

PUBLIC DISCLOSURE

November 2, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Copiah Bank
101 Caldwell Drive
Hazlehurst, Mississippi 39083**

RSSD ID NUMBER: 398837

**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: This institution is rated Satisfactory.

Major factors supporting the institution's rating include:

- The bank's loan-to-deposit (LTD) ratio was reasonable given its asset size, financial condition, and assessment area credit needs;
- A majority of loans were made in the assessment area;
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area;
- The distribution of borrowers reflects reasonable penetration among borrowers of different incomes and businesses of different sizes; and
- The bank has not received any CRA related complaints since the previous examination.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, within the context of information such as the asset size and financial condition of the institution, competitive factors, and the economic and demographic characteristics of its defined assessment area. This CRA performance review was based on the bank's lending performance in its assessment area using the Interagency Small Institution Examination Procedures. The rating was assessed using the following core criteria developed for evaluating CRA lending performance for small banks:

- Net loan-to-deposit (LTD) ratio
- Lending inside the assessment area
- Geographic distribution of loans
- Lending to borrowers of different incomes and businesses of different sizes
- The bank's responsiveness to complaints it has received regarding its CRA activities, if applicable

The evaluation included an analysis of HMDA-reportable loans, consumer loans, small business loans, and small farm loans originated from January 1, 2018 through December 31, 2019. 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 or nonresidential real estate or classified as a commercial loan. A small farm loan is defined as a business loan with an original amount of \$500 thousand or less and typically includes loans for financial agricultural production and other loans to farmers. Given its asset size, Copiah Bank is not required to report CRA small business loan data. However, the bank is subject to the reporting requirements of Regulation C – Home Mortgage Disclosure Act (HMDA).

As part of this evaluation, two community contacts were obtained with local representatives who are familiar with the economic and demographic characteristics as well as community development opportunities in the Jackson 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 applicable section of the evaluation for each assessment area.

DESCRIPTION OF INSTITUTION

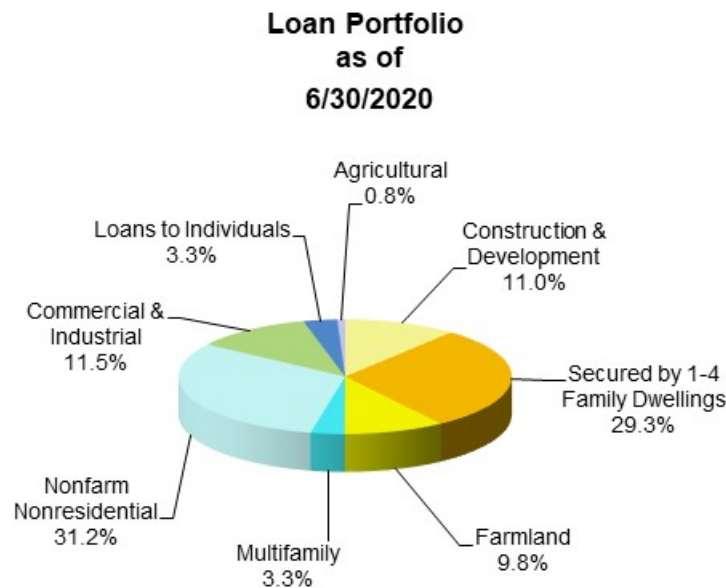
Copiah Bank is a small community bank that operates one main office and eight branches in the Jackson, MS assessment area. According to the Consolidated Report of Condition and Income (Call Report), between December 31, 2015 and June 30, 2020 total assets increased 44 percent from \$172 million to \$248 million. The bank offers traditional non-complex loan products.

Loan Portfolio

The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2020		12/31/2019		12/31/2018	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	19,005	11.0%	16,999	9.7%	16,778	9.7%
Secured by One- to Four- Family Dwellings	50,813	29.3%	51,327	29.1%	48,928	28.2%
Other Real Estate: Farmland	16,914	9.8%	20,594	11.7%	20,036	11.6%
Multifamily	5,726	3.3%	7,446	4.2%	7,189	4.1%
Nonfarm nonresidential	54,019	31.2%	52,827	30.0%	51,014	29.4%
Commercial and Industrial	19,866	11.5%	18,666	10.6%	20,179	11.6%
Loans to Individuals	5,694	3.3%	6,970	4.0%	7,610	4.4%
Agricultural Loans	1,329	0.8%	1,266	0.7%	1,582	0.9%
Total	\$173,366	100.00%	\$176,095	100.00%	\$173,316	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 illustrated in the table and chart above, the bank’s loan portfolio as of June 30, 2020 consisted primarily of nonfarm nonresidential loans followed by loans secured by one-to four-family dwellings, commercial and industrial loans, construction and development loans, farmland loans, loans to individuals and multifamily, and agricultural loans.

Credit Products

The bank offers non-complex residential real estate (RRE) loan products (in-house and secondary market products). In addition, the bank offers construction, fixed-rate, variable-rate, balloon, and qualified mortgages (QM) products. The bank does not offer loans with private mortgage insurance or escrow features.

Copiah Bank 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 an “outstanding” rating at its previous evaluation conducted by the Office of the Comptroller of the Currency dated August 3, 2015, under the small bank examination procedures.

DESCRIPTION OF JACKSON ASSESSMENT AREA

Overview

The assessment area has changed since the previous evaluation. The assessment area in 2014 included all of Copiah County but only parts of Hinds and Rankin Counties, one tract in Simpson County, and two tracts in non-MSA county Lincoln County. The Jackson assessment area now consists of three counties, Copiah, Hinds, and Rankin Counties, which are part of the Jackson, MS MSA.

Population Information

Population in the Jackson MS MSA was estimated at 415,176 in 2019, representing a decrease of 1.5 percent from 2015. Statewide, population grew by 0.3 percent over the time period. The estimated population in the MSA in 2019 represented 14.0 percent of the state of Mississippi’s estimated population of 2,976,149.²

Income Characteristics

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Jackson, Mississippi MSA. The following table sets forth the estimated median family income for 2018 and 2019 for the Jackson MSA. It also provides a breakdown of the estimated annual income based on income-level.

**Borrower Income Levels
Jackson, MS MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%		Moderate 50% - 79.99%		Middle 80% - 119.99%		Upper 120% - & above	
2018	\$60,700	0	- \$30,349	\$30,350	- \$48,559	\$48,560	- \$72,839	\$72,840	- & above
2019	\$60,400	0	- \$30,199	\$30,200	- \$48,319	\$48,320	- \$72,479	\$72,480	- & above

As shown in the table above, the median family income decreased from \$60,700 in 2018 to \$60,400 in 2019, or 0.5 percent. According to the 2018 and 2019 FFIEC census data, there were 103,888 families in the assessment area. Of those families, 31.2 percent were considered low- to moderate-income. Of the total families, 15.3 percent had incomes below the poverty level. Additionally, 42.4 percent of families in low-income tracts and 27.4 percent of families in moderate-income tracts have incomes below the poverty level. The concentration of families living below the poverty level in low- and moderate-income tracts may create challenges to lending in these tracts.

