

PUBLIC DISCLOSURE

May 22, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

CapStar Bank
1201 Demonbreun Street
Suite 700
Nashville, Tennessee 37203

RSSD ID NUMBER: 3715444

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: This institution is rated Satisfactory.

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

PERFORMANCE LEVELS	CapStar Bank		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		
Needs to Improve			X
Substantial Noncompliance			

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

Major factors contributing to this rating include the following:

- A high percentage of loans were made in the bank’s assessment areas.
- The overall geographic distribution of HMDA and small business loans reflects good penetration throughout the assessment areas.
- The distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes.
- The bank makes a low level of community development loans.
- The bank makes a significant level of qualified investments and grants in its assessment areas.
- Retail banking services are reasonably accessible to geographies and individuals of different income levels in the bank’s assessments areas.
- Bank products, services, and standard business hours do not vary in a way that inconveniences any portion of the bank’s assessment areas.
- The bank provides a limited level of community development services in its assessment areas.

INSTITUTION

DESCRIPTION OF INSTITUTION

CapStar Bank (CapStar) is a community bank headquartered in Nashville, Tennessee. The bank is the sole bank subsidiary of CapStar Financial Holdings, Inc., a holding company also located in Nashville. CapStar’s products and services include those related to businesses (commercial and industrial, commercial real estate, healthcare, small business, treasury management, and correspondent banking), individuals (checking, savings, consumer non-real estate loans, and mortgages), and wealth management services. During the current review period, CapStar acquired First National Bank of Manchester and The Bank of Waynesboro on July 1, 2020, which expanded the bank’s footprint in the Middle Tennessee region. According to the March 31, 2023 Report of Condition, the bank had total assets of \$3.2 billion. As of the examination date, CapStar operates 23 banking offices in Tennessee.

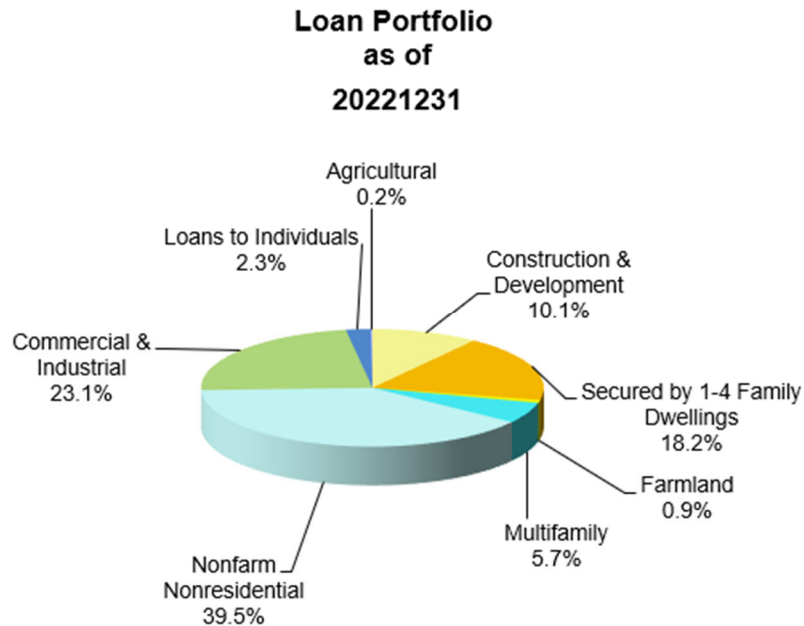
Loan Portfolio

The bank offers a variety of credit products, including working capital lines of credit, equipment financing, commercial real estate loans, acquisition financing, SBA loans, residential mortgage loans, and home equity loans. The following table shows the composition of the loan portfolio at year-end for each of the three years of the review period, according to the Consolidated Reports of Condition and Income (Call Report).

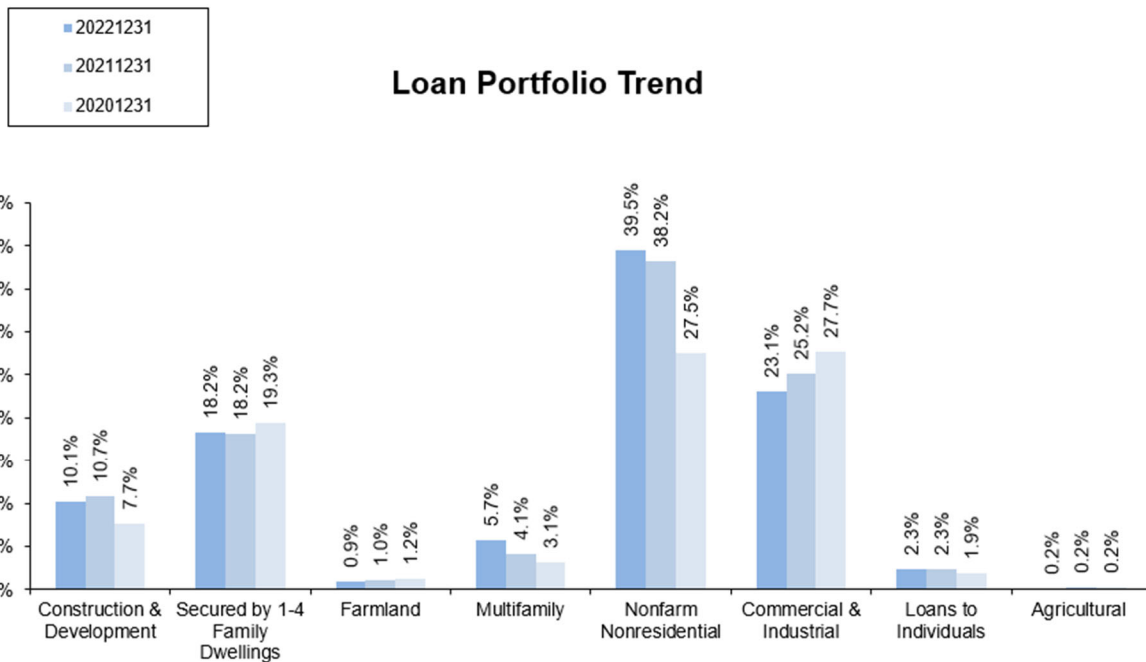
COMPOSITION OF LOAN PORTFOLIO						
Loan Type	20221231		20211231		20201231	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	229,972	10.1%	214,309	10.7%	174,859	8.6%
Secured by One- to Four- Family Dwellings	415,196	18.2%	363,632	18.2%	441,053	21.8%
Other Real Estate: Farmland	19,502	0.9%	20,878	1.0%	27,699	1.4%
Multifamily	130,998	5.7%	81,968	4.1%	71,170	3.5%
Nonfarm nonresidential	899,222	39.5%	763,335	38.2%	627,329	31.0%
Commercial and Industrial	527,621	23.1%	503,127	25.2%	630,776	31.2%
Loans to Individuals	53,382	2.3%	46,812	2.3%	44,279	2.2%
Agricultural Loans	3,457	0.2%	4,706	0.2%	5,163	0.3%
Total	\$2,279,350	100.00%	\$1,998,767	100.00%	\$2,022,328	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.

As indicated by the table, the bank is primarily focused on commercial lending. As of December 31, 2022, loans secured by nonfarm nonresidential property (commercial real estate) made up the largest percentage of the loan portfolio at 39.5 percent of total loans, followed by commercial and industrial loans at 23.1 percent. The following chart graphically illustrates the composition of the loan portfolio as of December 31, 2022.



The following chart shows the trend in the composition of the loan portfolio over the past three year ends. In terms of proportion of the loan portfolio, loans secured by nonfarm nonresidential property have shown the greatest increase; commercial and industrial loans have decreased.



COVID-19 Response

The bank participated in the SBA Paycheck Protection Program (PPP), which was established as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act. PPP loans were designed to help businesses retain workers and staff during the economic crisis caused by the pandemic. During the review period, the bank originated PPP loans in amounts of \$1 million or less for a total dollar amount of \$190.3 million, with 77.0 percent of these being originated within the bank's assessment areas. The PPP loans were considered responsive to the

needs of small businesses during the COVID-19 pandemic. Additional details regarding the bank's PPP lending are discussed in the *Product Innovation* section of this evaluation.

Assessment Areas

CapStar has expanded its assessment areas since the previous examination due to the acquisitions previously noted (forming the Manchester and Waynesboro assessment areas) and the opening of a branch in Chattanooga in September 2022 (forming the Chattanooga assessment area). Other changes to the bank's existing assessment areas are as follows: Cannon and Rutherford counties were added to the Nashville assessment area in 2020, and Knox County was added to the Knoxville assessment area in 2020 while Loudon County was removed from this assessment area in 2021. For this evaluation, CapStar has seven assessment areas in Tennessee which are listed below.

- Nashville, consisting of Cannon, Davidson, Rutherford, Sumner, and Williamson counties
- Athens, consisting of McMinn and Monroe counties
- Chattanooga, consisting of Hamilton County
- Cleveland, consisting of Bradley and Polk counties
- Knoxville, consisting of Loudon and Knox counties in 2020 and Knox County in 2021 and 2022
- Manchester, consisting of Coffee County
- Waynesboro, consisting of Lawrence and Wayne counties

CapStar complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a "Satisfactory" rating at its previous examination dated March 22, 2021, conducted by the Federal Reserve Bank of Atlanta using the Large Institution Examination Procedures.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including LMI neighborhoods, within the context of information such as asset size and financial condition of the institution, and competitive factors, as well as the economic and demographic characteristics of its defined assessment areas. CapStar's CRA performance evaluation was based on CRA activities within its assessment areas using the Large Institution Examination Procedures. Large institutions have total assets of at least \$1.503 billion for December 31 of both of the prior two years. Institutions meeting the threshold size are evaluated using three separately rated tests: a lending test, an investment test, and a service test. Each test is evaluated in light of the community needs within the bank's assessment areas and the capacity of the bank.

The Nashville assessment area was reviewed using full-scope examination procedures as it contains a majority of the bank's deposits, small business loans, and loans reportable under the HMDA. The other six assessment areas were reviewed using limited-scope examination procedures. In determining the overall rating, the greatest weight was placed on the bank's performance in the full-scope Nashville assessment area.

The evaluation included an analysis of HMDA loans and small business loans originated from January 1, 2020, through December 31, 2022. Due to low volumes relative to other loan types, small farm loans were not analyzed. Given the bank's asset size and offices located in an MSA, it submits annual reports about its residential real estate loan originations and applications, pursuant to HMDA. These loans are referred to as "HMDA loans" in this evaluation. A small business loan is defined as a business loan with an original amount of \$1 million or less and typically is either secured by nonfarm nonresidential real estate or classified as a commercial loan.

For the lending, investment, and service tests, the examination covered qualified community development loans, investments and services from January 1, 2020, through December 31, 2022. The CRA defines a community development activity as having a primary purpose of providing affordable housing for, or community services targeted to, LMI persons; promoting economic development through the financing of small businesses and farms that meet the requirements set forth in 12 CFR 228.12(g); or revitalizing or stabilizing LMI geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies. Community development activities must benefit the bank's assessment areas or a larger statewide or regional area that includes the bank's assessment areas. The service test included a review of retail banking services, such as the branch distribution and hours of operation, using data as of December 31, 2022.

As part of the CRA evaluation, information was obtained from two community contacts who are familiar with the economic and demographic characteristics as well as community development opportunities in the Nashville assessment area. Information obtained from these contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the Nashville assessment area section of the evaluation. The contacts did not identify any unmet small business credit needs; however, one contact identified the need for more in-depth financial literacy that includes creating and maintaining wealth through assets for LMI individuals and families. Opportunities were noted as plentiful throughout the Nashville MSA, with affordable housing in north Nashville and continued financing to, and partnership with, financial intermediaries being the key opportunities noted by both contacts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The lending test rating is low satisfactory. The lending test included an analysis of HMDA and small business loans originated during 2020, 2021, and 2022. Lending levels reflect good responsiveness to assessment area credit needs. A high percentage of loans were originated inside the assessment areas. The geographic distribution of loans reflects good penetration throughout the assessment areas. The distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank makes a low level of community development loans. Performance context information was considered in evaluating the bank's lending performance, such as factors related to competition, demographics, economic conditions, business strategy, and opportunities.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs given the bank's market share of deposits, competition, the economic environment, and other performance context factors in the assessment areas. The following table summarizes the bank's lending activity from 2020 through 2022.

Summary of Lending Activity

Loan Type	#	%	\$(000s)	%
Total Consumer related	0	0	\$0	0
Home Improvement	176	--	\$26,604	--
Home Purchase	3,488	--	\$1,217,767	--
Multi-Family Housing	56	--	\$134,673	--
Refinancing	4,196	--	\$1,158,109	--
Other Purpose Closed-End	108	--	\$23,190	--
Other Purpose LOC	281	--	\$63,644	--
Total HMDA related	8,305	64	\$2,623,987	78
Total Non-HMDA related	0	0	\$0	0
Small Business	4,481	--	\$719,115	--
Total Small Business related	4,481	34	\$719,115	21
Small Farm	207	--	\$13,897	--
Total Small Farm related	207	2	\$13,897	0
TOTAL LOANS	12,993	100	\$3,356,999	100

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

As shown, the bank originated 8,305 HMDA loans totaling \$2.6 billion during the review period. A large volume of HMDA loans were for the purpose of refinancing or home purchase. In addition, the bank made 4,481 small business loans totaling \$719.1 million.

Assessment Area Concentration

The bank originated a high percentage of its HMDA and small business loans to borrowers and businesses residing in or located within the bank's assessment areas. The following table below shows, by product type, the number and percentage of loans reviewed that were located inside and outside the bank's assessment areas. As shown, 77.9 percent of HMDA loans and 73.6 percent of small business loans were made inside the assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	155	88.1	\$23,958	90.1	21	11.9	\$2,646	9.9
Home Purchase - Conventional	2,410	76.4	\$883,191	78.8	745	23.6	\$237,511	21.2
Home Purchase - FHA	171	69	\$43,729	68.7	77	31	\$19,895	31.3
Home Purchase - VA	57	67.1	\$23,457	70.1	28	32.9	\$9,984	29.9
Multi-Family Housing	37	66.1	\$101,333	75.2	19	33.9	\$33,340	24.8
Other Purpose Closed-End	81	75	\$17,862	77	27	25	\$5,328	23
Other Purpose LOC	247	87.9	\$57,191	89.9	34	12.1	\$6,453	10.1
Refinancing	3,309	78.9	\$948,211	81.9	887	21.1	\$209,898	18.1
Total HMDA related	6,467	77.9	\$2,098,932	80	1,838	22.1	\$525,055	20
Small Business	3,300	73.6	\$413,603	57.5	1,181	26.4	\$305,512	42.5
Total Small Bus. related	3,300	73.6	\$413,603	57.5	1,181	26.4	\$305,512	42.5
Small Farm	191	92.3	\$12,792	92	16	7.7	\$1,105	8
Total Small Farm related	191	92.3	\$12,792	92	16	7.7	\$1,105	8
TOTAL LOANS	9,958	76.6	\$2,525,327	75.2	3,035	23.4	\$831,672	24.8

Note: Affiliate loans not included

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

The distribution of lending by geography and the distribution by borrower income and business size were compared to demographic data and available aggregate lending data. The overall geographic distribution of HMDA and small business loans reflects good penetration throughout the assessment areas and does not reveal any unexplained gaps in lending patterns. The distribution of loans by borrower characteristics reflects adequate penetration among customers of different income levels and businesses of different sizes.

Responsiveness to the Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

Based on the analysis of the geographic distribution of loans and the distribution of loans by borrower income and business revenue, the bank exhibits an adequate record of serving the credit needs of low-income individuals and geographies and very small businesses.

