%	19.3%
	Upper	14	28.0%	\$3,255	49.2%	41.5%	8	29.6%	28.5%	\$2,163	52.2%	40.5%	6	26.1%	29.1%	\$1,092	44.1%	42.7%
	Unknown	1	2.0%	\$70	1.1%	0.0%	0	0.0%	17.4%	\$0	0.0%	15.9%	1	4.3%	21.0%	\$70	2.8%	19.5%
Total	50	100.0%	\$6,622	100.0%	100.0%	27	100.0%	100.0%	\$4,146	100.0%	100.0%	23	100.0%	100.0%	\$2,476	100.0%	100.0%	
REFINANCE	Low	6	12.5%	\$365	3.4%	24.3%	4	10.0%	6.4%	\$262	3.0%	2.3%	2	25.0%	5.8%	\$103	5.6%	3.0%
	Moderate	8	16.7%	\$762	7.1%	16.3%	6	15.0%	13.1%	\$539	6.1%	6.0%	2	25.0%	13.2%	\$223	12.1%	8.6%
	Middle	6	12.5%	\$1,159	10.8%	18.0%	6	15.0%	18.1%	\$1,159	13.1%	10.1%	0	0.0%	16.4%	\$0	0.0%	13.1%
	Upper	24	50.0%	\$6,695	62.7%	41.5%	20	50.0%	36.0%	\$5,181	58.6%	30.3%	4	50.0%	35.7%	\$1,514	82.3%	46.0%
	Unknown	4	8.3%	\$1,703	15.9%	0.0%	4	10.0%	26.5%	\$1,703	19.3%	51.3%	0	0.0%	28.9%	\$0	0.0%	29.4%
Total	48	100.0%	\$10,684	100.0%	100.0%	40	100.0%	100.0%	\$8,844	100.0%	100.0%	8	100.0%	100.0%	\$1,840	100.0%	100.0%	
HOME IMPROVEMENT	Low	2	12.5%	\$10	1.1%	24.3%	1	12.5%	18.4%	\$5	0.6%	6.2%	1	12.5%	16.9%	\$5	5.0%	8.2%
	Moderate	4	25.0%	\$38	4.2%	16.3%	1	12.5%	21.2%	\$7	0.9%	14.3%	3	37.5%	22.3%	\$31	31.0%	14.3%
	Middle	5	31.3%	\$165	18.2%	18.0%	2	25.0%	20.6%	\$111	13.8%	15.0%	3	37.5%	24.2%	\$54	54.0%	19.7%
	Upper	5	31.3%	\$693	76.5%	41.5%	4	50.0%	33.8%	\$683	84.7%	52.6%	1	12.5%	33.5%	\$10	10.0%	42.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.0%	\$0	0.0%	11.9%	0	0.0%	3.1%	\$0	0.0%	14.9%
Total	16	100.0%	\$906	100.0%	100.0%	8	100.0%	100.0%	\$806	100.0%	100.0%	8	100.0%	100.0%	\$100	100.0%	100.0%	
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	24.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$2,950	100.0%	0.0%	1	100.0%	100.0%	\$2,950	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
Total	1	100.0%	\$2,950	100.0%	100.0%	1	100.0%	100.0%	\$2,950	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
HMDA TOTALS	Low	18	15.7%	\$921	4.4%	24.3%	8	10.5%	7.9%	\$500	3.0%	3.0%	10	25.6%	7.4%	\$421	9.5%	3.1%
	Moderate	28	24.3%	\$2,484	11.7%	16.3%	18	23.7%	17.6%	\$1,587	9.5%	9.5%	10	25.6%	18.4%	\$897	20.3%	11.5%
	Middle	20	17.4%	\$2,391	11.3%	18.0%	13	17.1%	19.1%	\$1,979	11.8%	12.9%	7	17.9%	19.2%	\$412	9.3%	15.5%
	Upper	43	37.4%	\$10,643	50.3%	41.5%	32	42.1%	33.0%	\$8,027	47.9%	32.5%	11	28.2%	31.8%	\$2,616	59.2%	40.5%
	Unknown	6	5.2%	\$4,723	22.3%	0.0%	5	6.6%	22.4%	\$4,653	27.8%	42.1%	1	2.6%	23.2%	\$70	1.6%	29.4%
Total	115	100.0%	\$21,162	100.0%	100.0%	76	100.0%	100.0%	\$16,746	100.0%	100.0%	39	100.0%	100.0%	\$4,416	100.0%	100.0%	

Originations & Purchases

2014 FFIEC Census Data and 2010 ACS Data

Appendix G

APPENDIX G – LIMITED SCOPE LENDING TABLES (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Montgomery

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2013, 2014					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses	2013			2014								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	%	Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %		
BUSINESS REVENUE	\$1million or Less	36	41.4%	\$4,057	27.4%	88.2%	13	36.1%	44.1%	\$1,257	29.0%	36.7%	23	45.1%	47.4%	\$2,800	26.8%	37.7%
	Over \$1 Million	44	50.6%	\$9,951	67.3%	8.0%	21	58.3%					23	45.1%				
	<i>Total Rev. available</i>	80	92.0%	\$14,008	94.7%	96.2%	34	94.4%					46	90.2%				
	Rev. Not Known	7	8.0%	\$781	5.3%	3.8%	2	5.6%					5	9.8%				
	<i>Total</i>	87	100.0%	\$14,789	100.0%	100.0%	36	100.0%					51	100.0%				
LOAN SIZE	\$100,000 or Less	50	57.5%	\$2,850	19.3%		24	66.7%	85.1%	\$1,206	27.9%	24.3%	26	51.0%	87.1%	\$1,644	15.7%	26.2%
	\$100,001 - \$250,000	21	24.1%	\$3,561	24.1%		8	22.2%	7.5%	\$1,341	31.0%	20.1%	13	25.5%	6.9%	\$2,220	21.2%	20.9%
	\$250,001 - \$1 Million	16	18.4%	\$8,378	56.7%		4	11.1%	7.4%	\$1,781	41.2%	55.6%	12	23.5%	5.9%	\$6,597	63.1%	52.9%
	<i>Total</i>	87	100.0%	\$14,789	100.0%		36	100.0%	100.0%	\$4,328	100.0%	100.0%	51	100.0%	100.0%	\$10,461	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	25	69.4%	\$1,355	33.4%													
	\$100,001 - \$250,000	8	22.2%	\$1,493	36.8%													
	\$250,001 - \$1 Million	3	8.3%	\$1,209	29.8%													
	<i>Total</i>	36	100.0%	\$4,057	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2014 FFIEC Census Data, ACS 2010 Data, and 2014 D&B Information