Demographic Data by Census Tracts

According to the 2018 and 2019 FFIEC census data, the assessment area contains 97 census tracts: 15 low-income census tracts (15.5 percent); 30 moderate-income tracts (30.9 percent); 29 middle-income tracts (29.9 percent); 22 upper-income tracts (22.7 percent); and one unknown-income tract.³

Housing Characteristics

There were 173,906 housing units in the assessment area, of which 57.6 percent were owner-occupied units, 30.0 percent were rental units, and 12.4 percent were vacant according to 2018 and 2019 FFIEC census data. In low-income tracts, 29.7 percent of housing units were owner-occupied and 45.9 percent were rental units; therefore, there may be limited opportunities for home mortgage lending in these tracts. In moderate-income tracts, 43.6

² QuickFacts. U.S. Census Bureau, n.d. Web 4 Nov. 2020. <http://quickfacts.census.gov>

³ 2018 FFIEC Census Report. 2019 FFIEC Census Report. FFIEC, n.d. Web 4 Nov. 2020.

percent were owner-occupied and 39.4 percent were rental units. The median age of the housing stock in the assessment area was 42 years as compared to 33 years in the state of Mississippi, while the median age was 57 years in low-income census tracts and 53 years in moderate-income tracts.

The estimated median value of an owner-occupied housing unit between 2014 and 2018 in Copiah, Hinds, and Rankin Counties was \$97,900, \$115,200 and \$160,000 respectively.⁴ Housing in the assessment area is considered slightly less affordable than statewide. The affordability ratio, defined as the median household income divided by the median housing value, is 35.4 percent for the assessment area, compared to 38.5 percent for the state of Mississippi. A higher ratio means the housing is considered more affordable while a lower ratio means the housing is considered less affordable.⁵ In addition to the housing affordability, 20.1 percent of homeowners in Copiah County, 23.1 percent of homeowners in Hinds County, and 15.3 percent of homeowners in Rankin County between 2014 and 2018 are cost-burdened, meaning that homeowners spent 30.0 percent or more of household income on housing costs.⁶

Rents in the assessment area are also generally less affordable than elsewhere in the state. The estimated median gross rent between 2014 and 2018 for Copiah, Hinds, and Rankin Counties was \$724, \$845, and \$975 respectively, as compared to the state of Mississippi at \$762. Additionally, the percentage of renters in Copiah, Hinds, and Rankin Counties between 2014 and 2018 at 36.3 percent, 48.5 percent, and 32.4 percent respectively are cost-burdened, meaning that renters spent 30.0 percent or more of household income on rent.⁷

Employment Statistics

The following table shows the unemployment rates percentages for the bank's assessment area, the Jackson, MS MSA, and the state of Mississippi. As shown in the table, the unemployment rates for the bank's assessment area, the MSA, and the state of Mississippi increased from 2018 to 2019. The unemployment rates in Copiah County in 2018 and 2019 were higher than the other two counties, the MSA and the state of Mississippi while also having the highest increase for the one year period at one percent.

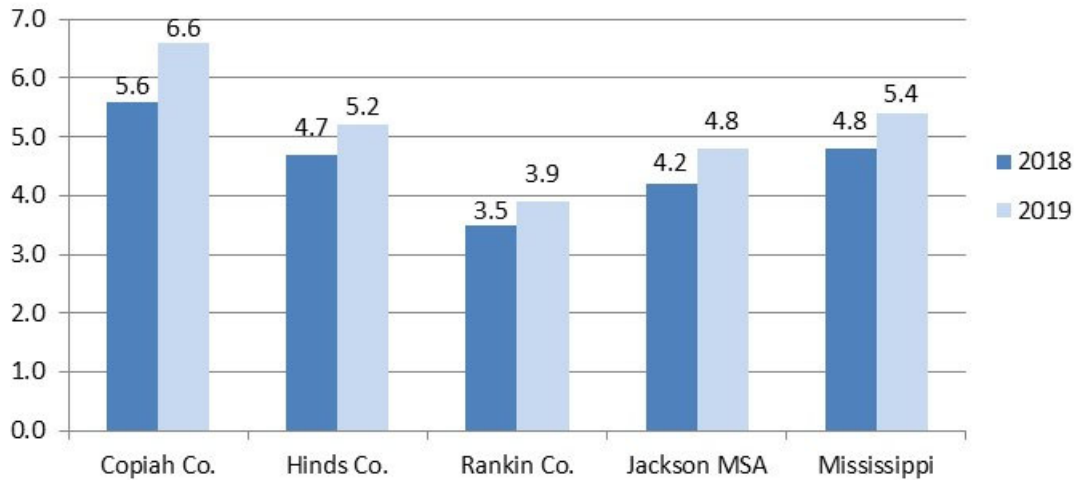
⁴ "Jackson MSA, MS (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*, The Reinvestment Fund, n.d. Web. 5 Nov. 2020. <http://www.policymap.com/>

⁵ FRB Atlanta Calculations of 2018 and 2019 FFIEC Census Data

⁶ "Jackson MSA, MS (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*, The Reinvestment Fund, n.d. Web. 5 Nov. 2020. <http://www.policymap.com/>

⁷ "Jackson MSA, MS (U.S. Census Bureau)." *GIS Mapping and Geographic Information System Data*, The Reinvestment Fund, n.d. Web. 5 Nov. 2020. <http://www.policymap.com/>

Unemployment Rates - Jackson



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

Competition

The bank operates in a highly competitive market as shown by the number of depository institutions with a presence in the assessment area. According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report, Copiah Bank ranked 10th out of 22 depository institutions operating in the assessment area with a deposit market share of 1.7 percent. The institutions with the largest market share in the area are Trustmark National Bank, Regions Bank, and Bankplus, with market shares of 38.6 percent, 21.9 percent, and 10.4 percent, respectively. Bank management indicated that increased competition from the number of financial institutions in the area has made business more challenging.

Community Contacts

As part of the CRA examination, information was obtained from two local contacts specializing in community and economic development. The first organization works primarily with lower income and minority clients, including many who are unbanked. The contact stated that there are opportunities for banks to create low balance, entry point accounts for low- and moderate-income individuals in the community who have been historically underserved. Banks could work to gain their trust by offering these accounts and could build long-term relationships, which could lead to other lending opportunities. The contact indicated there were not any affordable home mortgage products with low down payments in the area.

The second contact expressed the local economy is flat and does not seem to be improving. As a result, unemployment remains high. There are a lot of blighted properties in the city and a need for more revitalization and stabilization efforts. The contact also indicated that there is a need for affordable housing. The tax base has declined as individuals with resources have left the city, and as a result, the local government is struggling financially. There are limited incentives for investors and other outsiders to come into the area and to help revitalize or stabilize the area.