Community Development Lending

The bank makes a low level of community development loans. The conclusion was the result of declining community development lending performance in the full-scope assessment area since the previous examination and the bank's performance being below that of peers in the full-scope assessment area. Furthermore, the bank made no community development loans in five of the six limited-scope assessment areas even though the bank had notable market share throughout most of the limited-scope assessment areas.

During the review period, the bank originated or renewed 17 qualified community development loans totaling approximately \$20.9 million in its assessment areas. Thirteen loans totaling approximately \$12.4 million benefited the Nashville assessment area and four loans totaling \$8.5 million benefited the Knoxville assessment area. Loans totaling \$6.5 million supported affordable housing; \$6.5 million provided community services targeted to LMI individuals; \$4.6 million helped revitalize or stabilize a moderate-income geographies; and \$3.3 million promoted economic development for small businesses employing LMI individuals. More information on the community development loans can be found in the *Community Development Lending* section of this evaluation applicable to the Nashville and Knoxville assessment areas.

Product Innovation

CapStar makes limited use of innovative and/or flexible lending practices in serving assessment area credit needs. The bank offers government-insured loan programs through the Federal Housing Administration (FHA), Department of Veterans Affairs (VA), and USDA as well as commercial loans and PPP loans through the SBA. FHA, VA, and USDA loans offer flexible, long-term financing to eligible borrowers with low or no down payment requirements. Loans made through the SBA provide small businesses with access to capital with more flexible terms than conventional commercial financing. PPP loans, which were made in response to the COVID-19 pandemic in 2020 and 2021, were available to businesses with fewer than 500 employees or businesses that met SBA industry size standards. The program provided funds for payroll costs and other operational costs to businesses impacted by the pandemic and are fully forgivable if employee retention criteria were met and the funds were used for eligible purposes.

INVESTMENT TEST

The investment test rating is high satisfactory. CapStar makes a significant level of qualified investments and grants in its assessment areas. The bank had six current period investments totaling approximately \$15.8 million and 14 prior period investments totaling approximately \$8.1 million.

Current period investments benefiting the bank's assessment areas consisted of two investments totaling \$10 million in the Nashville assessment area, two investments totaling \$5 million in the Knoxville assessment

area, and two investments totaling approximately \$765,000 benefiting the broader statewide or regional area (BSRA) that includes all of the bank's assessment areas. All current period investments supported affordable housing. Prior period investments benefiting the assessment areas consisted of nine investments totaling approximately \$2.8 million in the Nashville assessment area and five investments for approximately \$5.3 million benefiting the BSRA. Investments in the BSRA included economic development supporting a small business CDFI and a Small Business Investment Company (SBIC) serving the Southeast and nationwide, respectively, as well as affordable housing benefiting all portions of the state of Tennessee.

The bank also made qualified contributions totaling \$592,000 during the review period. Contributions included \$71,250 in the Nashville assessment area, \$19,750 in the Athens assessment area, and a \$500,000 donation shared by the Athens, Cleveland, and Knoxville assessment areas. The bank also made \$1,000 in donations benefiting an organization serving a BSRA that includes all of the bank's assessment areas. Most of the contributions were for purposes of providing community services to LMI individuals.

The bank exhibits adequate responsiveness to assessment area credit and community development needs, but investments are not considered innovative or complex. More information on investments and contributions can be found in the *Investment Test* section for each applicable assessment area benefitted.

SERVICE TEST

The service test rating is needs to improve.

Retail banking services are adequate. Delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's assessment areas. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies or LMI individuals. During the review period, the bank gained nine branches through the acquisitions of First National Bank of Manchester and Bank of Waynesboro in 2020, two of which were in LMI tracts. The bank also opened a branch in the Knoxville assessment area in 2021 and converted a loan production office in Chattanooga to a branch in 2022; none of these openings occurred in LMI tracts. The bank closed a branch in a moderate-income tract in the Knoxville assessment area in 2020. Bank products, services, and standard business hours do not vary in a way that inconveniences the bank's assessment areas, including LMI geographies or LMI individuals.

CapStar provides a limited level of community development services in its assessment areas. During the review period, bank staff provided 295 hours of qualified community development services that benefited the assessment areas. Beginning in March 2020, the COVID-19 pandemic posed a particularly acute challenge to banks attempting to provide community development services when disruptions to organizations' staffing and ability to convene in person drastically limited community development service opportunities throughout the nation. These limitations were taken into consideration for the community development services ratings. These limitations notwithstanding, qualified community service hours show a significant decrease from the previous examination and a continuation of a decline over the past three examination cycles. Additionally, the bank's community development service hours are below that of its peers during the same time period. Community development service hours totaled 57 in the Nashville assessment area, 166 in the Athens assessment area, 52 in the Chattanooga assessment area, and 20 in the Manchester assessment area. The majority of service hours were the result of employees serving as board members for organizations providing community services to LMI individuals.

More information on retail and community development services can be found in the *Service Test* section for each applicable assessment area benefitted.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous examination.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NASHVILLE, TENNESSEE ASSESSMENT AREA

Overview

The Nashville assessment area consists of Cannon, Davidson, Rutherford, Sumner, and Williamson counties, which are five of the 13 counties that make up the Nashville MSA. Cannon and Rutherford counties were added to the assessment area in 2020 after CapStar’s acquisition of First National Bank of Manchester. The state capital of Nashville, in Davidson County, is the principal city in the assessment area. As of December 31, 2022, CapStar operated seven banking offices in the assessment area.

Population and Income Characteristics

According to data from the 2020 U.S. Census Bureau, the population of the assessment area is 1,515,883. With approximately 47.2 percent of the population, Davidson County is the most populous of the five counties in the assessment area, followed by Rutherford County with 22.5 percent, Williamson County with 16.3 percent, Sumner County with 13.0 percent, and Cannon County with 1.0 percent. The population of the assessment area grew 14.5 percent from 2015 to 2020. All five counties experienced population growth, the highest being in Williamson County (24.2 percent) and Rutherford County (20.9 percent). As comparison, the population in Tennessee grew 6.3 percent during the same time frame.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the relevant area. The following table sets forth the estimated median family income for 2020, 2021, and 2022 for the Nashville MSA and shows that the median family income increased significantly from 2021 to 2022. The table also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

**Borrower Income Levels
Nashville-Davidson-Murfreesboro-Franklin, TN MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2020	\$76,500	0 - \$38,249	\$38,250 - \$61,199	\$61,200 - \$91,799	\$91,800 - & above
2021	\$79,200	0 - \$39,599	\$39,600 - \$63,359	\$63,360 - \$95,039	\$95,040 - & above
2022	\$95,600	0 - \$47,799	\$47,800 - \$76,479	\$76,480 - \$114,719	\$114,720 - & above

There is significant variation in the 2020 median family income for the five counties in the assessment area, ranging from a high of \$127,613 in Williamson County to a low of \$64,114 in Cannon County. The 2020 median family income for Tennessee was \$68,793. The median family income figures provide some perspective on the economic diversity across the assessment area, which has implications for lending opportunities.

According to 2022 FFIEC census data, 355,588 families live in the assessment area. Of those families, 20.0 percent are low-income, 17.1 percent are moderate-income, 20.9 percent are middle-income, and 42.0 percent are upper-income. Of the total families, 7.9 percent have incomes below the poverty level. However, poverty levels in the individual counties of the assessment area further illustrate the area’s economic diversity.

The percentage of persons in poverty is 10.6 percent in Davidson County and 12.5 percent in Cannon County, but only 3.2 percent in Williamson County.

Assessment Area Demographics

The following tables provide demographic characteristics of the assessment area. The first table is based on 2021 FFIEC census data and 2021 Dun & Bradstreet (D&B) information. The second table is based on 2022 FFIEC census data and 2022 D&B information. Certain components of the data in the tables are discussed in this evaluation as they apply to specific parts of the analysis.

Combined Demographics Report - 2020 - 2021

Assessment Area: Nashville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	10.3%	20,666	6.4%	7,478	36.2%	64,928	20.2%
Moderate-income	66	22.6%	67,173	20.9%	11,965	17.8%	54,051	16.8%
Middle-income	104	35.6%	120,363	37.4%	9,015	7.5%	63,908	19.8%
Upper-income	87	29.8%	113,442	35.2%	3,634	3.2%	139,076	43.2%
Unknown-income	5	1.7%	319	0.1%	34	10.7%	0	0.0%
Total Assessment Area	292	100.0%	321,963	100.0%	32,126	10.0%	321,963	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	43,904	11,758	3.7%	26.8%	26,636	60.7%	5,510	12.6%
Moderate-income	128,902	52,157	16.6%	40.5%	64,492	50.0%	12,253	9.5%
Middle-income	199,012	124,648	39.6%	62.6%	60,571	30.4%	13,793	6.9%
Upper-income	171,633	126,170	40.0%	73.5%	35,277	20.6%	10,186	5.9%
Unknown-income	509	372	0.1%	73.1%	82	16.1%	55	10.8%
Total Assessment Area	543,960	315,105	100.0%	57.9%	187,058	34.4%	41,797	7.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,515	8.0%	4,762	7.5%	703	12.8%	50	9.1%
Moderate-income	13,931	20.1%	12,649	20.0%	1,206	22.0%	76	13.8%
Middle-income	19,374	28.0%	18,180	28.7%	1,080	19.7%	114	20.7%
Upper-income	29,814	43.0%	27,182	43.0%	2,326	42.4%	306	55.4%
Unknown-income	680	1.0%	508	0.8%	166	3.0%	6	1.1%
Total Assessment Area	69,314	100.0%	63,281	100.0%	5,481	100.0%	552	100.0%
Percentage of Total Businesses:			91.3%		7.9%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	19	2.8%	19	2.8%	0	0.0%	0	0.0%
Moderate-income	81	11.8%	76	11.3%	4	50.0%	1	25.0%
Middle-income	256	37.4%	250	37.2%	3	37.5%	3	75.0%
Upper-income	322	47.1%	321	47.8%	1	12.5%	0	0.0%
Unknown-income	6	0.9%	6	0.9%	0	0.0%	0	0.0%
Total Assessment Area	684	100.0%	672	100.0%	8	100.0%	4	100.0%
Percentage of Total Farms:			98.2%		1.2%		0.6%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

Combined Demographics Report - 2022

Assessment Area: Nashville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	19	5.7%	15,879	4.5%	4,850	30.5%	71,062	20.0%
Moderate-income	79	23.9%	72,571	20.4%	10,931	15.1%	60,967	17.1%
Middle-income	122	36.9%	137,079	38.5%	8,195	6.0%	74,248	20.9%
Upper-income	102	30.8%	127,467	35.8%	3,741	2.9%	149,311	42.0%
Unknown-income	9	2.7%	2,592	0.7%	496	19.1%	0	0.0%
Total Assessment Area	331	100.0%	355,588	100.0%	28,213	7.9%	355,588	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	32,471	7,969	2.3%	24.5%	21,191	65.3%	3,311	10.2%
Moderate-income	137,860	59,531	16.9%	43.2%	66,633	48.3%	11,696	8.5%
Middle-income	231,144	143,090	40.7%	61.9%	71,976	31.1%	16,078	7.0%
Upper-income	198,435	139,056	39.6%	70.1%	44,984	22.7%	14,395	7.3%
Unknown-income	6,069	1,872	0.5%	30.8%	3,412	56.2%	785	12.9%
Total Assessment Area	605,979	351,518	100.0%	58.0%	208,196	34.4%	46,265	7.6%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,836	4.1%	2,572	4.1%	247	4.6%	17	2.8%
Moderate-income	14,817	21.4%	13,251	21.0%	1,462	27.0%	104	17.3%
Middle-income	20,761	30.0%	19,333	30.6%	1,297	24.0%	131	21.8%
Upper-income	28,875	41.7%	26,472	41.9%	2,073	38.4%	330	54.8%
Unknown-income	1,945	2.8%	1,599	2.5%	326	6.0%	20	3.3%
Total Assessment Area	69,234	100.0%	63,227	100.0%	5,405	100.0%	602	100.0%
	Percentage of Total Businesses:		91.3%		7.8%		0.9%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7	1.0%	7	1.1%	0	0.0%	0	0.0%
Moderate-income	95	14.0%	92	13.8%	2	28.6%	1	25.0%
Middle-income	236	34.9%	231	34.7%	3	42.9%	2	50.0%
Upper-income	335	49.5%	332	49.8%	2	28.6%	1	25.0%
Unknown-income	4	0.6%	4	0.6%	0	0.0%	0	0.0%
Total Assessment Area	677	100.0%	666	100.0%	7	100.0%	4	100.0%
	Percentage of Total Farms:		98.4%		1.0%		0.6%	

Based on 2022 FFIEC Census Data and 2022 D&B information

Housing Characteristics

The 2022 FFIEC census data shows 605,979 housing units in the assessment area. Of the total units, 58.0 percent are owner-occupied, 34.4 percent are rental units, and 7.6 percent are vacant. While a majority of the housing units are owner-occupied, a higher percentage of housing in LMI tracts consists of rental units, indicating reduced opportunities for mortgage origination in these geographies. The percentage of owner-occupied housing units is highest in Williamson County, while the percentage of rental units is highest in Davidson County.

The median age of the housing stock in the assessment area is 37 years, ranging from 33 years in upper-income tracts to 46 years in low-income tracts. Generally, the housing stock is newer in Williamson County (median age of 22 years) and Rutherford County (23 years) and older in Davidson County (38 years).

The median housing value in the assessment area is \$279,922, which is higher than the median housing value for the state of Tennessee at \$177,600. The median housing value ranges from \$169,956 in low-income tracts to \$423,412 in upper-income tracts. The median housing value is highest in Williamson County at \$471,300 and lowest in Cannon County at \$172,600.

The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means the housing is considered more affordable while a lower ratio means the housing is considered less affordable. The affordability ratio is 24.6 percent for the assessment area compared to 30.9 percent for the state of Tennessee, indicating that housing in the assessment area is less affordable than it is statewide. According to the affordability ratios, housing is most affordable in Cannon County and least affordable in Davidson County. Within the assessment area, 18 percent of homeowners are cost-burdened, meaning that their housing cost equals 30 percent or more of their household income.³

The median gross rent in the assessment area is \$1,173 compared to \$897 for the state of Tennessee. At \$642, the median gross rent in Cannon County is substantially less than the other counties in the assessment area. The median gross rent is highest in Williamson County at \$1,596 per month. Within the assessment area, 41 percent of renters are cost-burdened.⁴

Economic Conditions

The Nashville MSA has seen strong population and job growth in the past few years and is also a leading national healthcare hub and a thriving tourism center. Between January 2020 and December 2022, total nonfarm staffing grew 7.7 percent in the MSA,⁵ while total nonfarm staffing in the United States increased 1.6 percent.⁶ According to the Bureau of Labor Statistics, the private sector industries with the highest number of employees as of June 2022 are healthcare and social assistance, accommodation and food services, retail trade, and administrative and waste services. Apart from state government, the leading private sector employers in the metro area include Vanderbilt University Medical Center, Nissan North America, HCA Healthcare, Vanderbilt University, and Saint Thomas Health.⁷

³ U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy.

⁴ Ibid.

⁵ "All Employees: Total Nonfarm in Nashville-Davidson-Murfreesboro-Franklin, TN (MSA)." Federal Reserve Economic Data (FRED), St. Louis Fed, <https://fred.stlouisfed.org/series/NASH947NA>. Accessed 2 Jun. 2023.