General Economic and Business Characteristics

According to bank management and community contacts, economic progress and conditions in the assessment area are relatively slow with little or no growth. During the review period, the metropolitan area experienced

persistent net out-migration, which has constrained job growth. Mississippi is losing its young workforce at a rate higher than any other state. The largest employers in the assessment area are the State of Mississippi, University of Mississippi Medical Center, United States Government, Jackson Public School, and Rankin County School District.⁸

According to 2018 Dun & Bradstreet data, there were 18,074 businesses within the bank's assessment area, 90.3 percent of which had total annual revenues less than or equal to \$1 million, and were therefore considered to be small businesses. Of the total small businesses in the assessment area, 30.7 percent were located in low- and moderate-income tracts. The 2019 Dun & Bradstreet data reflects a decrease in the number of small businesses to 17,834 but the percentage of businesses that had total annual revenues less than or equal to \$1 million increased slightly to 91 percent. The percentage of small businesses in the assessment area that were located in low- and moderate-income tracts was comparable to 2018 at 30.6 percent. The total number of small farms in the assessment area slightly decreased between 2018 and 2019 but the percentage of small farms that are located in low-income tracts remained the same at 0.9 percent and the percentage of small farms in moderate-income tracts increased slightly from 11.6 percent to 12.6 percent.

Assessment Area Demographics

The following table provides demographic characteristics of the bank's assessment area based on the 2000 U.S. Census data used to analyze the bank's CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis. The first table is based on 2018 FFIEC census data along with 2018 Dun & Bradstreet (D&B) information and is used in the analysis of 2018 lending performance. The second table is based on the 2019 FFIEC census data and 2019 D&B information and is used in the analysis of 2019 lending performance. Low- and moderate-income tracts in the assessment area in 2018 and 2019 are designated by the FFIEC as distressed due to high poverty levels.

⁸ Major Employers. Greater Jackson Alliance Mississippi, n.d. Web 5 Nov. 2020.
http://www.greaterjacksonms.com/index.php/industry_information/business_lists

Combined Demographics Report

Assessment Area: Jackson

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	15	15.5	7,871	7.6	3,336	42.4	25,023	24.1
Moderate-income	30	30.9	24,564	23.6	6,719	27.4	18,381	17.7
Middle-income	29	29.9	41,343	39.8	4,410	10.7	18,971	18.3
Upper-income	22	22.7	30,110	29.0	1,477	4.9	41,513	40.0
Unknown-income	1	1.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	97	100.0	103,888	100.0	15,942	15.3	103,888	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	17,511	5,203	5.2	29.7	8,041	45.9	4,267	24.4
Moderate-income	45,593	19,871	19.8	43.6	17,974	39.4	7,748	17.0
Middle-income	64,991	41,542	41.4	63.9	17,575	27.0	5,874	9.0
Upper-income	45,786	33,632	33.5	73.5	8,560	18.7	3,594	7.8
Unknown-income	25	0	0.0	0.0	4	16.0	21	84.0
Total Assessment Area	173,906	100,248	100.0	57.6	52,154	30.0	21,504	12.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,416	7.8	1,257	7.7	144	9.6	15	6.3
Moderate-income	4,327	23.9	3,758	23.0	473	31.4	96	40.2
Middle-income	6,538	36.2	5,958	36.5	524	34.8	56	23.4
Upper-income	5,779	32.0	5,344	32.7	364	24.2	71	29.7
Unknown-income	14	0.1	11	0.1	2	0.1	1	0.4
Total Assessment Area	18,074	100.0	16,328	100.0	1,507	100.0	239	100.0
Percentage of Total Businesses:			90.3		8.3		1.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.9	2	0.6	1	14.3	0	0.0
Moderate-income	38	11.6	37	11.5	1	14.3	0	0.0
Middle-income	194	59.0	189	58.9	4	57.1	1	100.0
Upper-income	94	28.6	93	29.0	1	14.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	329	100.0	321	100.0	7	100.0	1	100.0
Percentage of Total Farms:			97.6		2.1		.3	

Combined Demographics Report

Assessment Area: Jackson

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	15	15.5	7,871	7.6	3,336	42.4	24,345	23.4
Moderate-income	30	30.9	24,564	23.6	6,719	27.4	18,097	17.4
Middle-income	26	26.8	37,785	36.4	4,115	10.9	18,807	18.1
Upper-income	25	25.8	33,668	32.4	1,772	5.3	42,639	41.0
Unknown-income	1	1.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	97	100.0	103,888	100.0	15,942	15.3	103,888	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	17,511	5,203	5.2	29.7	8,041	45.9	4,267	24.4
Moderate-income	45,593	19,871	19.8	43.6	17,974	39.4	7,748	17.0
Middle-income	59,390	37,832	37.7	63.7	16,455	27.7	5,103	8.6
Upper-income	51,387	37,342	37.2	72.7	9,680	18.8	4,365	8.5
Unknown-income	25	0	0.0	0.0	4	16.0	21	84.0
Total Assessment Area	173,906	100,248	100.0	57.6	52,154	30.0	21,504	12.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,376	7.7	1,232	7.6	138	9.6	6	3.7
Moderate-income	4,246	23.8	3,733	23.0	446	30.9	67	41.4
Middle-income	6,106	34.2	5,560	34.3	501	34.7	45	27.8
Upper-income	6,096	34.2	5,697	35.1	355	24.6	44	27.2
Unknown-income	10	0.1	8	0.0	2	0.1	0	0.0
Total Assessment Area	17,834	100.0	16,230	100.0	1,442	100.0	162	100.0
Percentage of Total Businesses:				91.0		8.1		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.9	2	0.6	1	14.3	0	0.0
Moderate-income	41	12.6	40	12.6	1	14.3	0	0.0
Middle-income	172	52.9	168	52.8	4	57.1	0	0.0
Upper-income	109	33.5	108	34.0	1	14.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	325	100.0	318	100.0	7	100.0	0	.0
Percentage of Total Farms:				97.8		2.2		.0

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Overview

Performance context factors such as economic conditions, competition, and demographic information were considered when evaluating the bank's lending performance. The bank's LTD ratio is reasonable. Based on an analysis of residential real estate, small business, small farm, and consumer loans originated from January 1, 2018 through December 31, 2019, the bank originated a majority of its loans within the assessment area. The geographic distribution of loans reflects reasonable penetration throughout the assessment area. The distribution of loans to borrowers with different incomes and businesses of different revenues within the assessment area is also reasonable.

Loan-to-Deposit Ratio

The bank's net LTD ratio, which measures the level of lending activity, demonstrates reasonable responsiveness to meeting the assessment area's credit needs. The bank's average LTD ratio for the 21 - quarter period ended June 30, 2020, was 86.3 percent. Performance context information such as competition and business strategy were considerations in determining the reasonableness of the LTD ratio. The assessment area is a highly competitive market, and there is strong competition with a number of larger institutions. The bank traditionally makes loans to customers near its branches, and to customers who have had a deposit relationship with the bank for many years. The LTD ratio was compared to one other similar depository institution, which had a LTD ratio of 57.9 percent in the assessment area over the same time period.

Assessment Area Concentration

The bank originated a majority of the total loans to borrowers and businesses residing in or located within the bank's assessment area. The table below shows, by product type, the number, and percentage of loans reviewed that were located inside and outside of the bank's assessment areas. As shown, the percentage of total loans originated by the bank in its assessment area is 86.2 percent. By product type, 88.0 percent of consumer loans, 80.7 percent of HMDA-reportable loans, 83.2 percent of small business loans, and 89.1 percent of small farm loans were originated in the bank's assessment area. This lending volume indicates the bank's willingness to originate loans that meet the credit needs of its assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Total Consumer Loans	1,082	88.0	\$7,881	88.2	148	12.0	\$1,055	11.8
Home Improvement	14	100.0	\$654	100.0	0	0.0	\$0	0.0
Home Purchase - Conventional	63	80.8	\$5,250	70.9	15	19.2	\$2,158	29.1
Multi-Family Housing	1	100.0	\$1,083	100.0	0	0.0	\$0	0.0
Other Purpose Closed-End	0	0.0	\$0	0.0	1	100.0	\$41	100.0
Refinancing	68	78.2	\$6,116	52.3	19	21.8	\$5,584	47.7
Total HMDA Loans	146	80.7	\$13,103	62.7	35	19.3	\$7,783	37.3
Total Small Business Loans	462	83.2	\$18,553	82.5	93	16.8	\$3,935	17.5
Total Small Farm Loans	123	89.1	\$7,218	82.0	15	10.9	\$1,585	18.0
TOTAL LOANS	1,813	86.2	\$46,755	76.5	291	13.8	\$14,358	23.5

Note: Affiliate loans not included

Geographic Distribution of Loans

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

Residential Real Estate (HMDA) Lending

The following tables shows the geographic distribution of the bank's HMDA-reportable loans for 2018 and 2019 within the Jackson assessment area. The tables also include a comparison of the bank's HMDA reportable lending to the aggregate HMDA lenders within the assessment area.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Jackson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			#	%	%	Bank		Agg
		#	%	\$ (000s)	\$ %	\$ (000s)				\$ %	\$ %	
HOME PURCHASE	Low	1	2.6%	\$79	3.1%	5.2%	1	2.6%	0.4%	\$79	3.1%	0.2%
	Moderate	13	34.2%	\$574	22.4%	19.8%	13	34.2%	6.8%	\$574	22.4%	4.2%
	Middle	17	44.7%	\$1,021	39.8%	41.4%	17	44.7%	39.7%	\$1,021	39.8%	34.9%
	Upper	7	18.4%	\$892	34.8%	33.5%	7	18.4%	53.1%	\$892	34.8%	60.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>38</i>	<i>100.0%</i>	<i>\$2,566</i>	<i>100.0%</i>	<i>100.0%</i>	<i>38</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,566</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	3.4%	\$54	2.1%	5.2%	1	3.4%	1.2%	\$54	2.1%	0.3%
	Moderate	6	20.7%	\$239	9.4%	19.8%	6	20.7%	11.2%	\$239	9.4%	6.6%
	Middle	16	55.2%	\$1,644	64.7%	41.4%	16	55.2%	39.1%	\$1,644	64.7%	34.6%
	Upper	6	20.7%	\$603	23.7%	33.5%	6	20.7%	48.6%	\$603	23.7%	58.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>29</i>	<i>100.0%</i>	<i>\$2,540</i>	<i>100.0%</i>	<i>100.0%</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,540</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	2.9%	\$0	0.0%	0.7%
	Moderate	5	55.6%	\$178	38.0%	19.8%	5	55.6%	13.2%	\$178	38.0%	8.7%
	Middle	4	44.4%	\$290	62.0%	41.4%	4	44.4%	41.6%	\$290	62.0%	42.9%
	Upper	0	0.0%	\$0	0.0%	33.5%	0	0.0%	42.3%	\$0	0.0%	47.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$468</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$468</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY				Multi-Family Units								
	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	11.5%	\$0	0.0%	15.8%
	Moderate	0	0.0%	\$0	0.0%	33.3%	0	0.0%	28.8%	\$0	0.0%	4.5%
	Middle	1	100.0%	\$1,083	100.0%	35.7%	1	100.0%	28.8%	\$1,083	100.0%	43.4%
	Upper	0	0.0%	\$0	0.0%	13.9%	0	0.0%	30.8%	\$0	0.0%	36.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$1,083</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,083</i>	<i>100.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.5%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	7.3%	\$0	0.0%	5.4%
	Middle	0	0.0%	\$0	0.0%	41.4%	0	0.0%	38.2%	\$0	0.0%	31.6%
	Upper	0	0.0%	\$0	0.0%	33.5%	0	0.0%	53.0%	\$0	0.0%	62.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Jackson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank		Owner Occupied Units		#	Count		Dollar			
		Count	Dollar		Bank		Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	2.3%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	8.0%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	41.4%	0	0.0%	47.1%	\$0	0.0%	39.9%
	Upper	0	0.0%	\$0	0.0%	33.5%	0	0.0%	42.5%	\$0	0.0%	51.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	3.4%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	20.8%	\$0	0.0%	14.0%
	Middle	0	0.0%	\$0	0.0%	41.4%	0	0.0%	53.2%	\$0	0.0%	53.2%
	Upper	0	0.0%	\$0	0.0%	33.5%	0	0.0%	22.6%	\$0	0.0%	30.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	2	2.6%	\$133	2.0%	5.2%	2	2.6%	0.9%	\$133	2.0%	1.3%
	Moderate	24	31.2%	\$991	14.9%	19.8%	24	31.2%	8.8%	\$991	14.9%	5.1%
	Middle	38	49.4%	\$4,038	60.7%	41.4%	38	49.4%	40.0%	\$4,038	60.7%	35.9%
	Upper	13	16.9%	\$1,495	22.5%	33.5%	13	16.9%	50.3%	\$1,495	22.5%	57.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>\$6,657</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,657</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