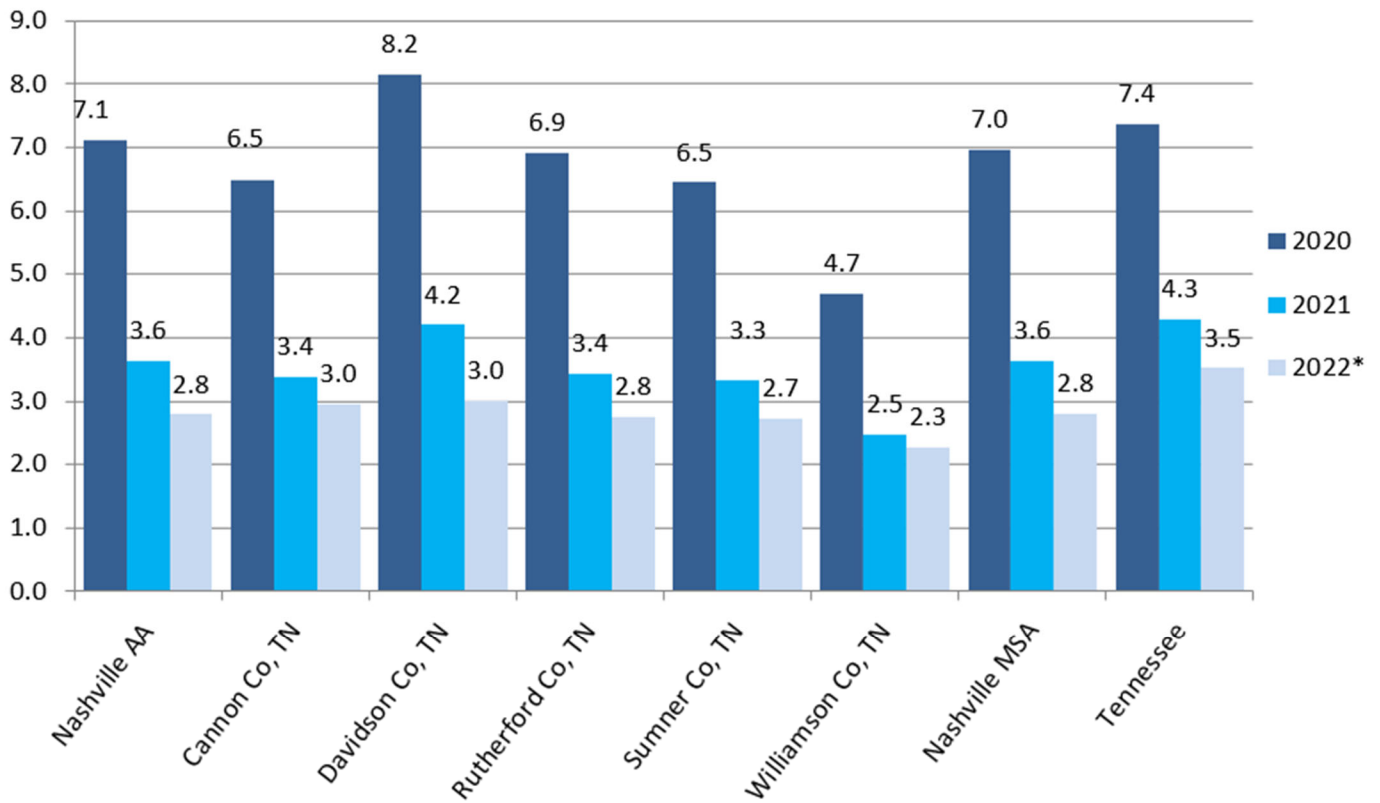
⁶ "All Employees: Total Nonfarm." Federal Reserve Economic Data (FRED), St. Louis Fed, <https://fred.stlouisfed.org/series/PAYEMS>. Accessed 2 Jun. 2023.

⁷ "Major Employers." Nashville Area Chamber of Commerce, <https://www.nashvillechamber.com/explore/work/major-employers>. Accessed 2 Jun. 2023.

According to multiple articles from The Tennessean, Nashville has benefited from corporate relocations and expansions. Companies such as Amazon and AllianceBernstein, an asset management and research firm, have made sizable commitments to the downtown area and Oracle is planning a waterfront campus across the river. These firms are drawn to Nashville for the region’s low business and living costs compared to core coastal markets, as well as the metro area’s robust and growing labor pool of highly educated workers.

The following chart shows the unemployment rates in 2020, 2021, and an eight month average in 2022 for the assessment area, each of the five counties in the assessment area, the Nashville MSA, and the state of Tennessee. Unemployment rates are trending down to near pre-pandemic levels, and in both 2021 and 2022, the unemployment rate in each of the five counties, as well as the Nashville MSA, was less than the rate in the state of Tennessee.

Unemployment Rates -Nashville



Not Seasonally Adjusted. Source: Bureau of Labor Statistics;
*2022 figures are an 8 month average through August 2022.

Competition

Nashville has a competitive banking market. According to the FDIC Deposit Market Share Report as of June 30, 2022, 56 financial institutions operated 441 offices inside the assessment area. CapStar ranked 10th in deposit market share with \$1.6 billion, or 2.0 percent of total deposits in the assessment area. Pinnacle Bank held the largest deposit market share with 19.6 percent followed by Bank of America with 17.2 percent.

Credit and Community Development Needs

As part of the CRA examination, information was obtained from two contacts familiar with both the community and community development activities. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs through lending, investment, or service activities. According to these contacts, affordable workforce housing, small business assistance, and predatory lending are concerns for the area.

The contacts noted that the Nashville area's community development environment is strong, with numerous nonprofits providing financial counseling and community development organizations targeting LMI individuals and families. Additionally, there are several active CDFIs specializing in affordable housing and small business lending. These organizations create a favorable environment and opportunity for banks to partner with nonprofits, developers, and CDFIs, to provide affordable housing, neighborhood revitalization, and small business development. According to the contacts, most banks in the area are active in community development projects and in lending to LMI communities and individuals, both directly and indirectly through CDFIs and other nonprofits. The contacts also noted that while the economy in the Nashville MSA is strong overall, there are some areas throughout north Nashville that continue to experience significant need and a concentrated level of disinvestment.

One of the contacts, a specialist engaged in affordable housing initiatives, explained that housing challenges in Nashville are twofold: the area faces a housing shortage in the next few years and the area is losing many of its naturally occurring affordable housing (NOAH) options. NOAH refers to residential rental properties that are below market rate rent and affordable to LMI households but not subsidized by any federal program. According to the contact, the older apartment complexes that are NOAH are being sold and renovated by investors or cash buyers and converted to luxury apartments with market-rate or above market-rate rents. With increased demand in the area for these properties by outside investors, nonprofit affordable housing developers have struggled to secure the additional funding needed to compete for these units. These issues have led to some existing LMI homeowners or renters being displaced through gentrification and prospective LMI homeowners or renters being priced out of housing within the city centers and forced to live farther away from where they work.

The housing contact also stated that rising housing and land costs have further challenged nonprofits in the area, reducing their ability to construct or rehabilitate affordable homes at a rate comparable to prior years. While land is available for development, affordable residential development is not feasible due to cost. Additionally, private investors are targeting high-end price points to maximize profits. This has created an extremely challenging and competitive environment for LMI individuals seeking affordable housing and also has created additional need for down payment and closing costs assistance programs. The contact explained that banks can collaborate with nonprofit affordable housing organizations to help address these challenges, primarily through providing capital or grants. Additional options include seeking housing tax credits or investment opportunities in loan consortiums targeting affordable housing.

The second contact, a specialist who works with small businesses, said that access to capital is a barrier to launching and growing new businesses. According to the contact, many small business owners in the area do not have the collateral or the personal net worth that would allow them to meet traditional bank underwriting

standards. The contact added that many local banks do not extend smaller dollar commercial loans even though many small businesses seek funding in smaller amounts. The contact stated that in some instances, banks that are unable to meet these needs will partner with and refer an applicant to local small business development centers (SBDCs) or CDFIs to address the need. This was noted by the contact as an impactful way to address small business needs. The contact encouraged banks to provide educational services to small businesses and to either partner with SBDCs or CDFIs specializing in small business lending or be more flexible on collateral standards and debt-service coverage ratios with small business lending.

The community contacts also expressed concerns over predatory lending and check cashing businesses, particularly in LMI communities. The contacts encourage banks to find alternative solutions to predatory lending and adjust their approach to financial literacy to also include wealth building and retention for LMI individuals.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The review included 5,107 HMDA loans and 1,625 small business loans made in the assessment area in 2020, 2021, and 2022. Given these volumes, HMDA lending was given greater weight in evaluating lending performance in the assessment area. Additionally, within the HMDA lending category, refinance loans were the primary HMDA product type by volume, thus, refinance loans were given the heaviest weight in deriving overall HMDA lending conclusions in this assessment area. Lending levels reflect good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank makes a low level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to assessment area credit needs. Lending activity performance was primarily driven by the dollar volume of the bank's loans compared to its dollar volume of deposits in the assessment area; 60.4 percent of the bank's deposits are found in the assessment area. Additional consideration was given to the bank's branch presence and competition in the assessment area.

By dollar, the bank originated 84.1 percent of its HMDA lending and 57.5 percent of its small business lending within the assessment area. HMDA lending exceeded the bank's deposit base while small business lending was below the bank's deposit base in the assessment area. The bank operates in a highly competitive banking environment that includes credit card lenders and large regional and nationwide banks. In 2020, CapStar ranked 16th out of 835 HMDA lenders in the assessment area, with 1.9 percent of the reported loans; in 2021, CapStar ranked 21st out of 875 HMDA lenders, with 1.7 percent of the reported loans. For small business lending, the bank ranked 15th out of 247 lenders reporting CRA data in 2020, with 1.9 percent of the reported loans. The bank ranked 17th out of 225 lenders in 2021, with 1.3 percent of the reported loans.

Geographic Distribution of Loans

Based on the following analysis, the overall geographic distribution of the bank's HMDA and small business loans reflects good penetration throughout the assessment area and does not reveal any unexplained gaps in lending patterns.

Residential Real Estate (HMDA) Lending

The following tables show the geographic distribution of the bank's HMDA loans for 2020 through 2022 within the assessment area. The tables include a comparison of HMDA lending to certain demographic data and to the lending of the aggregate HMDA lenders in the assessment area (available for 2020 and 2021 only). The HMDA aggregate lenders' data is the combined total of lending activity reported by all lenders subject to HMDA reporting in the assessment area. The analysis focused on the bank's major product types, home purchase and refinance loans.

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Nashville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										Bank Lending & Demographic Data						
		2020, 2021					2020					2021					2022						
		Bank		Owner Occupied Units %	Count		Dollar			Count		Dollar			Count		Dollar			Owner Occupied Units %			
		#	%		\$ (000s)	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %	Bank	%	\$ (000s)		%		
HOME PURCHASE	Low	197	12.0%	72,289	11.9%	3.7%	107	13.9%	6.1%	36,067	13.5%	5.9%	90	10.4%	6.4%	36,222	10.7%	6.2%	19	3.6%	8,762	3.7%	2.3%
	Moderate	243	14.8%	79,183	13.1%	16.6%	110	14.3%	14.7%	33,405	12.5%	11.2%	133	15.3%	15.8%	45,778	13.5%	12.0%	68	13.1%	24,867	10.4%	16.9%
	Middle	524	32.0%	173,928	28.7%	39.6%	215	28.0%	40.0%	65,675	24.5%	33.5%	309	35.6%	39.0%	108,253	32.0%	32.1%	183	35.1%	68,688	28.8%	40.7%
	Upper	673	41.1%	280,630	46.3%	40.0%	336	43.8%	39.0%	132,693	49.5%	49.4%	337	38.8%	38.6%	147,937	43.7%	49.7%	245	47.0%	133,919	56.1%	39.6%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.1%	6	1.2%	2,277	1.0%	0.5%
	Total	1,637	100%	606,030	100%	100%	768	100%	100%	267,840	100%	100%	869	100%	100%	338,190	100%	100%	521	100%	238,513	100%	100%
REFINANCE	Low	174	7.4%	53,135	7.4%	3.7%	112	8.2%	4.1%	34,992	8.5%	3.9%	62	6.3%	4.2%	18,143	5.9%	3.9%	11	3.9%	3,197	3.0%	2.3%
	Moderate	289	12.3%	68,016	9.4%	16.6%	149	10.8%	10.9%	36,181	8.8%	7.9%	140	14.2%	12.6%	31,835	10.3%	8.8%	38	13.4%	11,254	10.6%	16.9%
	Middle	662	28.1%	162,424	22.5%	39.6%	364	26.5%	35.5%	87,642	21.2%	28.8%	298	30.3%	36.9%	74,782	24.2%	29.6%	109	38.5%	27,800	26.2%	40.7%
	Upper	1,230	52.1%	437,876	60.6%	40.0%	746	54.3%	49.4%	253,719	61.4%	59.2%	484	49.1%	46.2%	184,157	59.6%	57.7%	124	43.8%	63,765	60.1%	39.6%
	Unknown	4	0.2%	684	0.1%	0.1%	3	0.2%	0.1%	497	0.1%	0.1%	1	0.1%	0.1%	187	0.1%	0.1%	1	0.4%	124	0.1%	0.5%
	Total	2,359	100%	722,135	100%	100%	1,374	100%	100%	413,031	100%	100%	985	100%	100%	309,104	100%	100%	283	100%	106,140	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	3.7%	0	0.0%	2.9%	0	0.0%	2.9%	0	0.0%	3.1%	0	0.0%	2.8%	0	0.0%	0	0.0%	2.3%
	Moderate	1	33.3%	37	43.0%	16.6%	1	33.3%	10.3%	37	43.0%	6.9%	0	0.0%	9.9%	0	0.0%	6.8%	12	15.0%	1,610	9.5%	16.9%
	Middle	2	66.7%	49	57.0%	39.6%	2	66.7%	32.7%	49	57.0%	26.8%	0	0.0%	32.8%	0	0.0%	25.8%	24	30.0%	2,578	15.2%	40.7%
	Upper	0	0.0%	0	0.0%	40.0%	0	0.0%	54.0%	0	0.0%	63.4%	0	0.0%	54.1%	0	0.0%	64.5%	44	55.0%	12,802	75.4%	39.6%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0	0.0%	0.5%
	Total	3	100%	86	100%	100%	3	100%	100%	86	100%	100%	0	0.0%	100%	0	0.0%	100%	80	100%	16,990	100%	100%
MULTI FAMILY	Multi-Family Units																						
	Low	0	0.0%	0	0.0%	13.6%	0	0.0%	21.3%	0	0.0%	8.7%	0	0.0%	19.5%	0	0.0%	19.5%	0	0.0%	0	0.0%	9.0%
	Moderate	0	0.0%	0	0.0%	34.9%	0	0.0%	34.4%	0	0.0%	18.0%	0	0.0%	39.7%	0	0.0%	39.0%	0	0.0%	0	0.0%	30.3%
	Middle	1	50.0%	2,100	14.6%	29.4%	0	0.0%	32.8%	0	0.0%	59.7%	1	50.0%	28.2%	2,100	14.6%	31.8%	2	100.0%	444	100.0%	31.5%
	Upper	1	50.0%	12,294	85.4%	22.1%	0	0.0%	11.5%	0	0.0%	13.6%	1	50.0%	12.1%	12,294	85.4%	9.2%	0	0.0%	0	0.0%	27.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.6%	0	0.0%	0.4%	0	0.0%	0	0.0%	1.7%
Total	2	100%	14,394	100%	100%	0	0.0%	100%	0	0.0%	100%	2	100%	100%	14,394	100%	100%	2	100%	444	100%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	3.7%	0	0.0%	2.7%	0	0.0%	1.6%	0	0.0%	2.8%	0	0.0%	1.9%	4	2.4%	985	2.1%	2.3%
	Moderate	0	0.0%	0	0.0%	16.6%	0	0.0%	8.0%	0	0.0%	4.8%	0	0.0%	7.8%	0	0.0%	4.7%	15	8.8%	1,621	3.5%	16.9%
	Middle	0	0.0%	0	0.0%	39.6%	0	0.0%	30.2%	0	0.0%	22.1%	0	0.0%	28.7%	0	0.0%	20.0%	45	26.5%	6,531	14.1%	40.7%
	Upper	0	0.0%	0	0.0%	40.0%	0	0.0%	59.1%	0	0.0%	71.5%	0	0.0%	60.7%	0	0.0%	73.5%	105	61.8%	36,792	79.4%	39.6%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	1	0.6%	397	0.9%	0.5%
	Total	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	170	100%	46,326	100%	100%