The bank originated 77 HMDA-reportable loans in 2018 with 2 loans (2.6 percent) in low-income tracts and 24 loans (31.2 percent) in moderate-income tracts. The percentage of bank loans in low- and moderate-income tracts was less than the percentage of owner-occupied units in low-income tracts (5.2 percent) and greater than the percentage of owner-occupied units in moderate-income tracts (19.8 percent). The bank's total HMDA-reportable lending of 2.6 percent in low-income tracts and 31.2 percent in moderate-income tracts was greater than aggregate lending of 0.9 percent in low-income tracts and 8.8 percent in moderate-income tracts. Aggregate data indicates that other lenders also exhibited low lending levels for home purchase, home refinance, and home improvement loans compared to the percentage of owner-occupied units in low-income tracts.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Jackson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2019					2019						
		Bank		Owner Occupied Units		Count	Bank		Agg		Dollar		Agg
		Count	Dollar	Dollar	%		Count	Dollar	Count	Dollar	Count	Dollar	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	0.9%	\$0	0.0%	0.3%	
	Moderate	11	44.0%	\$736	27.4%	19.8%	11	44.0%	7.8%	\$736	27.4%	4.3%	
	Middle	8	32.0%	\$631	23.5%	37.7%	8	32.0%	37.5%	\$631	23.5%	33.3%	
	Upper	6	24.0%	\$1,317	49.1%	37.2%	6	24.0%	53.8%	\$1,317	49.1%	62.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$2,684</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,684</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	1	2.6%	\$43	1.2%	5.2%	1	2.6%	0.9%	\$43	1.2%	0.2%	
	Moderate	7	17.9%	\$500	14.0%	19.8%	7	17.9%	8.9%	\$500	14.0%	5.7%	
	Middle	14	35.9%	\$1,310	36.6%	37.7%	14	35.9%	34.5%	\$1,310	36.6%	30.0%	
	Upper	17	43.6%	\$1,723	48.2%	37.2%	17	43.6%	55.7%	\$1,723	48.2%	64.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>\$3,576</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,576</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	3.7%	\$0	0.0%	0.9%	
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	17.5%	\$0	0.0%	11.8%	
	Middle	3	60.0%	\$127	68.3%	37.7%	3	60.0%	36.3%	\$127	68.3%	31.1%	
	Upper	2	40.0%	\$59	31.7%	37.2%	2	40.0%	42.5%	\$59	31.7%	56.2%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$186</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$186</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	17.1%	0	0.0%	17.9%	\$0	0.0%	9.3%	
	Moderate	0	0.0%	\$0	0.0%	33.3%	0	0.0%	20.9%	\$0	0.0%	15.0%	
	Middle	0	0.0%	\$0	0.0%	34.5%	0	0.0%	29.9%	\$0	0.0%	28.6%	
	Upper	0	0.0%	\$0	0.0%	15.1%	0	0.0%	31.3%	\$0	0.0%	47.1%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	1.1%	\$0	0.0%	0.5%	
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	9.7%	\$0	0.0%	6.5%	
	Middle	0	0.0%	\$0	0.0%	37.7%	0	0.0%	33.1%	\$0	0.0%	34.5%	
	Upper	0	0.0%	\$0	0.0%	37.2%	0	0.0%	56.1%	\$0	0.0%	58.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Jackson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2019					2019					
		Bank		Owner Occupied Units		Count			Dollar			
		Count	Dollar	Count	Dollar	Bank	Agg	Bank	Agg	Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	2.4%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	12.8%	\$0	0.0%	8.0%
	Middle	0	0.0%	\$0	0.0%	37.7%	0	0.0%	36.8%	\$0	0.0%	30.7%
	Upper	0	0.0%	\$0	0.0%	37.2%	0	0.0%	48.0%	\$0	0.0%	60.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	5.2%	0	0.0%	3.8%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	19.8%	0	0.0%	15.4%	\$0	0.0%	9.0%
	Middle	0	0.0%	\$0	0.0%	37.7%	0	0.0%	45.3%	\$0	0.0%	45.1%
	Upper	0	0.0%	\$0	0.0%	37.2%	0	0.0%	35.5%	\$0	0.0%	44.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	1.4%	\$43	0.7%	5.2%	1	1.4%	1.2%	\$43	0.7%	1.2%
	Moderate	18	26.1%	\$1,236	19.2%	19.8%	18	26.1%	8.8%	\$1,236	19.2%	6.0%
	Middle	25	36.2%	\$2,068	32.1%	37.7%	25	36.2%	36.6%	\$2,068	32.1%	32.1%
	Upper	25	36.2%	\$3,099	48.1%	37.2%	25	36.2%	53.4%	\$3,099	48.1%	60.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>\$6,446</i>	<i>100.0%</i>	<i>100.0%</i>	<i>69</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,446</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

The bank originated 69 HMDA-reportable loans in 2019 with 1 loan (1.4 percent) in low-income tracts and 18 loans (26.1 percent) in moderate-income tracts. By comparison, 5.2 percent of owner-occupied units are in low-income tracts and 19.8 percent of owner-occupied units are in moderate-income tracts. The bank's total HMDA-reportable lending of 1.4 percent in low-income tracts and 26.1 percent in moderate-income tracts was greater than aggregate lending of 1.2 percent in low-income tracts and 8.8 percent in moderate-income tracts.

Overall, the bank's HMDA-reportable lending reflects reasonable geographic distribution when compared to assessment area demographics and aggregate lending, despite the bank's weaker performance in low-income tracts. There are several factors to consider when evaluating Copiah Bank's performance in low-income tracts. First, only 29.7 percent of the total housing units in low-income census tracts are owner-occupied as compared to 45.9 percent that are rental units, providing fewer opportunities for home purchase and home improvement lending. Second, 42.4 percent of families in low-income census tracts are living below the poverty level, which means they are less likely to have the financial means to secure a loan. Third, there is significant competition from regional and national banks in this assessment area. Finally, aggregate data indicates that other lenders also exhibited low lending levels for home purchase, home refinance, and home improvement loans compared to the percentage of owner-occupied units in low-income tracts, supporting the conclusion that there may be limited demand for HMDA-reportable loans in these tracts.

Consumer Lending

The following tables show the geographic distribution of consumer loans within the Jackson assessment area for 2018 and 2019. The tables also include a comparison of the bank’s consumer lending to the demographic data within the assessment area.

Geographic Distribution of Consumer Loans

Assessment Area: Jackson

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2018				
	Bank		Dollar		Households
	Count				
	#	%	\$ (000s)	\$ %	%
Low	3	0.5%	10	0.3%	8.7%
Moderate	271	46.3%	1,445	35.4%	24.8%
Middle	276	47.2%	2,173	53.3%	38.8%
Upper	35	6.0%	449	11.0%	27.7%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	585	100.0%	4,077	100.0%	100.0%

Originations & Purchases

For 2018, the bank’s performance of 0.5 percent of loans in low-income tracts was less than the percentage of households in low-income tracts at 8.7 percent; however, the bank’s performance of 46.3 percent of loans in moderate-income tracts is significantly higher than the percentage of households in moderate-income tracts at 24.8 percent.

Geographic Distribution of Consumer Loans

Assessment Area: Jackson

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2019				
	Bank		Dollar		Households
	Count				
	#	%	\$ (000s)	\$ %	%
Low	2	0.4%	14	0.4%	8.7%
Moderate	229	46.1%	1,478	38.8%	24.8%
Middle	147	29.6%	1,477	38.8%	35.6%
Upper	119	23.9%	835	22.0%	30.9%
Unknown	0	0.0%	0	0.0%	0.0%
<i>Total</i>	497	100.0%	3,804	100.0%	100.0%

Originations & Purchases

For 2019, the bank’s performance of 0.4 percent of loans in low-income tracts was less than the percentage of households in low-income tracts at 8.7 percent; however, the bank’s performance of 46.1 percent of loans in moderate-income tracts is significantly higher than the percentage of households in moderate-income tracts at 24.8 percent.

Small Business Loans

The following tables show the geographic distribution of small business loans within the Jackson assessment area for 2018 and 2019. The tables also include a comparison of the bank’s small business lending to demographic data within the assessment area.

Geographic Distribution of Small Business Loans

Assessment Area: Jackson

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2018				
	Count		Bank Dollar		Total Businesses
	#	%	\$ (000s)	\$ %	%
Low	4	1.7%	\$65	0.5%	7.8%
Moderate	96	40.9%	\$5,308	42.1%	23.9%
Middle	93	39.6%	\$4,602	36.5%	36.2%
Upper	42	17.9%	\$2,645	21.0%	32.0%
Unknown	0	0.0%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>235</i>	<i>100.0%</i>	<i>\$12,619</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
 2018 FFIEC Census Data and 2018 D&B Information

In 2018, the bank’s performance of 1.7 percent of loans in low-income tracts was less than the percentage of total businesses in low-income tracts at 7.8 percent. However, the bank’s lending in moderate-income tracks at 40.9 percent of all loans was significantly higher than the percentage of total businesses in moderate-income tracts at 23.9 percent.