Originations & Purchases
Based on 2021 & 2022 FFIEC Census Data; 2011-2015 ACS data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Nashville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										Bank Lending & Demographic Data						
		2020, 2021					2020					2021					2022						
		Count		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar			Count		Dollar		Owner Occupied Units %		
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%		\$ (000s)	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	5	12.5%	955	8.0%	3.7%	3	20.0%	4.6%	567	13.9%	3.4%	2	8.0%	4.5%	388	4.9%	3.1%	0	0.0%	0	0.0%	2.3%
	Moderate	4	10.0%	595	5.0%	16.6%	3	20.0%	14.6%	483	11.8%	6.7%	1	4.0%	10.6%	112	1.4%	4.3%	2	20.0%	172	9.4%	16.9%
	Middle	8	20.0%	1,687	14.1%	39.6%	3	20.0%	32.7%	553	13.5%	17.7%	5	20.0%	29.2%	1,134	14.4%	13.5%	5	50.0%	485	26.5%	40.7%
	Upper	23	57.5%	8,751	73.0%	40.0%	6	40.0%	48.1%	2,485	60.8%	72.1%	17	68.0%	55.4%	6,266	79.3%	79.1%	3	30.0%	1,171	64.1%	39.6%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.3%	0	0.0%	0.1%	0	0.0%	0	0.0%	0.5%
	Total	40	100%	11,988	100%	100%	15	100%	100%	4,088	100%	100%	25	100%	100%	7,900	100%	100%	10	100%	1,828	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	3.7%	0	0.0%	3.8%	0	0.0%	3.3%	0	0.0%	3.8%	0	0.0%	2.5%	0	0.0%	0	0.0%	2.3%
	Moderate	0	0.0%	0	0.0%	16.6%	0	0.0%	21.3%	0	0.0%	14.0%	0	0.0%	22.8%	0	0.0%	15.6%	0	0.0%	0	0.0%	16.9%
	Middle	0	0.0%	0	0.0%	39.6%	0	0.0%	50.0%	0	0.0%	45.0%	0	0.0%	54.7%	0	0.0%	48.8%	0	0.0%	0	0.0%	40.7%
	Upper	0	0.0%	0	0.0%	40.0%	0	0.0%	24.8%	0	0.0%	37.7%	0	0.0%	18.7%	0	0.0%	33.1%	0	0.0%	0	0.0%	39.6%
	Unknown	0	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%	0.5%
	Total	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%	100%
HMDA TOTALS	Low	376	9.3%	126,379	9.3%	3.7%	222	10.3%	4.8%	71,626	10.5%	4.9%	154	8.2%	4.9%	54,753	8.2%	5.5%	34	3.2%	12,944	3.2%	2.3%
	Moderate	537	13.3%	147,831	10.9%	16.6%	263	12.2%	12.4%	70,106	10.2%	9.6%	274	14.6%	13.6%	77,725	11.6%	11.3%	135	12.7%	39,524	9.6%	16.9%
	Middle	1,197	29.6%	340,188	25.1%	39.6%	584	27.0%	37.1%	153,919	22.5%	32.0%	613	32.6%	37.4%	186,269	27.8%	30.4%	368	34.5%	106,526	26.0%	40.7%
	Upper	1,927	47.7%	739,551	54.6%	40.0%	1,088	50.4%	45.6%	388,897	56.8%	53.5%	839	44.6%	44.0%	350,654	52.4%	52.8%	521	48.9%	248,449	60.6%	39.6%
	Unknown	4	0.1%	684	0.1%	0.1%	3	0.1%	0.1%	497	0.1%	0.1%	1	0.1%	0.1%	187	0.0%	0.1%	8	0.8%	2,798	0.7%	0.5%
	Total	4,041	100%	1,354,633	100%	100%	2,160	100%	100%	685,045	100%	100%	1,881	100%	100%	669,588	100%	100%	1,066	100%	410,241	100%	100%

Originations & Purchases
Based on 2021 & 2022 FFIEC Census Data; 2011-2015 ACS data; 2016-2020 ACS data

The geographic distribution of HMDA loans is good. For 2020 and 2021, the percentage of the bank’s total loans in low-income tracts (9.3 percent) exceeded the percentage of owner-occupied housing units at 3.7 percent. The bank’s lending in 2020 and 2021 (10.3 percent and 8.2 percent, respectively) exceeded the aggregate comparison (4.8 percent and 4.9 percent, respectively). In 2022, the percentage of the bank’s total loans in low-income tracts (3.2 percent) exceeded the demographic comparison (2.3 percent). This represents excellent performance in low-income tracts.

In moderate-income tracts, the percentage of the bank’s total loans for 2020 and 2021 (13.3 percent) was less than the demographic comparison (16.6 percent). The bank’s lending in 2020 (12.2 percent) was similar to the aggregate comparison (12.4 percent), and in 2021, the bank’s lending (14.6 percent) exceeded the aggregate comparison (13.6 percent). In 2022, the percentage of the bank’s total loans in moderate-income tracts (12.7 percent) was less than the demographic comparison (16.9 percent). This represents adequate performance in moderate-income tracts.

For refinance loans, the percentage of the bank’s loans in low-income tracts exceeded the demographic comparison in 2020, 2021, and 2022 and exceeded the aggregate comparison in 2020 and 2021; this was deemed excellent. The percentage of the bank’s refinance loans in moderate-income tracts was less than the demographic comparison in 2020, 2021, and 2022, similar to the aggregate comparison in 2020, and exceeded the aggregate comparison in 2021; this was deemed adequate. Overall, bank performance in LMI tracts in the refinance category was good.

For home purchase loans, the percentage of the bank’s loans in low-income tracts exceeded the demographic comparison in 2020, 2021, and 2022 and exceeded the aggregate comparison in 2020 and 2021; this was deemed excellent. The percentage of the bank’s loans in moderate-income tracts was less than the demographic comparison in 2020, 2021, and 2022 and similar to the aggregate comparison in 2020 and 2021; this was deemed adequate. Overall, bank performance in LMI tracts in the home purchase category was good.

Small Business Lending

The following table shows the geographic distribution of small business and small farm loans in the assessment area for 2020 through 2022. The table includes a comparison of the bank’s lending to certain demographic data and to the lending of the aggregate lenders in the assessment area (available for 2020 and 2021 only). The CRA aggregate lenders’ data is the combined total of lending activity reported by all lenders subject to CRA small business and small farm loan data reporting requirements in the assessment area. As previously noted, the analysis did not include small farm loans.

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Nashville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending										Bank Lending & Demographic Data						
		2020, 2021					2020					2021					2022						
		Bank		Dollar		Total Businesses	Bank		Agg			Bank		Agg			Bank		Dollar			Total Businesses	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	\$ 000s	\$ %	%
SMALL BUSINESSES	Low	92	6.4%	16,627	8.7%	8.0%	56	6.8%	8.3%	9,742	9.0%	11.1%	36	5.8%	8.1%	6,885	8.3%	11.4%	6	3.3%	2,620	5.6%	4.1%
	Moderate	325	22.5%	41,103	21.5%	20.1%	171	20.9%	18.0%	24,891	23.1%	20.1%	154	24.6%	18.5%	16,212	19.5%	20.1%	36	19.9%	9,928	21.3%	21.4%
	Middle	386	26.7%	50,924	26.6%	28.0%	209	25.5%	26.1%	26,491	24.5%	20.2%	177	28.3%	27.8%	24,433	29.4%	21.3%	71	39.2%	17,345	37.2%	30.0%
	Upper	635	44.0%	80,164	41.9%	43.0%	382	46.6%	46.5%	46,569	43.1%	46.3%	253	40.5%	44.4%	33,595	40.4%	45.0%	62	34.3%	14,302	30.6%	41.7%
	Unknown	6	0.4%	2,407	1.3%	1.0%	1	0.1%	0.9%	291	0.3%	2.2%	5	0.8%	0.9%	2,116	2.5%	2.1%	6	3.3%	2,473	5.3%	2.8%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.0%	0	0.0%	0	0.0%	
	Total	1,444	100%	191,225	100%	100%	819	100%	100%	107,984	100%	100%	625	100%	100%	83,241	100%	100%	181	100%	46,668	100%	100%
SMALL FARM					Total Farms																	Total Farms	
	Low	0	0.0%	0	0.0%	2.8%	0	0.0%	2.5%	0	0.0%	2.4%	0	0.0%	2.1%	0	0.0%	2.1%	0	0.0%	0	0.0%	1.0%
	Moderate	17	68.0%	909	57.5%	11.8%	0	0.0%	22.3%	0	0.0%	21.3%	17	68.0%	21.2%	909	57.5%	25.5%	5	31.3%	529	28.4%	14.0%
	Middle	8	32.0%	673	42.5%	37.4%	0	0.0%	42.1%	0	0.0%	35.3%	8	32.0%	42.7%	673	42.5%	40.8%	11	68.8%	1,336	71.6%	34.9%
	Upper	0	0.0%	0	0.0%	47.1%	0	0.0%	32.5%	0	0.0%	41.0%	0	0.0%	33.4%	0	0.0%	31.4%	0	0.0%	0	0.0%	49.5%
	Unknown	0	0.0%	0	0.0%	0.9%	0	0.0%	0.5%	0	0.0%	0.1%	0	0.0%	0.6%	0	0.0%	0.1%	0	0.0%	0	0.0%	0.6%
Tr 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	0.0%	0	0.0%		
	Total	25	100%	1,582	100%	100%	0	0.0%	100%	0	0.0%	100%	25	100%	100%	1,582	100%	100%	16	100%	1,865	100%	100%

Originations & Purchases
Based on 2021 & 2022 FFIEC Census Data; 2011-2015 ACS data; 2016-2020 ACS data, 2021 & 2022 D&B information

The geographic distribution of small business loans is adequate. For 2020 and 2021, the bank made 6.4 percent of its small business loans in low-income tracts, which is less than the percentage of total businesses located in low-income tracts at 8.0 percent. The bank’s lending in 2020 and 2021 (6.8 percent and 5.8 percent, respectively) was less than the aggregate comparison (8.3 percent and 8.1 percent, respectively). In 2022, the bank’s lending in low-income tracts (3.3 percent) was less than the demographic comparison (4.1 percent). This was deemed poor performance for low-income tracts.

In moderate-income tracts, the bank’s lending for 2020 and 2021 (22.5 percent) exceeded the demographic comparison (20.1 percent). The bank’s lending in 2020 and 2021 (20.9 percent and 24.6, respectively) exceeded the aggregate comparison (18.0 percent and 18.5 percent, respectively). In 2022, the bank’s lending in moderate-income tracts (19.9 percent) was slightly less than the demographic comparison (21.4 percent). This was deemed excellent performance for moderate-income tracts.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

Based on the following analysis, the overall distribution of the bank’s HMDA and small business loans reflects adequate penetration among borrowers of different income levels and businesses of different sizes.

Residential Real Estate (HMDA) Lending

The following tables show the distribution of the bank’s HMDA loans for 2020 through 2022 by the income level of the borrowers. The tables include a comparison of the bank’s HMDA lending to certain demographic data and to the lending of the aggregate HMDA lenders in the assessment area (available for 2020 and 2021 only).

The distribution of loans by borrower income level is adequate, driven primarily by adequate performance in the refinance category, which carried the most weight in HMDA lending for this assessment area. For 2020 and 2021, the percentage of the bank's total loans to low-income borrowers (3.3 percent) was less than the percentage of low-income families in the assessment area at 20.2 percent. The bank's lending in 2020 and 2021 (3.1 percent and 3.5 percent, respectively) was less than the aggregate comparison (4.3 percent and 4.7 percent, respectively). In 2022, the percentage of the bank's total loans to low-income borrowers (4.9 percent) was less than the demographic comparison (20.0 percent). Overall bank performance to low-income borrowers, when considering the heavily weighted refinance category (discussed further below), was deemed adequate.

The percentage of the bank's total loans to moderate-income borrowers for 2020 and 2021 (14.4 percent) was less than the percentage of moderate-income families in the assessment area at 16.8 percent. The bank's lending in 2020 and 2021 (14.2 percent and 14.7 percent, respectively) was less than the aggregate comparison (15.1 and 15.5 percent, respectively). In 2022, the percentage of the bank's total loans to moderate-income borrowers (13.9 percent) was less than the demographic comparison (17.1 percent). Overall bank performance to moderate-income borrowers, when considering the heavily weighted refinance category (discussed further below), was deemed adequate.

For refinance loans, the percentage of the bank's loans to low-income borrowers was less than the demographic comparison in 2020, 2021, and 2022, and similar to the aggregate comparison in 2020 and 2021; this was deemed adequate. The percentage of the bank's refinance loans to moderate-income borrowers was less than the demographic comparison in 2020, greater than the demographic comparison in 2021, and similar to the demographic comparison in 2022. Bank performance to moderate-income borrowers was similar to the aggregate comparison in 2020 and greater than the aggregate comparison in 2021; this was deemed adequate. Overall, bank performance to LMI borrowers in the refinance category was adequate.

For home purchase loans, the percentage of the bank's loans to low-income borrowers was less than the demographic comparison in 2020, 2021, and 2022, and less than the aggregate comparison in 2020 and 2021. The percentage of the bank's home purchase loans to moderate-income borrowers was similar to the demographic comparison in 2020 and below demographic comparisons in 2021 and 2022. Bank performance was below the aggregate comparison in 2020 and 2021. Overall, bank performance to LMI borrowers in the home purchase category was poor.

Small Business Lending

The following table shows, by revenue and loan size, the number and dollar volume of small business loans made in the assessment area from 2020 through 2022. The table includes a comparison of the bank's lending to certain demographic data and to the lending of the aggregate CRA lenders in the assessment area (available for 2020 and 2021 only). As previously noted, small farm loans were not included in the analysis.

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: Nashville

PRODUCT TYPE	Bank Lending & Demographic Data																							
	Bank & Aggregate Lending										Bank Lending & Demographic Data													
	2020, 2021					2020					2021					2022								
	Bank		Total	Count		Dollar		Count		Dollar		Count		Dollar		Count		Dollar		Total				
#	%	\$ (000s)	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	\$ (000s)	%	%				
SMALL BUSINESS	Revenue	\$1 Million or Less	211	14.6%	40,909	21.4%	91.3%	62	7.6%	41.3%	14,972	13.9%	27.9%	149	23.8%	47.9%	25,937	31.2%	33.4%	74	40.9%	14,048	30.1%	91.3%
		Over \$1 Million	215	14.9%	56,942	29.8%	7.9%	103	12.6%		29,856	27.6%		112	17.9%		27,086	32.5%		93	51.4%	30,364	65.1%	7.8%
		Total Rev. available	426	29.5%	97,851	51.2%	99.2%	165	20.1%		44,828	41.5%		261	41.8%		53,023	63.7%		167	92.3%	44,412	95.2%	99.1%
		Rev. Not Known	1,018	70.5%	93,374	48.8%	0.8%	654	79.9%		63,156	58.5%		364	58.2%		30,218	36.3%		14	7.7%	2,256	4.8%	0.9%
		Total	1,444	100%	191,225	100%	100%	819	100%		107,984	100%		625	100%		83,241	100%		181	100%	46,668	100%	100.0%
	Loan Size	\$100,000 or Less	980	67.9%	33,719	17.6%		560	68.4%	85.2%	19,542	18.1%	27.4%	420	67.2%	89.9%	14,177	17.0%	30.1%	74	40.9%	3,889	8.3%	
		\$100,001 - \$250,000	246	17.0%	41,448	21.7%		135	16.5%	8.2%	22,547	20.9%	20.7%	111	17.8%	5.3%	18,901	22.7%	17.5%	41	22.7%	7,338	15.7%	
		\$250,001 - \$1 Million	218	15.1%	116,058	60.7%		124	15.1%	6.5%	65,895	61.0%	52.0%	94	15.0%	4.9%	50,163	60.3%	52.4%	66	36.5%	35,441	75.9%	
		Total	1,444	100%	191,225	100%		819	100%	100%	107,984	100%	100%	625	100%	100%	83,241	100%	100%	181	100%	46,668	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	115	54.5%	4,861	11.9%		25	3.1%		1,456	1.3%		90	14.4%		3,405	4.1%		37	20.4%	1,842	3.9%	
		\$100,001 - \$250,000	46	21.8%	8,719	21.3%		15	1.8%		2,735	2.5%		31	5.0%		5,984	7.2%		20	11.0%	3,191	6.8%	
		\$250,001 - \$1 Million	50	23.7%	27,329	66.8%		22	2.7%		10,781	10.0%		28	4.5%		16,548	19.9%		17	9.4%	9,015	19.3%	
Total		211	100%	40,909	100%		62	8%		14,972	14%		149	24%		25,937	31%		74	41%	14,048	30%		
SMALL FARM	Revenue	\$1 Million or Less	21	84.0%	1,448	91.5%	98.2%	0	0.0%	50.3%	0	0.0%	50.9%	21	84%	59.7%	1,448	92%	68.3%	14	88%	1,415	76%	98.4%
		Over \$1 Million	0	0.0%	0	0.0%	1.2%	0	0.0%		0	0.0%		0	0.0%		0	0.0%		2	12.5%	450	24.1%	1.0%
		Total Rev. available	21	84.0%	1,448	91.5%	99.4%	0	0.0%		0	0.0%		21	84.0%		1,448	91.5%		16	100.0%	1,865	100.0%	99.4%
		Not Known	4	16.0%	134	8.5%	0.6%	0	0.0%		0	0.0%		4	16.0%		134	8.5%		0	0.0%	0	0.0%	0.6%
		Total	25	100%	1,582	100%	100%	0	0.0%		0	0.0%		25	100%		1,582	100%		16	100%	1,865	100%	100.0%
	Loan Size	\$100,000 or Less	21	84.0%	678	42.9%		0	0.0%	84.8%	0	0.0%	38.3%	21	3.4%	85.1%	678	0.8%	33.7%	11	6.1%	519	1.1%	
		\$100,001 - \$250,000	3	12.0%	504	31.9%		0	0.0%	12.7%	0	0.0%	43.3%	3	0.5%	11.9%	504	0.6%	44.8%	1	0.6%	118	0.3%	
		\$250,001 - \$500,000	1	4.0%	400	25.3%		0	0.0%	2.5%	0	0.0%	18.4%	1	0.2%	3.0%	400	0.5%	21.5%	4	2.2%	1,228	2.6%	
		Total	25	100%	1,582	100%		0	0.0%	100%	0	0.0%	100%	25	4.0%	100%	1,582	1.9%	100%	16	8.8%	1,865	4.0%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	17	81.0%	544	37.6%		0	0.0%		0	0.0%		17	2.7%		544	0.7%		10	5.5%	419	0.9%	
		\$100,001 - \$250,000	3	14.3%	504	34.8%		0	0.0%		0	0.0%		3	0.5%		504	0.6%		1	0.6%	118	0.3%	
		\$250,001 - \$500,000	1	4.8%	400	27.6%		0	0.0%		0	0.0%		1	0.2%		400	0.5%		3	1.7%	878	1.9%	
Total		21	100%	1,448	100%		0	0.0%		0	0.0%		21	3.4%		1,448	1.7%		14	7.7%	1,415	3.0%		

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
Based on 2022 FFIEC Census Data, 2016-2020 ACS data, 2022 D&B information

The bank’s lending to small businesses is adequate. Of the 1,444 small business loans that the bank reported for 2020 and 2021, 963 (66.7 percent) were loans made through the PPP. The PPP did not require banks to collect revenue information for businesses obtaining PPP loans. CapStar did not report revenue information on any of its PPP loans. As shown in the table, 70.5 percent of the bank’s small business loans for 2020 and 2021 were to businesses with unknown revenues. In 2022, when no PPP loans were made, only 7.7 percent of the bank’s loans were to businesses with unknown revenues.

Of the 481 non-PPP loans made in 2020 and 2021, 43.9 percent were made to businesses with revenues of \$1 million or less. This percentage was less than the percentage of total businesses in the assessment area with revenues of \$1 million or less (91.3 percent) but was greater than the aggregate comparison of 41.3 percent in 2020 and less than the aggregate comparison of 47.9 percent in 2021. In 2022, 40.9 percent of the bank’s small business loans were made to businesses with revenues of \$1 million or less, which was below the 91.3 percent of total businesses in the assessment area with revenues of \$1 million or less.

Additional performance context factors were considered. Specifically, a review of the bank’s PPP loan data showed that 748 (or 77.7 percent) of the 963 PPP loans were for amounts of \$100,000 or less. Using loan size as a proxy for a small business in the assessment area, this data suggests that the bank was serving small businesses, as small businesses often are in need of small dollar loans. As shown in the table, in 2020 and 2021, the percentage of the bank’s small business loans (PPP and non-PPP) that were for amounts of \$100,000 or less was 68.4 percent and 67.2 percent, respectively. In 2022, 40.9 percent of the bank’s small business loans were for amounts of \$100,000 or less. These figures indicate the bank’s willingness to provide smaller dollar loans, which was a need noted by a community contact. Additionally, the analysis shows that the bank actively supported small businesses during the pandemic when small businesses needed additional funding and support to maintain operations.

Community Development Lending

CapStar makes a low level of community development loans in the Nashville assessment area considering the bank's capacity and the needs and opportunities in the assessment area. During the review period, the bank originated or renewed 13 qualified community development loans totaling approximately \$12.4 million in the assessment area. One loan, for \$4.6 million to a CDFI, met the community development purpose of revitalization or stabilization of moderate-income geographies; nine loans, totaling \$4.5 million, were for purposes related to community services; and three loans, totaling \$3.3 million, promoted economic development. The bank's volume and level of impact involving community development loans lagged behind peers and have declined since the previous examination when considering the length of the review period and the bank's growth.

INVESTMENT TEST

CapStar makes a significant level of qualified investments and grants in the Nashville assessment area. During the review period, the bank made two Low-Income Housing Tax Credit equity investments totaling \$10 million. The bank had nine prior period investments totaling \$2.8 million consisting primarily of mortgage-backed securities. The assessment area also benefits from BSRA investments, including two current investments totaling \$764,759 and one prior period investment with a balance of \$364,545, in municipal bonds issued by a state government agency with a mission of promoting affordable housing statewide; two prior period investments, totaling \$1.3 million, in a CDFI that provides financing to small businesses in the Southeast, primarily in Tennessee; and two prior period investments, totaling \$3.6 million, in an SBIC serving several states across the South and Midwest, including Tennessee.

In addition, the bank made qualified contributions totaling \$71,250 in the assessment area during the review period. The contributions were made primarily to organizations with a purpose of providing community services, with the largest amounts supporting financial literacy programs and hunger relief.

SERVICE TEST

Retail Banking Services

Delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area. The distribution of the bank's branches by census tract income level was compared to the distribution of households and businesses among the tract categories in the assessment area. The first table below shows the bank's branch and ATM distribution during 2020 and 2021 compared with certain demographic information based on 2021 FFIEC census data. The second table shows the branch and ATM distribution during 2022 compared with demographic information based on 2022 FFIEC census data.

Geographic Distribution of Branches & ATMS 2020 - 2021
Assessment Area: Nashville

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thrus	Extend-ed 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	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	30	10.3%	7.6%	8.0%
DTP	0		0	0	0			SA	0		0		0	0	0		0	0				
Moderate	2	28.6%	2	0	2	2	0	Total	3	37.5%	2	28.6%	2	0	1	100.0%	1	0	66	22.6%	23.2%	20.1%
DTP	0		0	0	0			SA	1		0		0	0	1		1	0				
Middle	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	104	35.6%	36.9%	28.0%
DTP	0		0	0	0			SA	0		0		0	0	0		0	0				
Upper	5	71.4%	0	0	0	5	0	Total	5	62.5%	5	71.4%	0	0	0	0.0%	0	0	87	29.8%	32.2%	43.0%
DTP	0		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	5	1.7%	0.1%	1.0%
DTP	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	7	100%	2	0	2	7	0	Total	8	100%	7	100%	2	0	1	100%	1	0	292	100%	100%	100%
DTP	0		0	0	0			SA	1		0		0	0	1		1	0				

Based on 2021 FFIEC Census Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTP - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

Geographic Distribution of Branches & ATMS - 2022
Assessment Area: Nashville

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thrus	Extend-ed 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	14.3%	0	0	1	1	0	Total	1	12.5%	1	14.3%	0	0	0	0.0%	0	0	19	5.7%	5.2%	4.1%
DTP	0		0	0	0			SA	0		0		0	0	0		0	0				
Moderate	1	14.3%	0	0	1	1	0	Total	1	12.5%	1	14.3%	0	0	0	0.0%	0	0	79	23.9%	22.5%	21.4%
DTP	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	122	36.9%	38.4%	30.0%
DTP	0		0	0	0			SA	0		0		0	0	0		0	0				
Upper	5	71.4%	0	0	0	5	0	Total	5	62.5%	5	71.4%	0	0	0	0.0%	0	0	102	30.8%	32.9%	41.7%
DTP	0		0	0	0			SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	1	12.5%	0	0.0%	0	0	1	100.0%	0	0	9	2.7%	0.9%	2.8%
DTP	0		0	0	0			SA	1		0		0	0	1		0	0				
Total	7	100%	0	0	2	7	0	Total	8	100%	7	100%	0	0	1	100%	0	0	331	100%	100%	100%
DTP	0		0	0	0			SA	1		0		0	0	1		0	0				

Based on 2022 FFIEC Census Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTP - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

CapStar acquired two branches in moderate-income tracts, one in Cannon County and one in Rutherford County, through an acquisition in July 2020. Due to the change in census data, the branch location in Rutherford County was reclassified as a low-income tract for 2022. The bank's five other branches are in upper-income tracts. CapStar did not close any branches in the assessment area during the review period. Given the acquired branches in LMI tracts and the absence of branch closures, the bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly to LMI geographies or LMI individuals. Bank products, services, and standard business hours do not vary in a way that inconveniences the bank's assessment area, including LMI geographies or LMI individuals.

Community Development Services

CapStar provides a limited level of community development services in the assessment area given its size and capacity and the challenges of the COVID-19 pandemic. During the review period, bank employees provided 57 hours of qualified community development services, which was significantly fewer than the number of hours qualified at the previous examination and was below performance of peers in the area. Service activities were not diverse and were primarily related to the community development purpose of community services.

**METROPOLITAN AREAS – CHATTANOOGA, CLEVELAND, AND KNOXVILLE, TENNESSEE
LIMITED-SCOPE REVIEW**

The following assessment areas were reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance and demographic information. Performance in these assessment areas did not change the bank's overall rating. Please refer to the tables in Appendix D for additional information regarding these assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHATTANOOGA ASSESSMENT AREA

The Chattanooga assessment area was added in 2022 as a result of CapStar converting a loan production office to a branch in September 2022. The assessment area consists of Hamilton County, which is one of three counties that make up the Chattanooga TN-GA MSA. According to the FDIC Deposit Market Share Report, as of June 30, 2022, the bank had total deposits of \$18.4 million in the assessment area. With a deposit market share of 0.1 percent, CapStar was ranked 18th out of 20 financial institutions that operated in the assessment area.

According to 2022 FFIEC census data, of the 87 tracts in the assessment area, 9.2 percent are low-income, 17.2 percent are moderate-income, 37.9 percent are middle-income, 32.2 percent are upper-income, and 3.4 percent have unknown income levels. Of the families in the assessment area, 19.3 percent are low-income, 16.3 percent are moderate-income, 19.1 percent are middle-income, and 45.3 percent are upper-income; 8.2 percent of families live below the poverty line. According to 2022 D&B information, of total businesses in the assessment area, 91.4 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CLEVELAND ASSESSMENT AREA

The Cleveland assessment area consists of Bradley and Polk counties, which make up the Cleveland, TN MSA. CapStar operates two branches in this assessment area. According to the FDIC Deposit Market Share Report, as of June 30, 2022, the bank had total deposits of \$56.6 million in the assessment area. With a deposit market share of 2.2 percent, CapStar was ranked 11th out of 14 financial institutions that operated in the assessment area.

According to 2022 FFIEC census data, of the 31 tracts in the assessment area, 3.2 percent are low-income, 16.1 percent are moderate-income, 67.7 percent are middle-income, and 12.9 percent are upper-income. Of the families in the assessment area, 20.9 percent are low-income, 18.7 percent are moderate-income, 20.4 percent are middle-income, and 40.0 percent are upper-income; 10.8 percent of families live below the poverty line. According to 2022 D&B information, of total businesses in the assessment area, 92.1 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KNOXVILLE ASSESSMENT AREA

The Knoxville assessment area consisted of Loudon and Knox counties in 2020 and Knox County in 2021 and 2022. Changes in the assessment area were the result of CapStar closing its branch in Loudon County in 2020 and opening a branch in Knox County in 2021. The Knoxville, TN MSA consists of eight counties. CapStar operates one branch in this assessment area. According to the FDIC Deposit Market Share Report, as of June 30, 2022, the bank had total deposits of \$27.5 million in the assessment area. With a deposit market share of 0.2 percent, CapStar was ranked 26th out of 30 financial institutions that operated in the assessment area.

According to 2022 FFIEC census data, of the 121 tracts in the assessment area, 9.9 percent are low-income, 13.2 percent are moderate-income, 36.4 percent are middle-income, 37.2 percent are upper-income, and 3.3 percent have unknown income levels. Of the families in the assessment area, 19.1 percent are low-income, 16.2 percent are moderate-income, 19.9 percent are middle-income, and 44.8 percent are upper-income; 8.5 percent of families live below the poverty line. According to 2022 D&B information, of total businesses in the assessment area, 90.4 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Performance in these assessment areas was evaluated and compared with the bank’s overall performance in the full-scope MSA assessment area. The following table shows the conclusions relative to that performance.

Performance in the Limited-Scope Review Metropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Chattanooga	Not Consistent (Below)	Not Consistent (Below)	Consistent
Cleveland	Not Consistent (Below)	Not Consistent (Below)	Consistent
Knoxville	Consistent	Consistent	Consistent

For the lending test, CapStar received a rating of low satisfactory. Performance in the Chattanooga assessment area was below that performance. The review included 65 HMDA loans and 85 small business loans made since the assessment area was formed in 2022. The geographic distribution of the bank’s HMDA loans reflects adequate penetration throughout the assessment area, while the small business loans reflect good penetration. The distribution of the HMDA loans to borrowers of different income levels and the distribution of small business loans to businesses of different revenue sizes are both poor. The bank made no community development loans in this assessment area.

Lending test performance in the Cleveland assessment area was below the bank’s performance. The review included 216 HMDA loans and 140 small business loans. The geographic distribution of the bank’s HMDA loans reflects poor penetration throughout the assessment area, while the small business loans reflect good penetration. The distribution of the HMDA loans to borrowers of different income levels and the distribution of small business loans to businesses of different revenue sizes are both adequate. The bank made no community development loans in this assessment area.