Geographic Distribution of Small Business Loans

Assessment Area: Jackson

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2019				
	Count		Bank Dollar		Total Businesses
	#	%	\$ (000s)	\$ %	%
Low	4	1.8%	\$84	1.4%	7.7%
Moderate	84	37.0%	\$1,640	27.6%	23.8%
Middle	73	32.2%	\$2,383	40.2%	34.2%
Upper	66	29.1%	\$1,826	30.8%	34.2%
Unknown	0	0.0%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>227</i>	<i>100.0%</i>	<i>\$5,934</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
 2019 FFIEC Census Data and 2019 D&B Information

In 2019, the bank’s performance of 1.8 percent of total loans in low-income tracts was less than the percentage of total businesses in low-income tracts at 7.7 percent but the bank’s performance is greater at 37.0 percent of total loans in moderate-income tracts compared to 23.8 percent of total businesses in these tracts

Small Farm Loans

The following tables show the geographic distribution of small farm loans within its Jackson assessment area for 2018 and 2019. The tables also include a comparison of the bank’s small farm lending to the demographic data within the assessment area.

Geographic Distribution of Farm Loans

Assessment Area: Jackson

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2018				
	Count		Bank \$ (000s)		Total Farms
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.9%
Moderate	28	46.7%	\$2,003	51.3%	11.6%
Middle	27	45.0%	\$1,093	28.0%	59.0%
Upper	5	8.3%	\$809	20.7%	28.6%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>\$3,906</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
 2018 FFIEC Census Data and 2018 D&B Information

The bank did not make any loans in low-income tracts though there is a low percentage of farms in low-income tracts overall. The bank’s lending in moderate-income tracts at 46.7 percent is significantly higher than percentage of total farms in moderate-income tracts at 11.6 percent.

Geographic Distribution of Farm Loans

Assessment Area: Jackson

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2019				
	Count		Bank \$ (000s)		Total Farms
	#	%	\$	%	%
Low	0	0.0%	\$0	0.0%	0.9%
Moderate	26	41.3%	\$1,334	40.3%	12.6%
Middle	20	31.7%	\$1,207	36.4%	52.9%
Upper	17	27.0%	\$771	23.3%	33.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>63</i>	<i>100.0%</i>	<i>\$3,312</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
 2019 FFIEC Census Data and 2019 D&B Information

In 2019, the bank again made no loans in low-income tracts. The bank’s lending to farms in moderate-income tracts at 41.3 percent is significantly higher than percentage of total farms in moderate-income tracts at 12.6 percent.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

Based on the following analysis, the overall distribution of the bank’s HMDA-reportable, consumer, small business, and small farm loans by borrower income and business revenue reflects reasonable penetration among borrowers with different incomes and businesses and farms with different revenues, and does not reveal any unexplained gaps in lending patterns. The distribution of loans to small businesses was particularly strong, which offset the weaker distribution of the bank’s HMDA-reportable lending to low- and moderate-income borrowers.

Residential Real Estate (HMDA) Lending

The following table shows the distribution of the bank’s HMDA-reportable loans by the income level of the borrowers.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Jackson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2018					2018					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Agg \$ %
HOME PURCHASE	Low	1	2.6%	\$26	1.0%	24.1%	1	2.6%	5.2%	\$26	1.0%	2.8%
	Moderate	4	10.5%	\$117	4.6%	17.7%	4	10.5%	20.1%	\$117	4.6%	14.7%
	Middle	8	21.1%	\$599	23.3%	18.3%	8	21.1%	23.7%	\$599	23.3%	22.4%
	Upper	16	42.1%	\$976	38.0%	40.0%	16	42.1%	33.5%	\$976	38.0%	43.7%
	Unknown	9	23.7%	\$848	33.0%	0.0%	9	23.7%	17.4%	\$848	33.0%	16.5%
	<i>Total</i>	<i>38</i>	<i>100.0%</i>	<i>\$2,566</i>	<i>100.0%</i>	<i>100.0%</i>	<i>38</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,566</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	2	6.9%	\$36	1.4%	24.1%	2	6.9%	7.5%	\$36	1.4%	3.9%
	Moderate	4	13.8%	\$216	8.5%	17.7%	4	13.8%	12.7%	\$216	8.5%	8.6%
	Middle	4	13.8%	\$267	10.5%	18.3%	4	13.8%	17.7%	\$267	10.5%	14.9%
	Upper	12	41.4%	\$1,419	55.9%	40.0%	12	41.4%	43.4%	\$1,419	55.9%	54.8%
	Unknown	7	24.1%	\$602	23.7%	0.0%	7	24.1%	18.7%	\$602	23.7%	17.9%
	<i>Total</i>	<i>29</i>	<i>100.0%</i>	<i>\$2,540</i>	<i>100.0%</i>	<i>100.0%</i>	<i>29</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,540</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	11.1%	\$13	2.8%	24.1%	1	11.1%	8.7%	\$13	2.8%	4.1%
	Moderate	3	33.3%	\$139	29.7%	17.7%	3	33.3%	15.8%	\$139	29.7%	11.7%
	Middle	1	11.1%	\$40	8.5%	18.3%	1	11.1%	20.3%	\$40	8.5%	17.5%
	Upper	3	33.3%	\$243	51.9%	40.0%	3	33.3%	41.3%	\$243	51.9%	48.3%
	Unknown	1	11.1%	\$33	7.1%	0.0%	1	11.1%	13.9%	\$33	7.1%	18.3%
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$468</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$468</i>	<i>100.0%</i>	<i>100.0%</i>
MULTIFAMILY	Low	0	0.0%	\$0	0.0%	24.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	1.9%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	5.8%	\$0	0.0%	0.6%
	Unknown	1	100.0%	\$1,083	100.0%	0.0%	1	100.0%	92.3%	\$1,083	100.0%	99.3%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$1,083</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,083</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	24.1%	0	0.0%	4.9%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	9.9%	\$0	0.0%	6.3%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	20.1%	\$0	0.0%	16.1%
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	61.1%	\$0	0.0%	71.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	3.3%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
 2018 FHIC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Jackson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018					Bank & Aggregate Lending Comparison 2018					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %						#	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	24.1%	0	0.0%	6.9%	\$0	0.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	16.1%	\$0	0.0%	11.7%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	13.8%	\$0	0.0%	11.2%
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	55.2%	\$0	0.0%	59.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.0%	\$0	0.0%	11.9%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	24.1%	0	0.0%	1.8%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	3.1%	\$0	0.0%	3.4%
	Middle	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.5%	\$0	0.0%	0.6%
	Upper	0	0.0%	\$0	0.0%	40.0%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	94.3%	\$0	0.0%	94.6%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	4	5.2%	\$75	1.1%	24.1%	4	5.2%	5.7%	\$75	1.1%	2.8%
	Moderate	11	14.3%	\$472	7.1%	17.7%	11	14.3%	16.7%	\$472	7.1%	11.8%
	Middle	13	16.9%	\$906	13.6%	18.3%	13	16.9%	20.8%	\$906	13.6%	18.4%
	Upper	31	40.3%	\$2,638	39.6%	40.0%	31	40.3%	36.7%	\$2,638	39.6%	43.0%
	Unknown	18	23.4%	\$2,566	38.5%	0.0%	18	23.4%	20.1%	\$2,566	38.5%	24.0%
	<i>Total</i>	<i>77</i>	<i>100.0%</i>	<i>\$6,657</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,657</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2018 FFIEC Census Data and 2015 ACS Data

In 2018, 5.2 percent of the bank’s total HMDA-reportable loans were originated to low-income borrowers, which is less than the percentage of families considered low-income (24.1 percent of total families) and slightly less than the aggregate lending performance (5.7 percent). The bank originated 14.3 percent of HMDA-reportable loans to moderate-income borrowers. The bank’s performance was less than the demographic (17.7 percent of families considered moderate-income) and less than aggregate lenders (16.7 percent of total loans to moderate-income borrowers).

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Jackson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2019					2019					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Agg \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	4.3%	\$0	0.0%	2.2%
	Moderate	3	12.0%	\$171	6.4%	17.4%	3	12.0%	18.0%	\$171	6.4%	12.4%
	Middle	3	12.0%	\$132	4.9%	18.1%	3	12.0%	24.6%	\$132	4.9%	22.6%
	Upper	11	44.0%	\$827	30.8%	41.0%	11	44.0%	35.8%	\$827	30.8%	46.8%
	Unknown	8	32.0%	\$1,554	57.9%	0.0%	8	32.0%	17.3%	\$1,554	57.9%	16.0%
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$2,684</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,684</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	4.7%	\$0	0.0%	2.4%
	Moderate	4	10.3%	\$162	4.5%	17.4%	4	10.3%	10.6%	\$162	4.5%	6.6%
	Middle	6	15.4%	\$270	7.6%	18.1%	6	15.4%	16.1%	\$270	7.6%	12.4%
	Upper	16	41.0%	\$1,880	52.6%	41.0%	16	41.0%	43.6%	\$1,880	52.6%	53.7%
	Unknown	13	33.3%	\$1,264	35.3%	0.0%	13	33.3%	25.0%	\$1,264	35.3%	24.9%
	<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>\$3,576</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,576</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	20.0%	\$21	11.3%	23.4%	1	20.0%	8.6%	\$21	11.3%	3.5%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	20.0%	\$0	0.0%	13.5%
	Middle	1	20.0%	\$16	8.6%	18.1%	1	20.0%	11.4%	\$16	8.6%	8.3%
	Upper	2	40.0%	\$59	31.7%	41.0%	2	40.0%	48.0%	\$59	31.7%	49.1%
	Unknown	1	20.0%	\$90	48.4%	0.0%	1	20.0%	12.0%	\$90	48.4%	25.6%
	<i>Total</i>	<i>5</i>	<i>100.0%</i>	<i>\$186</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$186</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	1.5%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	3.0%	\$0	0.0%	0.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	95.5%	\$0	0.0%	99.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	5.7%	\$0	0.0%	3.7%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	12.8%	\$0	0.0%	9.6%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	20.9%	\$0	0.0%	17.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	57.1%	\$0	0.0%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.4%	\$0	0.0%	2.6%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Jackson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison					
		2019					2019					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	9.6%	\$0	0.0%	8.5%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	20.0%	\$0	0.0%	13.6%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	19.2%	\$0	0.0%	20.0%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	46.4%	\$0	0.0%	53.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.8%	\$0	0.0%	4.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	23.4%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Middle	0	0.0%	\$0	0.0%	18.1%	0	0.0%	0.6%	\$0	0.0%	0.9%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	0.6%	\$0	0.0%	0.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	98.0%	\$0	0.0%	97.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	1.4%	\$21	0.3%	23.4%	1	1.4%	4.5%	\$21	0.3%	2.0%
	Moderate	7	10.1%	\$333	5.2%	17.4%	7	10.1%	15.0%	\$333	5.2%	9.2%
	Middle	10	14.5%	\$418	6.5%	18.1%	10	14.5%	20.7%	\$418	6.5%	16.8%
	Upper	29	42.0%	\$2,766	42.9%	41.0%	29	42.0%	38.4%	\$2,766	42.9%	43.5%
	Unknown	22	31.9%	\$2,908	45.1%	0.0%	22	31.9%	21.4%	\$2,908	45.1%	28.4%
	<i>Total</i>	<i>69</i>	<i>100.0%</i>	<i>\$6,446</i>	<i>100.0%</i>	<i>100.0%</i>	<i>69</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,446</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
 2019 FFIEC Census Data and 2015 ACS Data

In 2019, 1.4 percent of the bank’s total HMDA-reportable loans were originated to low-income borrowers, which was less than the percentage of families considered low-income (23.4 percent of total families) and less than the aggregate lending performance (4.5 percent). The bank originated 10.1 percent of HMDA-reportable loans to moderate-income borrowers. The bank’s performance was less than the demographic (17.4 percent of families considered moderate-income) and less than aggregate lenders (15.0 percent of total loans to moderate-income borrowers).

Consumer Lending

The following table shows the distribution of the bank’s consumer loans by the income level of the borrowers.

Borrower Distribution of Consumer Loans

Assessment Area: Jackson

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2018				
	Bank				Households by Household Incomes %
	Count		Dollar		
#	%	\$ (000s)	\$ %		
Low	165	28.2%	578	14.2%	25.9%
Moderate	142	24.3%	812	19.9%	16.5%
Middle	128	21.9%	1,198	29.4%	16.3%
Upper	121	20.7%	1,201	29.5%	41.3%
Unknown	29	5.0%	288	7.1%	0.0%
<i>Total</i>	585	100.0%	4,077	100.0%	100.0%

Originations & Purchases

In 2018, the bank's performance to low-income borrowers and moderate-income borrowers at 28.2 percent and 24.3 percent is higher than the percentage of low- and moderate-income households at 25.9 percent and 16.5 percent, respectively.

Borrower Distribution of Consumer Loans

Assessment Area: Jackson

Borrower Income Levels	Bank Lending & Demographic Data Comparison				
	2019				
	Bank				Households by Household Incomes %
	Count		Dollar		
#	%	\$ (000s)	\$ %		
Low	139	28.0%	832	21.9%	25.3%
Moderate	93	18.7%	600	15.8%	16.3%
Middle	131	26.4%	912	24.0%	16.2%
Upper	122	24.5%	1,193	31.4%	42.2%
Unknown	12	2.4%	268	7.0%	0.0%
<i>Total</i>	497	100.0%	3,804	100.0%	100.0%

Originations & Purchases

In 2019, the bank's performance to low-income borrowers and moderate-income borrowers at 28.0 percent and 18.7 percent is higher than the percentage of low- and moderate-income households at 25.3 percent and 16.3 percent, respectively.