Lending test performance in the Knoxville assessment area was consistent with the bank’s performance. The review included 98 HMDA loans and 233 small business loans. The geographic distribution of the bank’s HMDA loans reflects adequate penetration throughout the assessment area, while the small business loans reflect poor penetration. The distribution of the HMDA loans to borrowers of different income levels is poor, and the distribution of small business loans to businesses of different revenue sizes is adequate. The bank made four community development loans totaling \$8.5 million in this assessment area.

For the investment test, CapStar received a rating of high satisfactory. Investment test performance in the Chattanooga and Cleveland assessment areas was below the bank’s performance, while performance was consistent with the bank’s performance in the Knoxville assessment area. The bank made two qualified investments totaling \$5 million in the Knoxville assessment area and no qualified investment directly benefiting

the Chattanooga and Cleveland assessment areas. Consideration is given for investments that benefit the BSRA as previously noted, including a current period investment totaling approximately \$765,000 and five prior period investments totaling \$5.3 million. Additionally, the bank made a \$500,000 contribution that was shared among the Cleveland, Knoxville, and Athens assessment areas and a \$1,000 contribution to the BSRA that included all of the bank's assessment areas.

For the service test, CapStar received a rating of needs to improve. Service test performance was consistent with the bank's performance in all three limited-scope metropolitan assessment areas. In the Chattanooga assessment area, delivery systems are unreasonably inaccessible to portions of the assessment area and the bank's loan production office conversion to a branch did not impact the remaining portions of the retail service component of the service test as hours and location did not change. Bank employees provided 52 hours of qualified community development services. In the Cleveland assessment area, delivery systems are readily accessible and there were no changes to branch locations or hours. In contrast, the bank had no community development service hours. In the Knoxville assessment area, delivery systems are unreasonably inaccessible to significant portions of the assessment area and changes in branch locations adversely affected the accessibility of delivery systems. The bank also had no qualified community development service hours.

**NONMETROPOLITAN AREAS – ATHENS, MANCHESTER, AND WAYNESBORO, TENNESSEE
LIMITED-SCOPE REVIEW**

The following assessment areas were reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance are drawn from the review of available facts and data, including performance and demographic information. Performance in these assessment areas did not change the bank's overall rating. Please refer to the tables in Appendix D for additional information regarding these assessment areas.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ATHENS ASSESSMENT AREA

The Athens assessment area consists of McMinn and Monroe counties, which are not part of an MSA. CapStar operates five branches in the assessment area. According to the FDIC Deposit Market Share Report, as of June 30, 2022, the bank had total deposits of \$577.3 million in the assessment area. With a deposit market share of 25.9 percent, CapStar was ranked 1st out of 11 financial institutions that operated in the assessment area.

According to 2022 FFIEC census data, of the 26 tracts in the assessment area, none are low-income, 15.4 percent are moderate-income, 69.2 percent are middle-income, and 15.4 percent are upper-income. Of the families in the assessment area, 20.4 percent are low-income, 18.0 percent are moderate-income, 21.3 percent are middle-income, and 40.3 percent are upper-income; 12.8 percent of families live below the poverty line. According to 2022 D&B information, of total businesses in the assessment area, 92.3 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MANCHESTER ASSESSMENT AREA

The Manchester assessment area was added in 2020 as a result of bank acquisitions in July 2020. The assessment area consists of Coffee County, which is not part of an MSA. CapStar operates two branches in the assessment area. According to the FDIC Deposit Market Share Report, as of June 30, 2022, the bank had total deposits of \$182.6 million in the assessment area. With a deposit market share of 13.3 percent, CapStar was ranked 3rd out of 10 financial institutions that operated in the assessment area.

According to 2022 FFIEC census data, of the 17 tracts in the assessment area, none percent are low-income, 17.6 percent are moderate-income, 41.2 percent are middle-income, 35.3 percent are upper-income, and 5.9 percent have unknown income levels. Of the families in the assessment area, 16.3 percent are low-income, 18.7 percent are moderate-income, 20.2 percent are middle-income, and 44.8 percent are upper-income; 10.6 percent of families live below the poverty line. According to 2022 D&B information, of total businesses in the assessment area, 91.3 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WAYNESBORO ASSESSMENT AREA

The Waynesboro assessment area was added in 2020 as a result of bank acquisitions in July 2020. The assessment area consists of Lawrence and Wayne counties, which are not part of an MSA. CapStar operates five branches in the assessment area. According to the FDIC Deposit Market Share Report, as of June 30, 2022, the bank had total deposits of \$183.2 million in the assessment area. With a deposit market share of 12.4 percent, CapStar was ranked 3rd out of 10 financial institutions that operated in the assessment area.

According to 2022 FFIEC census data, of the 15 tracts in the assessment area, none are low-income, 6.7 percent are moderate-income, 80.0 percent are middle-income, and 13.3 percent are upper-income. Of the families in the assessment area, 21.4 percent are low-income, 18.8 percent are moderate-income, 21.0 percent are middle-income, and 38.8 percent are upper-income; 13.4 percent of families live below the poverty line. According to 2022 D&B information, of total businesses in the assessment area, 90.2 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Performance in these assessment areas was evaluated and compared with the bank’s overall performance. The following table shows the conclusions relative to the bank’s overall performance.

Performance in the Limited-Scope Review Nonmetropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Athens	Consistent	Not Consistent (Below)	Not Consistent (Exceeds)
Manchester	Not Consistent (Below)	Not Consistent (Below)	Consistent
Waynesboro	Not Consistent (Below)	Not Consistent (Below)	Consistent

For the lending test, CapStar received a rating of low satisfactory. Performance in the Athens assessment area was consistent with that performance. The review included 647 HMDA loans and 536 small business loans. The geographic distribution of the bank’s HMDA loans reflects adequate penetration throughout the assessment area, while the small business loans reflect excellent penetration. The distribution of the HMDA loans to borrowers of different income levels and the distribution of small business loans to businesses of different revenue sizes are both adequate. The bank made no community development loans in this assessment area.

Lending test performance in the Manchester assessment area was below the bank’s performance. The review included 169 HMDA loans and 244 small business loans. The geographic distribution of the bank’s HMDA loans reflects adequate penetration throughout the assessment area, while the small business loans reflect poor penetration. The distribution of the HMDA loans to borrowers of different income levels and the distribution of small business loans to businesses of different revenue sizes are both adequate. The bank made no community development loans in this assessment area.

Lending test performance in the Waynesboro assessment area was below the bank’s performance. The review included 165 HMDA loans and 437 small business loans. The geographic distribution of the bank’s HMDA loans reflects poor penetration throughout the assessment area, while the small business loans reflect adequate penetration. The distribution of the HMDA loans to borrowers of different income levels is good, and the distribution of small business loans to businesses of different revenue sizes is adequate. The bank made no community development loans in this assessment area.

For the investment test, CapStar received a rating of high satisfactory. Investment test performance was consistent with the bank’s performance for all three limited-scope nonmetropolitan assessment areas. The bank made no qualified investments directly benefitting these three assessment areas. However, consideration is given for investments that benefit the BSRA as previously noted, including a current period investment totaling approximately \$765,000 and five prior period investments totaling \$5.3 million. Additionally, the bank made a

\$500,000 contribution that was shared among the Cleveland, Knoxville, and Athens assessment areas and a \$1,000 contribution to the BSRA that included all of the bank's assessment areas.

For the service test, CapStar received a rating of needs to improve. Service test performance was consistent with the bank's performance in the Manchester and Waynesboro assessment areas, while performance exceeded the bank's performance in the Athens assessment area. In the Athens assessment area, delivery systems are accessible with no changes in branch locations or hours. Bank employees provided 166 hours of qualified community development services. In the Manchester assessment area, delivery systems are unreasonably inaccessible to portions of the assessment area and bank employees provided 20 hours of qualified community development services. In the Waynesboro assessment area, delivery systems are accessible and the bank had no qualified community development service hours.

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED January 1, 2020, through December 31, 2022			
FINANCIAL INSTITUTION CapStar Bank, Nashville, Tennessee		PRODUCTS REVIEWED HMDA loans Small business loans	
AFFILIATE(S) N/A	AFFILIATE RELATIONSHIP N/A	PRODUCTS REVIEWED N/A	
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>
Nashville, Tennessee – MSA (Cannon, Davidson, Rutherford, Sumner, and Williamson counties)	Full-Scope Review	None	None
Chattanooga, Tennessee – MSA (Hamilton County)	Limited-Scope Review	None	None
Cleveland, Tennessee – MSA (Bradley and Polk counties)	Limited-Scope Review	None	None
Knoxville, Tennessee – MSA (2020: Loudon and Knox counties; 2021–2022: Knox County)	Limited-Scope Review	None	None
Athens, Tennessee – non-MSA (McMinn and Monroe counties)	Limited-Scope Review	None	None
Manchester, Tennessee – non-MSA (Coffee County)	Limited-Scope Review	None	None
Waynesboro, Tennessee – non-MSA (Lawrence and Wayne counties)	Limited-Scope Review	None	None

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

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
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

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.

General Information

The 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 CapStar Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of May 22, 2023. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – 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 MSAs. 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 multifamily 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 (Board), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) 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, FDIC, and OCC, 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.

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).

APPENDIX C – GLOSSARY (Continued)

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 an MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, 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 multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings 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.

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

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

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

Multifamily: Refers to a residential structure that contains five or more units.

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.

APPENDIX C – GLOSSARY (Continued)

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 MA. 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 MA, the institution will receive a rating for the multistate MA.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the 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 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 at least 120 percent of the area median income, or a median family income at least 120 percent, in the case of a geography.

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS

Combined Demographics Report - 2020 - 2021

Assessment Area: Athens

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	5,405	20.7%
Moderate-income	1	5.9%	1,346	5.2%	495	36.8%	4,811	18.4%
Middle-income	15	88.2%	23,269	89.2%	3,254	14.0%	5,102	19.6%
Upper-income	1	5.9%	1,476	5.7%	127	8.6%	10,773	41.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	17	100.0%	26,091	100.0%	3,876	14.9%	26,091	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	2,902	990	3.6%	34.1%	1,398	48.2%	514	17.7%
Middle-income	38,815	25,005	90.2%	64.4%	7,548	19.4%	6,262	16.1%
Upper-income	2,381	1,729	6.2%	72.6%	501	21.0%	151	6.3%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	44,098	27,724	100.0%	62.9%	9,447	21.4%	6,927	15.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	397	13.1%	365	13.0%	30	16.2%	2	4.3%
Middle-income	2,439	80.3%	2,247	80.0%	151	81.6%	41	89.1%
Upper-income	203	6.7%	196	7.0%	4	2.2%	3	6.5%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	3,039	100.0%	2,808	100.0%	185	100.0%	46	100.0%
Percentage of Total Businesses:			92.4%		6.1%		1.5%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1	1.1%	1	1.1%	0	0.0%	0	0.0%
Middle-income	90	96.8%	86	96.6%	0	0.0%	4	100.0%
Upper-income	2	2.2%	2	2.2%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	93	100.0%	89	100.0%	0	0.0%	4	100.0%
Percentage of Total Farms:			95.7%		0.0%		4.3%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2022

Assessment Area: Athens

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	5,545	20.4%
Moderate-income	4	15.4%	3,482	12.8%	853	24.5%	4,880	18.0%
Middle-income	18	69.2%	19,181	70.7%	2,336	12.2%	5,773	21.3%
Upper-income	4	15.4%	4,475	16.5%	295	6.6%	10,940	40.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	26	100.0%	27,138	100.0%	3,484	12.8%	27,138	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	6,355	3,317	11.2%	52.2%	2,775	43.7%	263	4.1%
Middle-income	31,117	20,741	70.3%	66.7%	6,355	20.4%	4,021	12.9%
Upper-income	7,312	5,453	18.5%	74.6%	1,145	15.7%	714	9.8%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	44,784	29,511	100.0%	65.9%	10,275	22.9%	4,998	11.2%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	671	22.1%	610	21.8%	56	30.4%	5	10.2%
Middle-income	1,911	62.9%	1,755	62.6%	118	64.1%	38	77.6%
Upper-income	454	15.0%	438	15.6%	10	5.4%	6	12.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	3,036	100.0%	2,803	100.0%	184	100.0%	49	100.0%
Percentage of Total Businesses:			92.3%		6.1%		1.6%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	6	6.3%	6	6.5%	0	0.0%	0	0.0%
Middle-income	80	83.3%	77	83.7%	0	0.0%	3	75.0%
Upper-income	10	10.4%	9	9.8%	0	0.0%	1	25.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	96	100.0%	92	100.0%	0	0.0%	4	100.0%
Percentage of Total Farms:			95.8%		0.0%		4.2%	

Based on 2022 FFIEC Census Data and 2022 D&B information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2022

Assessment Area: Chattanooga

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	9.2%	5,504	6.2%	2,088	37.9%	17,214	19.3%
Moderate-income	15	17.2%	10,346	11.6%	1,665	16.1%	14,563	16.3%
Middle-income	33	37.9%	38,920	43.5%	2,394	6.2%	17,106	19.1%
Upper-income	28	32.2%	33,950	38.0%	1,132	3.3%	40,489	45.3%
Unknown-income	3	3.4%	652	0.7%	18	2.8%	0	0.0%
Total Assessment Area	87	100.0%	89,372	100.0%	7,297	8.2%	89,372	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	13,936	4,006	4.2%	28.7%	8,126	58.3%	1,804	12.9%
Moderate-income	23,171	10,609	11.2%	45.8%	9,616	41.5%	2,946	12.7%
Middle-income	68,564	41,837	44.0%	61.0%	21,338	31.1%	5,389	7.9%
Upper-income	56,403	37,552	39.5%	66.6%	13,842	24.5%	5,009	8.9%
Unknown-income	1,531	1,006	1.1%	65.7%	364	23.8%	161	10.5%
Total Assessment Area	163,605	95,010	100.0%	58.1%	53,286	32.6%	15,309	9.4%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,486	7.7%	1,278	7.2%	202	13.3%	6	4.2%
Moderate-income	3,336	17.2%	2,897	16.4%	425	28.0%	14	9.8%
Middle-income	6,849	35.4%	6,411	36.2%	396	26.1%	42	29.4%
Upper-income	7,542	38.9%	6,994	39.5%	473	31.2%	75	52.4%
Unknown-income	157	0.8%	129	0.7%	22	1.4%	6	4.2%
Total Assessment Area	19,370	100.0%	17,709	100.0%	1,518	100.0%	143	100.0%
Percentage of Total Businesses:			91.4%		7.8%		0.7%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	3.2%	4	3.2%	0	0.0%	0	0.0%
Moderate-income	10	8.1%	10	8.1%	0	0.0%	0	0.0%
Middle-income	51	41.1%	51	41.1%	0	0.0%	0	0.0%
Upper-income	59	47.6%	59	47.6%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	124	100.0%	124	100.0%	0	0.0%	0	0.0%
Percentage of Total Farms:			100.0%		0.0%		0.0%	

Based on 2022 FFIEC Census Data and 2022 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Chattanooga