Small Business Lending

The following table shows, by loan size, the number and dollar volume of small business loans made to businesses of different revenue sizes in the assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Jackson

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2018				
		Bank				Total Businesses
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	226	96.2%	\$8,974	71.1%	90.3%
	Over \$1 Million	9	3.8%	\$3,645	28.9%	8.3%
	<i>Total Rev. available</i>	235	100.0%	\$12,619	100.0%	98.6%
	Rev. Not Known	0	0.0%	\$0	0.0%	1.3%
	<i>Total</i>	235	100.0%	\$12,619	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	210	89.4%	\$4,396	34.8%	
	\$100,001 - \$250,000	14	6.0%	\$2,223	17.6%	
	\$250,001 - \$1 Million	11	4.7%	\$6,001	47.6%	
	<i>Total</i>	235	100.0%	\$12,619	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	210	92.9%	\$4,396	49.0%	
	\$100,001 - \$250,000	10	4.4%	\$1,483	16.5%	
	\$250,001 - \$1 Million	6	2.7%	\$3,095	34.5%	
	<i>Total</i>	226	100.0%	\$8,974	100.0%	

Originations & Purchases
 2018 FFIEC Census Data and 2018 D&B Information

In 2018, of the 235 small business loans where revenue figures were reported, 226 (96.2 percent) were originated to businesses with annual gross revenues of \$1 million or less, which is higher than the percentage of businesses in the assessment area with gross annual revenues of \$1 million or less at 90.3 percent. Additionally, the bank extended the nearly all (97.3 percent) of its small business loans for amounts of \$250,000 or less 92.9 percent were \$100,000 or less.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Jackson

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2019				Total Businesses
		Bank		\$ (000s)		
		Count		\$	%	%
		#	%			
BUSINESS REVENUE	\$1million or Less	218	96.0%	\$5,250	88.5%	91.0%
	Over \$1 Million	9	4.0%	\$684	11.5%	8.1%
	<i>Total Rev. available</i>	227	100.0%	\$5,934	100.0%	99.1%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.9%
	<i>Total</i>	227	100.0%	\$5,934	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	219	96.5%	\$4,181	70.5%	
	\$100,001 - \$250,000	5	2.2%	\$547	9.2%	
	\$250,001 - \$1 Million	3	1.3%	\$1,206	20.3%	
	<i>Total</i>	227	100.0%	\$5,934	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	211	96.8%	\$3,813	72.6%	
	\$100,001 - \$250,000	5	2.3%	\$547	10.4%	
	\$250,001 - \$1 Million	2	0.9%	\$890	17.0%	
	<i>Total</i>	218	100.0%	\$5,250	100.0%	

Originations & Purchases
 2019 FFIEC Census Data and 2019 D&B Information

In 2019, of the 227 small business loans where revenue figures were reported, 218 (96.0 percent) were originated to businesses with annual gross revenues of \$1 million or less, which is higher than the percentage of businesses in the assessment area had gross annual revenues of \$1 million or less at 91.0 percent. Additionally, the bank extended nearly all of its small business loans (99.1 percent) for amounts of \$250,000 or less and 96.8 percent were in amounts of \$100,000 or less.

The bank’s lending activity in 2018 and 2019 indicated the bank’s willingness to extend smaller loan amounts, which is particularly responsive to the needs of small businesses. According to bank management, competition for small business loans is strong given the number of financial institutions operating in Hinds and Rankin Counties.

Small Farm Lending

The following table shows, by loan size, the number and dollar volume of small farm loans to farms of different revenue sizes originated by Copiah Bank.

Farm Loans by Revenue & Loan Size

Assessment Area: Jackson

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2018				
		Bank				Total Farms
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	58	96.7%	\$3,720	95.2%	97.6%
	Over \$1 Million	2	3.3%	\$186	4.8%	2.1%
	<i>Total Rev. available</i>	60	100.0%	\$3,906	100.0%	99.7%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.3%
	<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>\$3,906</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	50	83.3%	\$1,720	44.0%	
	\$100,001 - \$250,000	7	11.7%	\$993	25.4%	
	\$250,001 - \$500,000	3	5.0%	\$1,192	30.5%	
	<i>Total</i>	<i>60</i>	<i>100.0%</i>	<i>\$3,906</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	49	84.5%	\$1,636	44.0%	
	\$100,001 - \$250,000	6	10.3%	\$891	24.0%	
	\$250,001 - \$500,000	3	5.2%	\$1,192	32.1%	
	<i>Total</i>	<i>58</i>	<i>100.0%</i>	<i>\$3,720</i>	<i>100.0%</i>	

Originations & Purchases
 2018 FFIEC Census Data and 2018 D&B Information

In 2018, of the 60 small farm loans where revenue figures were reported, 58 (96.7 percent) were originated to farms with annual gross revenues of \$1 million or less, which is comparable to the percentage of farms in the assessment area that had gross annual revenues of \$1 million or less at 97.6 percent. Additionally, the bank extended the majority of its small farm loans for amounts of \$250,000 or less, with a particular focus on amounts of \$100,000 or less.

Farm Loans by Revenue & Loan Size

Assessment Area: Jackson

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019				
		Bank				Total Farms
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	57	90.5%	\$3,011	90.9%	97.8%
	Over \$1 Million	6	9.5%	\$301	9.1%	2.2%
	<i>Total Rev. available</i>	63	100.0%	\$3,312	100.0%	100.0%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>63</i>	<i>100.0%</i>	<i>\$3,312</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	53	84.1%	\$1,744	52.7%	
	\$100,001 - \$250,000	9	14.3%	\$1,250	37.7%	
	\$250,001 - \$500,000	1	1.6%	\$317	9.6%	
	<i>Total</i>	<i>63</i>	<i>100.0%</i>	<i>\$3,312</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	48	84.2%	\$1,592	52.9%	
	\$100,001 - \$250,000	8	14.0%	\$1,102	36.6%	
	\$250,001 - \$500,000	1	1.8%	\$317	10.5%	
	<i>Total</i>	<i>57</i>	<i>100.0%</i>	<i>\$3,011</i>	<i>100.0%</i>	

Originations & Purchases
 2019 FFIEC Census Data and 2019 D&B Information

In 2019, of the 63 small farm loans where revenue figures were reported, 57 (90.5 percent) were originated to farms with annual gross revenues of \$1 million or less, which is comparable to the percentage of farms in the assessment area that had gross annual revenues of \$1 million or less at 97.8 percent. Additionally, the bank extended the majority of its small farm loans for amounts of \$250,000 or less with a particular focus on loans in amounts of \$100,000 or less.

The bank’s lending performance in 2018 and 2019 indicates responsiveness to the needs of small farms in the assessment area.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

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

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.

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
January 1, 2018 to December 31, 2019			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Copiah Bank, Hazlehurst, MS		Residential Real Estate Loans Consumer Loans Small Business Loans Small Farm Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	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>
Jackson, MS Non-MSA	Full Scope	N/A	N/A

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

This document is an evaluation of the CRA performance of Copiah Bank prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **November 2, 2020**. 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 multi-family rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

- I. Low-or moderate-income geographies;
- II. Designated disaster areas; or
- III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, 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 a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and 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): A MSA or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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 – ASSESSMENT AREA MAPS