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2022				
		Bank				Owner Occupied Units %
		Count		Dollar		
#	%	\$ (000s)	\$ %			
HOME PURCHASE	Low	1	5.0%	236	3.2%	4.2%
	Moderate	4	20.0%	815	11.0%	11.2%
	Middle	8	40.0%	3,015	40.7%	44.0%
	Upper	7	35.0%	3,343	45.1%	39.5%
	Unknown	0	0.0%	0	0.0%	1.1%
	<i>Total</i>	<i>20</i>	<i>100%</i>	<i>7,409</i>	<i>100%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	0	0.0%	4.2%
	Moderate	1	8.3%	85	2.0%	11.2%
	Middle	6	50.0%	2,657	61.7%	44.0%
	Upper	5	41.7%	1,565	36.3%	39.5%
	Unknown	0	0.0%	0	0.0%	1.1%
	<i>Total</i>	<i>12</i>	<i>100%</i>	<i>4,307</i>	<i>100%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	4.2%
	Moderate	2	20.0%	160	6.4%	11.2%
	Middle	3	30.0%	928	37.3%	44.0%
	Upper	5	50.0%	1,399	56.3%	39.5%
	Unknown	0	0.0%	0	0.0%	1.1%
	<i>Total</i>	<i>10</i>	<i>100%</i>	<i>2,487</i>	<i>100%</i>	<i>100.0%</i>
MULTI FAMILY	Low	1	10.0%	1,020	4.4%	13.9%
	Moderate	3	30.0%	5,832	25.1%	12.4%
	Middle	3	30.0%	3,351	14.4%	40.0%
	Upper	2	20.0%	13,000	56.0%	33.2%
	Unknown	0	0.0%	0	0.0%	0.5%
	<i>Total</i>	<i>9</i>	<i>90%</i>	<i>23,203</i>	<i>100%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	2	14.3%	582	17.7%	4.2%
	Moderate	1	7.1%	54	1.6%	11.2%
	Middle	3	21.4%	503	15.3%	44.0%
	Upper	8	57.1%	2,155	65.4%	39.5%
	Unknown	0	0.0%	0	0.0%	1.1%
	<i>Total</i>	<i>14</i>	<i>100%</i>	<i>3,294</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Chattanooga

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2022				
		Bank				Owner Occupied Units
		Count		Dollar		
#	%	\$ (000s)	\$ %	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	4.2%
	Moderate	0	0.0%	0	0.0%	11.2%
	Middle	0	0.0%	0	0.0%	44.0%
	Upper	0	0.0%	0	0.0%	39.5%
	Unknown	0	0.0%	0	0.0%	1.1%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	4.2%
	Moderate	0	0.0%	0	0.0%	11.2%
	Middle	0	0.0%	0	0.0%	44.0%
	Upper	0	0.0%	0	0.0%	39.5%
	Unknown	0	0.0%	0	0.0%	1.1%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	4	6.2%	1,838	4.5%	4.2%
	Moderate	11	16.9%	6,946	17.1%	11.2%
	Middle	23	35.4%	10,454	25.7%	44.0%
	Upper	27	41.5%	21,462	52.7%	39.5%
	Unknown	0	0.0%	0	0.0%	1.1%
	<i>Total</i>	<i>65</i>	<i>100%</i>	<i>40,700</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Chattanooga

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2022				
		Bank		Dollar		Total Businesses
		Count				
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	19	22.4%	6,694	20.5%	7.7%
	Moderate	12	14.1%	4,227	13.0%	17.2%
	Middle	17	20.0%	5,368	16.5%	35.4%
	Upper	37	43.5%	16,318	50.0%	38.9%
	Unknown	0	0.0%	0	0.0%	0.8%
	Tr Unknown	0	0.0%	0	0.0%	
	<i>Total</i>		85	100%	32,607	100%
SMALL FARM	Low	0	0.0%	0	0.0%	3.2%
	Moderate	0	0.0%	0	0.0%	8.1%
	Middle	0	0.0%	0	0.0%	41.1%
	Upper	0	0.0%	0	0.0%	47.6%
	Unknown	0	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%	
	<i>Total</i>		0	0.0%	0	0.0%

Originations & Purchases

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Chattanooga

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data				
		2022				
		Bank				Families by Family Income
		Count		Dollar		%
		#	%	\$ (000s)	\$ %	%
HOME PURCHASE	Low	1	5.0%	600	8.1%	19.3%
	Moderate	2	10.0%	475	6.4%	16.3%
	Middle	0	0.0%	0	0.0%	19.1%
	Upper	11	55.0%	4,371	59.0%	45.3%
	Unknown	6	30.0%	1,963	26.5%	0.0%
	<i>Total</i>		<i>20</i>	<i>100%</i>	<i>7,409</i>	<i>100%</i>
REFINANCE	Low	0	0.0%	0	0.0%	19.3%
	Moderate	0	0.0%	0	0.0%	16.3%
	Middle	1	8.3%	250	5.8%	19.1%
	Upper	10	83.3%	3,765	87.4%	45.3%
	Unknown	1	8.3%	292	6.8%	0.0%
	<i>Total</i>		<i>12</i>	<i>100%</i>	<i>4,307</i>	<i>100%</i>
HOME IMPROVEMENT	Low	2	20.0%	175	7.0%	19.3%
	Moderate	1	10.0%	25	1.0%	16.3%
	Middle	0	0.0%	0	0.0%	19.1%
	Upper	6	60.0%	1,899	76.4%	45.3%
	Unknown	1	10.0%	388	15.6%	0.0%
	<i>Total</i>		<i>10</i>	<i>100%</i>	<i>2,487</i>	<i>100%</i>
MULTI FAMILY	Low	0	0.0%	0	0.0%	19.3%
	Moderate	0	0.0%	0	0.0%	16.3%
	Middle	0	0.0%	0	0.0%	19.1%
	Upper	0	0.0%	0	0.0%	45.3%
	Unknown	9	100.0%	23,203	100.0%	0.0%
	<i>Total</i>		<i>9</i>	<i>100%</i>	<i>23,203</i>	<i>100%</i>
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	19.3%
	Moderate	0	0.0%	0	0.0%	16.3%
	Middle	3	21.4%	314	9.5%	19.1%
	Upper	11	78.6%	2,980	90.5%	45.3%
	Unknown	0	0.0%	0	0.0%	0.0%
	<i>Total</i>		<i>14</i>	<i>100%</i>	<i>3,294</i>	<i>100%</i>

Originations & Purchases

Based on 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Chattanooga

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data				
		2022				
		Bank				Families by Family Income
		Count		Dollar		%
		#	%	\$ (000s)	\$ %	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	19.3%
	Moderate	0	0.0%	0	0.0%	16.3%
	Middle	0	0.0%	0	0.0%	19.1%
	Upper	0	0.0%	0	0.0%	45.3%
	Unknown	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>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	19.3%
	Moderate	0	0.0%	0	0.0%	16.3%
	Middle	0	0.0%	0	0.0%	19.1%
	Upper	0	0.0%	0	0.0%	45.3%
	Unknown	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>
HMDA TOTALS	Low	3	4.6%	775	1.9%	19.3%
	Moderate	3	4.6%	500	1.2%	16.3%
	Middle	4	6.2%	564	1.4%	19.1%
	Upper	38	58.5%	13,015	32.0%	45.3%
	Unknown	17	26.2%	25,846	63.5%	0.0%
	<i>Total</i>	<i>65</i>	<i>100%</i>	<i>40,700</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2022 FFIEC Census Data; 2016-2020 ACS data

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: Chattanooga

PRODUCT TYPE		Bank Lending & Demographic Data						
		2022						
		Bank				Total Businesses		
		Count		Dollar		%		
		#	%	\$ (000s)	\$ %	%		
SMALL BUSINESS	Revenue	\$1 Million or Less	37	43.5%	12,804	39.3%	91.4%	
		Over \$1 Million	42	49.4%	16,407	50.3%	7.8%	
		<i>Total Rev. available</i>	79	92.9%	29,211	89.6%	99.3%	
		Rev. Not Known	6	7.1%	3,396	10.4%	0.7%	
		<i>Total</i>	85	100%	32,607	100%	100%	
	Loan Size	\$100,000 or Less	15	17.6%	1,019	3.1%		
		\$100,001 - \$250,000	18	21.2%	3,714	11.4%		
		\$250,001 - \$1 Million	52	61.2%	27,874	85.5%		
		<i>Total</i>	85	100%	32,607	100%		
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	9	24.3%	650	5.1%		
		\$100,001 - \$250,000	8	21.6%	1,545	12.1%		
		\$250,001 - \$1 Million	20	54.1%	10,609	82.9%		
		<i>Total</i>	37	100%	12,804	100%		
	SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms 100.0%
			Over \$1 Million	0	0.0%	0	0.0%	0.0%
<i>Total Rev. available</i>			0	0.0%	0	0.0%	100.0%	
Not Known			0	0.0%	0	0.0%	0.0%	
<i>Total</i>			0	0.0%	0	0.0%	100%	
Loan Size		\$100,000 or Less	0	0.0%	0	0.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		
		\$250,001 - \$500,000	0	0.0%	0	0.0%		
		<i>Total</i>	0	0.0%	0	0.0%		
Loan Size & Rev \$1 Mill or Less		\$100,000 or Less	0	0.0%	0	0.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		
		\$250,001 - \$500,000	0	0.0%	0	0.0%		
		<i>Total</i>	0	0.0%	0	0.0%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and

Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2020 - 2021

Assessment Area: Cleveland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	12.5%	2,479	7.9%	1,051	42.4%	7,003	22.4%
Moderate-income	4	16.7%	2,583	8.3%	604	23.4%	5,398	17.3%
Middle-income	12	50.0%	15,318	49.1%	1,930	12.6%	5,839	18.7%
Upper-income	5	20.8%	10,824	34.7%	1,042	9.6%	12,964	41.5%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	24	100.0%	31,204	100.0%	4,627	14.8%	31,204	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,594	1,191	3.9%	25.9%	2,855	62.1%	548	11.9%
Moderate-income	5,164	2,468	8.1%	47.8%	1,800	34.9%	896	17.4%
Middle-income	24,830	15,063	49.6%	60.7%	7,056	28.4%	2,711	10.9%
Upper-income	15,941	11,655	38.4%	73.1%	3,123	19.6%	1,163	7.3%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	50,529	30,377	100.0%	60.1%	14,834	29.4%	5,318	10.5%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	306	7.4%	271	7.1%	33	10.7%	2	6.5%
Moderate-income	525	12.6%	469	12.3%	48	15.5%	8	25.8%
Middle-income	2,114	50.9%	1,948	51.1%	153	49.5%	13	41.9%
Upper-income	1,209	29.1%	1,126	29.5%	75	24.3%	8	25.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	4,154	100.0%	3,814	100.0%	309	100.0%	31	100.0%
Percentage of Total Businesses:			91.8%		7.4%		0.7%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	5	5.0%	5	5.2%	0	0.0%	0	0.0%
Middle-income	52	52.0%	50	51.5%	2	66.7%	0	0.0%
Upper-income	43	43.0%	42	43.3%	1	33.3%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	100	100.0%	97	100.0%	3	100.0%	0	0.0%
Percentage of Total Farms:			97.0%		3.0%		0.0%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2022

Assessment Area: Cleveland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.2%	523	1.6%	207	39.6%	6,897	20.9%
Moderate-income	5	16.1%	3,887	11.8%	819	21.1%	6,164	18.7%
Middle-income	21	67.7%	23,756	72.0%	2,350	9.9%	6,746	20.4%
Upper-income	4	12.9%	4,848	14.7%	185	3.8%	13,207	40.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	31	100.0%	33,014	100.0%	3,561	10.8%	33,014	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	#	%	#	%	
Low-income	1,210	212	0.6%	17.5%	847	70.0%	151	12.5%
Moderate-income	7,162	2,108	6.4%	29.4%	4,357	60.8%	697	9.7%
Middle-income	37,434	24,735	75.5%	66.1%	9,198	24.6%	3,501	9.4%
Upper-income	7,419	5,701	17.4%	76.8%	1,020	13.7%	698	9.4%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	53,225	32,756	100.0%	61.5%	15,422	29.0%	5,047	9.5%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	42	1.0%	31	0.8%	10	3.4%	1	2.9%
Moderate-income	982	23.4%	880	22.8%	97	32.8%	5	14.3%
Middle-income	2,754	65.7%	2,557	66.2%	170	57.4%	27	77.1%
Upper-income	415	9.9%	394	10.2%	19	6.4%	2	5.7%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	4,193	100.0%	3,862	100.0%	296	100.0%	35	100.0%
Percentage of Total Businesses:			92.1%		7.1%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	2	2.1%	2	2.2%	0	0.0%	0	0.0%
Middle-income	81	85.3%	79	84.9%	2	100.0%	0	0.0%
Upper-income	12	12.6%	12	12.9%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	95	100.0%	93	100.0%	2	100.0%	0	0.0%
Percentage of Total Farms:			97.9%		2.1%		0.0%	

Based on 2022 FFIEC Census Data and 2022 D&B information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2020 - 2021

Assessment Area: Knoxville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	8.0%	6,480	5.9%	3,041	46.9%	22,457	20.3%
Moderate-income	20	17.9%	15,856	14.4%	3,274	20.6%	17,144	15.5%
Middle-income	42	37.5%	44,859	40.6%	3,942	8.8%	21,064	19.1%
Upper-income	39	34.8%	43,277	39.2%	1,786	4.1%	49,821	45.1%
Unknown-income	2	1.8%	14	0.0%	14	100.0%	0	0.0%
Total Assessment Area	112	100.0%	110,486	100.0%	12,057	10.9%	110,486	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	14,132	3,711	3.2%	26.3%	8,868	62.8%	1,553	11.0%
Moderate-income	37,256	14,019	12.1%	37.6%	18,993	51.0%	4,244	11.4%
Middle-income	78,803	49,259	42.6%	62.5%	22,782	28.9%	6,762	8.6%
Upper-income	67,767	48,591	42.0%	71.7%	14,408	21.3%	4,768	7.0%
Unknown-income	161	4	0.0%	2.5%	94	58.4%	63	39.1%
Total Assessment Area	198,119	115,584	100.0%	58.3%	65,145	32.9%	17,390	8.8%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	982	4.9%	844	4.7%	134	7.2%	4	3.4%
Moderate-income	2,852	14.2%	2,510	13.9%	331	17.8%	11	9.4%
Middle-income	6,422	32.0%	5,890	32.5%	503	27.0%	29	24.8%
Upper-income	9,769	48.6%	8,808	48.6%	889	47.7%	72	61.5%
Unknown-income	63	0.3%	55	0.3%	7	0.4%	1	0.9%
Total Assessment Area	20,088	100.0%	18,107	100.0%	1,864	100.0%	117	100.0%
Percentage of Total Businesses:			90.1%		9.3%		0.6%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	2.5%	4	2.5%	0	0.0%	0	0.0%
Moderate-income	20	12.5%	20	12.7%	0	0.0%	0	0.0%
Middle-income	56	35.0%	55	35.0%	1	33.3%	0	0.0%
Upper-income	79	49.4%	77	49.0%	2	66.7%	0	0.0%
Unknown-income	1	0.6%	1	0.6%	0	0.0%	0	0.0%
Total Assessment Area	160	100.0%	157	100.0%	3	100.0%	0	0.0%
Percentage of Total Farms:			98.1%		1.9%		0.0%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2022

Assessment Area: Knoxville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	9.9%	7,531	6.5%	3,006	39.9%	22,256	19.1%
Moderate-income	16	13.2%	13,294	11.4%	1,867	14.0%	18,858	16.2%
Middle-income	44	36.4%	45,562	39.1%	3,514	7.7%	23,231	19.9%
Upper-income	45	37.2%	50,102	43.0%	1,509	3.0%	52,283	44.8%
Unknown-income	4	3.3%	139	0.1%	19	13.7%	0	0.0%
Total Assessment Area	121	100.0%	116,628	100.0%	9,915	8.5%	116,628	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	19,057	4,556	3.7%	23.9%	11,422	59.9%	3,079	16.2%
Moderate-income	28,077	14,574	11.8%	51.9%	11,038	39.3%	2,465	8.8%
Middle-income	79,164	48,948	39.7%	61.8%	23,599	29.8%	6,617	8.4%
Upper-income	78,993	55,154	44.7%	69.8%	18,249	23.1%	5,590	7.1%
Unknown-income	2,320	40	0.0%	1.7%	1,956	84.3%	324	14.0%
Total Assessment Area	207,611	123,272	100.0%	59.4%	66,264	31.9%	18,075	8.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,175	5.9%	1,011	5.6%	157	8.7%	7	5.7%
Moderate-income	2,009	10.1%	1,778	9.9%	221	12.3%	10	8.1%
Middle-income	6,311	31.6%	5,776	32.0%	508	28.2%	27	22.0%
Upper-income	10,234	51.2%	9,272	51.4%	886	49.1%	76	61.8%
Unknown-income	242	1.2%	207	1.1%	32	1.8%	3	2.4%
Total Assessment Area	19,971	100.0%	18,044	100.0%	1,804	100.0%	123	100.0%
Percentage of Total Businesses:			90.4%		9.0%		0.6%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8	4.9%	8	5.0%	0	0.0%	0	0.0%
Moderate-income	7	4.3%	6	3.8%	1	33.3%	0	0.0%
Middle-income	69	42.3%	69	43.1%	0	0.0%	0	0.0%
Upper-income	77	47.2%	76	47.5%	1	33.3%	0	0.0%
Unknown-income	2	1.2%	1	0.6%	1	33.3%	0	0.0%
Total Assessment Area	163	100.0%	160	100.0%	3	100.0%	0	0.0%
Percentage of Total Farms:			98.2%		1.8%		0.0%	

Based on 2022 FFIEC Census Data and 2022 D&B information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data													Bank & Aggregate Lending						Bank Lending & Demographic Data					
		2020, 2021						2020						2021						2022						
		Bank		Dollar		Families by Family Income %	Count		Dollar		Agg	Count		Dollar		Agg	Count		Dollar		Families by Family Income %					
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %		Bank	Agg	#	%		\$ (000s)	\$ %			
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	6.8%	0	0.0%	2.4%	0	0.0%	7.7%	0	0.0%	3.4%	0	0.0%	19.1%					
	Moderate	1	33.3%	154	19.5%	15.5%	1	33.3%	13.9%	154	19.5%	10.0%	0	0.0%	13.5%	0	0.0%	6.8%	0	0.0%	16.2%					
	Middle	0	0.0%	0	0.0%	19.1%	0	0.0%	22.6%	0	0.0%	14.5%	0	0.0%	20.2%	0	0.0%	12.4%	0	0.0%	19.9%					
	Upper	2	66.7%	635	80.5%	45.1%	2	66.7%	48.1%	635	80.5%	66.7%	0	0.0%	53.8%	0	0.0%	72.3%	0	0.0%	44.8%					
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	8.7%	0	0.0%	8.7%	0	0.0%	4.8%	0	0.0%	5.1%	0	0.0%	0.0%					
	Total	3	100%	789	100%	100%	3	100%	100%	789	100%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%					
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	20.3%	0	0.0%	1.4%	0	0.0%	0.8%	0	0.0%	0.7%	0	0.0%	0.5%	0	0.0%	19.1%					
	Moderate	0	0.0%	0	0.0%	15.5%	0	0.0%	2.8%	0	0.0%	2.3%	0	0.0%	2.7%	0	0.0%	2.0%	0	0.0%	16.2%					
	Middle	0	0.0%	0	0.0%	19.1%	0	0.0%	1.2%	0	0.0%	1.0%	0	0.0%	0.7%	0	0.0%	0.7%	0	0.0%	19.9%					
	Upper	0	0.0%	0	0.0%	45.1%	0	0.0%	1.0%	0	0.0%	1.2%	0	0.0%	0.7%	0	0.0%	1.4%	0	0.0%	44.8%					
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	93.6%	0	0.0%	94.7%	0	0.0%	95.2%	0	0.0%	95.4%	0	0.0%	0.0%					
	Total	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%					
HMDA TOTALS	Low	4	6.5%	600	1.0%	20.3%	0	0.0%	4.7%	0	0.0%	2.2%	4	13.8%	5.1%	600	1.3%	2.5%	1	2.8%	214	1.0%	19.1%			
	Moderate	3	4.8%	420	0.7%	15.5%	2	6.1%	14.8%	276	2.4%	9.5%	1	3.4%	16.0%	144	0.3%	10.2%	2	5.6%	239	1.1%	16.2%			
	Middle	10	16.1%	2,636	4.5%	19.1%	7	21.2%	18.7%	1,820	16.1%	15.0%	3	10.3%	18.6%	816	1.7%	14.5%	4	11.1%	903	4.3%	19.9%			
	Upper	35	56.5%	13,828	23.8%	45.1%	21	63.6%	44.9%	6,479	57.5%	52.9%	14	48.3%	43.0%	7,349	15.7%	49.4%	16	44.4%	6,561	31.4%	44.8%			
	Unknown	10	16.1%	40,601	69.9%	0.0%	3	9.1%	16.9%	2,702	24.0%	20.3%	7	24.1%	17.3%	37,899	81.0%	23.4%	13	36.1%	12,950	62.1%	0.0%			
	Total	62	100%	58,085	100%	100%	33	100%	100%	11,277	100%	100%	29	100%	100%	46,808	100%	100%	36	100%	20,867	100%	100%			

Originations & Purchases
Based on 2021 & 2022 FFIEC Census Data; 2011-2015 ACS data; 2016-2020 ACS data

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: Knoxville

PRODUCT TYPE		Bank Lending & Demographic Data													Bank & Aggregate Lending						Bank Lending & Demographic Data					
		2020, 2021						2020						2021						2022						
		Bank		Dollar		Total Businesses %	Count		Dollar		Agg	Count		Dollar		Agg	Count		Dollar		Total Businesses %					
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %		Bank	Agg	#	%		\$ (000s)	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	26	12.6%	4,952	21.2%	90.1%	15	10.7%	39.5%	2,277	17.8%	23.4%	11	16.4%	46.1%	2,675	25.5%	28.8%	17	65.4%	4,435	52.8%	90.4%		
		Over \$1 Million	21	10.1%	3,941	16.9%	9.3%	12	8.6%		1,326	10.3%		9	13.4%		2,615	24.9%		8	30.8%	3,580	42.6%	9.0%		
		Total Rev. available	47	22.7%	8,893	38.1%	99.4%	27	19.3%		3,603	28.1%		20	29.9%		5,290	50.4%		25	96.2%	8,015	95.4%	99.4%		
		Rev. Not Known	160	77.3%	14,436	61.9%	0.6%	113	80.7%		9,221	71.9%		47	70.1%		5,215	49.6%		1	3.8%	390	4.6%	0.6%		
		Total	207	100%	23,329	100%	100%	140	100%		12,824	100%		67	100%		10,505	100%		26	100%	8,405	100%	100.0%		
	Total	207	100%	23,329	100%		140	100%	100%	12,824	100%	100%	67	100%	100%	10,505	100%	100%	26	100%	8,405	100%				
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	143	69.1%	5,013	21.5%		102	72.9%	82.3%	3,591	28.0%	24.7%	41	61.2%	87.2%	1,422	13.5%	26.7%	9	34.6%	720	8.6%				
	\$100,001 - \$250,000	40	19.3%	6,569	28.2%		26	18.6%	9.9%	4,164	32.5%	21.6%	14	20.9%	6.6%	2,405	22.9%	18.3%	6	23.1%	1,207	14.4%				
	\$250,001 - \$1 Million	24	11.6%	11,747	50.4%		12	8.6%	7.9%	5,069	39.5%	53.7%	12	17.9%	6.2%	6,678	63.6%	55.1%	11	42.3%	6,478	77.1%				
	Total	207	100%	23,329	100%		140	100%	100%	12,824	100%	100%	67	100%	100%	10,505	100%	100%	26	100%	8,405	100%				
	Total	207	100%	23,329	100%		140	100%	100%	12,824	100%	100%	67	100%	100%	10,505	100%	100%	26	100%	8,405	100%				
SMALL FARM	Revenue	\$1 Million or Less	2	100.0%	70	100.0%	98.1%	2	100%	50.0%	70	100%	28.0%	0	0.0%	74.4%	0	0.0%	49.4%	0	0.0%	0	0.0%	98.2%		
		Over \$1 Million	0	0.0%	0	0.0%	1.9%	0	0.0%		0	0.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	1.8%		
		Total Rev. available	2	100.0%	70	100.0%	100.0%	2	100.0%		70	100.0%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	100.0%		
		Not Known	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	2	100%	70	100%	100%	2	100%		70	100%		0	0.0%		0	0.0%		0	0.0%	0	0.0%	100.0%		
	Total	2	100%	70	100%		2	100%	100%	70	100%		0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%				
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	70	100.0%		2	1.4%		70	0.5%	45.0%	0	0.0%	97.7%	0	0.0%	76.4%	0	0.0%	0	0.0%				
	\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	2.5%	0	0.0%	14.0%	0	0.0%	2.3%	0	0.0%	23.6%	0	0.0%	0	0.0%				
	\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	5.0%	0	0.0%	41.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0	0.0%				
	Total	2	100%	70	100%		2	1.4%	100%	70	0.5%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0	0.0%				
	Total	2	100%	70	100%		2	1.4%		70	0.5%		0	0.0%		0	0.0%		0	0.0%	0	0.0%				
Total	2	100%	70	100%		2	1.4%		70	0.5%		0	0.0%		0	0.0%		0	0.0%	0	0.0%					

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
Based on 2022 FFIEC Census Data; 2016-2020 ACS data; 2022 D&B information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2020 - 2021

Assessment Area: Manchester

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,662	18.3%
Moderate-income	1	8.3%	1,012	7.0%	321	31.7%	2,387	16.4%
Middle-income	8	66.7%	10,515	72.3%	1,534	14.6%	2,854	19.6%
Upper-income	2	16.7%	3,021	20.8%	238	7.9%	6,645	45.7%
Unknown-income	1	8.3%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	12	100.0%	14,548	100.0%	2,093	14.4%	14,548	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	1,979	683	4.8%	34.5%	1,079	54.5%	217	11.0%
Middle-income	16,887	10,489	73.4%	62.1%	4,682	27.7%	1,716	10.2%
Upper-income	4,659	3,118	21.8%	66.9%	1,119	24.0%	422	9.1%
Unknown-income	4	0	0.0%	0.0%	0	0.0%	4	100.0%
Total Assessment Area	23,529	14,290	100.0%	60.7%	6,880	29.2%	2,359	10.0%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	205	10.7%	178	10.1%	27	18.0%	0	0.0%
Middle-income	1,268	65.9%	1,172	66.8%	79	52.7%	17	85.0%
Upper-income	450	23.4%	404	23.0%	43	28.7%	3	15.0%
Unknown-income	1	0.1%	0	0.0%	1	0.7%	0	0.0%
Total Assessment Area	1,924	100.0%	1,754	100.0%	150	100.0%	20	100.0%
Percentage of Total Businesses:			91.2%		7.8%		1.0%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	59	93.7%	57	93.4%	2	100.0%	0	0.0%
Upper-income	4	6.3%	4	6.6%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	63	100.0%	61	100.0%	2	100.0%	0	0.0%
Percentage of Total Farms:			96.8%		3.2%		0.0%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2022

Assessment Area: Manchester

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,370	16.3%
Moderate-income	3	17.6%	2,405	16.5%	387	16.1%	2,729	18.7%
Middle-income	7	41.2%	7,183	49.3%	944	13.1%	2,945	20.2%
Upper-income	6	35.3%	4,988	34.2%	219	4.4%	6,532	44.8%
Unknown-income	1	5.9%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	17	100.0%	14,576	100.0%	1,550	10.6%	14,576	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	4,226	2,350	16.0%	55.6%	1,333	31.5%	543	12.8%
Middle-income	11,907	7,222	49.1%	60.7%	3,660	30.7%	1,025	8.6%
Upper-income	8,135	5,135	34.9%	63.1%	2,330	28.6%	670	8.2%
Unknown-income	4	4	0.0%	100.0%	0	0.0%	0	0.0%
Total Assessment Area	24,272	14,711	100.0%	60.6%	7,323	30.2%	2,238	9.2%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	280	14.9%	245	14.3%	33	22.8%	2	10.5%
Middle-income	963	51.3%	881	51.4%	71	49.0%	11	57.9%
Upper-income	636	33.8%	589	34.3%	41	28.3%	6	31.6%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	1,879	100.0%	1,715	100.0%	145	100.0%	19	100.0%
Percentage of Total Businesses:			91.3%		7.7%		1.0%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	3	4.8%	3	5.0%	0	0.0%	0	0.0%
Middle-income	50	80.6%	48	80.0%	2	100.0%	0	0.0%
Upper-income	9	14.5%	9	15.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	62	100.0%	60	100.0%	2	100.0%	0	0.0%
Percentage of Total Farms:			96.8%		3.2%		0.0%	

Based on 2022 FFIEC Census Data and 2022 D&B information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2020 - 2021

Assessment Area: Waynesboro

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	3,410	21.8%
Moderate-income	2	13.3%	1,705	10.9%	371	21.8%	2,945	18.8%
Middle-income	12	80.0%	12,597	80.4%	1,914	15.2%	2,920	18.6%
Upper-income	1	6.7%	1,363	8.7%	161	11.8%	6,390	40.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	15	100.0%	15,665	100.0%	2,446	15.6%	15,665	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	3,287	1,643	9.7%	50.0%	1,042	31.7%	602	18.3%
Middle-income	20,287	13,908	82.1%	68.6%	3,810	18.8%	2,569	12.7%
Upper-income	1,823	1,384	8.2%	75.9%	284	15.6%	155	8.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	25,397	16,935	100.0%	66.7%	5,136	20.2%	3,326	13.1%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	267	16.3%	215	14.5%	43	34.4%	9	25.0%
Middle-income	1,299	79.1%	1,190	80.3%	82	65.6%	27	75.0%
Upper-income	77	4.7%	77	5.2%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	1,643	100.0%	1,482	100.0%	125	100.0%	36	100.0%
Percentage of Total Businesses:			90.2%		7.6%		2.2%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	11	7.9%	11	8.0%	0	0.0%	0	0.0%
Middle-income	119	85.6%	117	85.4%	0	0.0%	2	100.0%
Upper-income	9	6.5%	9	6.6%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	139	100.0%	137	100.0%	0	0.0%	2	100.0%
Percentage of Total Farms:			98.6%		0.0%		1.4%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Combined Demographics Report - 2022

Assessment Area: Waynesboro

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	3,166	21.4%
Moderate-income	1	6.7%	999	6.8%	363	36.3%	2,781	18.8%
Middle-income	12	80.0%	11,107	75.2%	1,431	12.9%	3,104	21.0%
Upper-income	2	13.3%	2,673	18.1%	181	6.8%	5,728	38.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	15	100.0%	14,779	100.0%	1,975	13.4%	14,779	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	1,944	822	4.9%	42.3%	896	46.1%	226	11.6%
Middle-income	19,188	13,175	79.2%	68.7%	3,244	16.9%	2,769	14.4%
Upper-income	4,477	2,643	15.9%	59.0%	1,097	24.5%	737	16.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	25,609	16,640	100.0%	65.0%	5,237	20.4%	3,732	14.6%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	192	11.6%	152	10.2%	35	27.8%	5	13.5%
Middle-income	1,162	70.2%	1,067	71.5%	68	54.0%	27	73.0%
Upper-income	301	18.2%	273	18.3%	23	18.3%	5	13.5%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	1,655	100.0%	1,492	100.0%	126	100.0%	37	100.0%
Percentage of Total Businesses:			90.2%		7.6%		2.2%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1	0.7%	1	0.7%	0	0.0%	0	0.0%
Middle-income	128	94.1%	126	94.0%	0	0.0%	2	100.0%
Upper-income	7	5.1%	7	5.2%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	136	100.0%	134	100.0%	0	0.0%	2	100.0%
Percentage of Total Farms:			98.5%		0.0%		1.5%	

Based on 2022 FFIEC Census Data and 2022 D&B information

